

Company: Southern California Gas Company (U 904 G)  
Proceeding: 2019 General Rate Case  
Application: A.17-10-008  
Exhibit: SCG-46-3R

**THIRD REVISED**

**SOCALGAS**

**DIRECT TESTIMONY OF IFTEKHARUL (SHARIM) CHAUDHURY  
(PRESENT AND PROPOSED GAS TRANSPORTATION REVENUE AND RATES)**

**July 31, 2018**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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### LIST OF ACRONYMS

## SUMMARY

- This testimony presents the gas transportation revenue and rate changes, and the expected residential customer bill impact associated with of Southern California Gas Company's (SoCalGas) Test Year (TY) 2019 General Rate Case (GRC) proposals.
- Based on SoCalGas' TY 2019 GRC proposals:
  - System total bundled revenues will increase 18.5% over then-effective 2017 revenues for the period applicable during the date the TY 2019 GRC Application was filed on October 6, 2017 and revised testimony was served on December 20, 2017 (GRC Filing) and 17.3% over as expected authorized 2018 revenues shown in the GRC Filing.
  - For an illustrative non-California Alternate Rates for Energy (non-CARE) residential customer with average gas usage, the average monthly bill at proposed rates will increase 16.3% over the bill at then-effective 2017 rates shown in the GRC Filing and 16.2% over the bill at as expected authorized 2018 rates shown in the GRC Filing.

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2 **SOCALGAS DIRECT TESTIMONY OF IFTEKHARUL (SHARIM) CHAUDHURY**  
3 **(PRESENT AND PROPOSED GAS TRANSPORTATION REVENUES AND RATES)**

4 **I. INTRODUCTION**

5 The purpose of my testimony is to present: (1) a summary of the customer class-specific  
6 gas transportation revenue and rate changes that would result from the adoption of the TY 2019  
7 GRC proposals of SoCalGas; (2) an estimate of the average monthly gas bill impact for a  
8 residential customer with average monthly gas usage; and (3) proposed cost allocation methods  
9 for the forecasted balances in new regulatory accounts. Pursuant to the Assigned  
10 Commissioner’s Scoping Memorandum and Ruling issued on January 29, 2018 (Scoping  
11 Memo), this exhibit has been revised to reflect the impact of the Tax Cuts and Jobs Act (TCJA)  
12 on the SoCalGas TY 2019 GRC. The TCJA was signed into federal law on December 22, 2017  
13 and is discussed in the testimony of the Taxes witness Ragan Reeves (Exhibit SCG-37-2R),  
14 served concurrently with this exhibit. A roadmap of this TCJA-related submission and impacts  
15 on other witnesses’ areas is provided in the Case Management Exhibit SCG-49/SDG&E-49.  
16 Additionally, recognizing that SoCalGas’ current rates have changed since my direct testimony  
17 was served on October 6, 2017 and revised on December 20, 2017, the second revised testimony  
18 served on April 6, 2018 provided an Appendix A presenting numbers based on current 2018  
19 effective rates (consistent with Advice Letter 5238-G) at the time of that submission.<sup>1</sup> This third  
20 revised testimony corrects relatively minor errors in numbers shown in Appendix A due to  
21 SDG&E’s linking error explained in Exhibit SDG&E-45-3R.

22  
23 **II. SUMMARY OF PRESENT AND PROPOSED GAS TRANSPORTATION**  
24 **REVENUES AND RATES**

25 SoCalGas’ proposals in this GRC proceeding, if adopted, would result in changes to:

- 26 (i) total authorized base margin for transportation rates (see Summary of  
27 Earnings testimony of Ryan Hom (Exhibit SCG-43-2R));

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<sup>1</sup> SoCalGas maintained herein the comparison point of “2018 Expected” consistent with my prior testimony exhibits served in this proceeding on October 6 and December 20, 2017. Maintaining the comparison point isolates the impact of the TCJA. Please also refer to the second revised testimony of Summary of Earnings witness Ryan Hom (Exhibit SCG-43-2R).

- 1 (ii) franchise fee rate (see Tax testimony of Ragan Reeves (Exhibit SCG-37-  
2 2R));
- 3 (iii) uncollectible rate (see Customer Services - Office Operations testimony of  
4 Michael Baldwin (Exhibit SCG-19)); and
- 5 (iv) the balances for amortization in rates of certain regulatory accounts (see  
6 Regulatory Accounts testimony of Rae Marie Yu (Exhibit SCG-42)).

<b>SoCalGas' Proposals Resulting in Rate Changes:</b>	<b>Proposed 2019 Amounts</b>
Base Margin (\$ millions)	\$2,848
Franchise Fee Rate	1.3720%
Uncollectible Rate	0.3160%

7 SoCalGas' GRC proposals, if adopted, would lead to changes in customer class-specific  
8 revenues and rates. SoCalGas' customers are generally classified as core and noncore  
9 customers. Core customers comprise residential, small commercial and industrial (C&I), natural  
10 gas vehicles, gas air conditioning, and gas engine water pumping services. SoCalGas' noncore  
11 customers include large C&I, electric generation (EG), enhanced oil recovery, refinery, and  
12 wholesale customers. SoCalGas procures natural gas for its core customers;<sup>2</sup> noncore customers  
13 are responsible for procuring their own gas.

14 SoCalGas' TY 2019 GRC proposals, if adopted, would impact its intrastate transportation  
15 rates and revenues. Rates and revenues for other components of the bundled rates, including gas  
16 commodity cost and Public Purpose Program (PPP) surcharges, would not be impacted by this  
17 Application and therefore, have been held constant for the present versus proposed revenues and  
18 rates comparison.<sup>3</sup> The transportation rates and revenues reflect the cost allocation methods, the  
19 functional cost studies,<sup>4</sup> and sales volumes adopted in SoCalGas' most recent Triennial Cost  
20 Allocation Proceeding (TCAP) implemented on January 1, 2017,<sup>5</sup> and other proceedings as  
21 appropriate.

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<sup>2</sup> With the exception of core customers who procure gas from core transportation aggregators.  
<sup>3</sup> The commodity price used in these tables reflects 2017 annual gas price. The PPP surcharges used are those effective as of January 1, 2017.  
<sup>4</sup> Functional cost studies refer to cost studies for services for customer-related, distribution-related, transmission-related, and storage-related functions.  
<sup>5</sup> See Decision (D.) 16-10-004 (TCAP Phase 2); see also D.16-06-039 (TCAP Phase 1), effective September 1, 2016.

1            Since the proposed TY 2019 GRC revenue requirement and rates will be implemented no  
2 earlier than January 1, 2019, the tables below compare the proposed TY 2019 GRC revenue  
3 requirement and rates with those (i) then in effect as of August 1, 2017 (at the time of the GRC  
4 Filing) and (ii) as expected (at the time of the GRC Filing) to be in effect as of January 1, 2018.<sup>6</sup>  
5 Table ISC-01 below shows the then-effective August 2017 and proposed 2019 gas bundled  
6 revenues to be recovered from major customer classes.  
7

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<sup>6</sup> The 2018 as expected authorized revenue requirement and rates are different than those then in effect in August 2017 due to multiple factors: 2018 base margin increase under the current GRC attrition mechanism, and the recovery of costs associated programs outside the current GRC base margin, such as, with Pipeline Safety Enhancement Plan (PSEP), Aliso Canyon Turbine Replacement (ACTR) and updates to Advanced Meter Infrastructure (AMI) revenue requirement. In addition, SoCalGas implemented new revenue requirement and rates effective January 1, 2018 (See SoCalGas Advice Letter 5238-G). The January 1, 2018 revenue requirement and rates are different from the 2018 as expected authorized revenue requirement and rates as well as the then-effective 2017 rates shown in the GRC Filing. Comparisons of the proposed TY 2019 Revenues, Rates and Bills with the 2018 current effective rates are shown in Appendix A.

1 **Table ISC-01**  
2 **Southern California Gas Company**  
3 **Summary of Gas Bundled Revenues by Major Customer Class (\$ millions)**

Line No.	Customer Class	Then-Effective Revenues	Proposed Revenues	Change	
		Aug-17	2019	\$	%
1	Residential	\$2,850	\$3,285	\$435	15.3%
2	C&I	\$695	\$779	\$84	12.1%
3	Other Core	\$80	\$85	\$5	5.9%
4	Total Core	\$3,626	\$4,150	\$524	14.5%
	Noncore				
5	C&I	\$120	\$148	\$29	23.9%
6	EG	\$54	\$75	\$21	39.4%
7	Retail Noncore Average	\$174	\$223	\$50	28.7%
8	Wholesale	\$18	\$23	\$5	27.9%
9	Other (BTS and UBS)	\$300	\$483	\$183	61.2%
10	SYSTEM TOTALS	\$4,117	\$4,878	\$762	18.5%

4  
5 Table ISC-02 below shows the expected 2018 and proposed 2019 gas bundled revenues  
6 to be recovered from major customer classes.

7 **Table ISC-02**  
8 **Southern California Gas Company**  
9 **Summary of Gas Bundled Revenues by Major Customer Class (\$ millions)**

Line No.	Customer Class	Expected Revenues	Proposed Revenues	Change	
		Jan-18	2019	\$	%
1	Residential	\$2,850	\$3,285	\$435	15.3%
2	C&I	\$702	\$779	\$77	11.0%
3	Other Core	\$81	\$85	\$4	5.0%
4	Total Core	\$3,633	\$4,150	\$517	14.2%
	Noncore				
5	C&I	\$123	\$148	\$25	19.9%
6	EG	\$59	\$75	\$17	28.4%

7	Retail Noncore Average	\$182	\$223	\$41	22.7%
8	Wholesale	\$21	\$23	\$2	7.6%
9	Other (BTS and UBS)	\$321	\$483	\$161	50.2%
10	SYSTEM TOTALS	\$4,158	\$4,878	\$721	17.3%

1  
2 Table ISC-03 shows the then-effective August 2017 and proposed 2019 gas bundled rates  
3 by major customer classes.

4 **Table ISC-03**  
5 **Southern California Gas Company**  
6 **Summary of Gas Class Average Bundled Rates by Major Customer Class (\$/therm)**

Line No.	Customer Class	Then-Effective Rates	Proposed Rates	Change	
		Aug -17	2019	\$	%
1	Residential	\$1.17033	\$1.34901	\$0.17868	15.3%
2	Core C&I	\$0.67952	\$0.76168	\$0.08217	12.1%
3	Total Core	\$0.99691	\$1.14096	\$0.14405	14.5%
	Noncore				
4	C&I	\$0.07836	\$0.09705	\$0.01870	23.9%
5	EG	\$0.02017	\$0.02812	\$0.00795	39.4%
6	Retail Noncore Average	\$0.04129	\$0.05314	\$0.01185	28.7%
7	Wholesale	\$0.01129	\$0.01444	\$0.00315	27.9%
8	BTS (\$/dth/day)	\$0.30592	\$0.49954	\$0.19361	63.3%
9	SYSTEM TOTALS	\$0.43714	\$0.51804	\$0.08090	18.5%

7  
8 Table ISC-04 below shows the expected 2018 and proposed 2019 gas bundled rates by  
9 major customer classes.

10 **Table ISC-04**  
11 **Southern California Gas Company**  
12 **Summary of Gas Class Average Bundled Rates by Major Customer Class (\$/therm)**

Line No.	Customer Class	Expected Rates	Proposed Rates	Change	
		Jan-18	2019	\$	%
1	Residential	\$1.17025	\$1.34901	\$0.17877	15.3%
2	Core C&I	\$0.68612	\$0.76168	\$0.07556	11.0%
3	Total Core	\$0.99889	\$1.14096	\$0.14207	14.2%

	Noncore				
4	C&I	\$0.08093	\$0.09705	\$0.01613	19.9%
5	EG	\$0.02190	\$0.02812	\$0.00623	28.4%
6	Retail Noncore Average	\$0.04332	\$0.05314	\$0.00982	22.7%
7	Wholesale	\$0.01341	\$0.01444	\$0.00102	7.6%
8	BTS (\$/dth/day)	\$0.32403	\$0.49954	\$0.17551	54.2%
9	SYSTEM TOTALS	\$0.44150	\$0.51804	\$0.07655	17.3%

### III. RESIDENTIAL CUSTOMER GAS BILL IMPACT

The following table provides an estimate of the average monthly gas bill, comprising gas commodity cost, transportation charges, and PPP surcharge, for an illustrative non-CARE residential customer.<sup>7</sup> This estimated bill is based on the average residential customer gas usage of 35 therms per month. As shown in Table ISC-05 below, the gas bill for a residential customer using 35 therms per month would increase by \$6.95 per month, or 16.3% when compared to a 2017 bill (bill at then-effective rates shown in the GRC Filing using the same 35 therms monthly usage); and increase by \$6.89 per month, or 16.2% when compared to the expected 2018 bill (bill at 2018 rates as expected at the time of the GRC Filing using the same 35 therms monthly usage).

**Table ISC -05**  
**Monthly Residential Gas Bills with Average Usage**

	Then- Effective Aug-17	Proposed 2019	Change	
			\$	%
Average Bill 35 therms/month	\$42.50	\$49.45	\$6.95	16.3%

  

	Expected Jan-18	Proposed 2019	Change	
			\$	%
Average Bill 35 therms/month	\$42.56	\$49.45	\$6.89	16.2%

<sup>7</sup> CARE customers receive a 20% CARE discount on all customer, commodity, and transportation charges on their otherwise applicable service schedule. In addition, they do not pay the CARE portion of the Public Purpose Programs Surcharge.

1 **IV. COST ALLOCATION METHODS FOR NEW REGULATORY ACCOUNTS**

2 SoCalGas witness Ms. Yu (Ex. SCG-42) discusses forecasted balances at year-end 2018  
3 in certain new regulatory accounts. The methods to allocate the forecasted balances in these  
4 accounts across customer classes have not yet been addressed by the Commission since these are  
5 new accounts. These accounts are: Energy Data Request Memorandum Account (EDRMA),  
6 Operational Flow Cost Memorandum Account (OFCMA), Fire Hazard Prevention Memorandum  
7 Account (FHPMA), Avoided Cost Calculator Update Memorandum Account (ACCUMA),  
8 Morongo Rights-of-Way Balancing Account (MROWBA), Advanced Meter Opt-Out Program  
9 Balancing Account (AMOPBA), Aliso Canyon Memorandum Account (ACMA), Aliso Canyon  
10 True-up Tracking Account (ACTTA) and Liability Insurance Premiums Balancing Account  
11 (LIPBA).

12 Ms. Yu summarizes the purpose of these regulatory accounts in her testimony. With the  
13 exception of three accounts (AMOPBA, ACMA, and ACTTA), these new accounts reflect costs  
14 for activities that are likely to benefit all customer classes. As such, SoCalGas proposes to  
15 allocate the balances in these accounts across customer classes using the Equal Percent  
16 Authorized Margin (EPAM) method. According to the EPAM method, the balances in these  
17 accounts are allocated across customer classes based on each customer class' share of total GRC  
18 base margin allocated to that customer class. This proposed method is consistent with how a  
19 regulatory account balance that benefits all customer classes is allocated in a GRC.<sup>8</sup> Because  
20 installation of Advanced Meters is performed only for core customers, SoCalGas proposes to  
21 allocate the balance in AMOPBA across core customer classes using each customer class' share  
22 of total core meter counts. ACMA and ACTTA forecast balances are associated with the Aliso  
23 Canyon Turbine Replacement (ACTR) Project. SoCalGas proposes to allocate the balances in  
24 ACMA and ACTTA using the same allocation method to be used to allocate the \$200.9 million  
25 ACTR cost cap.<sup>9</sup> These costs are related to storage function and SDG&E proposes to allocate  
26 the costs using the existing storage cost allocation method.

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<sup>8</sup> 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 accounts reflects costs associated with activities to benefit all customer classes.

<sup>9</sup> The cost cap was authorized by the Commission in D.13-11-023. The ACTR Project is expected to be in service in 2018 and costs related to the capital expenses of the \$200.9 million cost cap will be included in a subsequent transportation rates update.

1  
2

**V. CONCLUSION**

This concludes my prepared direct testimony.

1 **VI. WITNESS QUALIFICATIONS**

2 My name is Iftekharul (Sharim) Chaudhury. I am employed by SoCalGas and SDG&E  
3 as the Rate Design and Demand Forecasting Manager within the Regulatory Affairs Department,  
4 which supports gas regulatory activities of both SoCalGas and SDG&E. My business address is  
5 555 West Fifth Street, Los Angeles, California, 90013-1011. I hold a Bachelor of Arts degree in  
6 Economics from Illinois State University. I received my Masters and Ph.D. degrees in  
7 Economics from the University of California, San Diego.

8 I have held my current position managing the rates group since August 2014, and have  
9 been managing the demand forecasting group since April 2013. Prior to joining SoCalGas, I  
10 worked at Southern California Edison Company from June 1999 to March 2013, holding several  
11 positions of increasing responsibility, from Senior Analyst to Manager of Price Forecasting to  
12 Manager of Long-Term Demand Forecasting. From October 1998 to May 1999, I worked at  
13 National Economic Research Associates (NERA) as a Senior Consultant. Prior to joining  
14 NERA, I worked at SoCalGas from 1991 to 1998, holding several positions of increasing  
15 responsibility, starting as Marketing Analyst to Senior Economist in the Rate Design group to  
16 Manager of Rate Design. I also worked for about a year at the California Energy Commission  
17 (CEC) in the Demand Analysis Office.

18 I have previously testified before the Commission.

## LIST OF ACRONYMS

<b>ACRONYM</b>	<b>DEFINITION</b>
ACCUMA	Avoided Cost Calculator Update Memorandum Account
ACMA	Aliso Canyon Memorandum Account
ACTTA	Aliso Canyon True-up Tracking Account
ACTR	Aliso Canyon Turbine Replacement
AMI	Advanced Meter Infrastructure
AMOPBA	Advanced Meter Opt-Out Program Balancing Account
C&I	commercial & industrial
CARE	California Alternate Rates for Energy
EDRMA	Energy Data Request Memorandum Account
EG	electric generation
EPAM	Equal Percent Authorized Margin
FHPMA	Fire Hazard Prevention Memorandum Account
GRC	General Rate Case
LIPBA	Liability Insurance Premiums Balancing Account
MROWBA	Morongo Rights-of-Way Balancing Account
OFCMA	Operational Flow Cost Memorandum Account
PPP	Public Purpose Program
PSEP	Pipeline Safety Enhancement Plan
RDDEA	Research, Development and Demonstration Expense Account
TCAP	Triennial Cost Allocation Proceeding
TCJA	Tax Cuts and Jobs Act
TY	Test Year

**APPENDIX A – COMPARISON OF CURRENT EFFECTIVE 2018 AND THE  
PROPOSED TY 2019 REVENUES, RATES AND BILLS**

Table ISC-01-2018 below shows the current effective January 2018 and proposed 2019 gas bundled revenues to be recovered from major customer classes.

**Table ISC-01-2018  
Southern California Gas Company  
Summary of Gas Bundled Revenues by Major Customer Class (\$ millions) at  
Effective 2018 and 2019 Proposed Rates**

Line No.	Customer Class	Present Revenues	Proposed Revenues	Change	
		Jan-18	2019	\$	%
1	Residential	\$2,891	\$3,373	\$482	16.7%
2	C&I	\$714	\$804	\$91	12.7%
3	Other Core	\$76	\$81	\$5	6.8%
4	Total Core	\$3,681	\$4,259	\$578	15.7%
	Noncore				
5	C&I	\$124	\$156	\$32	26.0%
6	EG	\$68	\$89	\$21	30.5%
7	Retail Noncore Average	\$192	\$245	\$52	27.6%
8	Wholesale	\$22	\$27	\$5	215%
9	Other (BTS and UBS)	\$277	\$387	\$110	39.6%
10	SYSTEM TOTALS	\$4,173	\$4,918	\$745	17.9%

Table ISC-02-2018 below shows the current effective January 2018 and proposed 2019 gas bundled rates by major customer classes.

**Table ISC-02-2018**  
**Southern California Gas Company**  
**Summary of Gas Class Average Bundled Rates by Major Customer Class (\$/therm) at Effective 2018 and 2019 Proposed Rates**

Line No.	Customer Class	Present Rates	Proposed Rates	Change	
		Jan-18	2019	\$	%
1	Residential	\$1.18725	\$1.38508	\$0.19783	16.7%
2	Core C&I	\$0.69751	\$0.78622	\$0.08872	12.7%
3	Total Core	\$1.01216	\$1.17101	\$0.15884	15.7%
	Noncore				
4	C&I	\$0.08122	\$0.10232	\$0.02110	26.0%
5	EG	\$0.02543	\$0.03319	\$0.00776	30.5%
6	Retail Noncore Average	\$0.04568	\$0.05828	\$0.01260	27.6%
7	Wholesale	\$0.01412	\$0.01716	\$0.00304	21.5%
8	BTS (\$/dth/day)	\$0.26353	\$0.37001	\$0.10648	40.4%
9	SYSTEM TOTALS	\$0.44311	\$0.52227	\$0.07916	17.9%

As shown in Table ISC-03-2018 below, the gas bill for a residential customer using 35 therms per month increase by \$7.01 per month, or 17.0% when compared to a 2018 bill (bill at current effective 2018 rates using the same 35 therms monthly usage).

**Table ISC -03-2018**  
**Southern California Gas Company**  
**Monthly Residential Gas Bills with Average Usage at Effective 2018 and 2019 Proposed Rates**

	Present	Proposed	Change	
	Jan-18	2019	\$	%
Average Bill 35 therms/month	\$41.33	\$48.34	\$7.01	17.0%

**SCG 2019 GRC Testimony Revision Log – July 2018**

<b>Exhibit</b>	<b>Witness</b>	<b>Page</b>	<b>Line or Table</b>	<b>Revision Detail</b>
SCG-46	Sharim Chaudhury	ISC-1	17-21	Added explanation for revisions to Appendix A in this third revised testimony.
SCG-46	Sharim Chaudhury	ISC-A-1	Table ISC-01-2018	Line 5 in the Change % column changed 25.9% to 26.0%.
SCG-46	Sharim Chaudhury	ISC-A-1	Table ISC-01-2018	In Line 6, changed \$88 to \$89 in the Proposed Revenues column; changed \$20 to \$21 in the Change \$ column; and changed 29.9% to 30.5% in the Change % column.
SCG-46	Sharim Chaudhury	ISC-A-1	Table ISC-01-2018	In Line 7, changed \$244 to \$245 in the Proposed Revenues column; and changed 27.3% to 27.6% in the Change % column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 1, changed \$1.38510 to \$1.38508 in the Proposed Rates column; and changed \$0.19785 to \$0.19783 in the Change \$ column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 2, changed \$0.78623 to \$0.78622 in the Proposed Rates column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 3, changed \$0.15885 to \$0.15884 in the Change \$ column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 4, changed \$0.10226 to \$0.10232 in the Proposed Rates column; changed \$0.02104 to \$0.02110 in the Change \$ column; and changed 25.9% to 26.0% in the Change % column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 5, changed \$0.03304 to \$0.03319 in the Proposed Rates column; changed \$0.00761 to \$0.00776 in the Change \$ column; and changed 29.9% to 30.5% in the Change % column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 6, changed \$0.05816 to \$0.05828 in the Proposed Rates column; changed \$0.01249 to \$0.01260 in the Change \$ column; and changed 27.3% to 27.6% in the Change % column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 7, changed \$0.01713 to \$0.01716 in the Proposed Rates column; changed \$0.00301 to \$0.00304 in the Change \$ column; and changed 21.3% to 21.5% in the Change % column.
SCG-46	Sharim Chaudhury	ISC-A-2	Table ISC-02-2018	In Line 9, changed \$0.52221 to \$0.52227 in the Proposed Rates column; and changed \$0.07910 to \$0.07916 in the Change \$ column.