Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2012.

A.10-12-005 (Filed December 15, 2010)

Application of Southern California Gas Company (U904G) for authority to update its gas revenue requirement and base rates effective on January 1, 2012.

A.10-12-006 (Filed December 15, 2010)

Application 10-12-006 Exhibit No.: (SCG-32-R)

# REVISED PREPARED DIRECT TESTIMONY OF TODD J. CAHILL ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**JULY 2011** 



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# REVISED PREPARED DIRECT TESTIMONY OF TODD J. CAHILL

# ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY (MISCELLANEOUS REVENUES)

#### I. SUMMARY OF MISCELLANEOUS REVENUES

Miscellaneous revenues are comprised of fees and revenues collected by the utility for the provision of specific products or services from non-rate sources. They include such revenues as service establishment charges, collection fees and rents. Miscellaneous revenues also reflect certain credits to be returned to ratepayers pursuant to previous California Public Utilities Commission ("CPUC") Decisions. Miscellaneous revenues are incorporated in rates as a reduction to the base margin revenue requirement charged to customers for gas utility service.

Shown below is a summary of the recorded (base year 2009) and proposed (test year 2012) Southern California Gas Company ("SoCalGas") miscellaneous revenues in thousands of dollars (\$000's) by Federal Energy Regulatory Commission ("FERC") account:

FERC Acct Description	2009 Recorded	2012 Test Year	Net Change
488 – Cust. Service Revenues	34,965	33,722	(1,243)
493 – Rent from Gas Property	3,457	586	(2,871)
495 – Other Gas Revenues	31,228	65,134	33,906
Other Adjustments (See items		30,20	20,200
20 through 22)	8,215	2,972	(5,243)
Total	77,865	102,413	24,548

#### II. OVERVIEW OF 2012 FORECAST

For purposes of forecasting test year 2012 ("TY 2012") miscellaneous revenues, SoCalGas performed an item by item analysis of miscellaneous revenue accounts, including a review of prioryear recorded results as well as the factors that could impact future results. The forecasts were developed using methodologies that reflect the drivers for each miscellaneous revenue item. For many items, such as service establishment charges, where SoCalGas has multiple years of recorded activity, the forecast was developed using a multi-year recorded average adjusted by estimated customer or sales growth factors, where applicable. In circumstances where the charge is based on a per customer basis, a customer growth factor was applied to adjust historical results to develop the 2012 forecast.

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forecast. Generally, unless otherwise specified, the customer or sales growth factors were applied at a system-wide level for simplicity and consistency purposes. In instances where the multi-year recorded results are not available or recent factors have caused the multi-year results to no longer reflect a reasonable expectation of the future, SoCalGas used the most recent recorded year (base year 2009) to develop the forecast. In other cases, such as for rents from property, the forecast is based on executed lease agreements adjusted for applicable escalation clauses. Finally, for other miscellaneous revenue items not reflected in the categories described above, a forecasting methodology was applied to reflect the unique circumstances of the particular activity. The increase in miscellaneous revenue forecasted for 2012 compared to the 2009 recorded amount is primarily due to the increase in shared asset revenue.

#### III. COMPONENTS OF MISCELLANEOUS REVENUES

SoCalGas forecasts TY 2012 Miscellaneous Revenues of \$104,120,000. The following provides an account-by-account summary and description of miscellaneous revenue items recorded in 2009, estimated for 2012, and the net change.

#### Customer Service Revenues – Account 488 a)

These revenues reflect fees collected by the utility for Service Establishment Charges ("SECs"), Reconnection Charges, Pipeline Services and other service related fees.

#### **SECs (\$000's)**

2009 Recorded	2012 Test Year	Net Change
26,489	25,557	(932)

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The SEC is \$25 for all customers, except electric generation and wholesale customers, to establish gas service pursuant to SoCalGas' Commission-approved Tariff Rule No. 10. Low-income customers who qualify for the CPUC-approved California Alternate Rates for Energy ("CARE") program are charged \$10.00, and the \$15.00 difference is recovered through the CARE portion of the Public Purpose Program ("PPP") charge. The amount recorded to miscellaneous revenue reflects the \$25 charge before the CARE discount. The 2012 forecast is based on the five-year historical average (2005-2009) adjusted for the annual customer growth factors for the period 2010-2012. Additional

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information on service establishment charges is presented in the direct testimony of Edward Fong (Exh. SCG-07).

#### 2. Reconnection Charge (\$000's)

2009	2012 Test Year	Net Change
Recorded		
1,707	1,919	212

The Reconnection Charge is \$16 to re-establish service subsequent to the closing of a customer account for non-payment pursuant to SoCalGas' Commission-approved Tariff Rule No. 10. The 2012 estimate is based on the five-year historical average (2005-2009) adjusted for the annual customer growth factors for the period 2010-2012. Additional information on Reconnection Charges is presented in the direct testimony of Edward Fong (Exh. SCG-07).

#### 3. Residential Parts Program (\$000's)

2009 Recorded	2012 Test Year	Net Change
1,576	1,521	(55)

The Residential Parts Program provides limited parts replacement for residential-type gas appliances (such as ranges, water heaters, and space heaters). The parts replaced include such items as appliance connectors, shut-off valves, thermocouples, pilot tubing, and gas light mantles. The 2012 forecast is based on the five-year historical average (2005-2009) adjusted for the annual customer growth factors for the period 2010-2012.

#### 4. Commercial Parts Program (\$000's)

2009 Recorded	2012 Test Year	Net Change
2,984	3,063	79

The Commercial Parts Program provides parts replacement for food industry-type appliances located in restaurants, hospitals, rest homes, sanitariums, schools, churches, and in-plant food preparation facilities. These appliances include dishwashers, broilers, griddles, hot food tables, ovens, braising pans, deep fat fryers, pressure fryers, steam cookers, and other similar equipment. The parts offered to these customers include thermostats, connectors, and control valves. The 2012 forecast is

based on the five-year historical average (2005-2009) adjusted for the annual customer growth factors for the period 2010-2012.

#### 5. Connect Appliance Program (\$000's)

2009 Recorded	2012 Test Year	Net Change
131	264	133

The Connect Appliance Program provides for, upon customer request, the connection of new and used portable appliances such as gas ranges, dryers, and barbecues pursuant to SoCalGas' Commission-approved Tariff Rule No. 10. The parts utilized to perform this service are shut-off valves and connectors. The 2012 forecast is based on the five-year historical average (2005-2009) adjusted for the annual customer growth factors for the period 2010-2012.

#### 6. Natural Gas Vehicle ("NGV") Maintenance (\$000's)

2009 Recorded	2012 Test Year	Net Change
120	150	30

SoCalGas receives revenues for providing maintenance services at customer-owned NGV facilities. SoCalGas provides a comprehensive set of routine services that are paid for by the customer at a fixed monthly fee based upon asset requirements. This service can include the changing of oil and filters, minor mechanical adjustments, the replacement of hoses and other vehicle maintenance related items. The 2012 estimate is based on an expectation that demand and therefore revenues will increase slightly for this service.

#### 7. Pipeline Services (\$000's)

2009 Recorded	2012 Test Year	Net Change
925	0	(925)

Pipeline services revenues are received for providing installation and maintenance of gas facilities primarily for commercial customers, school districts, cities, and counties. The number of projects range from 80 to 100 jobs annually and vary in size. Due to unknown future work requirements for Pipeline Services work, forecasting has been set to zero. Moreover, construction performed in areas of military installations and campus style projects have greatly decreased due to economic factors.

# 8. Late Payment Charges (\$000's)

2009 Recorded	2012 Test Year	Net Change
523	632	109

In D.04-12-015, the Commission adopted a Settlement Agreement in the revenue requirement phase of SoCalGas' 2004 Cost of Service. The Settlement Agreement adopted SoCalGas' proposal for a late payment charge for non-residential customers. The monthly charge was equal to 1/12 of SoCalGas' authorized rate of return on rate base applied to the unpaid balance. The 2012 forecast reflects the four year average booked revenue (2006-2009), as activity did not start until 2006 based on D.04-12-015.

#### 9. Other Customer Service Revenues - Net

2009 Recorded	2012 Test Year	Net Change
508	614	106

Other Customer Service Revenues consist of miscellaneous programs, including customer air quality and environmental programs, demonstration projects, timed appointments, and other service offerings. These programs, which contain individual items of \$50 thousand or less, are consolidated herein.

#### (b) Rents from Gas Property – Account 493

10. Rent from Property Used in Operations (\$000's)

These revenues reflect payments received by the utility for the rental of gas property.

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# 2009 Recorded 2012 Test Year Net Change 3,457 586 (2,871)

Rent from Property Used in Operations is received by SoCalGas from outside parties for use of utility-owned properties. The 2012 forecast is based on the rents received from existing lease agreements adjusted for applicable escalation clauses. The significant reduction forecasted for 2012 is based on the expiration of the Gas Company Tower Agreement on November 8, 2011, which will result in a reduction in revenues related to the expiration of lease-back agreements currently in effect.

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#### Other Gas Revenue – Account 495

Other gas revenues include the provision of various goods and services to other parties, including shared asset charges to affiliates, crude oil sales, returned check charges, training programs, line item billing and other items.

#### 11. Shared Assets (\$000's)

2009 Recorded	2012 Test Year	Net Change
19,468	53,694	34,226

Revenue from shared assets reflects the use of SoCalGas assets, primarily hardware, software and communication equipment, by San Diego Gas & Electric Company ("SDG&E"), Sempra Energy Corporate Center ("SECC") and its unregulated affiliates. On an on-going basis, SoCalGas and SDG&E follow a Shared Asset Policy whereby the company that receives the majority of the benefits from the shared assets shall own such assets and bill the affiliates for their use. This policy was implemented for new shared assets acquired or constructed on or after November 1, 2002.

The forecast of the 2012 charges billed to affiliates reflects the development of a revenue requirement associated with these assets, including depreciation, property taxes, federal and state income taxes and a return on rate base. The portion of the shared asset costs allocated to SDG&E, SECC and its unregulated affiliates is based on methodologies used to measure utilization. For each type of shared asset, an assignment of a causal/beneficial relationship is determined (e.g., number of users, square footage, etc.). The asset is then allocated to affiliates based on their share of the benefit from that asset according to the applicable utilization methodology. More detailed information on the nature of the shared assets, including the methodology used to allocate the charges between SDG&E, SECC and its unregulated affiliates is presented in the direct testimony of Patrick Moersen (Exh. SCG-25). The amounts billed to the affiliates are recorded as SoCalGas miscellaneous revenue, and are net of the billings to SECC charged back to SoCalGas. Since these assets are being established on SoCalGas' financial records, a significant revenue requirement is allocated back to SDG&E.

#### **12.** Crude Oil Sales (\$000's)

2009 Recorded	2012 Test Year	Net Change	
6,259	5,562	(697)	

Crude Oil Sales represents the revenue from the sale of crude oil produced at the Company's Aliso, Honor Rancho, and Playa Del Rey underground storage fields. The oil sales revenue estimate is

based on the forecasted price of oil times forecasted volumes. The price forecast is based on a recent NYMEX futures strip for West Texas Intermediate crude oil, adjusted for the historical differentials between the benchmark West Texas Intermediate price and the price received at the various storage fields. The oil volume is based on trending of recent years volumes.

#### 13. Goleta Storage Emission Credit Lease (\$000's)

2009 Recorded	2012 Test Year	Net Change
1,023	1,023	0

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Goleta Storage Emission Credit revenues result from the lease of emission-offset credits at SoCalGas' Goleta natural gas storage facility. The 2012 forecast is based on the continuation of a contractual agreement with Chevron U.S.A. Corporation relating to the Point Arguello Project executed on February 5, 1988. The agreement provides for a fixed annual fee paid on a quarterly basis.

#### 14. Returned Check Charge (\$000's)

2009	2012 Test Year	Net Change
Recorded		
563	604	41

The returned check charge is \$7.50, which is assessed to customers whose checks are returned from the bank for insufficient funds pursuant to SoCalGas' Commission-authorized Rule 12 tariff. The 2012 estimate is based on a five year historical average (2005-2009) adjusted for annual customer growth for 2010-2012.

#### 15. ITCC ("Income Tax Component of CIAC") (\$000's)

2009 Recorded	2012 Test Year	Net Change	
2,710	3,317	687	

ITCC represents the tax gross-up for contributions-in-aid-of-construction ("CIAC") which became taxable under the Tax Reform Act of 1986. These tax gross-up amounts reflect the present value cost of tax paid upon receipt of CIAC offset by the future tax benefits to be received through tax depreciation over the tax life of the constructed property. ITCC is included as a reduction to rate base and is amortized to miscellaneous revenue over the tax life of the constructed property as ordered in D.87-09-026. The 2012 forecast is based on the ongoing amortization of the ITCC collected from

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1987 through 2009 and the amortization of the forecasted ITCC to be collected from 2010-2012. Additional information on ITCC is contained in the direct testimony of Randall Rose (Exh. SCG-28).

#### 16. Training Activity (\$000's)

2009 Recorded	2012 Test Year	Net Change
103	73	(30)

SoCalGas receives revenues for providing distribution and customer services field training, particularly welding training, to various third party companies/contractors and other utilities involved in such activities. The 2012 forecast is based on the five-year historical average for the period 2005-2009, as activity has varied from year-to-year depending on the outside requests for these services.

#### 17. Line Item Billing (\$000's)

2009 Recorded	2012 Test Year	Net Change	
214	259	45	

This service is offered to third parties providing energy-related and home safety-related products and/or services to residential and small commercial industrial customers within SoCalGas' service territory. The billing statement displays the charges for the product or service provided by the third-party client on a single line item. For example, Company X provides X and the charge for this service is included in the customer's bill as a single line item. SoCalGas then charges the third-party client a predetermined fee for this billing service.

#### 18. Federal Energy Retrofit Program ("FERP") (\$000's)

2009 Recorded	2012 Test Year	Net Change	
731	440	(291)	

Under Executive Order 13132, the U.S. Government is authorized and encouraged to enter into contracts with local utilities to expedite and facilitate the implementation of cost effective energy and water conservation measures. SoCalGas currently performs project management under infrastructure improvement contracts. The amount recorded to miscellaneous revenue reflects the difference between the revenues collected from the government agencies less the costs incurred to perform the work. The 2012 forecast is based on the forecasted net revenue from existing contracts with federal entities.

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#### 19. Miscellaneous Other Gas Revenues (\$000's)

2009 Recorded	2012 Test Year	Net Change
157	161	4

Miscellaneous Other Revenues consist of items not reflected above, including mapping services, Aliso Canyon property revenue, RECLAIM and emission credits, Anaheim parking revenue, and meter repair revenue.

#### **Other Adjustments**

These items include authorized adjustments relating to SoCalGas' interest in the Gas Tower and an adjustment to account for the unamortized portion of gains from the sale of utility property.

#### 20. Gas Tower Equity Interest (\$000's)

2009 Recorded	2012 Test Year	Net Change
2,487	0	(2,487)

The Gas Tower Equity Interest is the pass through to ratepayers for the value of the equity interest pursuant to D.92-07-080. Ordering Paragraph ("OP") 1 of D.92-07-080 states that "SoCalGas is authorized to hold a 15% equity interest in the Gas Company Tower for the benefit of its shareholders. In consideration for this asset, SoCalGas shall credit to ratepayers the net savings from the equity interest, as specified in the decision." SoCalGas is required to flow through to ratepayers the estimated net present value of the 15% equity interest of \$34.4 million over 20 years as specified in D.92-07-080, Appendix C and Exhibit No. 300. The 2012 estimate is based upon the above referenced decision.

#### 21. Gas Tower Equity Income (\$000's)

2009 Recorded	2012 Test Year	Net Change	
2,756	0	(2,756)	

The Gas Tower Equity Income is the pass through to ratepayers for the annual reduction in cash flow from the equity income pursuant to D.92-07-080, Exhibit No. 300. The 2012 estimate is based on the above referenced decision. Pursuant to D.92-07-080, the amortization period of the equity income will terminate at the end of 2010. Prior to December 31, 2010, SoCalGas will file an advice letter to adjust its base margin revenue requirement to reflect the removal of the \$2.756 million from authorized miscellaneous revenues effective January 1, 2011

## 22. Gain on Sale of Property (\$000's)

2009 Recorded	2012 Test Year	Net Change	
2,972	2,972	0	

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SoCalGas is requesting to return 100% of the previously realized gain-on-sale of nondepreciable property (\$17.8 million) through 2013. Consequently, SoCalGas will file an advice letter prior to December 31, 2013 to remove this component from 2014 rates.

This concludes my revised prepared direct testimony.

#### IV. WITNESS QUALIFICATIONS

My name is Todd J. Cahill and my business address is 8330 Century Park Court, San Diego, California 92123. I am currently employed by Sempra Energy Utilities as a Regulatory Case Manager. My responsibilities include managing the groups responsible for SDG&E's electric and gas tariffs and records management, as well as managing certain cases before the CPUC. I assumed my current position in April 2009. Prior to my current position, I served as the Regulatory Tariff Manager for SDG&E from August 2006 through March 2009. I joined Regulatory Affairs in 2000, and have been employed by SDG&E and Sempra Energy since 1999.

I received a Bachelors of Arts in Political Science from Brigham Young University in 1998. I also received a Masters in Business Administration from San Diego State University in 2010.

I have previously testified before this Commission.

#### **CHANGE LOGS**

# SCG 2012 GRC Testimony Errata Log

Exhibit	Witness	Page	Line	Errata Item
SCG-32	Todd	TJC-	28, 1-4	Corrected methodology for forecasting crude oil revenues:
	Cahill	6,7		
				Replaced:
				"The 2012 estimate is based on the most recent U.S. Energy Information
				Administration ("EIA") price forecasts, adjusted for the historical differentials
				between the benchmark West Texas Intermediate price and the price received at
				the various storage fields. The price varies by storage field because of the
				differences in the quality of oil."
				Inserted:
				"The oil sales revenue estimate is based on the forecasted price of oil times
				forecasted volumes. The price forecast is based on a recent NYMEX futures
				strip for West Texas Intermediate crude oil, adjusted for the historical
				differentials between the benchmark West Texas Intermediate price and the
				price received at the various storage fields. The oil volume is based on trending
				of recent years volumes."
				_

# SCG 2012 GRC Testimony Tax Relief Act Change Log

Exhibit	Witness	Page	Line	Tax Relief Act Item
SCG-32	Todd	TJC-1	Table	Changed "65,918" to "65,134" in 2012 Test Year column
	Cahill			
				Changed "34,690" to "33,906" in Net Change column
				Changed "103,197" to "102,413" in 2012 Test Year column
				Cl.,, 1 (35, 222) 4, (24, 540) N.4 Cl.,,
				Changed "25,332" to "24,548" in Net Change column
SCG-32	Todd	TJC-7	Table "ITCC	Changed "4,101" to "3,317" in 2012 Test Year columm
	Cahill		("Income	
			Tax	Changed "1,391" to "687" in Net Change column
			Component	
			of CIAC")	
			(\$000's)"	