Decision 84 08 117 AUG 7 1984

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SOUTHERN CALIFORNIA GAS COMPANY and PACIFIC LIGHTING GAS SUPPLY COMPANY for Authority to Revise Gas Rates and Tariffs Effective May 1, 1984, under the Consolidated Adjustment Mechanism.	Application 84-03-30 (Filed March 9, 1984)

(See Decision 84-07-071 for appearances.)

O P I N I O N

Applicants Southern California Gas Company and Pacific Lighting Gas Supply Company (SoCal) have filed this application pursuant to the Consolidated Adjustment Mechanism (CAM) procedure. Also this year, SoCal is applying for a general rate increase (Application 84-02-25). In addition, SoCal will file a Fall CAM application. These three applications have become very interrelated with most rate design issues moved out of the general rate case and heard in the two CAM proceedings. A major decision is expected late in 1984 with rates to be effective in January 1985 which will incorporate the resolution of the rate design and revenue requirement issues of both the Fall CAM and general rate increase proceedings. Today's decision will resolve only those issues which require resolution at this time.

Because the change in the revenue requirement as calculated by SoCal is small and rate stability is desirable, SoCal seeks no rate increase in this application. A joint prehearing conference in this proceeding and the general rate case was conducted in Los Angeles on March 26, 1984. Nine days of hearing were held in Los Angeles and San Francisco during April 1984. The case was submitted subject to closing briefs filed June 22, 1984.

Revenue Requirement

The first and foremost issues to be decided concerning the revenue requirement is whether or not a rate increase can be granted. If a rate increase can be granted then an appropriate revenue requirement must be developed; if on the other hand, no rate increase can be authorized, many issues surrounding the revenue requirement are moot. This issue is highlighted by the differences of the increased revenue requirement developed by the company ($16.8 million) and by the staff ($223.9 million). A major factor in this difference is the treatment to be afforded a refund to SoCal from Transwestern Pipeline Company (Transwestern) which will be discussed later in this decision.

In this proceeding, SoCal assumed that its proposed treatment of the refund would prevail and therefore it would not need to increase rates. The staff on the other hand took the position at the prehearing conference that the Commission might adopt different treatment for the refund, thus requiring a rate increase. The staff requested that the company renotice its customers to disclose the possibility of a rate increase. The company refused. Toward Utility Rate Normalization (TURN) in its brief on this issue, argues that we cannot authorize an increase in rates without proper notice of a rate increase.

We agree with the TURN's position for the particular facts of this case and will not authorize an across-the-board rate increase. With this decision that there will be no rate increase authorized at this time (except the ammonia producer rate), the usual revenue requirement issues are mooted.

Transwestern Refund

On December 1, 1982, Transwestern filed its 1983 general rate case application, RP 83-25, with the Federal Energy Regulatory Commission (FERC). The application was accepted, consolidated with Transwestern's 1981 general rate proceeding, RP 81-130, and suspended until June 1, 1983. The issue remaining in the 1981 case was the minimum bill structure. Transwestern's partial settlement of its 1981 rate case was approved by FERC on May 2, 1983. Transwestern filed tariff sheets incorporating the 1981 rate case settlement into the 1983 rate case application effective June 1, 1983. The 1983 rate case rates were effective June 1, 1983 subject to refund.

SoCal's May 1983 CAM proceeding included the increased rates from the 1983 Transwestern general rate case. The rates reflected in the tariffs approved by this Commission for D.83-05-056, SoCal's May 1983 CAM, became effective May 18, 1983 and were not explicitly made "subject to refund". The total amount of the 1983 CAM increase was $397 million. The amount of the Transwestern refund here at issue is expected to be approximately $100 million. This refund to SoCal will flow from Transwestern as a result of the final settlement of the 1983 Transwestern case before the FERC. At the time of the filing of this CAM (A.84-03-30), settlement of that 1983 Transwestern case was imminent but the precise amount was not yet finalized. The exact amount will not be known until the final settlement is actually approved early August 1984.

The issue before us is how to treat this Transwestern refund. SoCal argues that it should be put in the CAM balancing account in order to avoid a rate increase to its customers at this time. TURN supports this argument. The commission staff and several other parties, notably CMA, argue that Public Utilities Code[1] Section 453.5[2] and California Manufacturers Association v. Public Utilities Commission (1979) 24 Cal. 3d 836 (hereinafter referred to as CMA) apply and therefore the Transwestern refund must be refunded accordingly - i.e., actually paid out and in proportion to usage since June 1983.

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1 All Code references hereafter will be to the Public Utilities Code unless otherwise noted.

2 Section 453.5 states: Whenever the commission orders rate refunds to be distributed, the commission shall require public utilities to pay refunds to all current utility customers, and, when practicable, to prior customers, on an equitable prorata basis without regard as to whether or not the customer is classifiable as a residential or commercial tenant, landlord, homeowner, business, industrial, educational, governmental, nonprofit, agricultural, or any other type of entity.

For the purposes of this section equitable prorata basis shall mean in proportion to the amount originally paid for the utility service involved, or in proportion to the amount of such utility service actually received.

Nothing in this section shall prevent the commission from authorizing refunds to residential and other small customers to be based on current usage.

In the <u>CMA</u> case the Court applied § 453.5 and annulled in part Commission Decisions 88361 and 88751 which had ordered PG&E and SoCal to put certain gas supplier refunds into balancing accounts under § 792.5,[3] to offset prospective rate increases. We think the factual and legal situation in the present case is substantially different from that presented in <u>CMA</u> case and thus is clearly distinguishable.

At issue in the <u>CMA</u> case were gas supplier refunds to SoCal and PG&E relating back as much as five years from our 1977 and 1978 decisions, in the period 1972-1976. There, tariffs had been approved by the Commission as a part of the original pass-through rate increase and were explicitly made "subject to refund"; those tariffs specifically mentioned proportionate customer-class refunds. The Court referred to the fact that the supplier refunds were time-delayed, that the overcollection time period was not immediately preceding the 1977 Commission decision, and that the Commission order was made after certain industrial customers sharply curtailed their gas usage.

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[3] Section 792.5 states: Whenever the commission authorizes any changes in rates reflecting and passing through to customers specific changes in costs except rates set for common carriers, the commission shall require as a condition of such order that the public utility establish and maintain a reserve account reflecting the balance, whether positive or negative, between the related costs and revenues, and the commission shall take into account by appropriate adjustment or other action any positive or negative balance remaining in any such reserve account at the time of any subsequent rate adjustment.

The Court itself stated the issue. "Because §§ 453.5 and 792.5 . . . present conflicting legislative directions . . . , we must therefore determine the scope of § 453.5...." (emphasis added) (24 Cal. 3d at 843). The Court then determined that section's scope and stated:

> "Within the context of the case before us, we therefore hold that the statutory term 'rate refunds' as used in § 453.5, refers to prior direct rebates received by utilities from their suppliers for past overcharges and earmarked by commission-approved tariffs for 'refund' to customers." (emphasis added) (24 Cal.3d at 848)

The question then is whether § 453.5, with its scope so defined and delimited, is applicable to the supplier refund presently before us. Briefly stated here, and to be analyzed below in the context of CMA, the facts in this proceeding are:

1. The relevant May 1983 CAM customer increase was not only not made "subject to refund", but there were no tariffs "earmarking" proportionate customer classes or any other type of refund distribution;
2. The amounts here in question were not "time delayed" but instead are forthcoming from an "immediately preceding rate adjustment" (24 Cal. 3d at 842);
3. There are no parties who have specifically shown that they would be unfairly disadvantaged by balancing account treatment;
4. The relevant May 1983 customer increase did not even affect industrial rates;
5. The 1983 CAM proceeding involved numerous additional interrelated factors and not just a separate, identifiable gas cost pass-through.

The only seeming similarity between these proceedings is that we are dealing in both with a gas cost refund from a supplier. But that similarity alone does not invoke § 453.5. That section is invoked only when the subject amounts are "included within the separate, limited category of 'rate refunds'" (emphasis added) (24 Cal. 3d at 846) as outlined in the CMA opinion. If not so included, then § 453.5 does not apply and thus does not limit § 792.5 or any other traditional powers of the Commission.

Further analyzing CMA, we note the Court found that the Legislature specifically intended the amounts there at issue to be refunded as set forth in § 453.5. Second, the sponsor of § 453.5 introduced the legislation to avoid discriminatory treatment of these particular refunds. Third, the amount at issue was earlier earmarked by Commission-approved tariffs not only to be refunded but to be refunded in a specific way. Fourth, balancing account overcollections did not reflect excessive charges for the period "immediately preceding rate adjustment", but instead rate adjustment for these particular supplier refunds was delayed. Finally, the Court in CMA rejected the Commission's argument that no "refund" occurs until the commission actually orders that a refund be distributed. This last point is not an issue in the current proceeding.

As stated above, we are convinced that the Transwestern refund amount at issue here is distinguishable from the gas supplier "rate refunds" defined by the Court in the CMA case and there made subject to § 453.5 limitations.

The first major distinction is that the resultant rate increase included in SoCal's May 1983 CAM proceeding (D.83-05-056), stemming in part from the 1983 Transwestern FERC increase (FERC docket RP 83-25), was never "earmarked by commission-approved tariffs for 'refund' to customers". (24 Cal. 3d at 848) The tariff approved by this Commission to implement SoCal's May 1983 CAM makes no reference to the Transwestern docket RP 83-25 before the FERC. No ostensible entitlement to any potential refund was established for any customer of SoCal's by that commission-approved tariff. In CMA, by contrast, the Commission had earlier approved tariffs of the utilities which contained the following language:

> "Refunds received from El Paso Natural Gas Company and Pacific Lighting Service company as related to the F.P.C. dockets listed in subsection "c" will be made to various customer classes in proportion to the contingent offset charges collected during the periods to which the refunds apply"[4] (emphasis added).

Given the language of the former tariffs, customers of the utilities arguably had a legal entitlement to refunds thus earmarked by the Commission. Under the circumstances of that case, not the least of which was the 5-year time delay involved, petitioners certainly had an equitable claim to the refunds. Those circumstances simply are not present in this case and thus § 453.5, as specifically delimited by the Supreme Court, does not apply.[5]

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[4] This is the SoCal tariff language applicable during the 1972-1976 period at issue in CMA

[5] See 24 Cal. 3d at 848.

It should be noted that Commission ratemaking procedures have changed dramatically since the time of the events at issue in CMA. In the early 1970's, offset rate increases simply passed through to customers particular gas cost increases imposed by suppliers. This pass-through mechanism permitted specific identification of the portion of the increase borne by each customer class, as the above-referenced tariffs reveal. The Court in CMA referred to the nature of the balancing accounts at that time as adjusting for "variations in a single item of cost, such as natural gas purchased from suppliers". (24 Cal. 3d at 842)

Since the adoption of the CAM procedure in 1981 (Commission Resolution G-2406) all this has changed. Offset increases now include not only specific supplier rate adjustments, but prior period undercollections and a margin component as well. The procedure is, indeed, a Consolidated Adjustment Mechanism. Post 1981 tariffs do not distinguish between charges for gas costs, charges for margin contribution and other consolidated adjustments. It is therefore no longer possible to trace the result of FERC authorized increases/refunds to specific retail customer classes as it was prior to 1981. The tariffs no longer include language that designates certain amounts as subject to refund in each rate schedule pending resolution of particular FERC dockets.

Of major concern to the Court in the CMA case was the fact that the refunds represented overcharges occurring from 1972 through 1976. The Court expressed concern that circumstances and identity of customers would have changed radically during the intervening period. Balancing account treatment of the refund would not properly have compensated the customers who actually contributed to the refund amounts.

In this case the refund period is from June 1983 until June or July 1984, obviously a recent period. The rate design adopted in the May 1983 CAM is still in place. The customers who have

contributed to the refund amount are the same customers whose rates would have been increased today, were we not to authorize SoCal to place the Trasnwestern refund in the CAM balancing account. It is these same customers who, if we were to invoke § 453.5, would receive monetary refunds based on "current usage". Further, and unlike the facts of CMA, so called low priority industrial and commercial customers did not contribute to the subject overcharge. Their rates were not increased by our May 1983 order.

Section 453.5 states that rate refunds (as defined and delimited in CMA) are to be distributed "to all current utility customers and, when practicable, to prior customers..." (emphasis added). Even if we were dealing with "rate refunds" as outlined in CMA, we would then have to determine whether a prorata prior customer rebate scheme met the "practicable" test of § 453.5.

Webster's New World Dictionary (2d college ed. 1982), at 1117, defines practicable as "practical, useful". In light of the above related facts describing the genesis of and the contributors to the amount in issue, the ordering of an actual refund payment to these ratepayers, and then the increasing of rates to the same group in order to recoup those same monies to balance the CAM account is neither practical nor useful.

Again, the classes of customers who did contribute to the refund amount (if any can be traced) were the high priority residential, G-1, GN-2a, and wholesale customers. These are the customers who would be entitled to a refund and § 453.5 specifically and as a qualification states that these customers may receive refunds based on current usage.[6] The effect of placing the Transwestern amount in SoCal's CAM balancing account is virtually the same as ordering an actual refund to these same customers, based on current usage.

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[6] Wholesale customers (SDG&E and the City of Long Beach) must be treated separately as these customers pay SoCal's actual cost of gas each month subject to their own balancing account corrections.

Finally, as an additional aspect of "practicality," we consider, that it is also in the interest of rate stabilization that we not order a monetary refund and a consequent rate increase in this CAM proceeding.

Use of Forecast Rates

Only one issue requiring resolution remains to be discussed. The issue is whether revenues at present rates should be computed at rates in effect on the date of filing or certain indexed rates should be forecast for the future CAM period.

In order to determine a rate change we forecast the utility's revenue requirement for the future year test period, and compare that amount to an estimate of the revenue that will be received over the same period at present rate levels. Generally speaking, the estimate of revenues at present rates has been fairly non-controversial. However, with the adoption of indexed rates, particularly the indexed GN-5 rate, the issue of future revenues at present rates is more problematic. The indexed rate is subject to automatic change biweekly depending on changes in the designated low sulfur waxy residual fuel oil price index.

In calculating the revenue requirement for this case SoCal has used revenues at present rates (date of filing) for all non-indexed rates, but has used a forecast average rate as the present rate for the indexed GN-5 rate. The staff, however, objects to using a forecast of the indexed rate because it does not reflect the "present" rate. In addition, the staff believes using the forecast rate will invite controversy over the appropriate forecasting methodology. The staff recommends using the indexed rate in effect as of the date the application is filed. TURN argues forcefully for use of the forecast rate.

To use the rate in effect on any given day could result in a significant error in the revenue requirement calculation which would be reflected in wide swings in the balancing account. It has been and continues to be our intent to provide for as stable rates as possible without allowing the balancing account to accumulate large under- or overcollections. We also note that both our staff and Southern California Edison Company must produce forecasts of both oil prices and future GN-5 rates for the Edison offset cases. In this circumstance, we will allow SoCal to calculate revenues at present rate with the _forecast_ indexed rates for the November CAM. However, the staff may present its forecast on the basis of the rates then in effect, together with additional evidence that might show that the rate-in-effect method will not produce large balancing account swings.

Rate Design

With the revenue requirement discussed earlier and the Transwestern Refund issue resolved, rate design is the remaining subject to be discussed. As mentioned earlier in this decision, various rate design issues have been or will be resolved in one of the three main SoCal proceedings this year. At this point, a basic outline showing in which case main issues will be decided is helpful as shown below:

Spring CAM	General Rate Case	Fall CAM
GN-5 Episode Day Rate	Service Establishment Charge	Residential Tier Structure 2 or 3 tiers
Indexing Industrial Rates		
Economic Curtailment vs floor pricing on Indexed Rates	Baseline Quantities	Relationship of GN-1, GN-2A to Residential Average Rate
	Wholesale Capacity Charge	Customer Charge

Spring CAM	General Rate Case	Fall CAM
Ammonia Producer Rate		Submetering discounts
		Food Processor Rate Continuation
		Water Pumping Rate
		GN-3 applicability Clause

In order to provide some guidance to parties participating in the Fall CAM, a few comments are warranted based on the evidence adduced to date.

First, evidence on submetering discounts should encompass three scenarios (1) no customer charge, (2) existing customer charge remains the same, and (3) the customer charge is increased as requested by SoCal.

Second, if the number of residential tiers is reduced then assume an elimination of the customer charge. If the customer charge is increased assume continuation of the three tier structure.

Third, the outline shows that we are interested in the issue of rate targeting based on end use applicability and whether or not such a practice should continue.

GN-5 Episode Day Rate

With these prefatory remarks concluded we can work through the Spring CAM issues. The first such is whether the GN-5 episode day rate should be continued. In the past, we have implemented the GN-5 episode day rate to help recover the SoCal revenue requirement. This concept simply recognizes that on episode days Edison has no alternate fuel. We have set the average retail rate as the standard for this rate. In this proceeding, although opposed by Edison, there was no evidence produced to warrant the adoption of a different standard. We do note however, that in Northern California the comparable average UEG rate (G-55) is much closer to the system

average rate than in the SoCal territory where the average UEG rate is much below the system average rate. We will continue the episode day rate which will be based on the forecast average retail rate.

Indexing Industrial Rates

SoCal has proposed that the GN-32/42 and 36/46 be indexed in order to prevent 1.3 Bcf of additional fuel switching. The GN-32/42 is to be indexed to Los Angeles area No. 2/diesel fuel prices and the GN-36/46 rate would be referenced to the U.S. Gulf Coast spot market prices. The floor price would be the avoidable cost plus 5¢ (35.67 + 5.0 = 40.67). The indexing proposal was generally supported and was not opposed by any party. TURN, however, cautions that the initial or reference base price be clear and unambiguous. We agree. We will adopt the indexing proposal as proposed by SoCal, but we will set the initial price to be equal to the current tariff rate (.56776¢/therm) with this rate allowed to change after the date of this decision in accordance with the proposed indexing mechanism. The date of issuance is also the date from which the indexing will be calculated.

Economic Curtailment

A sub-issue of the indexing of rates deals with economic curtailment. Economic curtailment simply means that if the indexed rates should fall below what we consider to be a "floor price" then the utility curtails service to that schedule. This theoretically should not work a hardship on any customers because these customers are ready and willing on a moment's notice to switch to an alternate fuel.

Another option to economic curtailment is so-called "floor pricing" which simply means that if the indexed rates would indicate a rate below our floor price, then the utility would continue to make sales at the floor price and that customers could curtail themselves if they so desired. This concept was supported by TURN and opposed by no party. We feel that this is a reasonable alternative to economic curtailment in that it will likely result in a greater margin contribution if the price of alternative fuel drops substantially than if economic curtailment is retained.

Ammonia Producer Rate and Surcharge

The Ammonia Producer Rate is legislatively mandated to be two cents above the price of SoCal's swing source of gas supply. All parties agree that for the next six months El Paso is the swing supply and the rate is the El Paso price plus 2 cents. The major issue raised in this regard is what should take place in the event the price of the swing supply should change between offset proceedings. A second issue is how the ammonia producer surcharge should be calculated and then applied.

We will discuss the latter issue first. The "Ammonia Producer Rate" is a subsidized rate. The subsidy according to the legislation is to be made up by non-residential customers throughout the state. CMA argues that the ammonia rate does contribute to margin and greater sales produce a larger contribution which should result in a smaller surcharge. We disagree. CMA fails to realize that the rate is a subsidized rate and that greater sales mean that a greater subsidy is produced which must be made up by other customers. We find the staff calculation of the surcharge reasonable. Several parties including the staff agree that the surcharge should be applied simultaneously statewide and that there presently exists no mechanism to accomplish this. We believe that SoCal should maintain a separate account of the ammonia producer rate revenue shortfall until a statewide mechanism can be adopted. SoCal and the staff should cooperatively propose such a mechanism during the Fall CAM.

The more important issue is how SoCal should respond to a change in the swing source of gas supply. The price of the swing source not only controls the Ammonia Producer Rate but also the floor price of the other industrial indexed rates. Another fact which complicates this matter is that the nature of gas supply contracts makes it impossible to know for certain, particularly early in the year, what source is indeed the swing source. Union Oil in

recognizing these facts argues that once a swing source is projected by the Commission that price could not be changed without a hearing. TURN and the staff take the position that the company should be allowed to make an advice letter subject to reasonableness review whenever SoCal projects a change in the swing source of supply.

We believe that the points raised by Union Oil are valid. There are indeed many facts that could be contested in arriving at a conclusion that the incremental source of gas has changed. If we authorized SoCal to file advice letter rates in this circumstance then it is very likely the advice letter would be legitimately protested with hearing likely following. Also, it appears that at this time the dollar effect of an incremental source change would be very small because the indexed industrial rates do not appear to approach the price floors for those rates. Thus, the only rate that is likely to be at issue is the Ammonia Producer rate. The Ammonia Producer requirements do not appear great enough to result in so large an impact for other customers that the determination of the swing source cannot be reexamined during the regularly scheduled Fall CAM.

Wholesale Rates

The only other rates, in addition to the Ammonia Producer Rate, that change significantly are the wholesale rates. These rates are reduced slightly, based on the wholesale rate formula, because of slight changes in SoCal's average cost of gas and in the Wholesale Balancing Account.

Findings of Fact

1. Application 84-03-30 requests no rate increase except in the ammonia producer rate.

2. The notice of the rate application in this proceeding indicated no rate increase was sought.

3. The GN-5 rate is subject to rapid fluctuations both seasonally and non-seasonally.

4. The 1983 general rate increase rates of Transwestern were effective June 1, 1983 subject to refund.

5. Transwestern's general rate increase rates effective June 1, 1984 were incorporated in SoCal's May 1983 CAM offset proceeding.

6. In the May 1983 CAM proceeding (D.83-05-056) there was no separate earmarking of any potential refunds to be handled in any specific manner.

7. A Transwestern Refund will be paid to SoCal during early August 1984.

8. Priority customers P-2B, 3, 4, and 5 received no rate increase in D.83-05-056.

9. Rate design policy in effect in May 1983 remains essentially unchanged.

10. The group of customers on the gas system during and following May 1983 is reasonably identical to the group of customers that will be on the system in the near future.

11. In May 1983, SoCal's marginal cost was below the average cost which relationship continues today and should continue in the near future.

12. After Resolution G-2406, our balancing account procedure applicable to purchased gas has changed from passing through a single element to multiple elements of cost.

13. Balancing account treatment of the Transwestern Refund will provide greater rate stability than a one time refund.

14. In May 1983, rates for priority 2B, 3, 4, and 5 customers were kept at their alternate fuel price.

15. On smog episode days, the electric generating utilities have no alternate fuel other than gas.

16. No sufficient evidence has been presented to warrant either elimination of the episode day rate or a change in the rate standard.

17. Indexing the GN-32/42 and 36/46 rates will prevent additional fuel switching.

18. A reasonable floor price for index rates is the avoidable cost (price of swing source) + 5¢.

19. Curtailing customers on indexed rate schedules when the indexed rate falls below the floor price will result in less contribution to margin than if sales are allowed to continue at the floor price.

20. For the next six months El Paso Gas Company will represent the incremental source of fuel for SoCal.

21. Staff calculation of the ammonia producer rate surcharge is reasonable.

Conclusions of Law

1. No rates except the ammonia producer rate should be increased at this time.

2. SoCal should be authorized to place the Transwestern Refund into its CAM balancing account except for that portion of the refund due to its wholesale customers which should be passed through based on past usage.

3. The rates set forth in Appendix A are just and reasonable for the period these rates will be in effect.

4. SoCal should be allowed to file GN-32/42 and GN-36/46 rates that are indexed as discussed herein.

5. The application should be granted to the extent provided in the above Findings.

ORDER

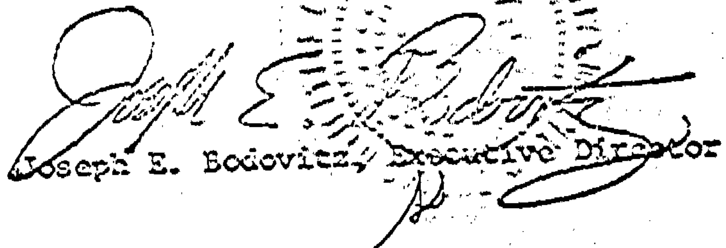
IT IS ORDERED that on or after the effective date of this order, Southern California Gas Company (SoCal) is authorized to file revised tariff schedules reflecting the rates attached as Appendix A. The revised tariff schedules shall take effect 5 days after the date of filing.

This order becomes effective 10 days from today.

Dated AUG 7 1984, at San Francisco, California.

LEONARD M. GRIMES, JR.
President
VICTOR CALVO
DONALD VIAL
WILLIAM T. BAGLEY
Commissioners

Commissioner Priscilla C. Grew, being necessarily absent, did not participate



APPENDIX A

Southern California Gas Company

Summary of Present and Adopted Rates

May 1984, CAM
(Cents Per Therm)

Class of Service	Present Rates	Adopted Rates
Residential		
Lifeline	46.484	46.484
Tier II	71.810	71.810
Tier III	81.810	81.810
Commercial-Industrial		
GN-1	71.840	71.840
GN-2A	71.840	71.840
GN-2B	62.156	62.156
G-COG	47.917	47.917*
GN-32/42	56.776	56.776
GN-36/46	56.776	56.776
GN-34 First 900 Mth	56.776	56.776
Next 600 Mth	45.120	45.120
Over 1500 Mth	43.120	43.120
Ammonia Producers	37.620	37.670
GN-6A Inside SCAQMD	-	48.000
GN-6B Outside SCAQMD	-	44.000
GN-7	-	40.000
Utility Electric Generation		
GN-5 Non-Episode Day	46.219	46.219*
GN-5 Episode Day	56.686	56.686
Wholesale		
G-60	41.123	40.587
G-61	40.866	40.121

* Estimated 12 month average.

(END OF APPENDIX A)