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November 3, 2005

Advice No. 3524-A  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Supplemental - Request to Establish New Memorandum Account for Incremental Call Center Costs**

Southern California Gas Company (SoCalGas) hereby submits for filing revisions to its tariff schedules, applicable throughout its service territory, as shown on Attachment B.

**Purpose**

In accordance with Ordering Paragraphs (OP) 5 and 7 of Resolution E-3958, dated October 27, 2005 and OP 19 of Decision (D.) 05-04-052 in Application (A.) 04-07-010, SoCalGas is revising its Preliminary Statement, Part VI - Memorandum Accounts, to establish the Interim Call Center Memorandum Account (ICCMA) to record call center labor costs incurred as a result of the CARE Program. This supplemental filing replaces in its entirety Advice No. 3524 filed on August 29, 2005.

**Background**

On July 1, 2004, the four major investor-owned utilities filed Low Income Energy Efficiency (LIEE) and CARE applications for 2005 program plans and funding at the request of the Commission. The CARE Program provides income-qualified customers with a 20 percent discount on their energy bills. SoCalGas A.04-07-010 contained funding for CARE call center labor costs and indirect costs as part of the CARE administrative budget. SoCalGas has been recovering CARE call center costs through the authorized 1995 CARE budget.

In D.05-05-019<sup>1</sup>, Table 1, the Commission disallowed \$453,000 in CARE call center labor costs from the CARE Outreach budget category. Conclusion of Law 15, in D.05-04-052, finds that call center staff costs should be recovered in a utility's base rates, rather than as part of public purpose program funding.

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<sup>1</sup> D.05-05-019 issued May 13, 2005, Order Correcting Errors in D.05-04-052. D.05-07-007 issued July 15, 2005, Order Correcting Error in D.05-05-019, corrected a double disallowance for the call center costs and indirect costs.

In D.05-04-052, the Commission states where a cost is one the utility would have to incur regardless of the presence of the low-income programs, it should be funded in base rates, rather than the earmarked Public Good Charge surcharge. OP 19 states SoCalGas may recover in base rates the call center costs disallowed in this decision. Accordingly, SoCalGas is making the following revisions in its preliminary statement to record and recover such costs since they are not included in SoCalGas' current base rates.

### **Revisions to Preliminary Statement**

SoCalGas is revising its Preliminary Statement to establish the ICCMA. The purpose of the ICCMA is to record and recover the incremental labor and indirect expenses incurred as a result of the CARE related program activities for the period beginning January 1, 2005 as directed by D.05-04-052. Incremental CARE related call center costs will continue to be recorded to the ICCMA until such time they are placed into base margin through SoCalGas' next general rate case, or in a separate proceeding initiated by a formal application.

This filing will not create any deviations from SoCalGas' tariffs, cause withdrawal of service from any present customers, or impose any more or less restrictive conditions.

### **Protest**

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Jerry Royer ([jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov)) and Honesto Gatchalian ([ijn@cpuc.ca.gov](mailto:ijn@cpuc.ca.gov)) of the Energy Division. A copy of the protest shall also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Sid Newsom  
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555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No. (213) 244-4957  
E-Mail: [snewsom@semprautilities.com](mailto:snewsom@semprautilities.com)

**Effective Date**

In compliance with OP 7 of Resolution E-3958, this filing is effective October 27, 2005, subject to Energy Division determining that it is in compliance with the Resolution.

**Notice**

A copy of this advice letter is being sent to the parties listed on Attachment A, including interested parties in R.04-01-006.

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Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY/ U 904 G**

Utility type:

ELC     GAS  
 PLC     HEAT     WATER

Contact Person: Nena Maralit

Phone #: (213) 244-2822

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### EXPLANATION OF UTILITY TYPE

ELC = Electric                      GAS = Gas  
PLC = Pipeline                      HEAT = Heat    WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3524-A

Subject of AL: Request to Establish New Memorandum Account for CARE Call Center Costs - Supplement

Keywords (choose from CPUC listing): CARE, Memorandum Account

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.05-04-052, Resolution E-3958

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: October 27, 2005                      No. of tariff sheets: 3

Estimated system annual revenue effect (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Preliminary Statement - Part VI, TOCs

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: \_\_\_\_\_

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

**CPUC, Energy Division**

**Attention: Tariff Unit**

**505 Van Ness Avenue**

**San Francisco, CA 94102**

**jjr@cpuc.ca.gov and jnj@cpuc.ca.gov**

**Southern California Gas Company**

**Attention: Sid Newsom**

**555 West Fifth Street, ML GT14D6**

**Los Angeles, CA 90013-4957**

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<sup>1</sup> Discuss in AL if more space is needed.

**ATTACHMENT A**  
**Advice No. 3524-A**

**(See Attached Service Lists)**

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ATTACHMENT B  
Advice No. 3524-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 39828-G	PRELIMINARY STATEMENT, PART VI, DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM, Sheet 1	Revised 39514-G 39502-G
Revised 39829-G	PRELIMINARY STATEMENT, PART VI, DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM, Sheet 18	Original 39503-G
Revised 39830-G	TABLE OF CONTENTS	Revised 39827-G

PRELIMINARY STATEMENT

Sheet 1

PART VI  
DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM

A. GENERAL

Memorandum accounts are special accounts authorized by the Commission for the purpose of tracking certain costs and revenues. Please refer to each individual memorandum account description for the specific accounting treatment applicable to each account.

B. LISTING OF MEMORANDUM ACCOUNTS

- PCB Expense Account (PCBEA)
- Research Development and Demonstration Expense Account (RDDEA)
- Curtailement Violation Penalty Account (CVPA)
- Economic Practicality Shortfall Memorandum Account (EPSMA)
- Catastrophic Event Memorandum Account (CEMA)
- Vernon Avoided Distribution Cost Memorandum Account (VADCMA)
- Interstate Capacity Step Down Account (ICSDA)
- Vernon Rate Savings Memorandum Account (VRSMA)
- Vernon Negotiated Core Contract Memorandum Account (VNCCMA)
- Earthquake Valve Installation Service Memorandum Account (EVISMA)
- Research Royalty Memorandum Account (RRMA)
- NGV Research Development & Demonstration Memorandum Account (RDDNGV)
- Intervenor Award Memorandum Account (IAMA)
- Z Factor Account (ZFA)
- Tax Interest Account (TIA)
- Energy Efficiency/DSM Memorandum Account (EEDSMMA)
- Wheeler Ridge Firm Access Charge Memorandum Account (WRFACMA)
- Gas Industry Restructuring Memorandum Account (GIRMA)
- Self-Generation Program Memorandum Account (SGPMA)
- Baseline Memorandum Account (BMA)
- Blythe Operational Flow Requirement Memorandum Account (BOFRMA)
- Annual Earnings Assessment Proceeding Memorandum Account (AEAPMA)
- Cost of Service Revenue Requirement Memorandum Account (COSRRMA)
- El Paso Settlement Proceeds Memorandum Account (EPSPMA)
- Interim Call Center Memorandum Account (ICCMA)

N

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 3524-A  
 DECISION NO. 05-04-052

ISSUED BY  
**Lee Schavrien**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Nov 3, 2005  
 EFFECTIVE \_\_\_\_\_  
 RESOLUTION NO. E-3958



TABLE OF CONTENTS

The following listed sheets contain all effective Schedules of Rates and Rules affecting service and information relating thereto in effect on the date indicated thereon.

<u>GENERAL</u>	<u>Cal. P.U.C. Sheet No.</u>
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Table of Contents--Rate Schedules .....	39823-G,39824-G,39757-G
Table of Contents--List of Cities and Communities Served .....	37398-G
Table of Contents--List of Contracts and Deviations .....	37894-G
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PRELIMINARY STATEMENT

Part I General Service Information .....	37917-G,24332-G,24333-G,24334-G,24749-G
Part II Summary of Rates and Charges .....	39759-G,39760-G,39761-G,39669-G,39250-G,39762-G 32491-G,32492-G,38848-G,39763-G,39764-G,39058-G,39059-G
Part III Cost Allocation and Revenue Requirement .....	27024-G,37920-G,27026-G,27027-G,39060-G
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Part VI Description of Regulatory Accounts-Memorandum .....	39828-G,38688-G,38689-G 34281-G,38004-G,38005-G,38006-G,38007-G,38008-G,38009-G 38010-G,38011-G,38012-G,38013-G,38014-G,38015-G,38016-G,39829-G
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(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 3524-A  
 DECISION NO. 05-04-052

ISSUED BY  
**Lee Schavrien**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Nov 3, 2005  
 EFFECTIVE \_\_\_\_\_  
 RESOLUTION NO. E-3958