

Application No: A.11-11-002
Exhibit No.: _____
Witness: Jason Bonnett

)
In the Matter of the Application of San Diego Gas &)
Electric Company (U 902 G) and Southern California)
Gas Company (U 904 G) for Authority to Revise)
Their Rates Effective January 1, 2013, in Their)
Triennial Cost Allocation Proceeding)
_____)

A.11-11-002
(Filed November 1, 2011)

REVISED UPDATED PREPARED DIRECT TESTIMONY
OF JASON BONNETT
SAN DIEGO GAS & ELECTRIC COMPANY
AND
SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

February 22, 2013

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1 **REVISED UPDATED PREPARED DIRECT TESTIMONY**
2 **OF JASON BONNETT**

3 **I. QUALIFICATIONS**

4 My name is Jason Bonnett. My business address is 8330 Century Park Court, San Diego,
5 California, 92123-1530.

6 I am employed by San Diego Gas & Electric Company (SDG&E) as a Principal
7 Regulatory Economic Advisor in the Regulatory & Rate Strategy Department of SDG&E and
8 Southern California Gas Company (SoCalGas). I hold a Bachelor of Science degree in Business
9 Administration from Mankato State University, a Juris Doctorate from Hamline University
10 School of Law, and a Master of Arts in Public Administration from Hamline University. I have
11 been employed by SDG&E since 2007.

12 Prior to joining SDG&E, I was employed by the Minnesota Department of Commerce,
13 Energy Division, as a Public Utilities Rates Analyst from May 1998 through July 2007. I have
14 previously testified before the California Public Utilities Commission (Commission).

15 **II. PURPOSE & OVERVIEW OF RATE DESIGN**

16 The purpose of my testimony is to present SoCalGas' proposed natural gas transportation
17 rates. These rates rely upon the cost allocation of authorized base margin costs among customer
18 classes as shown in the prepared direct testimony of Mr. Lenart.

19 **A. Overview**

20 The SoCalGas rate design model takes the allocated base margin provided by Mr. Lenart
21 and incorporates the transmission system with SDG&E along with unbundling the Backbone
22 Transmission Service (BTS). Additionally, the SoCalGas rate design model allocates the cost
23 within the noncore market for the Transmission Level Service (TLS) rate, and non-margin costs

1 which (for ratemaking purposes) reflect other costs incurred by the utility to provide basic
2 transportation services to its customers during the forecasted cost allocation period. These non-
3 margin costs reflect, but are not limited to, regulatory account balance amortizations, gas-engine
4 rate cap, and Enhanced Oil Recovery (EOR) revenue treatment.

5 **B. Non-Margin Cost Allocation and Rate Design Proposals**

6 Except as noted below, the methods employed to develop and allocate non-margin costs
7 are consistent with the methods employed to develop the SoCalGas transportation rates adopted
8 in Commission Decision (D.) 09-11-006, SoCalGas' most recent cost allocation proceeding
9 decision.

10 The following lists the non-margin cost allocation and rate design proposals incorporated
11 in my testimony:

- 12 1) Residential and Core Commercial and Industrial (C&I) rates fully de-averaged;
- 13 2) Maintain the residential baseline/non-baseline cap;
- 14 3) Update the submeter credit;
- 15 4) Propose a consistent allocation within and among the core C&I and noncore C&I
16 classes;
- 17 5) Update Natural Gas Vehicle (NGV) compression costs;
- 18 6) Provide TLS Revenue Report;
- 19 7) Propose allocation method for Compressor Station Fuel and Power Balancing
20 Account; and
- 21 8) Propose increasing Rule 38 C&I incentive cap.

1 **C. Illustrative Rates**

2 The non-margin cost allocation results are added to the results of the base margin cost
 3 allocation to complete the transportation rate revenue requirement. The completed transportation
 4 revenue requirement becomes the starting point for any rate design calculations.

5 The proposed changes in SoCalGas’ class-average transportation rates are shown below
 6 in Table 1. The rates in Column B include the transition adjustments proposed in the testimony
 7 of Mr. Lenart and correspond with those shown in his Table 16, while column D incorporates the
 8 forecasted regulatory account balances from the testimony of Mr. Ahmed and correspond with
 9 the rates shown in Appendix A of this testimony.

Table 1: Class Average Rates (\$/therm)

	2012 Current	2013 TCAP Rates w/ Transition Adjustments	% Change	2013 TCAP Rates w/ Regulatory Account Forecasts	\$/th Change	% Change
	A	B	C	D	E	F
SCG:						
Res \$/th	\$0.544	\$0.568	4%	\$0.560	\$0.016	3%
Avg Res Bill (38 th) \$/mo	\$38.82	\$39.47	2%	\$39.18	\$0.36	1%
CCI CA \$/th	\$0.299	\$0.243	-19%	\$0.235	(\$0.064)	-21%
Gas A/C \$/th	\$0.067	\$0.074	10%	\$0.068	\$0.001	2%
Gas Engine \$/th	\$0.088	\$0.097	10%	\$0.091	\$0.003	3%
NGV Uncompressed post-SW \$/th	\$0.057	\$0.059	4%	\$0.054	(\$0.002)	-4%
Core Class Average \$/th	\$0.460	\$0.457	-1%	\$0.449	(\$0.011)	-2%
NCCI-D CA \$/th	\$0.068	\$0.053	-22%	\$0.051	(\$0.017)	-25%
EG-D Tier 1 post-SW \$/th	\$0.055	\$0.060	10%	\$0.069	\$0.014	26%
EG-D Tier 2 post-SW \$/th	\$0.024	\$0.027	10%	\$0.026	\$0.002	9%
TLS CA Rate csitma/efba exempt	\$0.017	\$0.012	-29%	\$0.012	(\$0.005)	-27%
TLS CA Rate csitma/efba non-exempt	\$0.018	\$0.013	-28%	\$0.013	(\$0.005)	-26%
UBS \$1,000/yr	\$27,530	\$26,476	-4%	\$26,476	(\$1,055)	-4%
BTS w/BTBA \$/dth/d	\$0.110	\$0.126	15%	\$0.152	\$0.042	38%
SAR w/ BTS \$/th	\$0.206	\$0.199	-3%	\$0.199	(\$0.007)	-4%

10 The proposed rates reflect a decrease in the natural gas transportation revenue
 11 requirement of \$9,047 million (approximately 0.5 percent).

1 Appendix A contains a complete set of rate tables using the proposed cost allocation
2 method which represents this proposal.

3 **III. CORE RATE DESIGN**

4 In this section, SoCalGas updates its individual core rates. This section describes specific
5 changes to current rate design methods for core customers.

6 **A. Core De-Averaging**

7 SoCalGas is no longer including any core averaging adjustment. Instead, SoCalGas is
8 proposing to make a Transition Cost Adjustment pursuant to Section IX of Mr. Lenart's
9 testimony.

10 **B. Residential Rates**

11 These rates are applicable to three categories of residential customers: single-family,
12 multi-family, and small master metered dwellings (master meters with loads less than 100,000
13 therms of weather normalized usage for the past two calendar years). Current residential rates
14 consist of a \$0.16438 per meter per day customer charge and a two-tiered usage structure:
15 baseline (BL) and non-baseline (NBL) volumetric rates. The current targeted composite tier
16 differential between SoCalGas' BL and NBL transportation rates is 1.15 (i.e., the NBL rate is
17 fifteen percent higher than the composite BL rate). The composite BL rate is equal to the sum of
18 the customer charge revenues and BL volumetric rate revenues divided by the BL volumes;
19 however, the rate difference between the BL and NBL is currently capped at \$0.26/therm.
20 SoCalGas proposes that the cap be maintained at \$0.26/therm throughout the Triennial Cost
21 Allocation Proceeding (TCAP).

1 **C. Submeter Credits**

2 Submeter credits apply to customers with a master meter that provides service to
3 residential sub-units (e.g., multi-family dwelling units and mobile home parks). D.04-04-043
4 established a method for calculating submeter credits. In that decision, certain categories of
5 costs were defined as “Utility Avoided Costs” which are costs for which the owner of a master
6 meter is reimbursed through the discount provided by the utility (to the extent these costs do not
7 exceed the average costs the utility would have incurred in providing direct service). In this
8 proceeding, SoCalGas proposes to update the submeter credit in compliance with the agreed-
9 upon methodology for the calculation of submeter credits set forth in D.04-04-043. Currently,
10 submeter credits are set at \$0.30805/meter/day SoCalGas proposes to set them at
11 \$0.23573/meter/day.

12 **D. Core C&I Rates**

13 SoCalGas has a single tariff serving its core commercial customers, Schedule G-10.
14 Presently, the G-10 rate design consists of a \$15 customer charge and three tiers of declining
15 block volumetric rates.

16 In D.09-11-006, the Commission approved the current procedure for determining the rate
17 structure for the different tiers within SoCalGas’ G-10 rate design. Currently, non-base margin
18 costs, which are all costs associated with other operating costs and revenue as well as regulatory
19 balancing accounts and adjustments, are allocated to the tiers on an Equal Cents per Therm
20 (ECPT) basis. However, not all of these non-base margin costs are allocated to the class on an
21 ECPT allocation. Many are allocated on an Equal Percent Authorized Margin (EPAM) basis,
22 such as the Pension Balancing Account, PBOP Balancing Account, Rewards & Penalties
23 Balancing Account, etc. Thus, in order to promote a consistent allocation within the core C&I

1 class, SoCalGas proposes to combine those non-base margin costs not allocated on an ECPT
2 basis with base margin costs.

3 **E. NGV Compression Cost Update**

4 The NGV Compression Rate Adder has been updated to reflect current costs and
5 proposed allocation of those costs. This amount is composed of the return on ratebase plus the
6 capital related revenue requirement and any related operations & maintenance expense. The
7 embedded cost compression revenue requirement for SoCalGas is \$1.15 million, as was
8 presented in my supplemental testimony dated March 16, 2012.¹

9 The proposed revenue requirement is lower due to reduction in capital related expenses.

10 **IV. NONCORE RATE PROPOSALS**

11 **A. TLS Rates**

12 Pursuant to D.09-11-006, Appendix A, Section II.B.3.M.b, SoCalGas is required to
13 “include data on actual revenues from service provided under the TLS Reservation Rate Option
14 and actual volumes of service provided under that Option.” Therefore, SoCalGas presents the
15 following table in compliance with the Commission’s decision.

Table 2: TLS Reservation Rate Report	
Intrastate Transmission Level Service (TLS) Transportation Revenues and Volumes	
Time Period: 02/2010 (BCAP 2009 start) to 08/2011 (for SCG and SDGE)	
Reservation Service Transmission Revenue (\$000)	\$71,809
Volumes (Mth)	3,376,382

16 **B. Noncore C&I Distribution Rates**

17 SoCalGas’ current service for noncore C&I customers is provided under Schedules GT-F
18 and GT-I. The current rate design consists of a single customer charge of \$350 per month and
19 four tiers of declining block volumetric rates. Similar to the Core C&I rate, in order to promote a

¹ A.11-11-002, Supplemental Direct Testimony of Jason Bonnett, dated March 16, 2012, page 7.

1 consistent allocation within the non-core C&I class, SoCalGas proposes to combine those non-
2 base margin costs not allocated on an ECPT basis with base margin costs.

3 **V. OTHER PROPOSALS**

4 **A. Compressor Station Fuel and Power Balancing Account (CFPBA)**

5 As discussed in the testimony of Mr. Ahmed, the CFPBA was established to record actual
6 costs for electricity used in the operation of SoCalGas' compressor stations pursuant to the 2008
7 General Rate Case Decision (D.08-07-046). The purpose of my testimony is to propose an
8 allocation methodology for recovery of CFPBA costs in rates. Since the CFPBA is designed to
9 track electricity costs used for the transmission of natural gas, SoCalGas proposes that the
10 CFPBA be allocated similarly to other transmission related regulatory accounts and be allocated
11 based on a Cold-Year Throughput (CYTP) basis.

12 **B. Increase Rule 38 C/I Incentive Cap**

13 SoCalGas proposes to increase the maximum allowed equipment incentive cap in Rule
14 No. 38, Commercial/Industrial Equipment Incentive Program (Rule 38) from 50% of project cost
15 with a maximum \$100,000 cap, to 50% of project cost with a maximum \$500,000 cap.

16 Similarly, SoCalGas proposes a revision to increase the maximum allowed feasibility studies cap
17 in Rule 38, from 50% of the study cost with a \$20,000 maximum per study, to 50% of the study
18 cost, with a \$50,000 maximum per study.

19 The Rule 38 program provides shareholder-funded incentives to nonresidential customers
20 within SoCalGas' service territory for the objective of assisting customers in buying-down the
21 first-cost of qualifying high-efficiency equipment and/or emerging technology. The program
22 also funds feasibility studies to evaluate the potential benefits of these types of gas equipment.
23 The Rule 38 program was implemented with the approval of AL 2316 filed in June 1994. Rule

1 38 is a market development effort, funded entirely by shareholders to encourage energy-efficient
2 gas equipment purchases by both large and small core and noncore nonresidential customers in
3 SoCalGas' service territory. The objectives of the program are to:

- 4 a) Persuade nonresidential customers to install state-of-the-art equipment to reduce their
5 overall energy cost and increase their productivity and/or profitability.
- 6 b) Encourage and support manufacturers of gas equipment to develop and produce new,
7 cost-effective and energy-efficient nonresidential equipment for southern California.
- 8 c) Demonstrate SoCalGas' commitment to develop and promote new, alternative
9 technologies with environmental and/or energy-efficiency benefits.
- 10 d) Increase the amount of nonresidential gas equipment with high off-peak load usage
11 by: (1) better utilizing SoCalGas' pipeline capacity during the summer months, and
12 (2) reduce average operating costs by balancing system load.
- 13 e) Demonstrate that innovative nonresidential gas equipment is a viable and
14 environmentally beneficial alternative to traditional gas and electric technologies.

15 The purpose of raising the program incentive cap is to minimize the loss of project
16 opportunities. With an increased incentive cap, the program is better able to meet its purpose of
17 helping customers buy down the first-cost of gas equipment. Ratepayers and shareholders
18 mutually benefit from projects stimulated by Rule 38. Shareholders benefit from the incremental
19 transportation revenue generated by the added-load project for the length of the Rule 38 contract,
20 whereas ratepayers benefit immediately from the incremental PPS (Public Purpose Program
21 Surcharge) revenue generated by the added-load, and will also benefit from the incremental
22 transportation revenue subsequent to the Rule 38 contract expiration. Raising the incentive cap
23 will also support the Commission's goal of increasing CHP installations, which are a critical

1 element in helping California meet its 2020 greenhouse gas reduction goals as required under
2 AB32. According to the California Air Resources Board’s AB32 scoping plan, meeting
3 California’s 2020 greenhouse gas reduction goals will require installation of 4,000MW of new
4 CHP capacity.²

5 This concludes my revised updated prepared direct testimony.

² California Air Resources Board for the State of California. “Climate Change Scoping Plan, a framework for change , December 2008, Pursuant to AB 32, The California Global Warming Solutions Act of 2006,” *Combined Heat and Power*, pp. 43-44.

APPENDIX A
Transportation Rate Tables

TABLE 1
Natural Gas Transportation Rates
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13	Proposed	Jan-1-13	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	2,483,989	\$0.54427	\$1,351,948	2,483,053	\$0.56009	\$1,390,745	\$38,796	\$0.01583	2.9%
3	Commercial & Industrial	970,519	\$0.29905	\$290,234	1,013,177	\$0.23482	\$237,918	(\$52,316)	(\$0.06423)	-21.5%
4										
5	NGV - Pre SempraWide	117,231	\$0.07389	\$8,662	131,912	\$0.06355	\$8,384	(\$278)	(\$0.01033)	-14.0%
6	SempraWide Adjustment	117,231	(\$0.00503)	(\$590)	131,912	\$0.00048	\$63	\$653	\$0.00551	-109.5%
7	NGV - Post SempraWide	117,231	\$0.06886	\$8,072	131,912	\$0.06403	\$8,446	\$374	(\$0.00483)	-7.0%
8										
9	Gas A/C	1,210	\$0.06682	\$81	575	\$0.06793	\$39	(\$42)	\$0.00111	1.7%
10	Gas Engine	18,080	\$0.08848	\$1,600	17,984	\$0.09148	\$1,645	\$45	\$0.00300	3.4%
11	Total Core	3,591,030	\$0.46002	\$1,651,935	3,646,701	\$0.44939	\$1,638,794	(\$13,142)	(\$0.01063)	-2.3%
12										
13	NONCORE COMMERCIAL & INDUSTRIAL									
14	Distribution Level Service	982,465	\$0.06810	\$66,902	870,957	\$0.05130	\$44,684	(\$22,217)	(\$0.01679)	-24.7%
15	Transmission Level Service (2)	457,697	\$0.01783	\$8,162	639,338	\$0.01324	\$8,463	\$302	(\$0.00459)	-25.8%
16	Total Noncore C&I	1,440,163	\$0.05212	\$75,063	1,510,295	\$0.03519	\$53,148	(\$21,916)	(\$0.01693)	-32.5%
17										
18	NONCORE ELECTRIC GENERATION									
19	Distribution Level Service									
20	Pre Sempra Wide	353,995	\$0.02981	\$10,551	319,035	\$0.03331	\$10,626	\$75	\$0.00350	11.7%
21	Sempra Wide Adjustment	353,995	(\$0.00025)	(\$90)	319,035	(\$0.00108)	(\$343)	(\$253)	(\$0.00082)	323.8%
22	Distribution Post Sempra Wide	353,995	\$0.02955	\$10,461	319,035	\$0.03223	\$10,283	(\$179)	\$0.00268	9.1%
23	Transmission Level Service (2)	2,472,969	\$0.01719	\$42,507	2,753,888	\$0.01250	\$34,426	(\$8,081)	(\$0.00469)	-27.3%
24	Total Electric Generation	2,826,964	\$0.01874	\$52,968	3,072,923	\$0.01455	\$44,708	(\$8,260)	(\$0.00419)	-22.3%
25										
26	TOTAL RETAIL NONCORE	4,267,127	\$0.03000	\$128,031	4,583,218	\$0.02135	\$97,856	(\$30,175)	(\$0.00865)	-28.8%
27										
28	WHOLESALE									
29	Wholesale Long Beach (2)	117,093	\$0.01719	\$2,013	84,077	\$0.01250	\$1,051	(\$962)	(\$0.00469)	-27.3%
30	Wholesale SWG (2)	81,737	\$0.01719	\$1,405	67,171	\$0.01250	\$840	(\$565)	(\$0.00469)	-27.3%
31	Wholesale Vernon (2)	116,135	\$0.01719	\$1,996	80,602	\$0.01250	\$1,008	(\$989)	(\$0.00469)	-27.3%
32	International (2)	53,990	\$0.01719	\$928	66,380	\$0.01250	\$830	(\$98)	(\$0.00469)	-27.3%
33	Total Wholesale & International	368,955	\$0.01719	\$6,342	298,230	\$0.01250	\$3,728	(\$2,614)	(\$0.00469)	-27.3%
34	SDGE Wholesale	1,230,285	\$0.01027	\$12,636	1,233,373	\$0.00808	\$9,967	(\$2,668)	(\$0.00219)	-21.3%
35	Total Wholesale Incl SDGE	1,599,240	\$0.01187	\$18,977	1,531,603	\$0.00894	\$13,695	(\$5,282)	(\$0.00292)	-24.6%
36										
37	TOTAL NONCORE	5,866,366	\$0.02506	\$147,008	6,114,821	\$0.01824	\$111,551	(\$35,457)	(\$0.00682)	-27.2%
38										
39	Unbundled Storage (4)			\$27,530			\$26,476	(\$1,055)		
40	System Total (w/o BTS)	9,457,396	\$0.19313	\$1,826,474	9,761,522	\$0.18202	\$1,776,821	(\$49,653)	(\$0.01110)	-5.7%
41	Backbone Trans. Service BTS (3)	3,100	\$0.11042	\$124,939	2,978	\$0.15230	\$165,545	\$40,606	\$0.04188	37.9%
42	SYSTEM TOTALw/BTS	9,457,396	\$0.20634	\$1,951,413	9,761,522	\$0.19898	\$1,942,366	(\$9,047)	(\$0.00736)	-3.6%
43										
44	EOR Revenues	156,187	\$0.02359	\$3,685	149,770	\$0.02311	\$3,461	(\$224)	(\$0.00048)	-2.1%
45	Total Throughput w/EOR Mth/yr	9,613,583			9,911,292					

- 1) These rates are for Natural Gas Transportation Service from "Citygate to Meter". The FAR rate is for service from Receipt Point to Citygate.
- 2) These Transmission Level Service "TLS" amounts represent the average transmission rate, see Table 5 or detail list of TLS rates.
- 3) BTS charge is proposed as a separate rate. Core will pay through procurement rate, noncore as a separate charge.
- 4) Unbundles Storage costs are not part of the Core Storage or Load Balancing functions (those are included in transport rates).

TABLE 2
Residential Transportation Rates
Southern California Gas Company
2013 TCAP Application

2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13	Rate	Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	Revenue	Volumes	Rate	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
1	RESIDENTIAL SERVICE- Excludes Rate Adder:									
2	Customer Charge									
3	Single Family	3,676,464	\$5.00	\$220,588	3,722,951	\$5.00	\$223,377	\$2,789	\$0.00000	0.0%
4	Multi-Family	1,685,965	\$5.00	\$101,158	1,701,512	\$5.00	\$102,091	\$933	\$0.00000	0.0%
5	Small Master Meter	92,860	\$5.00	\$5,572	124,336	\$5.00	\$7,460	\$1,889	\$0.00000	0.0%
6	Submeter Credit-\$/unit/day	149,095	(\$0.30805)	(\$16,764)	149,967	(\$0.23573)	(\$12,903)	\$3,861	\$0.07233	-23.5%
7	Volumetric									
8	Baseline Rate	1,703,882	\$0.33904	\$577,688	1,682,421	\$0.34855	\$586,400	\$8,713	\$0.00950	2.8%
9	Non-Baseline Rate	768,363	\$0.59904	\$460,282	789,489	\$0.60855	\$480,440	\$20,158	\$0.00950	1.6%
10		2,472,246	\$0.54546	\$1,348,523	2,471,910	\$0.56105	\$1,386,865	\$38,342	\$0.01559	2.9%
11	NBL/BL Ratio:									
12	Composite Rate \$/th		\$0.97414			\$0.97076		(\$0.00338)		-0.3%
13	Gas Rate \$/th		\$0.45283			\$0.43200		(\$0.02083)		-4.6%
14	NBL/Composite rate ratio (4) =		1.08			1.07				
15	NBL- BL rate difference \$/th		0.26000			0.26000		\$0.00000		0.0%
16										
17	Large Master Meter Rate (Excludes Rate Adders for CAT):									
18	Customer Charge	61	\$339.80	\$249	56	\$373.78	\$252	\$3	\$33.98	10.0%
19	Baseline Rate	9,017	\$0.10138	\$914	8,288	\$0.17932	\$1,486	\$572	\$0.07794	76.9%
20	Non-Baseline Rate	2,726	\$0.17913	\$488	2,856	\$0.31308	\$894	\$406	\$0.13396	74.8%
21		11,743	\$0.14063	\$1,652	11,143	\$0.23625	\$2,633	\$981	\$0.09562	68.0%
22										
23	Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)									
24	CSITMA Adder to Volumetric Rate	1,818,370	\$0.00065	\$1,191	1,817,434	\$0.00075	\$1,362	\$171	\$0.00009	14.4%
25	Residential:									
26	Customer Charge		\$5.00			\$5.00		\$0.00000		0.0%
27	Baseline \$/therm		\$0.33970			\$0.34929		\$0.00960		2.8%
28	Non-Baseline \$/therm		\$0.59970			\$0.60929		\$0.00960		1.6%
29	Average NonCARE Rate \$/therm		\$0.54612			\$0.56180		\$0.01568		2.9%
30	Large Master Meter:									
31	Customer Charge		\$339.80			\$373.78		\$33.98		10.0%
32	BaseLine Rate		\$0.10204			\$0.18007		\$0.07803		76.5%
33	NonBaseLine Rate		\$0.17978			\$0.31383		\$0.13405		74.6%
34	Average NonCARE Rate \$/therm		\$0.14129			\$0.23700		\$0.09571		67.7%
35	Core Aggregation Transport (CAT) = NonCARE rates + CAT Adder									
36	CAT Adder to Volumetric Rate	13,319	\$0.04382	\$584	8,732	(\$0.01314)	(\$115)	(\$698)	(\$0.05696)	-130%
37	Residential:									
38	Customer Charge		\$5.00			\$5.00		\$0.00		0.0%
39	BaseLine Rate		\$0.38352			\$0.33615		(\$0.04737)		-12.4%
40	NonBaseLine Rate		\$0.64352			\$0.59615		(\$0.04737)		-7.4%
41	Large Master Meter:									
42	Customer Charge		\$339.80			\$373.78		\$33.98		10.0%
43	BaseLine Rate		\$0.14586			\$0.16693		\$0.02107		14.4%
44	NonBaseLine Rate		\$0.22360			\$0.30069		\$0.07709		34.5%
45	Other Adjustments :									
46	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)		(\$0.00009)		14.4%
47	TOTAL RESIDENTIAL	2,483,989	\$0.54427	\$1,351,948	2,483,053	\$0.56009	\$1,390,745	\$38,796	\$0.01583	2.9%

TABLE 3
Core Nonresidential Transportation Rates
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13		Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	Revenue	Volumes	Rate	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
1										
2	CORE COMMERCIAL & INDUSTRIAL									
3	Customer Charge 1	127,666	\$15.00	\$22,980	149,077	\$15.00	\$26,834	\$3,854	\$0.00	0.0%
4	Customer Charge 2	87,620	\$15.00	\$15,772	61,373	\$15.00	\$11,047	(\$4,724)	\$0.00	0.0%
5	Volumetric Transportation Rate									
6	Tier 1 = 250th/mo	215,926	\$0.49316	\$106,487	230,544	\$0.39647	\$91,403	(\$15,084)	(\$0.09670)	-19.6%
7	Tier 2 = next 4167 th/mo	488,341	\$0.24824	\$121,226	510,293	\$0.18791	\$95,891	(\$25,335)	(\$0.06033)	-24.3%
8	Tier 3 = over 4167 th/mo	266,252	\$0.08402	\$22,371	272,340	\$0.04808	\$13,094	(\$9,276)	(\$0.03594)	-42.8%
9		970,519	\$0.29761	\$288,835	1,013,177	\$0.23517	\$238,270	(\$50,565)	(\$0.06244)	-21.0%
10										
11	Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)									
12	CSITMA Adder to Volumetric Rate	966,797	\$0.00065	\$633	1,009,456	\$0.00075	\$756	\$123	\$0.00009	14.4%
13	Tier 1 = 250th/mo		\$0.49382			\$0.39722		(\$0.09660)	-19.6%	
14	Tier 2 = next 4167 th/mo		\$0.24889			\$0.18866		(\$0.06023)	-24.2%	
15	Tier 3 = over 4167 th/mo		\$0.08467			\$0.04883		(\$0.03585)	-42.3%	
16			\$0.29826			\$0.23592		(\$0.06234)	-20.9%	
17	Core Aggregation Transport (CAT):									
18	CAT Adder to Volumetric Rate	17,488	\$0.04382	\$766	84,283	(\$0.01314)	(\$1,108)	(\$1,874)	(\$0.05696)	-130%
19	Tier 1 = 250th/mo		\$0.53764			\$0.38408		(\$0.15357)	-28.6%	
20	Tier 2 = next 4167 th/mo		\$0.29271			\$0.17552		(\$0.11719)	-40.0%	
21	Tier 3 = over 4167 th/mo		\$0.12849			\$0.03569		(\$0.09280)	-72.2%	
22			\$0.34209			\$0.22278		(\$0.11931)	-34.9%	
23	Other Adjustments :									
24	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)		(\$0.00009)	14.4%	
25										
26	TOTAL CORE C&I	970,519	\$0.29905	\$290,234	1,013,177	\$0.23482	\$237,918	(\$52,316)	(\$0.06423)	-21.5%
27										
28	NATURAL GAS VEHICLES (a sempra-wide rate)									
29	Customer Charge, P-1	229	\$13.00	\$36	229	\$13.00	\$36	\$0	\$0.00000	0.0%
30	Customer Charge, P-2A	44	\$65.00	\$34	67	\$65.00	\$52	\$18	\$0.00000	0.0%
31	Uncompressed Rate	117,231	\$0.05598	\$6,563	131,912	\$0.05371	\$7,085	\$522	(\$0.00227)	-4.1%
32	Total Uncompressed NGV	117,231	\$0.05658	\$6,633	131,912	\$0.05437	\$7,173	\$540	(\$0.00220)	-3.9%
33	Compressed Rate Adder	1,484	\$0.91797	\$1,363	1,233	\$0.95311	\$1,175	(\$188)	\$0.03513	3.8%
34										
35	Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)									
36	CSITMA Adder to Volumetric Rate	117,186	\$0.00065	\$77	131,867	\$0.00075	\$99	\$22	\$0.00009	14.4%
37	Uncompressed Rate \$/therm		\$0.05664			\$0.05446		(\$0.00218)	-3.8%	
38	Other Adjustments :									
39	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)		(\$0.00009)	14.4%	
40										
41	TOTAL NGV SERVICE	117,231	\$0.06886	\$8,072	131,912	\$0.06403	\$8,446	\$374	(\$0.00483)	-7.0%
42										
43	RESIDENTIAL NATURAL GAS VEHICLES (optional rate)									
44	Customer Charge	5,455	\$10.00	\$655	5,549	\$10.00	\$666	\$11	\$0.00000	0.0%
45	Uncompressed Rate	3,416	\$0.17175	\$587	5,433	\$0.13390	\$728	\$141	(\$0.03785)	-22.0%
46		3,416	\$0.36342	\$1,241	5,433	\$0.25645	\$1,393	\$152	(\$0.10696)	-29.4%
47	Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)									
48	CSITMA Adder to Volumetric Rate		\$0.00065			\$0.00075		\$0.00009	14.4%	
49	Uncompressed Rate \$/therm		\$0.17241			\$0.13465		(\$0.03776)	-21.9%	
50										
51	Core Aggregation Transport (CAT):									
52	CAT Adder to Volumetric Rate	0	\$0.04382	\$0	0	(\$0.01314)	\$0	\$0	(\$0.05696)	-130.0%
53	Uncompressed Rate		\$0.21623			\$0.12151		\$0	(\$0.09472)	-43.8%
54	Other Adjustments :									
55	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)				
56										
57	TOTAL RESIDENTIAL NATURAL G	3,416	\$0.36342	\$1,241	5,433	\$0.25645	\$1,393	\$152	(\$0.10696)	-29.4%

TABLE 4
Core Nonresidential Transportation Rates (continued)
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13		Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	Revenue	Volumes	Rate	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
1										
2										
3	<u>NON-RESIDENTIAL GAS A/C</u>									
4	Customer Charge	22	\$150.00	\$40	12	\$150	\$22	(\$18)	\$0.00000	0.0%
5	Volumetric Rate	1,210	\$0.03345	\$40	575	\$0.02962	\$17	(\$23)	(\$0.00383)	-11.4%
6		1,210	\$0.06616	\$80	575	\$0.06718	\$39	(\$41)	\$0.00102	1.5%
7	<u>Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)</u>									
8	CSITMA Adder to Volumetric Rate	1,210	\$0.00065	\$1	575	\$0.00075	\$0	(\$0)	\$0.00009	14.4%
9	Volumetric		\$0.03410			\$0.03037			(\$0.00373)	-10.9%
10	<u>Core Aggregation Transport (CAT):</u>									
11	CAT Adder to Volumetric Rate	0	\$0.04382	\$0	0	(\$0.01314)	\$0	\$0	(\$0.05696)	-130.0%
12	Gas A/C Rate		\$0.07792			\$0.01723		\$0	(\$0.06069)	-77.9%
13	<u>Other Adjustments :</u>									
14	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)				
15										
16	TOTAL A/C SERVICE	1,210	\$0.06682	\$81	575	\$0.06793	\$39	(\$42)	\$0.00111	1.7%
17										
18	<u>GAS ENGINES</u>									
19	Customer Charge	1,094	\$50.00	\$656	708	\$50	\$425	(\$232)	\$0.00000	0.0%
20	Volumetric	18,080	\$0.05152	\$932	17,984	\$0.06711	\$1,207	\$275	\$0.01559	30.3%
21		18,080	\$0.08783	\$1,588	17,984	\$0.09073	\$1,632	\$44	\$0.00290	3.3%
22	<u>Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)</u>									
23	CSITMA Adder to Volumetric Rate	18,080	\$0.00065	\$12	17,984	\$0.00075	\$13	\$2	\$0.00009	14.4%
24	Volumetric		\$0.05218			\$0.06786				
25	<u>Core Aggregation Transport (CAT):</u>									
26	CAT Adder to Volumetric Rate	0	\$0.04382	\$0	0	(\$0.01314)	\$0	\$0	(\$0.05696)	-130.0%
27	Gas Engine Rate		\$0.09600			\$0.05472		\$0	(\$0.04128)	-43.0%
28	<u>Other Adjustments :</u>									
29	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)				
30										
31	TOTAL GAS ENGINES	18,080	\$0.08848	\$1,600	17,984	\$0.09148	\$1,645	\$45	\$0.00300	3.4%
32										
33	<u>STREET & OUTDOOR LIGHTING (equals average Non-CAT CCI Rate)</u>									
34	Street & Outdoor Lighting Base Rate		\$0.29761			\$0.23517		(\$0.06244)		-21.0%
35										

TABLE 5
Noncore Commercial & Industrial Rates
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13	Rate	Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	Revenue	Volumes	\$/th	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
1	<u>NonCore Commercial & Industrial Distribution Level</u>									
2	Customer Charge	670	\$350.00	\$2,816	647	\$350.00	\$2,716	(\$100)	\$0.00000	0.0%
3										
4	<u>Volumetric Rates</u>									
5	Tier 1 = 250kth/yr	147,174	\$0.14649	\$21,560	129,737	\$0.11792	\$15,299	(\$6,261)	(\$0.02857)	-19.5%
6	Tier 2 = 250k to 1000k	244,409	\$0.08854	\$21,640	212,168	\$0.06970	\$14,787	(\$6,853)	(\$0.01885)	-21.3%
7	Tier 3 = 1 to 2 million th/yr	130,163	\$0.05078	\$6,610	106,660	\$0.03885	\$4,143	(\$2,467)	(\$0.01194)	-23.5%
8	Tier 4 = over 2 million th/yr	460,719	\$0.02961	\$13,643	422,392	\$0.01680	\$7,097	(\$6,546)	(\$0.01281)	-43.3%
9	Volumetric totals (excl itcs)	982,465	\$0.06459	\$63,454	870,957	\$0.04745	\$41,327	(\$22,127)	(\$0.01714)	-26.5%
10										
11	<u>Rates for CSITMA Non-Exempt, NonCARE Customers (Rate Basis + CSITMA Adder)</u>									
12	CSITMA Adder to Volumetric Rate		\$0.00065	\$632		\$0.00075	\$642	\$10	\$0.00009	14.4%
13	Tier 1 = 250kth/yr		\$0.14715			\$0.11867		(\$0.02847)		-19.4%
14	Tier 2 = 250k to 1000k		\$0.08920			\$0.07045		(\$0.01875)		-21.0%
15	Tier 3 = 1 to 2 million th/yr		\$0.05144			\$0.03960		(\$0.01184)		-23.0%
16	Tier 4 = over 2 million th/yr		\$0.03027			\$0.01755		(\$0.01272)		-42.0%
			\$0.06524			\$0.04820		(\$0.01704)		-26.1%
17	<u>Other Adjustments :</u>									
18	TSA for CSITMA exempt cust.		(\$0.00065)			(\$0.00075)		(\$0.00009)		
19	NCCI - DISTRIBUTION LEVEL	982,465	\$0.06810	\$66,902	870,957	\$0.05130	\$44,684	(\$22,217)	(\$0.01679)	-24.7%
20										
21	NCCI-TRANSMISSION LEVEL (2) w/	457,697	\$0.01783	\$8,162	639,338	\$0.01324	\$8,463	\$302	(\$0.00459)	-25.8%
22										
23	TOTAL NONCORE C&I	1,440,163	\$0.05212	\$75,063	1,510,295	\$0.03519	\$53,148	(\$21,916)	(\$0.01693)	-32.5%

TABLE 6
Noncore Electric Generation Rates and Enhanced Oil Recovery Rates
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13	Rate	Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	Revenue	Volumes	Rate	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
1										
2	<u>ELECTRIC GENERATION</u>									
3										
4	<u>EFBA Exempt Distribution Rates:</u>									
5	<u>EG Distribution Level Service Tier 1:</u>									
6	Customer Charge	134	\$50.00	\$80	125	\$50.00	\$75	(\$5)	\$0.00000	0.0%
7	Volumetric Rate (excl ITCS)	60,420	\$0.05470	\$3,305	42,203	\$0.06914	\$2,918	(\$387)	\$0.01444	26.4%
8	EG Distribution Level Service Tier 1	60,420	\$0.05603	\$3,385	42,203	\$0.07092	\$2,993	(\$392)	\$0.01489	26.6%
9										
10	<u>EG Distribution Level Service Tier 2:</u>									
11	Customer Charge	32	\$0.00	\$0	29	\$0.00	\$0	\$0	\$0.00000	
12	Volumetric Rate (excl ITCS)	293,575	\$0.02410	\$7,076	276,832	\$0.02633	\$7,290	\$214	\$0.00223	9.3%
13	EG Distribution Level Service Tier 2	293,575	\$0.02410	\$7,076	276,832	\$0.02633	\$7,290	\$214	\$0.00223	9.3%
14										
15	Total EG Distribution EFBA Exempt C	353,995	\$0.02955	\$10,461	319,035	\$0.03223	\$10,283	(\$179)	\$0.00268	9.1%
16										
17	<u>EFBA Non-Exempt Rates:</u>									
18	EFBA Cost Adder	328,957	\$0.00000	\$0	232,796	\$0.00000	\$0	\$0	\$0.00000	
19	EG-Distribution Tier 1 w/EFBA Adder		\$0.05470			\$0.06914			\$0.01444	26.4%
20	EG-Distribution Tier 2 w/EFBA Adder		\$0.02410			\$0.02633			\$0.00223	9.3%
21	Total - EG Distribution Level	353,995	\$0.02955	\$10,461	319,035	\$0.03223	\$10,283	(\$179)	\$0.00268	9.1%
22										
23	EG Transmission Level (2)	2,472,969	\$0	\$42,507	2,753,888	\$0.01250	\$34,426	(\$8,081)	(\$0.00469)	-27.3%
24										
25	TOTAL ELECTRIC GENERATION	2,826,964	\$0.01874	\$52,968	3,072,923	\$0.01455	\$44,708	(\$8,260)	(\$0.00419)	-22.3%
26										
27	<u>EOR Rates & revenue:</u>									
28	<u>Distribution Level EOR:</u>									
29	Customer Charge	14	\$500.00	\$84	17	\$500.00	\$102	\$18	\$0.00000	0.0%
30	Volumetric Rate	80,880	\$0.02851	\$2,306	80,514	\$0.03096	\$2,493	\$187	\$0.00245	8.6%
31	Distribution Level EOR	80,880	\$0.02955	\$2,390	80,514	\$0.03223	\$2,595	\$205	\$0.00268	9.1%
32	Transmission Level EOR	75,307	\$0	\$1,294	69,256	\$0.01250	\$866	(\$429)	(\$0.00469)	-27.3%
33	Total EOR	156,187	\$0.02359	\$3,685	149,770	\$0.02311	\$3,461	(\$224)	(\$0.00048)	-2.1%

TABLE 7
Transmission Level Service Transportation Rates
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13		Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	BCAP Vols	Volumes	Rate	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth, Mdth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
Rate applicable to NonCore C&I, EOR & EG customer Classes:										
1	Reservation Service Option (RS):									
2	Daily Reservation rate \$/th/day	\$0.00844			\$0.00547			(\$0.00298)	-35.3%	
3	Usage Charge for RS \$/th	\$0.00481			\$0.00530			\$0.00049	10.2%	
4										
5	Class Average Volumetric Rate (CA)									
6	Volumetric Rate \$/th	\$0.01218			\$0.00769			(\$0.00449)	-36.9%	
7	Usage Charge for CA \$/th	\$0.00500			\$0.00479			(\$0.00021)	-4.1%	
8	Class Average Volumetric Rate (CA) \$/th	\$0.01718			\$0.01248			(\$0.00470)	-27.4%	
9										
10	120% CA (for NonBypass Volumetric NV) \$/th	\$0.02061			\$0.01497			(\$0.00564)	-27.4%	
11	135% CA (for Bypass Volumetric BV) \$/th	\$0.02319			\$0.01684			(\$0.00634)	-27.4%	
12	Total Transmission Level Service (N	2,930,667	\$0.01719	\$50,374	3,393,226	\$0.01250	\$42,418	(\$7,956)	(\$0.00469)	-27.3%
13										
14	Rate applicable to NonCore C&I for CSITMA and EFBA NonExempt Customers									
15	CSITMA Adder to Usage Charge	457,697	\$0.00064	\$294	639,338	\$0.00074	\$471	\$177	\$0.00009	
16	EFBA Cost Adder	1,016,987	\$0.00000	\$0	1,540,747	\$0.00000	\$0		\$0.00000	
17	Reservation Service Option (RS):									
18	Daily Reservation rate \$/th/day	\$0.00844			\$0.00547			\$0	(\$0.00298)	-35.3%
19	Usage Charge for RS \$/th	\$0.00545			\$0.00603			\$0	\$0.00058	10.7%
20										
21	Class Average Volumetric Rate (CA)									
22	Volumetric Rate \$/th	\$0.01218			\$0.00769			\$0	(\$0.00449)	-36.9%
23	Usage Charge for CA \$/th	\$0.00564			\$0.00553			\$0	(\$0.00011)	-2.0%
24	Class Average Volumetric Rate (CA) \$/th	\$0.01782			\$0.01321			\$0	(\$0.00460)	-25.8%
25										
26	120% CA (for NonBypass Volumetric NV) \$/t	\$0.02138			\$0.01586			\$0	(\$0.00552)	-25.8%
27	135% CA (for Bypass Volumetric BV) \$/th	\$0.02405			\$0.01784			\$0	(\$0.00622)	-25.8%
28										
29	Other Adjustments :									
30	TSA for CSITMA exempt cust.		(\$0.00064)			\$0.00074			\$0.00138	
31	Total Transmission Level Service (N	2,930,667	\$0.01729	\$50,668	3,393,226	\$0.01264	\$42,889	(\$7,779)	(\$0.00465)	-26.9%
32										
33	Rate applicable to Wholesale & International customer Classes:									
34	Reservation Service Option (RS):									
35	Daily Reservation rate \$/th/day	\$0.00842			\$0.00545			(\$0.00297)	-35.3%	
36	Usage Charge for RS \$/th	\$0.00480			\$0.00529			\$0.00049	10.2%	
37										
38	Class Average Volumetric Rate (CA)									
39	Volumetric Rate \$/th	\$0.01215			\$0.00767			(\$0.00448)	-36.9%	
40	Usage Charge for CA \$/th	\$0.00499			\$0.00478			(\$0.00021)	-4.1%	
41	Class Average Volumetric Rate (CA) \$/th	\$0.01713			\$0.01245			(\$0.00469)	-27.4%	
42										
43	120% CA (for NonBypass Volumetric NV) \$/th	\$0.02056			\$0.01494			(\$0.00562)	-27.4%	
44	135% CA (for Bypass Volumetric BV) \$/th	\$0.02313			\$0.01680			(\$0.00633)	-27.4%	
45	Total Transmission Level Service (W	368,955	\$0.01719	\$6,342	298,230	\$0.01250	\$3,728	(\$2,614)	(\$0.00469)	-27.3%
46										
47	Average Transmission Level Se	3,299,622	\$0.01728	\$57,010	3,691,456	\$0.01263	\$46,617	(\$10,393)	(\$0.00465)	-26.9%

TABLE 8
Backbone Transmission Service and Storage Rates
Southern California Gas Company
2013 TCAP Application
2013TCAP SCG RD Model - 2/20/2013 Update Filing

	Present Rates			Proposed Rates			Changes			
	Jan-1-12	Average	Jan-1-12	Jan-1-13		Jan-1-13	Revenue	Rate	% Rate	
	Volumes	Rate	BCAP Vols	Volumes	Rate	Revenue	Change	Change	change	
	Mth	\$/th	\$000's	Mth, Mdth	\$/th	\$000's	\$000's	\$/th	%	
	A	B	C	D	E	F	G	H	I	
48										
49	Backbone Transmission Service BTS									
50	BTS SFV Reservation Charge \$/dth	3,100	\$0.11042	\$124,939	2,978	\$0.15230	\$165,545	\$40,606	\$0.04188	37.9%
51	BTS Interruptible Volumetric Charge \$/therm		\$0.11042			\$0.15230		\$0.04188	37.9%	
52										
53	BTS Adder for Direct Service \$/th		\$0.00000			\$0.00831		\$0.00831		
54										
55	Storage Rates: (incl. HRSMA)									
56	Injection mmcf/d; rate = \$/dth/day	850	\$29.78	\$26,074	850	\$30.77	\$26,770	\$697	\$1.00	3.3%
57	Inventory BCF; rate = \$/dth	135	\$0.25768	\$35,863	136	\$0.25865	\$36,030	\$167	\$0.00098	0.4%
58	Withdraw l mmcf/d; rate = \$/dth/day	3,195	\$9.81	\$32,276	3,195	\$8.19	\$26,770	(\$5,506)	(\$1.62)	-16.5%
59			\$94,213			\$89,571	(\$4,642)			

See footnotes Table 1