SOUTHERN CALIFORNIA GAS COMPANY

REQUESTING REAUTHORIZATION OF THE CUSTOMER INCENTIVE PROGRAM

(A.16-12-010)

(DATA REQUEST ORA-06)

Date Requested: August 9, 2017
Date Responded: August 25, 2017

QUESTION 1:

Starting at line 12 on page 1 of the above subject, SoCalGas states:
The CFCA and NFCA adjustment mechanisms are described in SoCalGas' current Preliminary Statement Part XI, Performance Based Regulation, under Sections F.5 (reproduced below under the heading "Section F.5 for the CFCA Adjustment Mechanism from the SoCalGas Current Preliminary Statement Part XI"). and G.2.d. (reproduced below under the heading, "Section G.2.d for the NFCA adjustment mechanism from the SoCalGas' current Preliminary Statement Part XI"), respectively. As discussed in Chapter II Testimony, under CIP, customers are provided an upfront cash incentive or a discount rate. Under the upfront cash incentive, any incremental revenues above base revenues (i.e., baseload at non-discounted rates) are removed from the NFCA or CFCA and allocated to shareholders, resulting in only base revenues credited to the NFCA or CFCA. Below is an example of CFCA/NFCA adjustments for a customer given an upfront cash incentive for technologies to produce incremental noncore load but may be partially offset by a reduction in the customer's core consumption below the customer's core baseload. As shown in the example below, the CFCA is appropriately credited with core base revenues to ensure core ratepayers are not impacted by the customer's contract under CIP.

Section F.5 for the CFCA adjustment mechanism from the SoCalGas' current Preliminary
Statement Part XI

F. CORE PRICING FLEXIBILITY (Continued)
5. CFCA Adjustment Mechanism
This mechanism is designed to protect core customers by calculating those revenues which represent base revenues that would have been credited to the CFCA absent any optional tariffs
or negotiated rates.

a. Unless otherwise noted, base revenues are calculated by multiplying base volumes times the Otherwise Applicable Tariff rate plus the customer charge, where base volumes are the amount of gas the customer would have used in the absence of the optional tariff or negotiated rate.

b. When load being served under optional tariffs and negotiated rates is not separately metered, base volumes are established using the last 12 months recorded usage. In certain cases,
base volumes are adjusted, as described in section I.6, for temperature variations.

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c. SoCalGas credits the CFCA with aggregate base revenues annually for all customers participating in the optional tariffs and negotiated rate program. This annual credit is calculated
as the sum of the monthly base revenues.

d. CFCA Credits

1) New Customers
For a new customer who provides an affidavit stating they would not have become a customer absent the discounted rate, base volume equals zero, and there is no credit to the CFCA. For a new customer who does not provide an affidavit, the base volume equals the actual
volume, and the CFCA credit is equal to 100% of the expected revenue under the Otherwise Applicable Tariff [i.e., 100% *(total metered actual volumes * Otherwise Applicable Tariff rate + customer charge)].

2) Existing Customers - Load Retention

The CFCA credit is equal to 95 % of actual revenue [i.e., 95% * (total metered actual volumes * optional tariff rate + customer charge)]; the remaining 5% of actual revenues goes to SoCalGas shareholders.

3) Existing Customers – Load Gain

a) Not Temperature Sensitive

Since customers with an annual load of less than 3,000 therms per year are treated as temperature sensitive, this category applies only to core commercial and industrial customers who use more than 3,000 therms in the base year, and have a seasonal factor less than 2.3. For these customers, base volumes equal the volume for the 12 months preceding the customer's participation in the optional tariff program.

b) Temperature Sensitive

For customers to whom the TAM applies, SoCalGas will use temperature-adjusted base volumes, as described in section I.6.

e. In the event proposed optional tariffs present special circumstances that may cause the CFCA adjustment mechanism to be clearly inappropriate or inaccurate, SoCalGas will

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propose, by advice letter filing, an alternative CFCA adjustment mechanism. Under such special
circumstances, other parties may also propose alternate CFCA adjustment mechanisms.

f. The revenue calculation for the CFCA adjustment mechanism shall remain unaffected by Backbone Transmission Service (BTS) implementation per D.11-04-032

Section G.2.d for the NFCA adjustment mechanism from the SoCalGas' current Preliminary Statement Part XI

G. TRIENNIAL COST ALLOCATION PROCEEDING (TCAP) (Continued)

2. Noncore Competitive Load Growth Opportunities – Revenue Treatment (Continued)
d). Regulatory Requirements

1) At the end of every calendar year, SoCalGas shall file with the Commission a confidential report showing a summary of activity under this program. The report will show the number of qualifying contracts, qualifying volumes, revenues received for qualifying volumes, and amounts
credited to ratepayers for baseload volumes.

2) Customer must sign an affidavit attesting that the contract structure (in case of Red Team contracts) or the incentives (in case of Rule 38) were a material factor in the customer's decision to participate.

3) SoCalGas shall track all volumes that qualify under this program. These volumes will be excluded from forecasts adopted for cost allocation purposes for a period of five years after the start of each contract.

4) Revenues from customers and contracts qualifying under this are separated into two components:

a) Baseload revenues, calculated as the applicable baseload volumes times the otherwise applicable tariff.

b) Load growth related revenues, calculated as total revenues received from the customers minus baseload revenues.

Baseload revenues will be credited to the Noncore Fixed Cost Account. Load Growth Related Revenues will be credited to the shareholder.

5) SoCalGas will track any contract specific costs incurred to support volumes qualifying under this program. Any costs incurred for separate metering, service lines, regulators, main extensions, etc. to serve specific locations that qualify under this program would be tracked. As long as the contract volumes are exempt from inclusion in cost allocation proceedings, these costs will not be included in the authorized utility revenue requirement.

In addition, **on SoCalGas Application (A.) 16-12-010 Chapter 3 Supporting Testimony page 2, SoCalGas states the following, including assumptions and CFCA/NFCA Adjustments:**
Assumptions – Upfont Cash:

-Project adds 500 therms to a noncore meter, but offsets 100 therms on core meter
-Actual core and noncore revenues have already been recorded to applicable fixed cost balancing accounts
-Calculation of usage offset: Based on expected loss revenues or available heat data provided by customer.
-Contract Term: 59 Months; Minimum Annual Quantities (MAQ): 20 therms per month
-Customer Incentive (funded by SCG shareholders): $1000
- Incremental Noncore Usage 500 therms
- Baseload Core Usage 400 therms
- Actual Core Usage 300 therms
-Expected Loss Core Usage 100 therms
- Transportation Cost $ 0.10 per therm

CFCA/NFCA Adjustments:
Ratepayer - (over)/ Shareholder - under collection (gain)/loss
Credit CFCA for Expected Loss Core Usage:
Core Loss Usage -100
Transportation Cost $ 0.10
CFCA Credit Adjustment1/ ($10) $10

NFCA Adjustment:
Noncore Incremental Usage2/ 500
Transportation Cost $ 0.10
NFCA Adjustment3/ $50 ($50)

______________ __________
Net Annual Balancing Account Adjustments/Shareholder Impact $40 ______ ($40)_____

Project incremental revenues over contract term ($2,360)
Shareholder funded incentive $1,000____
Net Shareholder (Gain)/Loss over contract term ($1,360)___
1/ To credit ratepayers for loss revenues.
2/ This includes billings to customer if customer usage falls below monthly MAQ. For example, if noncore usage is 10
therms lower than the MAQ, customer is billed for the revenue shortfall of $1.00 (i.e., [20 therms MAQ minus 10 therms
noncore usage] x $0.10/therm).
3/ To adjust NFCA for incremental revenues initially balanced during the year.

With all of this context in mind, please respond to the questions below:

(a) Please clarify whether the 500 therms added to a noncore meter by the Project in the Hypothetical example is assumed to be the net incremental load (above the baseline load) and specify whether this is stated on an annual basis, monthly basis, or something else.

(b) Would it be accurate to assume that the customer in the above SoCalGas hypothetical example of a Project that adds 500 therms to a noncore meter is an existing noncore customer who adds 500 therms of incremental usage from his CIP Project?

> (1) If this is an existing noncore customer, then explain how the base load revenues will
> be determined from the actual revenues;
>
> (2) If not an existing noncore customer, then please clarify whether the example assumes a new load from a new noncore customer and explain how the baseload volumes and actual volumes are determined.

(c) In the box under the title “Assumptions – Upfront Cash”, the assumptions are silent regarding the actual noncore usage. Please explain whether the example assumes the 500 therms of
“Incremental Noncore Usage” is based on estimated incremental usage or if the 500 therms is
assumed to also be the actual usage by the noncore customer.

(d) If the answer to item (a) above confirms that the customer whose Project adds 500 therms is
noncore, then please explain why it would be reasonable to assume that the hypothetical Project in the example would also offset 100 therms on a core meter. The stated assumption

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"Project adds 500 therms to a noncore meter, but offsets 100 therms on core meter" needs to be clarified in terms of explaining the connection between the noncore customer whose Project adds 500 therms and the corresponding core meter offsets of 100 therms that are assumed.

Please include an explanation of how the terms "offsets" and "core loss usage" are being used here in relation to the Project.

(e) If the answer to item (a) above confirms that the customer whose Project adds 500 therms is
noncore, can SoCalGas provide all past examples in which a Project added 500 therms to a noncore meter, but offset 100 therms on a core meter?

1. If SoCalGas cannot provide any such examples, please say so.
2. If SoCalGas provides the requested examples, please explain how the terms "offsets" and "core loss usage" as defined in response to question 1(d) were used in these instances.

(f) The assumptions are silent regarding the actual core and noncore revenues, stating only that
"Actual core and noncore revenues have already been recorded to applicable fixed cost balancing accounts." Please provide the explicit assumptions regarding actual core and noncore revenues that are supposed to have already been recorded in this hypothetical.

(g) The assumptions are silent regarding the calculation of the usage offset, stating only that the
"Calculation of usage offset: Based on expected loss revenues or available heat data provided by customer."

1. Please explain why it would be necessary to assume a baseload Core Usage for a Project that adds 500 therms to a noncore meter.
2. Similarly, please explain why it would be necessary to record an actual core usage for a Project that adds 500 therms to a noncore meter.
3. Please provide the explicit assumptions which are required or would be necessary in the calculation of the usage offset based on the hypothetical example used to illustrate
CFCA/NFCA Adjustments.

(h) SoCalGas states in the above "the CFCA is appropriately credited with core base revenues to ensure core ratepayers are not impacted by the customer's contract under CIP."

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Please explain how the CFCA is appropriately credited with core base revenues and ensure core ratepayers are not impacted by the customer contract under CIP.

(i) The above assumptions state a contract term of 59 months, an MAQ of 20 therms per month, and an upfront customer incentive of $1000 funded by SCG shareholders. Please provide the
calculation of the upfront customer incentive of $1000 based on the given assumptions of the hypothetical example. Please explicitly state any necessary additional assumptions in order to do the calculation.

(j) Would it be accurate to say that the noncore customer in the example would qualify for the proposed CIP upfront cash incentive based on an MAQ of 240 therms per year (i.e., 20 therms x
12 months)?

1. If so, would it also be accurate to say that the noncore customer could be billed for any
revenue shortfall in case the actual usage falls below the MAQ of 20 therms per month?

2. Using the assumption in footnote 2 of this example (i.e., noncore usage is 10 therms lower than the MAQ), then would it be accurate to say that the noncore customer could be billed for $12 if the noncore usage is 10 therms lower than MAQ each month for the next 12 months?

3. Pursuing this example further, would it be accurate to say that the noncore customer could be billed for a total of $60 if the noncore usage is 10 therms lower than the MAQ each month for the entire contract term in the example?

4. If so, at the end of the contract term, would it be accurate to say that the noncore customer in the example receives an upfront incentive of $1000 but would be billed for a total of $60 of revenue shortfalls?

((k) If the actual usage of the noncore customer in the example above is equal to the MAQ of 20
therms per month, then please explain how SoCalGas would calculate the energy efficiency benefits of this noncore customer, and provide the quantitative calculation.

(l) If the actual usage of the noncore customer in the example above is in excess of the MAQ of 20 therms per month, and in this example, the incremental noncore usage is 500 therms,

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then please explain how SoCalGas would calculate the energy efficiency benefits of this noncore customer, and provide the quantitative calculation.

(m)The SoCalGas example above shows a CFCA Credit Adjustment of ($10) for ratepayers and $10 for shareholders and an NFCA Adjustment of $50 for ratepayers and ($50) for shareholders, or net annual balancing account adjustments/shareholder impact of $40 for ratepayers and ($40) for shareholders. Please explain in detail how the above described portions of Section F.5 and G.2.d for the CFCA/NFCA adjustment mechanism from the SoCalGas' current Preliminary Statement Part XI were applied to arrive at the stated amounts of the CFCA/NFCA Credit Adjustments.

(n) Please explain how SoCalGas determined the Project Incremental Revenues over the contract term in the amount of ($2,360) in the example above.

RESPONSE 1:

Please note that the hypothetical example presented in the Prepared Direct Testimony of Reginald M. Austria at page 2 is corrected herein and will be corrected on the stand, changes are noted in bold and strikethrough.

Assumptions - Upfront Cash:

- Project adds 500 therms to a noncore meter, but offsets 100 therms on core meter
- Actual core and noncore revenues have already been recorded to applicable fixed cost balancing accounts
- Calculation of usage offset: Based on expected loss revenues or available heat data provided by customer.
- Contract Term: 59 Months; Minimum Annual Quantities (MAQ): 20 therms per month
- Customer Incentive (funded by SCG shareholders): ~~$1000~~ **$100**

- Incremental Noncore Usage	500	therms
- Baseload Core Usage	400	therms
- Actual Core Usage	300	therms
Expected Loss Core Usage	100	therms
- Transportation Cost	$ 0.10	per therm

CFCA/NFCA Adjustments:

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		Ratepayer - (over)/ under collection	Shareholder - (gain)/loss	
Credit CFCA for Expected Loss Core Usage:				
Core Loss Usage	-100			
Transportation Cost	$ 0.10			
CFCA Credit Adjustment[1/]		($10)	$10	
NFCA Adjustment:				
Noncore Incremental Usage[2/]	500			
Transportation Cost	$ 0.10			
NFCA Adjustment[3/]		$50	($50)	
Net Annual Balancing Account Adjustments/Shareholder Impact		$40	($40)	
Project incremental revenues over contract term			~~($2,360)~~	**($197)**
Shareholder funded incentive			~~$1,000~~	**$100**
Net Shareholder (Gain)/Loss over contract term			~~($1,360)~~	**($97)**

[1/] To credit ratepayers for loss revenues.

[2/] This includes billings to customer if customer usage falls below monthly MAQ. For example, if noncore usage is 10 therms lower than the MAQ, customer is billed for the revenue shortfall of $1.00 (i.e., [20 therms MAQ minus 10 therms noncore usage] X $0.10/therm).

[3/] To adjust NFCA for incremental revenues initially balanced during the year.

(a) The 500 therms in the example is assumed to be the net incremental load and represents an annual amount.

(b) In the hypothetical example, the customer is an existing core customer but increases usage as a noncore customer as a result of the installation of energy efficient technology. In this case, 100% of the customer's actual noncore usage is considered incremental since there was no noncore baseload volumes.

(c) Please see response 1.b.

(d) Please see response to 1.b., above. The example is for a hypothetical project where the new technology offsets usage on a different meter. This hypothetical example was selected to illustrate the regulatory accounting mechanisms. Offsets refer to the

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amount of heat that may be utilized from the project to reduce usage on the core meter. Core usage loss refers to the actual reduction of gas usage on the core meter.

(e) Please see response to 1.b., above. The example is for a hypothetical project where the new technology offsets usage on a different meter. This hypothetical example was selected to illustrate the regulatory accounting mechanisms. SoCalGas does not have past examples where a project added 500 therms to a noncore meter but offset 100 therms on a core meter.

(f) In the example, actual noncore and core revenues are $50 (500 therms times $0.10 per therm) and $30 (300 therms times $0.10 per therm), respectively.

(g) (1) In the hypothetical example, if the technology the customer chooses has its own noncore meter and offsets usage on a separate existing core meter, a baseload for the existing core meter should be established so ratepayers do not see a reduction in revenues from the core meter due to the new technology.

(2) In the hypothetical example, it is necessary to record an actual core usage because the new technology affects the baseload of an existing core meter. The difference between the baseload and actual usage would be calculated to determine whether a CFCA credit adjustment is necessary.

(3) In the hypothetical example, no assumptions were necessary for recording revenue. The baseline would be set at an average of the previous 24 months and the actual usage would be compared against the baseline.

(h) Since actual core revenues of $30 (300 therms times $0.10 therms) is currently recorded in the CFCA, this is $10 (100 therm core usage loss times $0.10 per therm) lower than the customer's core baseload revenues of $40 (400 therms times $0.10 per therm). In order to isolate ratepayers from being allocated the undercollection ($10) of these revenues that are recorded in the CFCA, a credit adjustment of $10 is required to be recorded in the CFCA, which allocates the revenue shortfall to shareholders.

(i) As the customer is adding 500 therms/year on the noncore meter, but offsetting 100 therms on a core meter, this would be an annual net revenue of $40/year, which would provide an incentive cap of $197 ($40 / 12 months * 59 months). The $100 incentive, as reflected in the corrected example, is an example of a negotiated amount with the customer. As the amount is negotiated, there is no explicit calculation.

(j) Yes.

(1) Yes.

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(2) Yes, the noncore customer would be billed $12 if the noncore usage was 10 therms each month.

(3) No, the noncore customer would be billed $59 if they were 10 therms short for the entire length of the contract as the contract is for 59 months

(4) As SoCalGas clarified in its response to Question I, above, the customer would receive an upfront incentive of $100 not $1000. With this correction, the noncore customer would receive an upfront incentive of $100 but be billed for $59 of shortfall.

(k) SoCalGas objects to this request on the grounds that it is an incomplete hypothetical and is therefore vague and ambiguous. Notwithstanding the objection, SoCalGas responds as follows: In responding to this question, SoCalGas assumes that the customer is qualified under the criteria that requires the technology being purchased is 10% more efficient than a lower cost version. Based on this and the following assumption, if the customer used 500 therms, the less efficient technology would have used at least 556 therms (500 / .9 = 556). Therefore, the new technology would use 56 therms less than what they could have used.

(l) SoCalGas objects to this request on the grounds that it is an incomplete hypothetical and is therefore vague and ambiguous. Notwithstanding the objection, SoCalGas responds as follows: See Answer (K).

(m) The $10 CFCA credit adjustment is consistent with Section F.5.c. as discussed in response to Question H, above. In Section G.2.d, a NFCA credit adjustment would not apply in this example since it assumes that the actual noncore usage recorded to the NFCA is 100% incremental noncore load and therefore there should be no noncore baseload revenues to credit the NFCA. Since the revenues associated with noncore incremental load should be allocated to shareholders, the NFCA would record a charge or debit adjustment in order to remove these incremental noncore revenues from the NFCA.

(n) The incremental revenues over the contract term was incorrectly calculated by multiplying the annual shareholder benefit or $40 times 59 month contract term ($40 times 59 months equals $2,360). The incremental revenues over the contract term should have been shown as approximately $197 ($40 times [59 months contract term / 12 months]), as noted in the correction above and will be corrected on the stand.

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QUESTION 2:

Starting on line 1 at page 3 of **SoCalGas Application (A.) 16-12-010 Chapter 3 Supporting Testimony,** SoCalGas states:

> Under optional pricing, the CFCA or NFCA is credited with revenues equal to those expected absent any optional tariffs or negotiated rates (i.e., base revenues) **only if** (emphasis added) actual revenues exceed base revenues. Any incremental revenues associated with consumption above baseload will be removed from the CFCA and NFCA
> and allocated to shareholders. Under the prior optional pricing mechanism, if actual revenues are below base revenues, no adjustments would be made to the CFCA/NFCA to reflect base revenues since the customer is only given a discounted rate on consumption above baseload and, as such, the revenue shortfall is not due to optional pricing but due to other factors (i.e., economy, etc.). SoCalGas proposes to continue this regulatory treatment.
>
> Under both programs, however, to the extent the customer's consumption falls below the
> incremental load agreed upon by the customer and SoCalGas, SoCalGas shareholders
> will make up the difference in the public purpose program (PPP) surcharge revenues that
> would have been recorded to SoCalGas' PPP balancing accounts (i.e., the Demand Side
> Management Balancing Account, or "DSMBA"; Direct Assistance Program Balancing Account, or "DAPBA"; and California Alternate Rates for Energy Account, or "CAREA") had the incremental load materialized.

In Findings of Fact # 2 and #3 of D.98-01-040, the Commission states:

> 2. In D.97-07-054, the Commission agreed that SoCal's proposal to offer negotiated discount rates and optional tariffs was consistent with its PUR goals, and directed SoCal
> to file an adjustment mechanism to its CFCA to ensure that ratepayers were isolated from
> any risk of revenue shortfalls that may result from it offering negotiated rates or optional

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tariffs to its core customers. Therefore, shareholders are responsible for any reduction in
core revenues that may occur under discounting.

3. On September 17, 1997, SoCal filed a proposed adjustment mechanism to its CFCA. SoCal proposed that on an annual basis, the CFCA will be credited with the base revenue of all participating customers, e.g., those choosing either the negotiated discount rate or optional tariffs.

With this context regarding base revenues, please respond to the following questions:

a. Please confirm that the term “base revenues” in the above SoCalGas statements for purposes of either the CFCA or NFCA, refer to base volumes multiplied by the “otherwise applicable tariff” plus the customer charge, where base volumes are the amount of gas the customer would have used in the absence of the optional tariff or negotiated rate from the proposed CIP, to arrive at the amount of “base revenues.” If this is incorrect for either CFCA or NFCA, then please provide the correct definition of “base revenues.”

b. Would it be accurate to say that if base revenues are less or equal to actual revenues, then under the proposed CIP, no revenue is credited to the CFCA or NFCA. Please provide a yes or no answer and explain your response.

c. Would it be accurate to say that if base revenues are less or equal to actual revenues, then under either the existing Core Pricing Flexibility Program or the Noncore Competitive Load Growth Opportunities Program, no revenue is credited to the CFCA or NFCA? Please provide a yes or no answer and explain your response.

d. Please fully explain how the above statement where SoCalGas states “Under the prior optional pricing mechanism, if actual revenues are below base revenues, no adjustments would be made to the CFCA/NFCA to reflect base revenues since the customer is only given a discounted rate on consumption above baseload and, as such, the revenue shortfall is not due to optional pricing but due to other factors (i.e., economy, etc.) … SoCalGas shareholders will make up the difference in the public purpose program (PPP) surcharge revenues….” is consistent with Findings of Fact #2 and #3 of D.98-01-040 which are the implementation guidelines for D.97- 07-054, the Commission decision that authorized the Core Pricing Flexibility Program. Please also explain how this treatment will ensure that ratepayers are isolated from any risk of revenue shortfalls that may result from it offering negotiated rates or optional tariffs.

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RESPONSE 2:

a. Base Revenues are the baseload quantities of usage, multiplied by the otherwise applicable tariff plus the customer charge.

b. No. If base revenues are less or equal to actual revenues, the base revenue is credited to the CFCA/NFCA. Shareholders only receive the revenues above the base revenue.

c. See the response to (b), above.

d. If actual revenues are below base revenues, all revenue is credited to the CFCA/NFCA with the shareholders receiving no revenue. However, SoCalGas does not make up the difference between actual revenues and base revenues. Since the program goes into effect when technology is added, any drop in usage below the baseload is due to circumstances outside the program (economy, etc.) and would have occurred even without the program. Under the proposed CIP only usage above the baseload is discounted. For baseload usage, ratepayers are credited with revenues at the otherwise applicable, undiscounted tariff rate.