

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

Application of Southern California Gas  
Company (U 904 G) and San Diego Gas &  
Electric Company (U 902 G) for Renewable  
Natural Gas Tariff

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G) FOR RENEWABLE  
NATURAL GAS TARIFF**

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**I. INTRODUCTION**

Pursuant to Article 2 of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC or Commission), Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E, with SoCalGas, Applicants or Utilities) respectfully submit this Application requesting authority to offer a voluntary Renewable Natural Gas Tariff (RNGT) program to their residential, and small commercial and industrial customers.

This Application requests that the CPUC authorize the Applicants to create an RNGT program that offers customers the option to purchase Renewable Natural Gas (RNG), e.g., natural gas from emissions from the agricultural and waste sectors, as part of their natural gas service. If approved, the program will be a voluntary tariff offering that allows Procurement Customers as defined in Rule No. 1, on core<sup>1</sup> rates, with the exception of customers receiving

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<sup>1</sup>Per SoCalGas rule 23 (and similar to SDG&E Rule No.14), core service is defined as follows:

Priority 1 All residential usage regardless of size. All nonresidential usage less than 20,800 therms per active month[], excluding usage reclassified to noncore service pursuant to customer request. All electric generation, refinery and enhanced oil recovery (EOR) usage less than 20,800 therms per active month electing core service.

Priority 2A All nonresidential usage of 20,800 therms or greater per active month[] eligible for core service, not electing noncore service.

transportation-fuel service under Schedule No. G-NGV, (hereafter referred to as ‘eligible’ customers), to designate that all, or a portion of their natural gas service, be provided from RNG sources. The program is similar in concept to the electric green tariff shared renewable (GTSR) programs (for example, SDG&E’s EcoChoice and EcoShare) that are already available to electric customers.<sup>2</sup>

In this Application and the accompanying prepared direct testimony, SoCalGas and SDG&E establish that an RNG tariff supports California’s climate goals by providing core customers ways to lower their carbon impact, that there are sufficient supplies and potential demand for the proposed program, and that such a program can be efficiently offered with costs recovered just from participants, meaning this program would not require any broad incremental ratepayer funding.

Based on the foregoing, as expanded on herein and in the accompanying testimony, SoCalGas and SDG&E request authority to offer an RNGT program, and to collect program costs through rates charged to program participants.

## **II. OVERVIEW OF PROPOSED PROGRAM**

The proposed RNGT program is overall relatively straightforward. The program would give the option to customers to purchase a set amount of their monthly natural gas bill to be for the purchase of RNG in lieu of traditional natural gas. To help residential customers more easily manage costs, this would be a set dollar amount, but small industrial and commercial customers would be given the additional option to purchase RNG as a percent of their monthly gas bill. In order to keep prices down and allow Applicants to best understand the customer market for RNG, at the initiation of this program residential customers opting in will be required to commit

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<sup>2</sup> See D.15-05-051, D.16-05-006, D.17-07-007 and Resolution 4734.

to one year of RNG at their particular RNG election (and two years for industrial/commercial consumers).<sup>3</sup>

This program helps the environment because it takes methane from waste that would end up in the atmosphere and repurposes it. Along those lines, it will also encourage additional market growth so that more methane waste can be captured. The program also helps gas customers who want new and additional decarbonization options. In addition, the program is being designed so that only those customers who voluntarily enroll in it will end up paying for the costs of implementation.

Many stakeholders support SoCalGas' and SDG&E's efforts to offer a voluntary RNGT. This is evidenced by the over 30 support letters that are included in Appendix A, attached hereto.<sup>4</sup>

### **III. SUMMARY OF TESTIMONY**

Support for Applicants' requests is provided in the accompanying prepared direct testimony and attachments. The direct testimony consists of four chapters: (1) Policy (Tanya Peacock), (2) Program Design (Grant Wooden), (3) RNG Procurement (Andrew Cheung), and (4) Regulatory Accounting (Reginald Austria).

#### **A. CHAPTER 1 – POLICY**

The Policy Chapter covers the overarching policy reasons supporting the RNGT program. As noted therein, California is a leader in advancing policies to reduce greenhouse gas (GHG) emissions. Starting in 2006, California enacted the landmark Assembly Bill (AB) 32, which set a target of reducing GHG emissions to 1990 levels by 2020. California followed that legislation

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<sup>3</sup> See Chapter 2, Prepared Direct Testimony of Grant Wooden (Wooden Testimony) at 2.

<sup>4</sup> Applicants also believe they may receive additional letters of support following the filing of the Application.

ten years later with SB 32 (requiring GHG reductions), and later SB 1383 (establishing a statewide methane reduction goal).

Because RNG reduces fugitive methane emissions from agricultural and waste sectors and displaces traditional natural gas, it will be integral to the state reaching these goals; furthermore, it does this without disrupting the way California residents and businesses use energy and without requiring significant investment in before-end-of-life replacement of millions of end-use appliances. Despite this key role that RNG can play, and the presence of many comparable programs on the electric side, SoCalGas is not aware of any programs at the state level to promote RNG use in the residential, commercial, or industrial sectors.

The proposed RNGT program will provide a market for RNG. When combined with SB 1440, these two utility procurement programs can help provide stability to the RNG market by driving demand for RNG and creating market pressure that will increase supply and lower the overall cost. Furthermore, the climate and carbon benefits of this proposed voluntary program will be bolstered by SB 1440's anticipated RNG requirements.

## **B. CHAPTER 2 – PROGRAM**

The Program Chapter covers in detail how the RNGT program will function. As Mr. Wooden explains, the RNGT is intended to be a voluntary tariff with a minimum commitment of one year for residential customers and two years for non-residential customers. This commitment is necessary to allow the Utilities to add more stability to the amount of RNG the Utilities need to acquire, and to support entering into longer-term contracts for supply, which should help reduce the cost of RNG for participants. The program will be available to all eligible customers, including CARE customers.

When enrolling, a residential customer will select a pre-defined maximum monthly dollar amount for the purchase of RNG (e.g. \$10, \$20, \$30, \$50 per month).<sup>5</sup> Commercial/industrial customers will select a dollar amount or a percentage of their gas use. In order to assist customers in estimating the impact of their selected RNG purchase commitment,<sup>6</sup> the Utilities will provide an online calculation tool for customers to see how the additional amount paid for RNG will impact their bill and reduce GHG emissions.<sup>7</sup> After accepting terms and conditions (contained in the tariff and enrollment materials), customers will be enrolled in the program. The Utilities will also allow customers a 60-day “cooling-off period” during which the customer may notify the Utility that they wish to cancel enrollment or modify their RNGT purchase amount. After their initial commitment is up, customers can change their election for another year, or continue month-to-month and terminate at any time following the end of the next bill cycle.

As explained in the testimony, the price of the gas under the RNGT program will be the commodity price of gas in addition to a fee calculated to cover administration and marketing costs. For SoCalGas, these administration and marketing costs include costs for a program website with RNG monthly cost estimation online software, programming costs to modify SoCalGas’ Customer Information System (CIS) to accommodate enrollment, disenrollment, and reporting of the new customer offering, costs to modify the billing calculation programs and costs to modify bill presentment, labor increases, certification, program marketing, and other

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<sup>5</sup> The Utilities will adjust the pre-defined maximum monthly dollar amounts as needed to encourage the maximum amount of program participation and customer satisfaction. The amounts shown are only examples and may not be the final program offering.

<sup>6</sup> Because the Utilities billing systems calculate on whole therms, the actual amount charged may be less. The pre-defined amount would be a ‘not-to-exceed’ amount each month. *See* Chapter 2 (Wooden) at § IV.B Residential Bill Calculation.

<sup>7</sup> GHG reduction calculation will be based on California Air Resources Board (CARB) approved methodology.

costs. SoCalGas will coordinate with its energy efficiency (EE) group to encourage customers to reduce their overall bill costs through EE programs.

Finally, as detailed in testimony, Applicants recommend reporting for the program to the CPUC and also seek to communicate with customers to keep both apprised of the impacts of the program.

### **C. CHAPTER 3 – RNG PROCUREMENT**

The RNG Procurement Chapter explains how SoCalGas' Gas Acquisition Department (Gas Acquisition) plans to purchase RNG supplies for both SoCalGas and SDG&E<sup>8</sup> core residential, commercial and industrial customers that voluntarily elect to take service under the Utilities' proposed RNGT.

As Mr. Cheung explains, there appears to be ample RNG supply for the RNGT program. Estimates of current biomass resources in California and nationwide have been conducted to evaluate the availability of feedstocks that can be developed to produce RNG. A UC Davis study estimated that more than 20 percent of California's current residential natural gas use can be provided by biogas derived from our state's existing organic waste alone (approximately 90 BCF per year).<sup>9</sup> An ICF white paper reviewed a number of RNG studies to arrive at a figure of 104 to 208 BCF/year of total RNG potential in California.<sup>10</sup> The US Department of Energy's

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<sup>8</sup> Pursuant to the California Public Utilities Commission (CPUC) Omnibus Decision (D.) 07-12-019 at 114 (Ordering Paragraph #4), the core portfolios of SoCalGas and SDG&E were consolidated into one single portfolio managed by SoCalGas' Gas Acquisition Department, effective April 1, 2008.

<sup>9</sup> Amy Jaffe, The Feasibility of Renewable Natural Gas as a Large-Scale, Low Carbon Substitute 53 STEPS Program, Institute of Transportation Studies, UC Davis (Updated June 2016), *available at* <https://www.arb.ca.gov/research/apr/past/13-307.pdf>. The 90 BCF per year figure is echoed by Nathan Parker in Renewable natural gas in California: An assessment of the technical and economic potential. 111 Energy Pol'y 235 (Dec. 2017).

<sup>10</sup> Dr. Philip Sheehy & Jeffrey Rosenfeld, Design Principles for a Renewable Gas Standard (Dec. 19, 2017).

2016 “Billion Ton Study” found that approximately 1,200 to 9,200 BCF per year of RNG production is available at a national level.<sup>11</sup>

Chapter 3 explains the need for long-term contracts with suppliers. To meet the subscribed load for eligible customers electing to participate in the RNG Tariff, SoCalGas plans to contract with marketers who carry a portfolio of RNG supplies and/or directly with biogas producers and developers. In general, suppliers/producers place a premium on contracts with longer contract terms and minimum delivery requirements. As a result, SoCalGas expects that RNG suppliers will be more likely to accept a pricing structure that discounts the incentives available in the transportation sector through longer-term contracts. In order to keep costs down, SoCalGas also intends to utilize procurement tools already authorized by the CPUC for managing its traditional natural gas portfolio, including storage, tolerance bands for regulatory account over / under-collection amortization, and trading (including off-system sales)<sup>12</sup> in an effort to offer the most cost-effective RNG available.

The price customers ultimately pay will be based on the RNG Commodity Price coupled with the program price. The former will be comprised of the Schedule G-CP “Core Procurement Service” tariff rate less several of the G-CP rate component. The Program Charge will be comprised of 1) administration and marketing costs associated with program oversight, program marketing collateral creation and customer outreach<sup>13</sup> and 2) RGTBA Program Charge sub-

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<sup>11</sup> U.S. Department of Energy. 2016. 2016 Billion-Ton Report: Advancing Domestic Resources for a Thriving Bioeconomy, Volume 1: Economic Availability of Feedstocks. M. H. Langholtz, B. J. Stokes, and L. M. Eaton (Leads), ORNL/TM2016/160. Oak Ridge National Laboratory, Oak Ridge, TN. 448p. doi: 10.2172/1271651, *available at*

[https://www.energy.gov/sites/prod/files/2016/12/f34/2016\\_billion\\_ton\\_report\\_12.2.16\\_0.pdf](https://www.energy.gov/sites/prod/files/2016/12/f34/2016_billion_ton_report_12.2.16_0.pdf)

<sup>12</sup> See D.97-06-061 at 9 (Conclusion of Law #12).

<sup>13</sup> See Wooden Testimony at § V.

account over/under-collection amortization.<sup>14</sup> SoCalGas intends to establish tolerance bands for the RNG Commodity Price and Program Charge sub-accounts for purposes of over/under collection amortization analogous to the tolerance band authorized by the CPUC for SoCalGas' PGA.<sup>15</sup> These ultimate rates will be calculated during the last week of the month and filed via a Tier 1 advice letter by the last business day of the month to be effective on the first calendar day of the next month.

#### **D. CHAPTER 4 – REGULATORY ACCOUNTING**

Finally, in the Regulatory Accounting Chapter, Mr. Austria explains how the RNGT program will be handled from a regulatory accounting perspective and the recovery of costs of the program. The Applicants Renewable Natural Gas Tariff Balancing Accounts (RNGTBA) are proposed as interest-bearing balancing accounts recorded on the Utilities' financial statements. For SoCalGas, the RNGTBA consists of two subaccounts: the RNG Commodity Charge Subaccount and the Program Charge Subaccount. The RNG Commodity Charge Subaccount balance will be incorporated in rates as necessary in connection with SoCalGas' and SDG&E's Tier 1 advice letter filings to establish the monthly RNG Charge. The Program Charge component of the RG Rate for SoCalGas and SDG&E will be established separately for each utility based on a forecast of the utility's applicable RG program costs and corresponding customer participation. The Program Charge component may be updated on an annual basis to amortize any under or overcollection balance in SoCalGas' Program Charge Subaccount of its RNGTBA or in SDG&E's RNGTBA. The update of the Program Charge component of the RG Rate will be reflected in the Utilities' Tier 1 advice letter to establish the January RG Charge.

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<sup>14</sup> See Renewable Natural Gas Tariff, in Chapter 2, attachment B, for RNG Rate details and pro-forma bill calculations.

<sup>15</sup> D.98-07-068 at 5 (Ordering Paragraph #3).

The remaining balance in the RNGTBA after the end of the program (if the program ends) will be addressed in SoCalGas' and SDG&E's next general rate case or other applicable proceeding.

#### **IV. DELAYED IMPLEMENTATION FOR SDG&E**

As the Commission is aware, SDG&E is currently implementing a CIS replacement program as approved in D.18-08-008. The new CIS system is expected to go live in January 2021. The implementation timeline includes a "freeze period" on changes to SDG&E's legacy CIS system during 2020 to reduce the overall risks and customer impact during the transition to the new system. Given the timeline for the CIS replacement program, at this time SDG&E is unable to estimate the costs to implement the RNG rate in the new billing system because it has not yet been built. However, SDG&E does not see this as prohibiting it from joining this Application.

Therefore, SDG&E requests approval of the RNGT program in purpose, concept, and design at this time jointly with SoCalGas. Should the Commission approve this program application, SDG&E requests that it be permitted to implement the program and bill customers at a future time, which SDG&E anticipates will be approximately in 2022.

#### **V. STATUTORY AND PROCEDURAL REQUIREMENTS**

##### **A. Rule 2.1 (a) – (c)**

This Application is made pursuant to Sections 451, 454, 701, and 1701 of the Public Utilities Code of the State of California, Commission General Order 96-B, Rule 5.2, Article XII, Section 6 of the California Constitution, the Commission's Rules of Practice and Procedure, and relevant decisions, orders, and resolutions of the Commission. In accordance with Rule 2.1(a)-(c) of the Commission's Rules of Practice and Procedure, SoCalGas and SDG&E provide the following information.

**1. Rule 2.1 (a) – Legal Name**

SoCalGas is a public utility corporation 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.

SDG&E is a public utility corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E’s principal place of business is 8330 Century Park Court, San Diego, California, 92123.

**2. Rule 2.1 (b) – Correspondence**

All correspondence and communications to SoCalGas and SDG&E regarding this Application should be addressed to:

JOSEPH MOCK

*Regulatory Case Manager for:*

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

555 West Fifth Street, GT-14D6

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E-mail: JMock@semprautilities.com

A copy should also be sent to:

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**3. Rule 2.1 (c) – Category, Hearings, Issues, Schedule**

a. Proposed Category of Proceeding

SoCalGas and SDG&E propose that this proceeding be categorized as “Ratesetting” under Rule 1.3(e) and 7.1(e)(2) because the Application will have a potential future effect on the proposed SoCalGas and SDG&E rate, and because the proceeding does not otherwise clearly fit into another category under Rule 1.3.

b. Need for Hearings

SoCalGas and SDG&E anticipate that evidentiary hearings will not be necessary.

c. Issues to be Considered and Relevant Safety Considerations

The principal issue to be considered in this proceeding is whether or not the Commission should approve the establishment of the RNG Tariff, and whether it should therefore grant the relief requested as summarized in Section VI below. There do not appear to be relevant safety concerns with respect to this Application.

d. Proposed Schedule

SoCalGas and SDG&E propose the following schedule for this Application:

<b>EVENT</b>	<b>DATE</b>
Application	2/28/19
Responses/Protests	within 30 days Daily Calendar notice
SoCalGas/SDG&E Reply Responses/Protests	within 10 days (see Rule 2.6)
Prehearing Conference	Early May 2019
Intervenor Testimony	July 2019
Rebuttal Testimony	August 2019
Opening Briefs	September 2019
Reply Briefs	October 2019

Proposed Decision	November 2019
Commission Decision	December 2019

**4. Rule 2.2 – Articles of Incorporation**

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.

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on September 10, 2014 in connection with SDG&E’s Application No. 14-09-008, and is incorporated herein by reference.

**B. Rule 3.2 (a) – (d)**

Although their applicability here is unclear, in accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SoCalGas and SDG&E provide the following information.

**1. Rule 3.2 (a)(1) – Balance Sheet and Income Statement**

The most recent updated Balance Sheet and Income Statements for SoCalGas and SDG&E are attached to this Application as Attachment B and Attachment C, respectively.

**2. Rule 3.2 (a)(4) – Description of Applicants’ Property and Equipment**

A general description of SoCalGas’ property and equipment was previously filed with the Commission on May 3, 2004 in connection with SoCalGas’ Application 04-05-008, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve as of, September 30, 2018 is attached as Attachment D.

A general description of SDG&E's property and equipment was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve as of September 30, 2018 is attached as Attachment E.

**3. Rules 3.2 (a)(5) and (6) – Summary of Earnings**

A summary of earnings for SoCalGas and SDG&E are included herein as Attachment F and Attachment G.

**4. Rule 3.2 (a)(7) – Depreciation**

The Applicants note that for financial statement purposes, depreciation has been computed on a straight-line remaining life basis at rates based on the estimated useful lives of plant properties. For federal income tax accrual purposes, SoCalGas and SDG&E generally compute depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SoCalGas and SDG&E have computed their tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SoCalGas and SDG&E have computed their tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, have normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981, the Tax Reform Act of 1986, and the Tax Cuts and Jobs Act of 2017.

**5. Rule 3.2 (a)(8) – Proxy Statement**

A copy of SoCalGas' most recent proxy statement, dated April 26, 2018, was mailed to the Commission on April 27, 2018, and is incorporated herein by reference. A copy of most recent proxy statement sent to all shareholders of SDG&E's parent company, Sempra Energy, dated March 23, 2018, was mailed to the Commission on May 9, 2018, and is incorporated herein by reference.

**6. Rule 1.9**

SoCalGas and SDG&E are serving this Application on all parties to Rulemaking 13-02-008 (Rulemaking to Adopt Biomethane Standards and Requirements, Pipeline Open Access Rules, and Related Enforcement Provisions) and Application 18-06-009 (Application of Southern California Gas Company Regarding Year 24 (2017-2018) of Its Gas Cost Incentive Mechanism).

**VI. CONCLUSION**

For the reasons described above and in the testimony supporting this Application, SoCalGas and SDG&E respectfully request that the Commission:

- Authorize SoCalGas and SDG&E to establish new, optional procurement tariffs for residential and core commercial/industrial customers to be sourced with Renewable Natural Gas by SoCalGas' Gas Acquisition department;
- Authorize SoCalGas and SDG&E to modify their bills to charge opt-in customers the prevailing tariff rate of Renewable Natural Gas for the portion of the customer's usage that has been elected;







**ATTACHMENT A**

Letters of Support



20 February 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

RE: RENEWABLE GAS TARIFF OPTION

Dear Ms. Tomkins:

The Alhambra Chamber of Commerce is in support of Southern California Gas Company's filing an application to provide Renewable Natural Gas to residential and commercial/business customers. The Chamber supports this concept.

The Alhambra Chamber of Commerce, with over 400 members, advocates and represents business interests and issues affecting the community. We provide an environment to help members prosper and succeed through a working partnership with all levels of government and community organizations to achieve a prosperous local economy and quality of life.

The Alhambra Chamber of Commerce believes that a voluntary program is appropriate so that businesses will have the opportunity to support the State of California's environmental goals by using methane gas that is derived from renewable sources such as municipal waste streams.

We urge that the California Public Utilities Commission consider SoCalGas' application. We strongly believe that natural gas should remain in the State's energy portfolio. Many of our businesses depend on natural gas and could experience a negative financial impact if they were forced to change out equipment and expend funds for more expensive energy.

Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Sharon Gibbs".

Sharon Gibbs  
Chief Executive Officer  
Alhambra Chamber of Commerce

**CHAMBER CHAPTERS**  
SOUTHERN CALIFORNIA  
SAN DIEGO COUNTY  
NORTHERN CALIFORNIA

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**TREASURER**

Matthew Kennedy  
OWNER, COSTELLO/KENNEDY LANDSCAPE ARCHITECTS  
MBR: PONCA TRIBE OF NEBRASKA

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MTA  
MWD  
NBC UNIVERSAL  
NORTHROP GRUMMAN  
ORANGE COUNTY TRANSPORTATION AUTHORITY  
PG&E  
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SBA  
SOUTHERN CALIFORNIA EDISON  
SOUTHERN CALIFORNIA GAS CO., A SEMPRA ENERGY UTILITY  
SOUTHERN CALIFORNIA MINORITY BUSINESS DEVELOPMENT COUNCIL  
THE WALT DISNEY COMPANY  
TOYOTA MOTOR SALES, INC.  
VERIZON  
WELLS FARGO  
WESTERN REGIONAL MINORITY SUPPLIER DEVELOPMENT COUNCIL

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AUDREY MARTINEZ  
SAN MANUEL BAND OF MISSION INDIANS  
ANDREW MASIEL, SR.  
PECHANGA BAND OF LUISEÑO INDIANS  
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ROSEMARY MORILLO,  
SOBOBA BAND OF LUISEÑO INDIANS  
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**AMERICAN INDIAN CHAMBER OF COMMERCE OF CALIFORNIA**

February 22, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

On behalf of the American Indian Chamber of Commerce of California (Chamber), we are writing today to support the Southern California Gas Company and their efforts to develop options for customers in their service territory through a Renewable Gas Tariff.

Our rationale in supporting this proposed Renewable Gas Tariff is so that our community can enjoy viable, reasonable selections for their choice in this arena. Our Chamber policy is to ensure that any energy service initiative that our Chamber supports, our people receive the best in value, reliability, safety and affordability for their homes and businesses. This proposed program is also voluntary and will allow Southern California Gas Company a method in which to reduce fossil gas brought into their system.

The mission of the American Indian Chamber of Commerce of California is to educate, mentor, support and advocate for tribal enterprises and American Indian/Alaska Native businesses. We are proud of the fact that California is home to the largest population of American Indian/Alaska Natives in the country, and has, by far, the most American Indian/Alaska Native owned businesses.

The Chamber believes that with your expediency in establishing this innovative Renewable Gas Tariff; this program will go a long ways towards continuing our energy evolution here in California.

If you have any further questions, you can contact me directly at my office number of 714-898-6364.

Sincerely,

Tracy Stanhoff  
President & Creative Director, AD PRO  
Former Tribal Chair, Prairie Band Potawatomi Nation  
President, American Indian Chamber of Commerce of CA  
tel 714-898-6364

# AMERICAN JERKY COMPANY, LLC

2400 E. FRANCIS STREET  
ONTARIO, CA 91761

February 21, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff option

Dear Ms. Tomkins:

We are a jerky manufacturer based in Ontario and understand that there is a proposal for a green tariff, which would allow for an outlet for renewable natural gas. I believe this opportunity should be one that is afforded to all customers within SoCalGas jurisdiction as we, companies strive to be more environmentally conscious. I have not been made fully aware of costs or reasonableness of the program, but I do believe that it should at a minimum be explored and offered as an option for participants to explore.

We have been making jerky treats for roughly 4 years and have been steady users of natural gas. We dehydrate proteins ranging from chicken, duck, turkey, beef, pork, etc. The ability to promote renewable resources helps avoid the use of fossil fuels and should be explored. I support the program in moving forward with exploration to see viability and costs associated with such program. My hopes are to make this option available as soon as possible so we can try to create a greener future for the following generations. Without knowing which options we have, it will be difficult to move forward in protecting our environment for our children's future.

I hope to have SoCalGas explore these options as soon as possible and share with your users the availability of such options.

Sincerely,

A handwritten signature in black ink, appearing to read 'Benjamin Wu', with a long horizontal stroke extending to the right.

Benjamin Wu  
American Jerky Company

VALET SERVICES™



Your Partner Toward Total Laundry Success...

February 21, 2019

Ms. Sharon Tomkins

Vice President, Customer Solutions

Southern California Gas Company

555 W. Fifth Street, ML GCT 21C2

Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

Anitsa Inc., DBA Valet Services would support a renewable gas tariff option. Having this tariff option would help us reduce overall greenhouse gas emissions.

We are a commercial launderer that provides laundering services to the hospitality industry.

Our business relies on natural gas to operate and having a green option is favorable to our business as we recycle water and use NPE free chemistry to reduce our carbon footprint.

We respectfully request that regulators make this option available as quickly as possible.

Sincerely,

Daniel Soussa

Operations Manager

February 14, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

RE: Renewable Gas Tariff Option

Athens Services supports the efforts of Southern California Gas Company to offer residential and small/medium-size business customers the option of purchasing a portion of their natural gas from renewable sources.

Athens Services is committed to the environment and supports California as it moves towards a more sustainable future. As the company that developed the first mixed-waste processor in Los Angeles County, Athens has always been ahead of the curve. We have continued to look forward, recently investing in new, near-zero emission natural gas vehicles that are 90% cleaner than the Environmental Protection Agency's strictest emissions standard. We are always looking for ways to advance our recycling programs, save precious resources, and create a better environment for all. We believe in a zero-waste future where businesses and consumers alike are conscious about consumption and product lifecycles, and are engaged in sustainable thinking concerning the use, management and restoration of the Earth's resources.

The Southern California Gas Company's Renewable Gas Tariff Option will not only help foster the growth and development of the Renewal Gas industry, but will empower customers to use energy wisely and help reduce GHG emissions, ultimately empowering customers to achieve their own sustainability goals.

Athens Services encourages the CPUC to make this opportunity available to SoCal Gas customers as soon as possible. State mandates for GHG reductions are impacting all businesses and the need for renewable resources is high. Offering this program will only help to expedite California's emission reduction goals.

Sincerely,



Gary M. Clifford II  
Executive Vice President



February 27, 2019

President Michael Picker  
California Public Utilities Commission  
505 Van Ness Ave  
San Francisco, CA 94102

Dear President Picker:

Bloom Energy (Bloom) manufactures an innovative fuel cell technology that generates always-on, distributed energy. Our non-combustion process transforms natural gas or biogas into electricity, producing on-site, clean, resilient, reliable, affordable energy, practically anywhere. With over 450 installations in California, our fuel cells are the most efficient electricity generators on the planet; significantly reducing electricity costs, dramatically reducing greenhouse gas emissions, and virtually eliminating combustion related criteria air pollutants.

Since installing our first commercial fuel cell in 2009, Bloom has actively sought renewable natural gas (RNG) to power our systems. Due to market distortions created by well-intentioned policies, however, securing a stable, cost-competitive supply of RNG for Bloom projects has proved immensely challenging. As a recent report by the California Council on Science and Technology concluded: "The current value of the Federal and State incentives far exceeds the market value of the biomethane. Financial incentives through the California Low Carbon Fuel Standard (LCFS) and the Federal Renewable Fuel Standard (RFS) programs can be a factor of up to 18 times greater than the commodity value of the biomethane itself."<sup>1</sup> This market distortion makes it uneconomical for non-transportation end users, such as building owners and operators looking to install non-combustion, renewable-electricity generating fuel cells, to source California renewable gas for their projects.

Bloom finds that SoCalGas' renewable gas tariff poses great potential to help level the playing field and create a new option for hospitals, data centers, and other facilities in California seeking a reliable, always-On clean energy solution. If properly designed, this voluntary tariff will provide a mechanism by which consumers who wish to purchase RNG may do so—serving a clear market demand, helping drive down costs, and simultaneously assisting California in achieving its energy goals. Bloom supports this tariff with the understanding that fuel cell customers are eligible to receive service.

We look forward to continued collaboration to meet California's methane, carbon, and air pollution reduction goals.

---

<sup>1</sup> <https://ccst.us/publications/2018/2018biomethane.pdf>, pg 79



Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Grizard', written in a cursive style.

Erin Grizard  
Senior Director, Policy



February 15, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Subject: Renewable Gas Tariff Option

Dear Ms. Tomkins:

I am pleased to offer support for SoCalGas' application for a Renewable Gas Tariff with the California Public Utilities Commission (CPUC) to offer residential and commercial/industrial customers the option of purchasing a portion of their natural gas from renewable sources.

The Bolsa Chica Conservancy was founded nearly 30 years ago by community, environmental, government and business leaders with the common goal of restoring the Bolsa Chica wetlands and connecting generations through community involvement, leadership and education in wetland science, watersheds, coastal ecology and environmental sustainability. Our organization has succeeded beyond our wildest dreams with an interpretive center, school programs, scout programs and tens of thousands of visitors every year.

As an environmental organization we recognize efforts and initiatives that support the state's goal to achieve decarbonization by reducing methane emissions. We urge regulators to make the the option for RNG tariff available to SoCalGas' residential and commercial industrial customer base as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Grace Adams", is written over a vertical line.

Grace Adams  
Executive Director

**Corporate Office**

16530 South. Garfield Avenue  
Paramount CA 9072  
Tel: (562) 531-3440  
(800) 272-8657  
Fax: (562) 531-2050



LINEN SERVICE, INC.  
**BRAUNLINEN.COM**

396 South. La Mesa Street.  
Pomona CA 91766  
Tel: (909) 623-2678  
(800) 245-1269  
Fax: (909) 623-7276

February 20, 2019

Ms. Sharon Tomkins

Vice-President, Customer Solutions  
Southern California Gas Company  
555 W Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

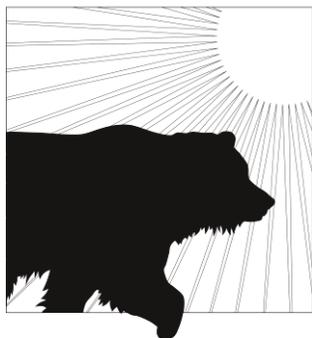
Braun Linen Service Inc would support the renewable gas tariff option. The idea of purchasing a portion of its natural gas from renewable sources is a great concept. Braun Linen is a commercial laundry service, dependent on natural gas for the processing of its goods. I would support the renewable gas tariff as Braun Linen's part in helping reduce greenhouse gases. I request for regulations to make options as soon as possible.

Sincerely,

W. Scott Cornwell  
President, Braun Linen Service, Inc

**Setting the Standard in Service and Quality**

CALIFORNIA LATINO



LEADERSHIP INSTITUTE

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In Memoriam (1943-2016)

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301 East Colorado Blvd.

S# 426

Pasadena, CA 91101

ATTN BILL HRANCHAK, CPA

(323) 660-7234

FAX (323) 664-7222

**Lisa D. Baca**

*Executive Director*

*Cell 213 910-2592*

Email [cli.baca@gmail.com](mailto:cli.baca@gmail.com)

[www.calatinoleadership.org](http://www.calatinoleadership.org)

IRS 501 c 3 FEIN #47-1243514

February 25, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**Re: Renewable Gas Tariff Option**

Dear Ms. Tomkins:

I am writing this letter in **SUPPORT** of Southern California Gas Company's Green Tariff proposal to help customers reduce their carbon footprint by using renewable gas (RG).

Founded in 2014 as a 501 c 3 nonprofit organization, the Mission of the CA Latino Leadership Institute (CLLI) is to develop diverse entrepreneurial and action-oriented public, corporate and community leaders as effective mentors, creating a better future for California.

As California's youth grow into the leaders of tomorrow, they are keenly aware of impacts their carbon footprint will have on future generations. CLLI supports the Southern California Gas Company using RG to help the state achieve its climate change goals by reducing methane and carbon dioxide emissions.

Thank you,

*Lisa D. Baca*

Executive Director CLLI



525 S. Hewitt St.  
Los Angeles, CA 90013

213.634.3790  
climateresolve.org

February 21, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**Re: SoCalGas submission to CPUC on green tariff - SUPPORT**

Dear Ms. Tomkins:

Climate Resolve supports SoCalGas' proposal to the California Public Utilities Commission to begin a green tariff program that will provide customers options to procure renewable gas.

The reduction of greenhouse gas emissions is a central goal of our organization. Based in Los Angeles, Climate Resolve is dedicated to achieving local solutions to global climate change and ensuring that these solutions benefit all, especially low-income communities.

SoCalGas' green tariff, if approved, will help customers reduce their carbon footprint by displacing fossil fuel with renewable gas. We think that this is smart policy and is wholly aligned with California's goal of achieving net zero emissions by 2045.

Just as Climate Resolve supported SB 100, to achieve 100% carbon-free electricity in the state by 2045, we further support using renewable electricity to displace fossil gas. Electrifying household products is a key strategy in de-carbonizing the state – and we support it.

Yet, today, millions of California use natural gas to warm their showers, heat their homes and cook their meals. As much as we like and promote electrification of heating and cooking, we also know that market penetration of these appliances is low.

We must be realistic – the electrification of consumer products is decades away, if ever. Therefore, SoCalGas' green tariff is a practical way for households, businesses, even entire cities, to achieve carbon neutral goals – and not need to wait for a magic electric bullet. We can achieve carbon savings today.

Akin to community choice options in the electricity sector, the green tariff would allow residential customers to choose how much of their gas will be supplied by renewable sources. Commercial and industrial customers could make similar choices.

This is smart policy that deserves support.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Parfrey". The signature is fluid and cursive, with a large, sweeping initial "J".

Jonathan Parfrey  
Executive Director



February 26, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Dear Ms. Tomkins:

**Re: Renewable Gas Tariff Option**

I am very interested to hear your proposal to offer a renewable gas option to our businesses here in the City of Commerce. I support the initiative to offer businesses a tariff option on their gas bill.

We represent the Business Community in the City of Commerce as their local Business Chamber. We are a not for profit organization, and we pride ourselves on our relationships and our ability to advocate on behalf of our members.

I am in favor of any initiative that promotes renewable energy and I am absolutely in favor of offering our members an option to participate if they choose at the earliest opportunity.

Sincerely,

Robert Taylor  
Executive Director  
Commerce Industrial Council



# CONGRESS OF CALIFORNIA SENIORS

1230 "N" STREET, SUITE 201, SACRAMENTO, CA 95814 • (916) 442-4474 • (800) 543-3352 • FAX (916) 442-1877 • www.seniors.org

February 20, 2019

Ms. Sharon Tomkins, Vice President  
Southern California Gas Company Customer Solutions  
555 W. Fifth Street. ML GCT 21C2  
Los Angeles, CA 90013

Dear Ms. Tomkins,

On behalf of the Congress of California Seniors (CCS) I am writing to express our support for Southern California Gas Company's (SoCalGas) Green Tariff proposal which would allow SoCalGas customers to purchase a set amount of gas from renewable sources for a set period of time. We urge the state Public Utilities Commission to approve this proposal.

CCS has been a vital advocate for seniors at the state capitol for almost 42 years. Our members and allies have become increasingly aware of the importance of the gas, electric, telecom, and digital infrastructure in the lives of older Californians. In these areas our advocacy focuses on maintaining reliability of service while keeping costs affordable.

The Green Tariff proposal will allow individual residential customers as well as businesses to contract with SoCalGas to use Renewable Gas (RG) rather than natural gas mined from under the earth. RG is simply the usable methane gas that is created when organic substances decay. Examples of RG sources are garbage dumps, waste water treatment plants, animal waste, crop waste and wasted food. RG can be collected and used in lieu of regular natural gas, thus helping reduce the effects of climate change.

CCS sees the Green Tariff option as another way that seniors can contribute to the movement to reduce California's carbon footprint while at the same time promoting new technologies without loss of reliable service. For these reasons, the Congress of California Seniors strongly supports the renewable gas Green Tariff proposal.

Sincerely,

A handwritten signature in black ink that reads "Gary Passmore". The signature is written in a cursive style and is set against a light beige rectangular background.

Gary Passmore  
President

February 26, 2019

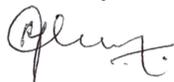
Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: California Public Utilities Commission - Renewable Gas Tariff Option

Dear Ms. Tomkins:

As the Director of the **Center for Renewable Natural Gas (CRNG)** with the College of Engineering Center for Environmental Research and Technology at the University of CA, Riverside, I am writing to support a Renewable Natural Gas tariff option. Renewable Natural Gas is an important alternate fuel with significant GHG and air quality benefits. RNG, like most other renewable fuels, is more expensive than fossil fuels due to a number of factors. With proper policy support, the costs will very likely decrease over time as more projects are developed and technology keeps maturing. A voluntary green tariff initiative is an excellent way to support RNG, and similar approaches have worked for other renewable resources and in other jurisdictions. This approach also gives individuals and organizations a unique opportunity to support a clean, renewable fuel and combat climate change. Making RNG readily available and offering the option to the public will support customers in reaching their sustainability goals and reducing their and California's carbon footprint.

Sincerely,



Arun Raju  
Director, Center for Renewable Natural Gas  
CE-CERT, University of California, Riverside  
arun@engr.ucr.edu  
951-781-5686 work; 909-910-6577 cell  
<http://www.cert.ucr.edu/research/rng/>



February 20, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**Subject: Renewable Gas Tariff Option**

Dear Ms. Tomkins:

Eastern Municipal Water District supports a renewable gas tariff option as it allows for a broader supply portfolio. With the ever changing regulations for Green House Gas reduction and the increased market availability of more environmentally friendly fuel supplies, having a renewable gas option that is locally makes good operational sense.

Eastern Municipal Water District (EMWD) is the water, wastewater service and recycled water provider to more than 825,000 people living and working within a 555-square mile service area in western Riverside County. It is California's sixth-largest retail water agency and its mission is "To deliver value to our customers and the communities we serve by providing safe, reliable, economical and environmentally sustainable water, wastewater and recycled water services."

EMWD supports Southern California Gas Company's business decision to provide Renewable Gas for both environmental and procurement diversity reasons. Renewable Gas provides an option for EMWD to purchase a more environmental friendly sourced product and during possible shortages of Natural Gas, allows for the purchase of an alternative fuel supply.

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2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300

T 951.928.3777 • F 951.928.6177 [www.emwd.org](http://www.emwd.org)

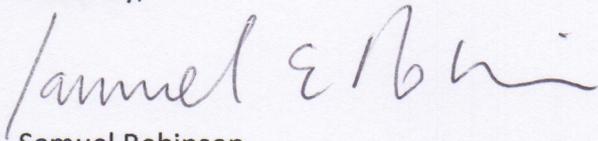
Ms. Sharon Tomkins / Subject: Renewable Gas Tariff Option

February 20, 2019

Page 2

Eastern Municipal Water District requests that regulators make the Renewable Gas option available as soon as possible so that we may begin exploring the financial and operational benefit to the District and its stakeholders where it makes good financial sense.

Sincerely,

A handwritten signature in cursive script that reads "Samuel Robinson". The signature is written in dark ink and is positioned above the printed name and title.

Samuel Robinson

Energy Program Manager



**GLAAACC**

**Greater Los Angeles African  
American Chamber of  
Commerce**

501(C) 6

February 20, 2019

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Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Dear Ms. Tomkins:

The Greater Los Angeles African American Chamber of Commerce (GLAAACC) is supportive of the renewable gas tariff option.

GLAAACC is dedicated to the growth and development of African American owned businesses in the greater LA area. Our mission is to advocate and promote on behalf of our members and create business opportunities, business alliances and legislative advocacy.

We support efforts that will help small business reach their sustainability goals and reduce their carbon footprint. It's one way we can all help stabilize climate change and reduce methane and carbon dioxide emissions. We believe the Green Tariff proposal will achieve that goal.

On behalf of our directors and members, we urge regulators to make the renewable gas tariff option available as soon as possible. Thank you for your consideration.

Sincerely,

Gene Hale  
Chairman



February 26, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

On behalf of the Inglewood Airport Area Chamber of Commerce (IAACC) we are pleased to support the Southern California Gas Company's (SoCal Gas) Green Tariff Proposal. The Southern California Gas Company is the nation's largest natural gas distribution utility, that delivers clean, safe and reliable energy to 21.6 million consumers in more than 500 communities throughout Central and Southern California, including the South Bay Region. The IAACC is in support of the Green Tariff Proposal because renewable fuel has the potential to reduce greenhouse gas emissions, create jobs and increase the diversity of domestic energy supply portfolio.

Inglewood Chamber of Commerce, the mission is to support our members and community by identifying and addressing the changing needs of our region focusing on building a vibrant and prosperous resort town, increasing tourism, promoting recreation, education for our youth and business owners, and giving back to those in need.

The Green Tariff Proposal will empower customers to put waste streams to beneficial use by purchasing a portion of their gas from renewable sources therefore reducing their carbon footprint. The Tariff proposal will also help the State of California achieve its climate change goals by reducing methane and carbon dioxide emissions.

We strongly support the Southern California Gas Company's (SoCal Gas) Green Tariff Proposal and hope you will consider funding this program in an effort to reduce greenhouse gas emissions and address climate change. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Erick Holly".

Erick Holly  
Executive Vice President

# THE LANGHAM

HUNTINGTON  
PASADENA, LOS ANGELES

February 22, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

I am writing this letter to encourage your support for renewable gas tariff option.

I am currently the Director of Finance for the Langham Pasadena Hotel. Our hotel has and continues to be heavily involved in the community. Part of this relationship, and part of our brand's global initiatives, is to mitigate our impact on the environment. We continually review our operation for any opportunity that will allow us to become more "green" and providing us with renewable gas would clearly support this agenda.

My last request would be to encourage SoCal Gas to make this option available to its clients immediately. As stakeholders in our community, we should not delay any process that can better our earth.

Sincerely,



Hannah Riches  
Director of Finance  
The Langham Huntington, Pasadena  
[Hannah.riches@langhamhotels.com](mailto:Hannah.riches@langhamhotels.com)

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth St. ML GCT 21C2  
Los Angeles, Ca. 90013

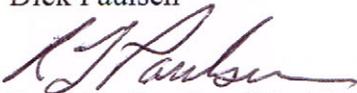
02/23/19

Dear Ms. Tomkins,

We have reviewed your "Green Tariff Proposal" for the inclusion of renewable gas to reduce the current levels of carbon (GHG) in your customers use of fossil fuel delivered gas. We would encourage the CPUC to approve this voluntary tariff to help us reach our sustainability goals. Properly implemented this program may reduce the cost of adding renewable gas to our fossil fuel mix.

Sincerely,

Dick Paulsen



Founder, Leading Edge Power Solutions



**MAXIMUM NURSERY**

February 22, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

Maximum Nursery Inc. is proud to support SoCalGas' green tariff application to the California Public Utilities Commission, which would allow the company to provide its customers the option to purchase a portion of their gas from renewable sources.

Maximum Nursery is the oldest grower of gerbera daisies in the nation. We have been growing flowers here in California for over 35 years, but our legacy in this business goes back for decades. The standards to which we adhere were passed down from the rich floral heritage of our founders' European ancestors over the course of ten generations. That is why we know what it takes to grow top-quality flowers for our customers. We locate the finest varieties and subject them to rigorous scrutiny to ensure they are the absolute best. Then we utilize the latest in hydroponics technology to guarantee that everything we grow receives the right balance of nutrients, temperature, humidity, light, and carbon dioxide to produce a beautiful, healthy yield.

The Carpinteria Valley has been incredibly kind to Maximum Nursery. It has the ideal conditions for growing many types of flowers and we recognize that this land has been essential to our success. We seek to utilize practices that are environmentally-conscious and reduce waste in our operations because we understand the importance of protecting our environment for ourselves and for future generations. We support SoCalGas' renewable gas tariff option because it is the type of program that will help California reduce its methane emissions. Combating climate change requires bold innovative solutions like this proposal, which is why we are backing it.

We request that the CPUC grant SoCalGas' request without delay and make the renewable gas tariff available to SoCalGas' customers as soon as possible.

Sincerely,

  
Winfred Van Wingerden



February 20, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

At Newlight, we believe that the most sustainable way to reduce the amount of carbon in the air is to use greenhouse gas emissions as a resource for the production of commercially useful materials that out-compete oil-based materials. Founded in 2003, after over a decade of research, Newlight has developed a carbon capture technology able to produce high-performance biomaterials from carbon capture. Our mission is to replace oil-based plastics with greenhouse gas-based materials on a global scale, moving oil out of the world's products, reducing material production costs, and reducing the amount of carbon in the air on a market-driven basis.

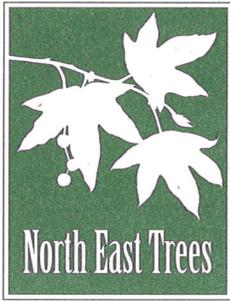
Newlight has developed a carbon capture technology that converts methane and carbon dioxide into a naturally-occurring biomaterial called AirCarbon. By weight, in its most basic form, AirCarbon is approximately 40% oxygen from air and 60% carbon and hydrogen from captured carbon.

One element of Newlight's platform is the use of renewable natural gas (RNG). Because of this, we support the renewable gas tariff option and would like to see it available as soon as possible.

Please let me know how Newlight can assist in moving this tariff forward.

Best regards,

Evan Creelman, CFA  
COO | Newlight Technologies, Inc.  
Direct: (714) 556-4505  
[www.newlight.com](http://www.newlight.com)



February 22, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**Re: Renewable Gas Tariff Option**

Dear Ms. Tomkins:

North East Trees (NET) is pleased to offer its support for the Green Tariff proposal by The Southern California Gas Company (SoCalGas).

NET is a design-build, environmental justice non-profit organization dedicated to improving ecologically depleted and socioeconomically underserved communities through the design, construction and preservation of green open spaces. At the core of NET is providing ongoing education, training and employment to local at-risk youth using urban forestry as a tool. We use a collaborative approach integrating science, technology, design, community engagement, education, and volunteering to create permanent public benefits.

NET has a nearly 30 year track record of implementing outstanding conservation projects in L.A. County. NET has planted over hundreds of thousands of trees, designed and built over 200 parks and trained and employed thousands of local at-risk youth in our environmental stewardship program. Founded by Scott Wilson, an educator, landscape architect, contractor and arborist, NET is recognized throughout the state of California for its creation of innovative, low impact native plant based sustainable designs, and for forging strategic partnerships with urban communities in LA County.

This Green Tariff will help customers reach their sustainability goals and reduce their carbon footprint by displacing traditional fossil fuel with clean, renewable gas. It was also help the State achieve its climate change goals in 2030 and 2050 by reducing methane and carbon dioxide emissions. By capturing renewable gas, SoCalGas would be putting waste streams to beneficial use, reducing greenhouse gas emissions, and addressing climate change.

North East Trees fully supports this proposal and respectfully requests that this option for renewable gas be made available as soon as possible.

Sincerely,

Mark Kenyon  
Executive Director

570 W. Avenue 26, Suite 200, Los Angeles, California 90065 Phone: (323) 441-8634 Fax: (323) 441-8618

*North East Trees is a non-profit organization improving communities in Northeast Los Angeles by planting an urban forest.*



NORTH  
ORANGE COUNTY  
CHAMBER

February 22, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

North Orange County Chamber (NOCC) would like to express our support of the Renewable Gas (RG) Tariff Option.

As the voice of the business community in the region, North Orange County Chamber represents 3,000 business throughout the area. We actively work to build stronger communities and advocate for a healthy business climate.

The RG Tariff Option provides residential as well as commercial/industrial customers the ability to purchase a portion of their natural gas from renewable sources. North Orange County is home to many manufacturers large and small as well as a plethora of small businesses. It is important that each of our business owners and professionals as well as residents throughout the region have access to RG options to help reduce their carbon footprint. Furthermore, the RG Tariff Option will help the state achieve its climate change goals by reducing methane and carbon dioxide emissions.

For these reasons, NOCC supports the Renewable Gas (RG) Tariff Option and ask that you move forward to approve the proposal.

Thank you for your consideration.

Sincerely,

Theresa Harvey  
President and CEO  
North Orange County Chamber

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February 15, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**RE: RENEWABLE GAS TARIFF OPTION – SUPPORT**

Dear Ms. Tomkins,

Orange County Business Council (OCBC) is a regional leader in business and serves as an influential advocate for Orange County's economic prosperity. One of OCBC's core initiatives is to modernize Southern California's infrastructure, from highways to utilities. Climate change has presented challenges in enhancing infrastructure that require innovative mitigation strategies, such as the Renewable Gas (RG) Tariff. **OCBC supports the use of the RG, or Green, Tariff as a vehicle for helping the state achieve its ambitious climate goals.**

If approved by the California Public Utilities Commission (CPUC), the program will invite residential and commercial customers receiving gas from SoCalGas to choose how much of their gas will be supplied by renewable resources by selecting from a series of set dollar amounts. The voluntary tariff reduces the amount of fossil gas brought into the SoCalGas system. By committing environmentally conscious customers to green energy for a minimum of one year, the state will be closer to achieving its decarbonization goals by reducing methane emissions.

The RG Tariff program would be a crucial step toward sustainability, and if approved by the CPUC, the program would significantly strengthen the growth and development of the renewable natural gas industry. **For these reasons, OCBC strongly supports the RG Tariff program.**

Sincerely,



Alicia Berhow  
Senior Vice President of Government Affairs

February 20, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

The Pasadena Chamber of Commerce supports a diverse and environmentally friendly approach to the delivery of energy, including natural gas. We are fully supportive of efforts to bring recycled biogas to use by natural gas users in Southern California, including the proposal by SoCal Gas for a tariff for those customers who want to purchase recycled bio-methane gas.

The Pasadena Chamber of Commerce and Civic Association is a member service organization serving 1450 businesses in the Pasadena area. Since 1888 we have provided advocacy, support and assistance to local businesses to help them grow and prosper in our local economy.

The Pasadena Chamber sees the conversion of bio-methane into usable natural gas as a positive for our environment, as it removes greenhouse gasses from the atmosphere while providing energy for heating, cooking and powering our economy.

We certainly hope the Renewable Gas Tariff proposal by SoCal Gas is approved by regulators so customers can access this valuable added resource.

Sincerely,



Paul Little  
President and Chief Executive Officer



February 15, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

The renewable gas tariff will empower customers with the option of purchasing a portion of their gas from renewable sources, and thus, individually support the reduction of emissions.

PTS Advance has serviced the staffing augmentation needs of the Energy & Infrastructure sector for over 2 decades. PTS works with various clients including owner/operators, EPC organizations, construction and maintenance contractors, as well as service providers who create the entire supply chain for designing, building and operating the infrastructure that helps to drive the US economy.

Nearly 80% of methane emissions come from organic waste streams decomposing and escaping into the atmosphere as greenhouse gas. Renewable gas is produced from renewable sources, including these existing municipal waste streams, like landfills and waste water treatment plants, as well as sustainable biomass sources, including animal waste, crop residue, and food waste. By collecting this gas to create renewable fuel, we are putting waste streams to beneficial use, reducing greenhouse gas emissions, and addressing climate change.

The program will be open to all residential customers and to commercial and industrial customers for whom SoCalGas purchases gas. This voluntary tariff will allow SoCalGas to buy RG from producers and reduce the amount of fossil gas that is brought into their system and allow them to begin offering the program in early 2020

Sincerely,

**Ronald Stein, P.E.**

Founder and Ambassador for Energy & Infrastructure

**PTS ADVANCE**

TEAMWORK REIMAGINED

949-268-4023

[Ronald.Stein@PTSadvance.com](mailto:Ronald.Stein@PTSadvance.com)

<https://www.linkedin.com/in/ronaldstein/detail/recent-activity/shares/>

[PTSadvance.com](http://PTSadvance.com)



**February 25, 2019**

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**RE: Green Tariff Proposal**

Dear Ms. Tomkins,

The Coalition for Renewable Natural Gas (RNG Coalition) offers this letter in strong support of Southern California Gas Company's proposal for a voluntary renewable natural gas or Green Tariff (Green Tariff). If approved, the Green Tariff should allow the utility's customers to choose to replace all or a portion of their conventional natural gas consumption with renewable natural gas (RNG or biogas-derived Biomethane) that is produced from organic waste.

The RNG Coalition is a non-profit organization that represents and provides public policy advocacy and education on behalf of the renewable natural gas industry in North America. Our more than 175 members represent each sector of the industry and produce more than 95% of the RNG in the United States and Canada. These members include waste collection, recycling and management companies, RNG project developers, banks, investment firms, financiers, engineers, organized labor, law firms, technology and service providers, equipment manufacturers, gas and power marketers, transporters, fueling stations, fleets, transportation companies, consultants, municipalities, universities, investor-owned and public utilities. Together, we advocate for increased development, deployment and utilization of renewable natural gas so present and future generations will have access to domestic, renewable, clean fuel and energy. The RNG Coalition supports the increased development, deployment and utilization of RNG from sustainable feedstocks, indiscriminate of the competing technologies used to upgrade raw biogas to RNG, for all sustainable end-use applications.

The RNG industry is nascent relative to other renewable energy industries but has shown extraordinary growth driven largely by federal, state, provincial and corporate policies designed to promote environmental, economic and sustainability goals

including but not limited to clean air, effective waste management, job development, energy independence and security, and resource diversity.

RNG is produced from the largest renewable waste streams in society today—landfills, diverted food waste, wastewater treatment plants, agricultural and livestock operations. These waste sources emit methane—a highly potent greenhouse gas—into the atmosphere. RNG projects prevent this from happening, by capturing the methane and converting it into an ultra-low-carbon renewable fuel or electricity.

We are strongly supportive of policies like the proposed Green Tariff that encourage the lowest cost outcomes to decarbonize all end uses of conventional natural gas and facilitate consumer choice so that individuals, families and businesses can select the amount of renewable energy they prefer to use.

The RNG Coalition sponsored SB 1440 (Hueso, Statutes of 2018) which requires the California Public Utilities Commission to open a proceeding to consider establishing a Renewable Natural Gas procurement program for natural gas utilities for purposes of decarbonizing California's pipeline infrastructure. We appreciate the Southern California Gas Company's support of SB 1440. To the extent the proposed Green Tariff will not interfere with the intent or implementation of SB 1440, we are pleased to offer our full support for the filing.

Sincerely,

A handwritten signature in blue ink that reads "Sam Wade". The signature is written in a cursive, flowing style.

**Sam Wade**

Director of State Regulatory Affairs  
Coalition for Renewable Natural Gas  
1017 L Street #513  
Sacramento, CA 95814  
916. 588. 3033  
Sam@RNGCoalition.com

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Azusa Pacific University

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Ontario International Airport

Robert Stamp  
University of La Verne

Sajid Sindhia  
Citrus Valley Health Partners

Kelly Wu  
Cathay Bank



February 21, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**Re: Renewable Gas Tariff Option**

Dear Ms. Tomkins,

On behalf of the San Gabriel Valley Economic Partnership, I write in strong support for Southern California Gas Company's Green Tariff renewable gas program. The Partnership is a regional business organization covering the 31 cities and 2 million residents of the San Gabriel Valley in eastern Los Angeles County.

Southern California Gas Company has developed an innovative option for its customers to purchase specified portions of their natural gas from renewable sources. This option will empower consumers to set and reach sustainability goals and reduce their carbon footprint and greenhouse gas emissions. This program would be of immense benefit to the State of California, encouraging organic waste to be captured and turned into renewable natural gas instead of simply released into the atmosphere, thereby reducing our carbon emissions as well as our dependence on imported fossil-based natural gas which must be delivered to the state typically through long-distance pipelines.

I respectfully ask the regulators at the California Public Utilities Commission to expedite the approval of this Green Tariff program, so California consumers and companies can swiftly use this option to reduce their carbon footprint.

Sincerely,

A handwritten signature in black ink that reads "William R. Manis". The signature is written in a cursive style.

William R. Manis  
President & CEO



*A Nonprofit Housing and Community Development Organization*

February 18, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

Self-Help Enterprises (SHE) enthusiastically supports Southern California Gas Company (SoCalGas) proposal for a Renewable Gas Tariff with the California Public Utilities Commission (CPUC) to offer residential and commercial/industrial customers the option of purchasing a portion of their natural gas from renewable sources.

SHE is a nationally recognized housing and community development organization whose mission is to work together with low-income families to build and sustain healthy homes and communities. SHE accomplishes this mission through a variety of services including community engagement and outreach, facilitation of sewer, water and energy infrastructure projects, multi-family housing, single-family housing development and rehabilitation, homeownership counseling and education, homebuyer assistance programs, emergency services, loan portfolio management, park development and asset management. At the core of this effort is the empowerment of residents to take control of the development of their own community infrastructure needs. SHE works collaboratively with communities to attain sustainable infrastructures that support healthy, thriving communities.

Our organization has a strong commitment to creating and supporting sustainable communities. Therefore, we support the proposal of the SoCalGas for a Renewable Gas Tariff that will empower customers with the option of purchasing a portion of their gas from renewable sources. This voluntary tariff will allow SoCalGas to buy renewable gas from producers and reduce the amount of fossil gas that is brought into our system.

This proposal will help customers reach their sustainability goals and reduce their carbon footprint by displacing traditional fossil fuels with clean, renewable gas (RG). This action will also help the state achieve its climate change goals by reducing methane and carbon dioxide emissions. We plan to encourage the CPUC to make the option for RG tariff available to SoCalGas' residential and commercial industrial customer base as soon as possible.

Sincerely,

Thomas J. Collishaw  
President/CEO





February 26, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

**Re: Renewable Gas Tariff Option for Southern California Gas Company Customers**

Dear Ms. Tomkins:

I am writing on behalf of Sequoia Riverlands Trust (SRT) to support Southern California Gas Company's application for a Renewable Gas Tariff that would offer residential, commercial and industrial customers the option of purchasing a portion of their energy from renewable sources. SRT is a regional, accredited land trust that inspires love and lasting protection for important lands, including habitat and farmland in the Southern San Joaquin Valley.

SRT strongly supports California's efforts to reduce greenhouse gas emissions through changes in land use and transportation, regenerative management of working landscapes and development of renewable energy infrastructure. Initiatives to reduce methane emissions by putting existing waste streams to use can contribute to these efforts, provided that energy production facilities are consistent with the needs of local communities. For this reason, we respectfully request that the California Public Utilities Commission approve the Southern California Gas Company's application for a Renewable Gas Tariff.

Thank you for your time and consideration.

Sincerely,

Adam Livingston  
Director of Planning and Policy  
Sequoia Riverlands Trust



REGIONAL CHAMBER OF COMMERCE  
**SAN GABRIEL VALLEY**

February 14, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

RE: Renewable Gas Tariff Option

Dear Ms. Sharon Tomkins:

On behalf of the Regional Chamber of Commerce San Gabriel Valley (RCCSGV), I am writing to support the application submitted by Southern California Gas Company (SoCalGas) with the California Public Utilities Commission to offer residential and small/medium-size business customers the option of purchasing a portion of their natural gas from renewable sources.

This Renewable Gas (RG) Tariff will be available to all residential customers and to commercial and industrial customers for whom SoCalGas purchases gas, who upon request, voluntarily choose to designate all or a portion of their natural gas service to be provided by RG. The program will help the state achieve its decarbonization goals by reducing methane emissions and by displacing traditional fossil fuels. It will help foster the growth and development of the RG industry. The Renewable Gas Tariff will empower customers to use energy wisely and help reduce Green House Gas Emissions and assist customers to achieve their own sustainability goals.

The Regional Chamber of Commerce San Gabriel Valley serves the Southeast San Gabriel Valley and is home to the communities of Diamond Bar, Walnut, Rowland Heights, Hacienda Heights, Avocado Heights, La Puente, Bassett and Valinda. RCCSGV promotes, strengthens, and supports our business members for the benefit of the local San Gabriel Valley economy.

We respectfully ask for approval of SoCalGas' application. Thank you very much for your consideration. If there are any questions, please do not hesitate to call me at (626) 810-8476 or email at AnthonyD@RegionalChamberSGV.com.

Sincerely,

**Anthony Duarte**  
Chief Executive Officer  
Regional Chamber of Commerce-San Gabriel Valley

**Anthony Duarte**  
Chief Executive Officer

**EXECUTIVE COMMITTEE**

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Chair  
2018-2019

**Joe Raquel**  
Foothill Transit  
Chair-elect  
2019-2020

**Dan Arrighi**  
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Water Company  
Chief Financial Officer

**Jillian Reiff**  
Valley Vista Services  
Vice President  
Membership  
Development

**Luis Cetina**  
Metropolitan Water  
District  
Vice President  
Business Advocacy

**David Malkin**  
Kiwanis Club of  
Hacienda Heights  
Vice President  
Economic  
Development

**Ken Liebman**  
American Medical  
Response  
Immediate  
Past Chair  
of the Board



February 15, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

The El Monte/South El Monte Chamber has learned that Southern California Gas Company will be filing an application to provide Renewal Natural Gas to residential and commercial/business customers. The Chamber supports this concept and will look forward to receiving more details as the program evolves.

Our Chamber of Commerce has close to 500 members representing the cities of El Monte and South El Monte. The Mission of the El Monte/South El Monte Chamber of Commerce is to be ambassadors to the business community and a positive voice in local economic development, while advocating strength in education, membership and government legislation.

The EM/SEM Chamber believes that a voluntary program is appropriate so that businesses will have the opportunity to support the State of California's environmental goals by using methane gas that is derived from renewal sources such as municipal waste streams.

We urge that the California Public Utilities Commission consider SoCalGas' application. We strongly believe that natural gas should remain in the State's energy portfolio. Many of our businesses use natural gas and could experience a negative financial impact if they had to change out equipment and expend funds for more expensive energy. Thank you.

Sincerely,

Ken Rausch  
Chief Executive Officer  
El Monte/South El Monte Chamber



February 21, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street ML GCT 21C2  
Los Angeles, CA 90013

**RE: SUPPORT PROCESS TO SEEK CUSTOMER OPTIONS FOR PURCHASING GAS FROM RENEWABLE SOURCES**

Dear Ms. Tomkins,

South Orange County Economic Coalition (SOCEC) is writing in support of SoCalGas efforts to meet with State Regulators (CPUC) to seek a customer option of purchasing a portion of their gas from renewable sources. The proposed Green Tariff proposal will help customers reach their sustainability goals and reduce their carbon footprint by displacing traditional fossil fuel with clean, renewable gas.

SOCEC serves as the primary voice for our region's business community, advocating policies that support a healthy business climate and strong regional economy. Conversely, we will be the first to oppose unnecessary government red tape or regulations that stifle our local economy.

As the regional voice for business, we acknowledge that the demand for natural gas has continued to increase, but supply production has not kept up with demand. This option would help to increase its development while promoting the purchase and use of gas from renewable resources, helping customers meet their desired environmental goals, without removing the choice to continue to purchase and use the same gas customers do now if they so desire.

We appreciate your time and consideration. If you have any questions or need additional information regarding our support of this project, please do not hesitate to contact me by email at [info@economiccoalition.com](mailto:info@economiccoalition.com) or via telephone at (949) 600-5470.

Sincerely,

A handwritten signature in cursive script that reads "Kristen Camuglia".

Kristen Camuglia  
Chair  
South Orange County Economic Coalition

February 15, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

Tejon Ranch Co. (NYSE: TRC) supports Southern California Gas Company's Green Tariff proposal that would provide its customers, including Tejon Ranch Co., its subsidiary businesses, and future residents, the option to purchase a portion of their gas from renewable sources. Such a proposal is consistent with our dedication to sustainability.

Conservation, stewardship and sustainability are important guiding principles at Tejon Ranch Co. We own the 270,000-acre Tejon Ranch, and in 2008, we signed the largest private conservation agreement in California history. The agreement with five of the country's leading environmental organizations will conserve 240,000 acres of our property—90% of our landholdings.

Instead of allowing organic waste streams and biomass sources like crop residue, and animal and food waste to decompose and escape into the atmosphere as methane gas, these renewable sources should be better used to produce fuel. But there must also be a market for such fuel, and Southern California Gas Company's proposal helps make that happen.

We request the California Public Utilities Commission view this proposal favorably and would encourage the commission to Southern California Gas Company customers this option to purchase renewable gas at the earliest date possible.

Sincerely,

TEJON RANCH CO.

Barry Zoeller  
Vice President, Corporate Communications & Investor Relations



OFFICE OF THE PRESIDENT

Energy and Sustainability  
1111 Broadway, Suite 1450  
Oakland, California 94607-5200  
(510) 987-0205

February 15, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Dear Ms. Tomkins:

The University of California (UC) supports SoCalGas's proposal to the California Public Utilities Commission (CPUC) to establish a green tariff for renewable natural gas. This would allow informed customers to choose renewable natural gas as a portion of their energy supplies.

In November of 2013, UC President Janet Napolitano announced the Carbon Neutrality Initiative, which commits the UC to emitting net zero greenhouse gases from its buildings and vehicle fleet by 2025. Renewable natural gas is a key strategy in reaching this goal. We plan to have at least 40% of our existing natural gas supplies be supplanted with biomethane by 2025.

UC's commitment to carbon neutrality is meant to demonstrate scalable solutions to reduce emissions and support California's climate goals. Lacking other options, UC has been working to develop our own renewable gas supply projects. This process has been challenging, despite UC's scale and resources. New programs like that proposed by SoCalGas are necessary to create a robust and cost-effective commercial market for renewable natural gas in California.

We urge you and the CPUC to prioritize expedited approval of this program given the urgency and benefits of reducing short-lived climate pollutants.

Sincerely,

A handwritten signature in black ink that reads "David Phillips".

David Phillips  
Associate Vice President, Energy and Sustainability  
University of California, Office of the President



**Valley Vista Services**  
*Waste Disposal and Recycling Division*

17445 East Railroad Street • City of Industry, California 91748 • (626) 961-6291 • Fax (626) 961-1105

Recovering the Earth's Resources

February 19, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

Our organization is in full support of the Renewable Gas (RG) tariff as it gives all users a more environmental option to source their natural gas needs.

We are a family owned waste and recycling collection and processing business that has relied on natural gas to fuel our fleet since 2002' and currently operates one of the largest privately owned CNG refuse fleets in Southern California.

In our field of operation it is crucial to us as well as our customer base that we continue to strive to shrink our carbon foot print and renewable natural gas is a large part of that effort. We currently operate two large volume CNG fueling facilities, one in the San Gabriel Valley and the other in the Pomona Valley. Areas that have long felt the impacts of industrial uses on their air quality. Coupling our fuel stations with renewable natural gas for use as a motor fuel allows us to continue to do our part in improving the quality of life in our region.

Please do all you can to encourage our regulators make this option available as soon as possible.

Sincerely,

David Perez  
Principal

Valley Vista Services, Inc.  
17554 E Railroad Street  
City of Industry, CA 91748



February 22, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

Natural gas has always been a vital resource for commercial and residential consumers alike. As a Federally Qualified Health Center, our agency relies heavily on natural gas to provide heat to our various clinics for the thousands of patients that seek care with us during the winter months. These same patients utilize this resource to power the stove that helps feed their family and run the dryer that ensures their children have clean clothes for school. Those who own small businesses in the community would not be able to run their day to day operations without the assistance of natural gas. In short, our community depends on this utility to thrive.

While natural gas is invaluable to our local commerce and daily lifestyles, we also understand the impact that it can have on the environment. This is why Via Care wholeheartedly supports The Green Tariff Initiative proposed by the Southern California Gas Company. Converting waste sources, such as landfills and crop residue, into renewable gas is an extremely innovative idea that will not only help reduce program costs, but will also help curb the detrimental effects of methane emissions on our climate, thereby securing a recyclable energy source for future generations.

Via Care Community Health Center is a Federally Qualified Health Center located in the heart of East Los Angeles with a focus on primary healthcare for a largely Hispanic demographic, that also suffer from a disproportionate rate of diseases such as, diabetes, hypertension, obesity, and asthma, to name a few. Over the past few years we have expanded our services from a mainly medical paradigm to encompass dental, behavioral health and insurance enrollment services. Our mission is to bring quality healthcare to anyone and everyone who walks through our doors, regardless of their ability to pay.

As a healthcare provider in a largely Latino community, we hear firsthand about the important role that utilities, such as natural gas, play in the daily lives of our patients, friends and neighbors. Extending a renewable gas option to this population will not only help to reduce costs in an already impoverished neighborhood, but it will also set a positive example of how all natural utilities should strive for the betterment of both their community and their environment.

As vital a resource as natural gas is, it is imperative that a renewable option be extended to a population that relies heavily on the benefits provided by this utility; not only to curb negative environmental effects, but also to send the message that natural gas can fit into the modern recyclable energy paradigm that permeates our society. As such, we would like to appeal to regulators to make this option available as soon as possible to all SoCalGas customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deborah Villar', written over a horizontal line.

Deborah Villar, CEO  
Via Care Community Health Center

**ATTACHMENT B**

Southern California Gas Company  
Balance Sheet and Income Statement

**SOUTHERN CALIFORNIA GAS COMPANY  
BALANCE SHEET  
ASSETS AND OTHER DEBITS  
SEPTEMBER 30, 2018**

	<b>1. UTILITY PLANT</b>	<u>2018</u>
101	UTILITY PLANT IN SERVICE	\$16,754,079,114
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	852,333,732
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,636,929,464)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(55,183,782)
117	GAS STORED-UNDERGROUND	<u>61,422,045</u>
	TOTAL NET UTILITY PLANT	<u>11,975,721,645</u>
 <b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	32,413,200
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(13,537,820)
123	INVESTMENTS IN SUBSIDIARY COMPANIES NONCURRENT PORTION OF ALLOWANCES	-
124	OTHER INVESTMENTS	15,980
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	3,000,000
175	LONG TERM PORTION OF DERIVATIVE ASSETS	<u>324,955</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>22,216,315</u>

Data from SPL as of January 24, 2019.

**SOUTHERN CALIFORNIA GAS COMPANY  
BALANCE SHEET  
ASSETS AND OTHER DEBITS  
SEPTEMBER 30, 2018**

<b>3. CURRENT AND ACCRUED ASSETS</b>		2018
131	CASH	3,951,498
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	126,287
136	TEMPORARY CASH INVESTMENTS	(2,783,474)
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	364,305,572
143	OTHER ACCOUNTS RECEIVABLE	73,115,734
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(4,041,214)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	88,219,495
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(3,851,651)
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	52,280,157
155	MERCHANDISE	-
156	OTHER MATERIALS AND SUPPLIES	-
158	GHG ALLOWANCE	285,708,270
	(LESS) NONCURRENT PORTION OF ALLOWANCES	-
163	STORES EXPENSE UNDISTRIBUTED	175,316
164	GAS STORED	115,993,175
165	PREPAYMENTS	32,642,596
171	INTEREST AND DIVIDENDS RECEIVABLE	807,208
173	ACCRUED UTILITY REVENUES	-
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	28,005,992
175	DERIVATIVE INSTRUMENT ASSETS	6,199,439
176	LONG TERM PORTION OF DERIVATIVE ASSETS	(324,955)
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<b>1,040,529,444</b>
<b>4. DEFERRED DEBITS</b>		
181	UNAMORTIZED DEBT EXPENSE	25,573,566
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,703,912,834
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	3,106,069
184	CLEARING ACCOUNTS	(250,594)
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	805,641,000
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	5,182,763
190	ACCUMULATED DEFERRED INCOME TAXES	365,754,780
191	UNRECOVERED PURCHASED GAS COSTS	-
	<b>TOTAL DEFERRED DEBITS</b>	<b>3,908,920,419</b>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>\$ 16,947,387,825</b>

Data from SPL as of January 24, 2019.

**SOUTHERN CALIFORNIA GAS COMPANY  
BALANCE SHEET  
LIABILITIES AND OTHER CREDITS  
SEPTEMBER 30, 2018**

**5. PROPRIETARY CAPITAL**

	2018
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	(3,234,612,617)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	19,398,560
	(4,102,827,180)

**6. LONG-TERM DEBT**

221 BONDS	(3,450,000,000)
224 OTHER LONG-TERM DEBT	(9,338,770)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	7,139,703
	(3,452,199,067)

**7. OTHER NONCURRENT LIABILITIES**

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(707,633)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(130,576,868)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(708,009,055)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
245 NONCURRENT DERIVATIVE INSTRUMENT LIABILITIES	-
230 ASSET RETIREMENT OBLIGATIONS	(2,006,441,109)
	(2,845,734,666)

Data from SPL as of January 24, 2019.

**SOUTHERN CALIFORNIA GAS COMPANY  
BALANCE SHEET  
LIABILITIES AND OTHER CREDITS  
SEPTEMBER 30, 2018**

<b>8. CURRENT AND ACCRUED LIABILITES</b>		2018
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	(709,203,539)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(35,852,410)
235	CUSTOMER DEPOSITS	(100,541,695)
236	TAXES ACCRUED	(20,526,156)
237	INTEREST ACCRUED	(28,127,462)
238	DIVIDENDS DECLARED	(50,323,265)
241	TAX COLLECTIONS PAYABLE	(14,223,002)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(368,697,624)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(3,126,563)
244	DERIVATIVE INSTRUMENT LIABILITIES	(5,148,809)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	<b>TOTAL CURRENT AND ACCRUED LIABILITIES</b>	<b>(1,335,770,525)</b>
<b>9. DEFERRED CREDITS</b>		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(82,118,093)
	OTHER DEFERRED CREDITS	(192,924,770)
254	OTHER REGULATORY LIABILITIES	(3,439,396,832)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(9,118,999)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,193,296,599)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(294,001,095)
	<b>TOTAL DEFERRED CREDITS</b>	<b>(5,210,856,387)</b>
	<b>TOTAL LIABILITIES AND OTHER CREDITS</b>	<b>\$ (16,947,387,825)</b>

Data from SPL as of January 24, 2019.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**NINE MONTHS ENDED SEPTEMBER 30, 2018**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		2,700,782,066
401	OPERATING EXPENSES	1,635,081,241	
402	MAINTENANCE EXPENSES	196,603,712	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	413,745,442	
408.1	TAXES OTHER THAN INCOME TAXES	77,621,802	
409.1	INCOME TAXES	(17,699,916)	
410.1	PROVISION FOR DEFERRED INCOME TAXES	148,629,499	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(79,313,442)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(809,088)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	(247,776)	
411.7	LOSS FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		2,373,611,473
	NET OPERATING INCOME		327,170,593

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES FROM NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(255,226)	
418	NONOPERATING RENTAL INCOME	352,953	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	215,198	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	29,847,191	
421	MISCELLANEOUS NONOPERATING INCOME	(719,970)	
421.1	GAIN ON DISPOSITION OF PROPERTY	0	
	TOTAL OTHER INCOME	29,440,146	
421.2	LOSS ON DISPOSITION OF PROPERTY	(98,241)	
425	MISCELLANEOUS AMORTIZATION	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	(4,554,922)	
		(4,653,163)	
408.2	TAXES OTHER THAN INCOME TAXES	(156,347)	
409.2	INCOME TAXES	(22,670,663)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	(29,405,212)	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	27,627,274	
420	INVESTMENT TAX CREDITS	-	
		-	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	(24,604,948)	
	TOTAL OTHER INCOME AND DEDUCTIONS		182,035
	INCOME BEFORE INTEREST CHARGES		327,352,628
	NET INTEREST CHARGES*		82,419,793
	NET INCOME		\$244,932,834

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION. (\$8,479,706)

Data from SPL as of January 24, 2019.

**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**NINE MONTHS ENDED SEPTEMBER 30, 2018**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,040,649,581
NET INCOME (FROM PRECEDING PAGE)	244,932,834
DIVIDEND TO PARENT COMPANY	(50,000,000)
DIVIDENDS DECLARED - PREFERRED STOCK	(969,798)
OTHER RETAINED EARNINGS ADJUSTMENT	<u>-</u>
RETAINED EARNINGS AT END OF PERIOD	<u><u>\$3,234,612,617</u></u>

**ATTACHMENT C**

San Diego Gas & Electric Company  
Balance Sheet and Income Statement

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**September 30,2018**

		2018
<b>1. UTILITY PLANT</b>		
101	UTILITY PLANT IN SERVICE	\$ 18,076,186,935
102	UTILITY PLANT PURCHASED OR SOLD	279,422
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	0
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,330,567,123
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,510,929,374)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(863,743,883)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,687,824)
118	OTHER UTILITY PLANT	1,303,370,018
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(266,380,066)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	\$ 14,156,607,072
<b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	\$ 6,028,916
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(326,049)
158	NON-CURRENT PORTION OF ALLOWANCES	153,004,279
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,041,688,168
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	98,473,756
	TOTAL OTHER PROPERTY AND INVESTMENTS	\$ 1,298,869,070

Data from SPL as of November 15, 2018

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**September 30,2018**

**3. CURRENT AND ACCRUED ASSETS**

		2018
131	CASH	\$ 8,679,418
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	403,359,872
143	OTHER ACCOUNTS RECEIVABLE	133,123,963
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(4,871,013)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	723,143
151	FUEL STOCK	655,097
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	136,585,635
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	272,239,297
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(153,004,279)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	365,298
165	PREPAYMENTS	109,370,868
171	INTEREST AND DIVIDENDS RECEIVABLE	2,424,619
173	ACCRUED UTILITY REVENUES	71,348,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,400,000
175	DERIVATIVE INSTRUMENT ASSETS	132,604,309
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(98,473,756)
	TOTAL CURRENT AND ACCRUED ASSETS	\$ 1,017,530,971

**4. DEFERRED DEBITS**

181	UNAMORTIZED DEBT EXPENSE	\$ 35,191,699
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,668,321,332
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	682,437
184	CLEARING ACCOUNTS	(414,398)
185	TEMPORARY FACILITIES	323,699
186	MISCELLANEOUS DEFERRED DEBITS	126,035,739
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	6,948,253
190	ACCUMULATED DEFERRED INCOME TAXES	140,760,086
	TOTAL DEFERRED DEBITS	\$ 1,977,848,847

	\$ 18,450,855,960
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Data from SPL as of November 15, 2018

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**September 30, 2018**

**5. PROPRIETARY CAPITAL**

		2018
201	COMMON STOCK ISSUED	\$ 291,458,395
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	591,282,978
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	479,665,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	4,537,331,009
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(13,802,425)
	TOTAL PROPRIETARY CAPITAL	\$ 5,861,329,685

**6. LONG-TERM DEBT**

221	BONDS	\$ 4,776,266,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(12,823,314)
	TOTAL LONG-TERM DEBT	\$ 4,763,442,686

**7. OTHER NONCURRENT LIABILITIES**

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 991,240,490
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	23,683,235
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	175,464,960
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	107,472,404
230	ASSET RETIREMENT OBLIGATIONS	863,459,256
	TOTAL OTHER NONCURRENT LIABILITIES	\$ 2,161,320,345

Data from SPL as of November 15, 2018

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**September 30, 2018**

**8. CURRENT AND ACCRUED LIABILITES**

		2018
231	NOTES PAYABLE	\$ 48,000,000
232	ACCOUNTS PAYABLE	445,137,643
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	52,392,077
235	CUSTOMER DEPOSITS	78,802,461
236	TAXES ACCRUED	37,733,370
237	INTEREST ACCRUED	58,315,429
238	DIVIDENDS DECLARED	250,000,000
241	TAX COLLECTIONS PAYABLE	5,414,155
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	259,305,218
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	57,220,250
244	DERIVATIVE INSTRUMENT LIABILITIES	149,254,500
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(107,472,404)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 1,334,102,699

**9. DEFERRED CREDITS**

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 54,590,239
253	OTHER DEFERRED CREDITS	312,629,900
254	OTHER REGULATORY LIABILITIES	2,207,491,998
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	15,913,107
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	1,612,853,805
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	127,181,496
	TOTAL DEFERRED CREDITS	\$ 4,330,660,545

	\$ 18,450,855,960
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\$4,330,660,545

Data from SPL as of November 15, 2018

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
September 30, 2018

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$ 3,833,640,636
401	OPERATING EXPENSES	\$ 2,358,985,257	
402	MAINTENANCE EXPENSES	118,287,250	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	484,763,212	
408.1	TAXES OTHER THAN INCOME TAXES	107,088,155	
409.1	INCOME TAXES	59,034,001	
410.1	PROVISION FOR DEFERRED INCOME TAXES	144,733,508	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(58,728,155)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(1,726,942)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>\$3,212,436,286</u>
	NET OPERATING INCOME		\$ 621,204,350

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WOF \$	-	
417	REVENUES OF NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(314)	
418	NONOPERATING RENTAL INCOME	24,880	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	11,928,996	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	49,295,400	
421	MISCELLANEOUS NONOPERATING INCOME	662,098	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>\$ 61,911,060</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	\$ -	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	3,278,730	
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 3,466,266</u>	
408.2	TAXES OTHER THAN INCOME TAXES	\$ 494,640	
409.2	INCOME TAXES	3,464,600	
410.2	PROVISION FOR DEFERRED INCOME TAXES	28,615,773	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(24,589,289)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 7,985,724</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>\$ 50,459,070</u>
	INCOME BEFORE INTEREST CHARGES		671,663,420
	EXTRAORDINARY ITEMS AFTER TAXES		-
	NET INTEREST CHARGES*		<u>151,163,791</u>
	NET INCOME		<u><u>\$ 520,499,629</u></u>

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$16,584,174)

Data from SPL as of November 15, 2018

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**September 30,2018**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 4,266,831,380
NET INCOME (FROM PRECEDING PAGE)	520,499,629
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	(250,000,000)
OTHER RETAINED EARNINGS ADJUSTMENTS	-
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 4,537,331,009</u>

**ATTACHMENT D**

Southern California Gas Company

Statement of Original Cost and Depreciation Reserve

## SOUTHERN CALIFORNIA GAS COMPANY

Plant Investment and Accumulated Depreciation

As of September 30, 2018

ACCOUNT NUMBER	DESCRIPTION	ORIGINAL COSTS	ACCUMULATED RESERVE	NET BOOK VALUE
<b>INTANGIBLE ASSETS</b>				
301	Organization	\$ 76,457	\$ -	\$ 76,457
302	Franchise and Consents	\$ 582,060	\$ -	\$ 582,060
	Total Intangible Assets	<u>\$ 658,517</u>	<u>0</u>	<u>\$ 658,517</u>
<b>PRODUCTION:</b>				
325	Other Land Rights	\$ 15,321	\$ -	\$ 15,321
330	Prd Gas Wells Const	\$ 5,557,139	\$ (1,415)	\$ 5,555,724
331	Prd Gas Wells Eqp	\$ 454,718	\$ (55)	\$ 454,663
332	Field Lines	\$ 1,731,111	\$ -	\$ 1,731,111
334	FldMeas&RegStnEquip	\$ 536,249	\$ -	\$ 536,249
336	Prf Eqpt	\$ 485,415	\$ -	\$ 485,415
	Total Production	<u>\$ 8,779,952</u>	<u>(1,470)</u>	<u>\$ 8,778,482</u>
<b>UNDERGROUND STORAGE:</b>				
350	Land	\$ 4,539,484	\$ -	\$ 4,539,484
350SR	Storage Rights	\$ 17,935,798	\$ (17,513,664)	\$ 422,134
350RW	Rights-of-Way	\$ 25,354	\$ (17,333)	\$ 8,021
351	Structures and Improvements	\$ 94,940,123	\$ (24,364,682)	\$ 70,575,441
352	Wells	\$ 471,617,426	\$ (78,925,394)	\$ 392,692,032
353	Lines	\$ 141,354,493	\$ (96,389,617)	\$ 44,964,876
354	Compressor Station and Equipment	\$ 430,929,578	\$ (68,762,469)	\$ 362,167,108
355	Measuring And Regulator Equipment	\$ 8,107,874	\$ (2,774,196)	\$ 5,333,678
356	Purification Equipment	\$ 153,446,114	\$ (80,148,476)	\$ 73,297,638
357	Other Equipment	\$ 65,515,223	\$ (16,998,568)	\$ 48,516,655
	Total Underground Storage	<u>\$ 1,388,411,466</u>	<u>(385,894,398)</u>	<u>\$ 1,002,517,068</u>
<b>TRANSMISSION PLANT- OTHER:</b>				
365	Land	\$ 6,663,549	\$ -	\$ 6,663,549
365LRTS	Land Rights	\$ 22,506,032	\$ (15,445,589)	\$ 7,060,444
366	Structures and Improvements	\$ 59,982,083	\$ (21,438,280)	\$ 38,543,803
367	Mains	\$ 2,142,735,789	\$ (683,522,929)	\$ 1,459,212,860
368	Compressor Station and Equipment	\$ 241,753,332	\$ (105,522,351)	\$ 136,230,981
369	Measuring And Regulator Equipment	\$ 158,239,209	\$ (33,085,948)	\$ 125,153,261
370	Communication Equipment	\$ 34,912,119	\$ (3,248,539)	\$ 31,663,580
371	Other Equipment	\$ 6,786,233	\$ (3,867,949)	\$ 2,918,284
	Total Transmission Plant	<u>\$ 2,673,578,347</u>	<u>(866,131,585)</u>	<u>\$ 1,807,446,762</u>
<b>DISTRIBUTION PLANT:</b>				
374	Land	\$ 29,928,292	\$ -	\$ 29,928,292
374LRTS	Land Rights	\$ 2,824,582	\$ (2,085,133)	\$ 739,449
375	Structures and Improvements	\$ 287,448,081	\$ (85,279,268)	\$ 202,168,813
376	Mains	\$ 4,960,985,640	\$ (2,421,052,487)	\$ 2,539,933,154
378	Measuring And Regulator Equipment	\$ 114,700,932	\$ (76,761,045)	\$ 37,939,887
380	Services	\$ 2,842,738,599	\$ (2,079,243,561)	\$ 763,495,038
381	Meters	\$ 913,911,264	\$ (206,777,222)	\$ 707,134,042
382	Meter Installation	\$ 576,836,469	\$ (169,081,857)	\$ 407,754,612
383	House Regulators	\$ 167,051,064	\$ (71,589,310)	\$ 95,461,754
387	Other Equipment	\$ 56,255,664	\$ (24,735,887)	\$ 31,519,777
	Total Distribution Plant	<u>\$ 9,952,680,588</u>	<u>(5,136,605,770)</u>	<u>\$ 4,816,074,818</u>
<b>GENERAL PLANT:</b>				

## SOUTHERN CALIFORNIA GAS COMPANY

Plant Investment and Accumulated Depreciation

As of September 30, 2018

ACCOUNT NUMBER	DESCRIPTION	ORIGINAL COSTS	ACCUMULATED RESERVE	NET BOOK VALUE
389	Land	\$ 1,342,839	\$ -	1,342,839
389LRTS	Land Rights	\$ 74,300	\$ (37,901)	36,399
390	Structures and Improvements	\$ 210,694,692	\$ (188,338,716)	22,355,976
391	Office Furniture and Equipment	\$ 1,263,892,817	\$ (799,207,330)	464,685,487
392	Transportation Equipment	\$ 151,892	\$ (149,267)	2,625
393	Stores Equipment	\$ 99,134	\$ (71,723)	27,411
394	Shop and Garage Equipment	\$ 86,015,584	\$ (26,823,365)	59,192,219
395	Laboratory Equipment	\$ 4,506,620	\$ (1,607,188)	2,899,432
396	Construction Equipment	\$ 11,957	\$ (4,182)	7,775
397	Communication Equipments	\$ 191,277,613	\$ (52,662,710)	138,614,904
398	Miscellaneous Equipment	\$ 3,228,862	\$ (1,613,697)	1,615,164
	Total General Plant	<u>\$ 1,761,296,309</u>	<u>(1,070,516,078)</u>	<u>\$ 690,780,231</u>
	Subtotal	<u><b>\$ 15,785,405,179</b></u>	<u><b>(7,459,149,300)</b></u>	<u><b>\$ 8,326,255,878</b></u>

**ATTACHMENT E**

San Diego Gas & Electric Company

Statement of Original Cost and Depreciation Reserve

**SAN DIEGO GAS & ELECTRIC COMPANY**

**COST OF PROPERTY AND  
DEPRECIATION RESERVE APPLICABLE THERETO  
AS OF SEPTEMBER 30, 2018**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>ELECTRIC DEPARTMENT</b>			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	178,592,058.86	125,268,083.95
	<b>TOTAL INTANGIBLE PLANT</b>	<u>178,814,900.22</u>	<u>125,470,984.25</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	89,230,272.75	41,757,102.84
312	Boiler Plant Equipment	161,752,233.19	77,199,366.30
314	Turbogenerator Units	130,881,904.46	50,825,314.80
315	Accessory Electric Equipment	83,852,556.38	39,928,344.67
316	Miscellaneous Power Plant Equipment	49,998,833.19	14,459,499.15
	Steam Production Contra Accounts	<u>(1,621,911.83)</u>	<u>(470,229.65)</u>
	<b>TOTAL STEAM PRODUCTION</b>	<u>528,620,406.43</u>	<u>223,745,916.40</u>
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	27,285,711.08	2,658,162.87
322	Boiler Plant Equipment	243,225,717.06	21,662,290.99
323	Turbogenerator Units	26,982,364.66	2,370,893.39
324	Accessory Electric Equipment	10,878,214.63	1,458,232.53
325	Miscellaneous Power Plant Equipment	166,754,468.81	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	<u>(475,126,476.33)</u>	<u>(76,957,383.29)</u>
	<b>TOTAL NUCLEAR PRODUCTION</b>	<u>(0.09)</u>	<u>0.00</u>
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	23,529,950.99	8,901,979.24
342	Fuel Holders, Producers & Accessories	21,368,233.00	8,087,773.26
343	Prime Movers	94,575,339.90	42,149,571.14
344	Generators	360,077,971.61	156,001,772.94
345	Accessory Electric Equipment	32,510,919.85	15,038,708.85
346	Miscellaneous Power Plant Equipment	<u>29,087,796.47</u>	<u>15,425,425.03</u>
	<b>TOTAL OTHER PRODUCTION</b>	<u>561,377,008.69</u>	<u>245,607,658.42</u>
	<b>TOTAL ELECTRIC PRODUCTION</b>	<u>1,089,997,415.03</u>	<u>469,353,574.82</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	77,827,209.51	0.00
350.2	Land Rights	161,387,770.81	23,778,841.84
352	Structures and Improvements	537,386,626.77	79,070,758.57
353	Station Equipment	1,710,121,925.35	344,888,681.77
354	Towers and Fixtures	900,966,680.38	184,588,939.40
355	Poles and Fixtures	600,064,916.49	119,286,844.53
356	Overhead Conductors and Devices	654,615,080.06	242,305,965.32
357	Underground Conduit	456,586,221.74	67,320,044.31
358	Underground Conductors and Devices	518,568,520.03	65,967,471.90
359	Roads and Trails	320,628,960.42	36,871,750.01
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	TOTAL TRANSMISSION	5,938,153,911.56	1,164,079,297.65
360.1	Land	16,558,313.10	0.00
360.2	Land Rights	88,412,505.50	44,060,804.07
361	Structures and Improvements	9,321,203.30	1,619,793.25
362	Station Equipment	547,176,331.98	202,687,930.96
363	Storage Battery Equipment	124,269,130.82	26,319,167.06
364	Poles, Towers and Fixtures	764,676,388.40	283,055,904.85
365	Overhead Conductors and Devices	743,469,939.47	226,021,736.01
366	Underground Conduit	1,318,884,752.78	507,723,366.85
367	Underground Conductors and Devices	1,606,438,999.77	940,155,526.29
368.1	Line Transformers	640,608,509.15	179,076,948.11
368.2	Protective Devices and Capacitors	34,061,366.83	9,406,533.37
369.1	Services Overhead	172,105,185.03	117,685,980.03
369.2	Services Underground	361,458,414.22	254,527,049.70
370.1	Meters	196,818,316.98	99,554,665.76
370.2	Meter Installations	58,655,280.65	26,114,602.06
371	Installations on Customers' Premises	9,360,128.68	10,498,157.03
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	31,160,189.31	20,217,576.06
	TOTAL DISTRIBUTION PLANT	6,723,434,955.97	2,948,725,741.46
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	44,850,290.10	25,888,083.96
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	18,047.26
393	Stores Equipment	46,521.59	531.34
394.1	Portable Tools	33,263,509.74	9,595,007.24
394.2	Shop Equipment	278,147.42	207,215.61
395	Laboratory Equipment	5,333,953.73	893,002.61
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	302,470,411.71	119,076,988.06
398	Miscellaneous Equipment	18,168,839.54	1,998,621.19
	TOTAL GENERAL PLANT	411,842,490.97	157,844,883.15
101	TOTAL ELECTRIC PLANT	14,342,243,673.75	4,865,474,481.33

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>GAS PLANT</b>			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	<b>TOTAL INTANGIBLE PLANT</b>	<b>86,104.20</b>	<b>86,104.20</b>
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,242,164.87	1,254,337.90
	<b>TOTAL STORAGE PLANT</b>	<b>2,242,164.87</b>	<b>1,254,337.90</b>
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,515,541.91	1,474,582.24
366	Structures and Improvements	19,306,097.54	10,747,287.22
367	Mains	244,206,472.31	84,172,238.01
368	Compressor Station Equipment	92,181,833.42	71,548,133.48
369	Measuring and Regulating Equipment	27,307,998.16	17,363,626.62
371	Other Equipment	1,994,264.34	102,032.16
	<b>TOTAL TRANSMISSION PLANT</b>	<b>393,161,351.43</b>	<b>185,407,899.73</b>
374.1	Land	1,083,616.95	0.00
374.2	Land Rights	8,372,869.81	7,189,249.97
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,207,988,580.87	401,841,603.66
378	Measuring & Regulating Station Equipment	19,025,030.10	8,758,431.64
380	Distribution Services	314,129,551.34	297,410,351.30
381	Meters and Regulators	162,001,323.69	65,512,915.77
382	Meter and Regulator Installations	103,635,103.94	44,407,723.29
385	Ind. Measuring & Regulating Station Equipm	1,516,810.70	1,254,330.86
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,402,034.82	5,561,192.56
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>1,829,198,369.13</b>	<b>831,997,052.15</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	0.00	0.13
394.1	Portable Tools	11,637,669.14	4,352,177.63
394.2	Shop Equipment	53,038.12	31,837.63
395	Laboratory Equipment	0.00	(7,344.15)
396	Power Operated Equipment	16,162.40	13,031.16
397	Communication Equipment	2,066,323.73	730,941.80
398	Miscellaneous Equipment	465,784.09	110,437.55
	TOTAL GENERAL PLANT	<u>14,238,977.48</u>	<u>5,256,584.75</u>
101	TOTAL GAS PLANT	<u>2,238,926,967.11</u>	<u>1,024,001,978.73</u>
<b>COMMON PLANT</b>			
303	Miscellaneous Intangible Plant	521,298,693.05	342,938,277.88
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,792.37	0.00
389.2	Land Rights	856,578.73	27,775.65
390	Structures and Improvements	425,505,879.71	156,827,600.17
391.1	Office Furniture and Equipment - Other	39,628,607.13	14,808,980.42
391.2	Office Furniture and Equipment - Computer E	50,989,156.88	14,305,413.70
392.1	Transportation Equipment - Autos	594,873.39	223,530.73
392.2	Transportation Equipment - Trailers	107,977.72	580.77
392.3	Transportation Equipment - Aviation	11,580,557.15	628,300.30
393	Stores Equipment	333,835.97	16,873.43
394.1	Portable Tools	1,520,822.86	468,329.86
394.2	Shop Equipment	142,759.33	90,378.13
394.3	Garage Equipment	1,854,148.83	303,044.26
395	Laboratory Equipment	1,731,116.64	768,963.28
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	230,270,983.03	74,914,894.70
398	Miscellaneous Equipment	5,151,851.74	215,084.31
118.1	TOTAL COMMON PLANT	<u>1,299,062,634.53</u>	<u>606,345,048.49</u>
	TOTAL ELECTRIC PLANT	14,342,243,673.75	4,865,474,481.33
	TOTAL GAS PLANT	2,238,926,967.11	1,024,001,978.73
	TOTAL COMMON PLANT	<u>1,299,062,634.53</u>	<u>606,345,048.49</u>
101 & 118.1	TOTAL	<u>17,880,233,275.39</u>	<u>6,495,821,508.55</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CONTRA-ELECTRIC		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	<u>(1,540,513.52)</u>	<u>(1,540,513.52)</u>
101	Accrual for Retirements		
	Electric	(4,759,459.52)	(4,759,459.52)
	Gas	(435,362.71)	(435,362.71)
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(5,194,822.23)</u>	<u>(5,194,822.23)</u>
102	Electric	279,421.69	0.00
	Gas	<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>279,421.69</u>	<u>0.00</u>
104	Electric	85,194,000.02	19,225,724.58
	Gas	<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT LEASED TO OTHERS	<u>85,194,000.02</u>	<u>19,225,724.58</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,072,815,410.20	
	Gas	105,735,960.72	
	Common	<u>152,015,752.40</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,330,567,123.32</u>	<u>0.00</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	1,040,779,458.92
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,040,779,458.92
101.1	ELECTRIC CAPITAL LEASES	1,352,823,281.00	306,191,775.00
118.1	COMMON CAPITAL LEASE	14,305,775.75	12,476,541.94
		1,367,129,056.75	318,668,316.94
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	(62,963,775.37)	(40,861,208.00)
143	FAS 143 ASSETS - Legal Obligation	17,125,479.67	(1,038,527,427.03)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	100,964,116.53	40,162,963.19
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,634,437,856.68)
	TOTAL FAS 143	118,089,596.20	(2,632,802,320.52)
	UTILITY PLANT TOTAL	20,774,757,137.62	5,234,957,352.72

**ATTACHMENT F**  
Southern California Gas Company  
Summary of Earnings

**SOUTHERN CALIFORNIA GAS COMPANY  
SUMMARY OF EARNINGS  
NINE MONTHS ENDED SEPTEMBER 30, 2018  
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$2,701
2	Operating Expenses	<u>2,374</u>
3	Net Operating Income	<u><u>\$327</u></u>
4	Weighted Average Rate Base	\$6,261
5	Rate of Return*	7.34%

\*Authorized Cost of Capital

**ATTACHMENT G**  
San Diego Gas & Electric Company  
Summary of Earnings

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**SUMMARY OF EARNINGS**  
**September 30, 2018**  
**(\$ IN MILLIONS)**

Line No.	Item	Amount
1	Operating Revenue	\$ 3,834
2	Operating Expenses	<u>3,212</u>
3	Net Operating Income	<u>\$ 621</u>
4	Weighted Average Rate Base	\$ 9,354
5	Rate of Return*	7.55%
	*Authorized Cost of Capital	