

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

In the Matter of the Application of Southern
California Gas Company (U 904 G) Requesting
Reauthorization of the Customer Incentive Program.

Application 16-12-_____
(Filed December 21, 2016)

**APPLICATION OF
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
REQUESTING REAUTHORIZATION OF THE CUSTOMER
INCENTIVE PROGRAM**

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Dated: December 21, 2016

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INCENTIVE PROGRAM**

Pursuant to the California Public Utilities Commission (Commission or CPUC) Ordering Paragraph 6 in Resolution G-3515 dated May 12, 2016 (Resolution), Southern California Gas Company (SoCalGas) hereby submits its Application seeking (1) reauthorization for its Customer Incentive Program (CIP), previously called the Core Pricing Flexibility Program and the Noncore Competitive Load Growth Opportunities Program (the Programs);¹ (2) approval of tariff GO-CIP, which will serve as the sole stand-alone tariff for the CIP; and (3) the closure of Rule 38, GO-ET, GTO-ET, GO-IR and GTO-IR to any new customers once a decision is issued on this Application.

I. BACKGROUND

Currently, SoCalGas has two customer incentive programs; (1) the Core Pricing Flexibility Program, authorized by Decision (D.) 97-07-054 with further programmatic details being provided in D.98-01-040; and (2) the Noncore Competitive Load Growth Program, established in D.00-04-060 and consisting of two programs – (a) the California Red Team Economic Development Effort (“Red Team”), and (b) SoCalGas Rule 38.

¹ For purposes of this Application, the current Core Pricing Flexibility Program and the Noncore Competitive Load Growth Opportunities Program are referred to as the Programs, collectively. The modification to the Programs submitted for approval in this Application is referred to as CIP.

The Core Pricing Flexibility Program allows SoCalGas to offer discounted natural gas transmission rates to both new and existing customers for up to five years. Additional details of this program were initially approved in Advice No. 2687/2687-A. The Noncore Competitive Load Growth Program authorizes SoCalGas' revenue treatment for contracts. The Red Team program was a state-sponsored program designed to promote the creation and retention of business in California. Rule 38 was designed to evaluate the performance of nonresidential, high-efficiency technology.

On March 2, 2016, the Commission issued an initial draft Resolution² in which the Commission raised certain questions about these Programs, including, for example, whether these programs remain consistent with legislation that has been enacted subsequent to the Programs' institution and current Commission policy; and whether the shareholder/ratepayer split of incremental net revenue from the Core Pricing Flexibility Program is consistent with D.98-01-040. Based on these questions, the Commission proposed to suspend the Programs.

On March 21, 2016, SoCalGas submitted comments in which SoCalGas argued, among other arguments, that these customer programs supported customer investments in energy efficient technologies, and that energy efficiency and associated technology gains could be lost if the programs were suspended immediately.

On May 16, 2016, the Commission issued a final Resolution (Final Resolution) in which the Commission acknowledged SoCalGas' arguments concerning the need for the Programs given the potential lost opportunities for investments in energy efficiency technologies. The Commission therefore authorized SoCalGas to continue these programs with certain conditions through 2016.³

² A revised draft Resolution was later issued on April 21, 2016.

³ See, e.g., Final Resolution, pp. 8-9 & Ordering Paragraph (OP) 2, 4.

In addition, the CPUC authorized SoCalGas to submit a new application seeking reauthorization of the Programs, if SoCalGas wishes to continue the Programs in 2017 and beyond.⁴

This Application is in response to the CPUC's authorization to submit a new application in order to continue the Programs, as modified, beyond 2017.⁵

II. PURPOSE OF APPLICATION AND RELIEF SOUGHT

The purpose of this Application is to seek Commission reauthorization of the modified Core Pricing Flexibility and Noncore Competitive Load Growth Opportunities Programs, referred to as the CIP. SoCalGas modified components of the CIP to address the questions raised in the Resolution, and to streamline the customer offerings. In addition, SoCalGas requests approval of the proposed tariff GO-CIP, which will serve as the sole stand-alone tariff for the CIP and the closure of Rule 38, GO-ET, GTO-ET, GO-IR and GTO-IR to new customers once a decision is issued.

III. DESCRIPTION OF CUSTOMER INCENTIVE PROGRAM

The CIP is fully elective, optional, and nondiscriminatory tariff service that will offer an incentive to customers which is fully funded by shareholders. The CIP will provide customers an opportunity to acquire new natural-gas technology that is cleaner or more energy efficient than an alternative technology the customer would have otherwise chosen.

SoCalGas' CIP supports the State's effort to transform California's energy economy to cleaner solutions, to give consumers cleaner and more efficient energy technology choices, and to improve the State's energy resiliency. The CIP will help ease issues commonly faced by customers, such as high upfront technology costs, and their impact on business operations. In turn, as customer demand for energy efficient and cleaner technology grows with the CIP, manufacturers can be encouraged to pursue industry innovation for energy efficient or clean technologies.

⁴ Final Resolution, OP 6.

⁵ Final Resolution, at 1.

If a customer is interested in benefiting from the CIP, the CIP establishes eligibility criteria with certain subcomponents.⁶ One of those criteria is to require any new natural-gas technology to either: (a) be more energy efficient than what the customer would have otherwise installed; or (b) reduce greenhouse gas and/or criteria air pollutants emissions. In order to meet the energy efficiency and emissions reductions, SoCalGas proposes to use objective standards, like the Federal Energy Regulatory Commission's (FERC) efficiency standard or to require that the technology be at least 10% more efficient than a lower cost alternative.

If a customer meets the eligibility criteria, then the customer will be offered two incentive options, either: (1) a one-time incentive payment (Upfront Payment Incentive); or (2) a rate discount applied through the term of the contract (Rate Discount Incentive).⁷ All eligible customers will have the choice of one of the two options available to them. In addition, SoCalGas proposes to give customers the ability to receive an additional incentive above their selected incentive option if they procure and use renewable natural gas (RNG).

SoCalGas also proposes certain program controls in order to monitor customer use. In order to deter free-ridership, SoCalGas proposes to require an economic analysis on each project to calculate the time it will take for a customer to pay back the incentive. SoCalGas will use this analysis to fund only those projects that exceed a three-year payback timeframe since these projects are likely to require additional funding to move forward. If the project meets the payback timeframe, SoCalGas will then require all participating customers to sign an affidavit attesting to the fact that the incentive was a material factor in committing to the project.

In addition, SoCalGas is committed to protecting ratepayers and therefore, will fund the Public Purpose Program (PPP) surcharge resulting from the expected incremental gas load. SoCalGas will only receive the transmission revenue during the length of the contract (which will

⁶ The program mechanics are discussed in Chapter I, Testimony of Tuan Nguyen.

⁷ See Chapter I.

be no more than 59 months). Ratepayers are expected to benefit from increased PPP surcharge revenue for the remaining life of the technology, which SoCalGas anticipates to be approximately 15 years. Moreover, any shortfall from the contracted expected PPP surcharge growth will be funded by SoCalGas shareholders.

As discussed in greater detail in Chapter III testimony, SoCalGas proposes to continue the regulatory accounting treatment of revenues under the CIP similar to the treatment of revenues under the previous Programs. The regulatory treatment will continue to use the Core Fixed Cost Account (CFCA) and Noncore Fixed Cost Account (NFCA) adjustment mechanisms on an annual basis to ensure that ratepayers are isolated from any risk from offering discounted core and noncore rates, respectively, and upfront cash incentives.

IV. SUPPORTING TESTIMONY

In support of the Application, SoCalGas attaches, and incorporates herein by reference, the testimony of the following witnesses:

- **Chapter I (Rasha Prince)** – This chapter discusses the policy foundations for the new CIP and describes how components of the CIP have been designed to support and to align with current California policies.
- **Chapter II (Tuan Nguyen)** – This chapter describes the proposed CIP, its components, and how the services will be delivered to customers.
- **Chapter III (Reginald M. Austria)** – This chapter provides a description of the cost tracking procedures and regulatory accounting treatment that will be put in place to ensure that the costs of CIP are funded by shareholders and that ratepayers are isolated from any risk.

V. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Authority – Rule 2.1

This Application is made pursuant to Resolution G-3515, Sections 454, 701, 728, 729, and 1701 of the Public Utilities Code of the State of California, the Commission's Rules of Practice and Procedure, and relevant decisions, orders, and resolutions.⁸

B. Corporate Information – Rule 2.1(a)

SoCalGas is a public utility organized and existing under the laws of the State of California. SoCalGas' principal place of business and mailing address is 555 West Fifth Street, Los Angeles, California 90013.

C. Correspondence – Rule 2.1(b)

All correspondence and communications regarding this Application should be addressed to:

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⁸ This application does not identify any safety considerations associated with its requested relief.

D. Proposed Category of Proceeding, Need for Hearings, Issues, and Schedule – Rule 2.1(c)

SoCalGas proposes that this proceeding be categorized as “ratesetting” within the meaning of Commission Rules 1.3(e) and 7.1. SoCalGas believes that evidentiary hearings may be required. The issue to be considered in this proceeding is whether the Commission should approve SoCalGas’ proposed CIP, including the approval of the tariff GO-CIP, which will serve as the sole stand-alone tariff for the CIP, and should close Rule 38, GO-ET, GTO-ET, GO-IR and GTO-IR to new customers once a decision is issued.

SoCalGas proposes the following schedule for this Application:

Event	Date
Application filing date	December 21, 2016
Protests due	January 20, 2017 (30 days from Daily Calendar notice)
Replies to protests	January 30, 2017
Prehearing conference	February 13, 2017
Opening intervenor testimony	March 15, 2017
Concurrent rebuttal testimony	March 22, 2017
Evidentiary hearings (if needed)	May 1, 2017
Opening briefs	May 30, 2017
Reply briefs	June 14, 2017
CPUC issues Proposed Decision	August 14, 2017
CPUC issues Final Decision	4 th Quarter, 2017

E. Articles of Incorporation – Rule 2.2

A copy of SoCalGas’ Restated Articles of Incorporation, as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission

on October 1, 1998, in connection with A.98-10-012, and is incorporated herein by reference.

F. Balance Sheet and Income Statement – Rule 2.3

Attachment A to this Application is SoCalGas' Balance Sheet as of June 30, 2016.

Attachment B to this Application is SoCalGas' Income Statement for the three-month period ending June 30, 2016.

G. Rates - Rule 3.2

Rule 3.2 of the Commission's Rules of Practice and Procedure applies to applications "for authority to increase rates, or to implement changes that would result in increased rates." Because this application does not seek authority to increase rates, or to implement changes that would result in increased rates, Rule 3.2 is not applicable. Therefore, SoCalGas does not intend to undertake the notification efforts required under this rule.

H. Service and Notice – Rule 1.9

SoCalGas is serving this Application on all parties to the Resolution including service lists General Order 96-B, A.11-11-002, and A.10-12-006.

VI. RELIEF REQUESTED

SoCalGas respectfully requests that the Commission approve this Application in its entirety including:

1. Reauthorization for its CIP;
2. Approval of tariff GO-CIP, which will serve as the sole stand-alone tariff for the CIP; and
3. Closure of Rule 38, GO-ET, GTO-ET, GO-IR and GTO-IR to any new customers once a decision is issued on this Application.

VII. CONCLUSION

WHEREFORE, SoCalGas respectfully requests that the Commission approve this Application in its entirety.

Respectfully submitted,
SOUTHERN CALIFORNIA GAS COMPANY

By: /s/ Lisa Alexander
Lisa Alexander
Vice President of Customer Solutions
and Communications

By: /s/ Nancy S. Whang
Nancy S. Whang

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December 21, 2016

ATTACHMENT A

SoCalGas Balance Sheet

**SOUTHERN CALIFORNIA GAS COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
JUNE 30, 2016**

1. UTILITY PLANT		<u>2016</u>
101	UTILITY PLANT IN SERVICE	\$13,986,078,464
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	856,897,407
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,096,746,618)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(47,694,258)
117	GAS STORED-UNDERGROUND	<u>61,422,045</u>
	TOTAL NET UTILITY PLANT	<u>9,759,957,040</u>
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	32,720,092
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(12,904,221)
123	INVESTMENTS IN SUBSIDIARY COMPANIES NONCURRENT PORTION OF ALLOWANCES	- 93,815,426
124	OTHER INVESTMENTS	13,819
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>3,000,000</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>116,645,116</u>

Data from SPL as of September 20, 2016.

SOUTHERN CALIFORNIA GAS COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
JUNE 30, 2016

3. CURRENT AND ACCRUED ASSETS		2016
131	CASH	210,556,754
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	93,915
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	372,827,301
143	OTHER ACCOUNTS RECEIVABLE	381,625,636
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(7,221,498)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(951,035)
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	44,465,550
155	MERCHANDISE	10,057
156	OTHER MATERIALS AND SUPPLIES	-
158	GHG ALLOWANCE	110,737,203
	(LESS) NONCURRENT PORTION OF ALLOWANCES	(93,815,426)
163	STORES EXPENSE UNDISTRIBUTED	51,379
164	GAS STORED	-
165	PREPAYMENTS	17,477,340
171	INTEREST AND DIVIDENDS RECEIVABLE	3,643,473
173	ACCRUED UTILITY REVENUES	-
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	39,636,913
175	DERIVATIVE INSTRUMENT ASSETS	1,939,454
176	LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES	-
	TOTAL CURRENT AND ACCRUED ASSETS	1,081,077,016
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	20,152,903
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,075,206,272
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	1,454,893
184	CLEARING ACCOUNTS	(1,281,084)
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	480,032,671
188	RESEARCH AND DEVELOPMENT	1,160,756
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	8,629,125
190	ACCUMULATED DEFERRED INCOME TAXES	549,611,724
191	UNRECOVERED PURCHASED GAS COSTS	-
	TOTAL DEFERRED DEBITS	3,134,967,260
	TOTAL ASSETS AND OTHER DEBITS	\$ 14,092,646,432

Data from SPL as of September 20, 2016.

**SOUTHERN CALIFORNIA GAS COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
JUNE 30, 2016**

5. PROPRIETARY CAPITAL

	2016
201 COMMON STOCK ISSUED	(834,888,907)
204 PREFERRED STOCK ISSUED	(21,551,075)
207 PREMIUM ON CAPITAL STOCK	-
208 OTHER PAID-IN CAPITAL	-
210 GAIN ON RETIRED CAPITAL STOCK	(9,722)
211 MISCELLANEOUS PAID-IN CAPITAL	(31,306,680)
214 CAPITAL STOCK EXPENSE	143,261
216 UNAPPROPRIATED RETAINED EARNINGS	(2,474,606,959)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	18,176,119
TOTAL PROPRIETARY CAPITAL	(3,344,043,963)

6. LONG-TERM DEBT

221 BONDS	(3,000,000,000)
224 OTHER LONG-TERM DEBT	(9,338,770)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	7,775,376
TOTAL LONG-TERM DEBT	(3,001,563,395)

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	57,350
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(158,719,762)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(800,242,431)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	(1,726,355,251)
TOTAL OTHER NONCURRENT LIABILITIES	(2,685,260,094)

Data from SPL as of September 20, 2016.

**SOUTHERN CALIFORNIA GAS COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
JUNE 30, 2016**

8. CURRENT AND ACCRUED LIABILITES		2016
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	(457,730,967)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(16,444,483)
235	CUSTOMER DEPOSITS	(71,700,643)
236	TAXES ACCRUED	(4,118,032)
237	INTEREST ACCRUED	(19,542,627)
238	DIVIDENDS DECLARED	(323,265)
241	TAX COLLECTIONS PAYABLE	(15,533,955)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(168,258,421)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(1,353,526)
244	DERIVATIVE INSTRUMENT LIABILITIES	(1,326,966)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	(756,332,885)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(78,780,912)
	OTHER DEFERRED CREDITS	(254,065,058)
254	OTHER REGULATORY LIABILITIES	(1,776,417,370)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(12,404,170)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,573,375,556)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(610,403,029)
	TOTAL DEFERRED CREDITS	(4,305,446,095)
	TOTAL LIABILITIES AND OTHER CREDITS	\$ (14,092,646,432)

Data from SPL as of September 20, 2016.

ATTACHMENT B

SoCalGas Income Statement

SOUTHERN CALIFORNIA GAS COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
6 MONTHS ENDED JUNE 30, 2016

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		1,647,007,207
401	OPERATING EXPENSES	904,272,332	
402	MAINTENANCE EXPENSES	146,920,167	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	245,779,388	
408.1	TAXES OTHER THAN INCOME TAXES	43,794,103	
409.1	INCOME TAXES	26,817,502	
410.1	PROVISION FOR DEFERRED INCOME TAXES	175,093,572	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(145,679,351)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(1,282,375)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	(128,526)	
411.7	LOSS FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		1,395,586,812
	NET OPERATING INCOME		251,420,395

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES FROM NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(172,778)	
418	NONOPERATING RENTAL INCOME	267,436	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	547,773	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	20,289,101	
421	MISCELLANEOUS NONOPERATING INCOME	(1,227,924)	
421.2	LOSS ON DISPOSITION OF PROPERTY	(425,889)	
	TOTAL OTHER INCOME	19,277,719	
425	MISCELLANEOUS AMORTIZATION	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	(26,113,961)	
		(26,113,961)	
408.2	TAXES OTHER THAN INCOME TAXES	(32,599)	
409.2	INCOME TAXES	479,304	
410.2	PROVISION FOR DEFERRED INCOME TAXES	(31,224,611)	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	27,291,026	
420	INVESTMENT TAX CREDITS	-	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	(3,486,880)	
	TOTAL OTHER INCOME AND DEDUCTIONS		(10,323,122)
	INCOME BEFORE INTEREST CHARGES		241,097,273
	NET INTEREST CHARGES*		45,958,921
	NET INCOME		\$195,138,352
			\$0

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION. (\$3,284,075)

Data from SPL as of September 20, 2016.

STATEMENT OF INCOME AND RETAINED EARNINGS
6 MONTHS ENDED JUNE 30, 2016

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$2,280,115,139
NET INCOME (FROM PRECEDING PAGE)	195,138,352
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(646,532)
OTHER RETAINED EARNINGS ADJUSTMENT	-
RETAINED EARNINGS AT END OF PERIOD	<u><u>\$2,474,606,959</u></u>

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**NOTICE OF AVAILABILITY FOR APPLICATION OF
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
REQUESTING REAUTHORIZATION OF THE CUSTOMER
INCENTIVE PROGRAM**

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(Filed December 21, 2016)

NOTICE OF AVAILABILITY

To All Parties of Record in General Order 96-B, A.11-11-002, and A.10-12-006:

Pursuant to Rule 1.9 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Southern California Gas Company (SoCalGas) hereby provides this Notice of Availability for the **APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) REQUESTING REAUTHORIZATION OF THE CUSTOMER INCENTIVE PROGRAM**, filed with the Commission and served via this email to the official service lists on December 21, 2016, in the above-captioned docket. The referenced submittal can be found on SoCalGas' website at:

<https://www.socalgas.com/regulatory/A1612xxx.shtml>.

Individuals may receive a copy of the application and testimony by directing your request in writing to:

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