

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMMISSION ADVISORY
AND COMPLIANCE DIVISION
Energy BranchRESOLUTION G-2955
June 19, 1991I N T E R I M R E S O L U T I O N

RESOLUTION G-2955. SOUTHERN CALIFORNIA GAS COMPANY (SOCAL) AND SAN DIEGO GAS AND ELECTRIC COMPANY (SDG&E) SUBMIT PROPOSED EXPERIMENTAL TARIFFS AND RULES IN COMPLIANCE WITH DECISION 91-02-040 FOR CORE AGGREGATION SERVICE UNDER ORDERS INSTITUTING RULEMAKING (OIR) 86-06-006 AND 90-02-008.

BY SOCAL ADVICE LETTER 2022, FILED ON MARCH 15, 1991 AND SDG&E ADVICE LETTER 748-G, FILED ON MARCH 15, 1991.

SUMMARY

This interim Resolution conditionally approves the advice letters identified above subject to full compliance with the provisions of Decision (D.) 91-02-040 and this interim resolution. Also, this interim resolution adopts tariff language for abandoned customers during the contract period.

BACKGROUND

1. On December 3, 1986, by D.86-12-010 (OIR 86-06-006), the Commission gave core¹ customers with demand over 250,000 therms per year the option of electing utility transmission-only service.
2. On December 21, 1989, the School Project for Utility Rate Reductions (SPURR) filed a Petition for Modification of D.86-12-010. The petition asked the Commission to permit core customers to aggregate core loads to qualify for utility transportation-only service in order to meet the 250,000 annual therm threshold.

¹ Core - customers with end-use Priorities P-1 and P-2A.

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3. In response to the petition, the Commission issued D.90-11-061 on November 21, 1990. D.90-11-061 proposed rules for an experimental program allowing core customers to consolidate core loads for the purpose of qualifying as utility transportation-only customers. In its decision, the Commission gave parties the opportunity to file comments on the proposed rules.

4. D.91-02-040, dated February 21, 1991, sets forth the final rules for utility transportation-only services for core customers who aggregate their loads. It authorizes small and medium-sized core customers to compete in a competitive gas market by consolidating their loads and purchasing gas from sellers of their choice. The final rules provide:

- A minimum aggregate volume of 250,000 therms per year
- The program is limited to 10% of the utility's total core demand, exclusive of existing core transportation
- Open season from May 15, 1991 through July 1, 1991
- A one-year commitment per group
- Service Level 1, firm transportation
- Access to pipeline capacity reserved for core customers in proportion to their share of total core demand, exclusive of the pipeline access for noncore customers under D.90-09-089
- Access to storage reserved for core customers in proportion to their share of total core demand
- A \$10 per decatherm balancing and standby charge if other customers are curtailed
- A deposit of \$10 per thousand cubic feet of capacity requested per day
- Imbalance trading for core transport customers and noncore customers
- A change of membership after 90 days' notice to the utility, provided the volume requirement is met after the membership change

This is a three-year experimental program, which will begin on August 1, 1991. During the third year of the program, the Commission may consider under what conditions the program should continue or be expanded.

5. In compliance with D.91-02-040, SoCal filed A.L. 2022 on March 15, 1991, and SDG&E filed A.L. 748-G on March 15, 1991.

NOTICE

1. Public notice of the above mentioned advice letters were made by publication in the Commission's Daily Calendar and by each respective utility mailing copies to other utilities, governmental agencies, to the service list of OIR 86-06-006 and OIR 90-02-008, and to all interested parties who requested notification.

PROTESTS

1. A protest to SoCal's A.L. 2022 was filed by the School Project for Utility Rate Reductions (SPURR) on April 2, 1991. SPURR did not protest SDG&E's A.L. 748-G.
2. Access Energy Corporation (Access) filed a late protest on April 29, 1991. Access filed its comments on utility implementation of Commission D.91-02-040 as a late protest, and as a petition to modify D.91-01-040.
3. Comments to SDG&E's A.L. 748-G were filed by the Division of Ratepayer Advocates (DRA) on April 18, 1991.

DISCUSSION

Use of Storage for Balancing Purposes

SPURR argues that SoCal's proposed tariffs do not include provisions for injections or withdrawals, or how storage can be used for balancing. SoCal only states that:

"Aggregators shall be provided access to Utility's storage capacity reserved for core service in proportion to their aggregated share of total core demand."

SPURR alleges that, without these provisions, balancing penalties may be incurred, where otherwise the customer would be in balance if storage was taken into account. In addition, SPURR argues that the use of storage for balancing is an important consideration for core customers with weather-sensitive loads.

Access Energy Corporation (Access) notes that the SoCal storage program has certain nomination deadlines that conflict with the implementation dates. Access requests that during the first year of the program, the core transportation customers be allowed to participate in the storage service without complying with other deadlines and related requirements.

Access points out that SoCal will permit transporters to use the trading mechanism as well as storage gas to eliminate or reduce imbalances.

SoCal replies that at the time its A.L. 2022 was filed, it had not completely developed the implementation details of its core aggregation transportation program. On April 17, 1991, it filed its imbalance Rate Schedule G-IMB detailing its transportation balancing service. Its proposed tariff provides for the use of storage to offset a customer's transportation imbalances, as well as the trading of imbalances with other customers. Also, SoCal states that it plans to file a new tariff specifically for aggregators. This proposed tariff will detail storage injection and withdrawal in compliance with D.91-02-040.

SDG&E replies that its tariffs also provide for the use of imbalance trading mechanism and storage gas to eliminate or reduce imbalances. However, SDG&E does not plan to allow core storage gas to be used for trading purposes.

Discussion: D.91-02-040 provides for access to storage but is silent on the provisions for injections and withdrawals or how storage can be used for balancing. However, CACD believes that details of a storage program for core aggregators are important considerations for customers' decisionmaking. CACD recommends that complete details of storage injection, withdrawal, and use for balancing be included in the core aggregation tariff sheets, parallel to the adopted rules for noncore storage.

D.91-02-040 states that core transporters will have pro rata access to storage in proportion to their share of total core demand to ensure reliable core transport service and to recognize that core rates include storage cost. Therefore, Access' request for a Commission direction allowing core transporters to participate in utility's storage program for at least the first year, even if the utility's tariff deadlines may provide otherwise, is unnecessary.

SoCal will permit transporters to use the imbalance trading mechanism as well as storage gas to eliminate or reduce imbalances. SDG&E would not permit use of the imbalance trading mechanism with storage balances. CACD notes that details of storage injections, withdrawals, and use for imbalances are missing from SoCal and SDG&E's tariffs for core aggregation. CACD recommends that both utilities refile core aggregation tariffs to include these details of their storage programs for core customers. Also, SDG&E should permit customers to use storage gas to effect a trade.

Balancing Penalty (\$10/decatherm)

D.91-02-040 provides for a fee of \$10 per decatherm for customers who purchase balancing services during periods when balancing services to other customers have been curtailed.

Access believes that SoCal's interpretation of this provision is correct. SoCal interprets this provision as requiring the

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imposition of the \$10 charge only when balancing services are used by aggregate-load core transportation customers while other Service Level 1 core customers are being curtailed.

SDG&E replies that it supports SoCal's interpretation that the \$10 per decatherm penalty will apply only when balancing services are used by core aggregation customers while other Service Level 1 customers are being curtailed.

Discussion: The rules adopted by the Commission in Appendix A, page 3 of D.91-02-040 clearly set forth a \$10 per decatherm fee for core transportation customers that purchase utility balancing services during periods when balancing services to other customers are curtailed. The decision states that this fee will compensate for additional utility costs and risks associated with providing backup supplies. The decision further states that the balancing and standby services to core customers should provide the highest level of service reliability and priority ahead of all noncore and core subscription customers. Finally, the decision states that the imposition of these costs on core aggregators should prevent subsidies from remaining utility core customers.

CACD disagrees with Access', SoCal's, and SDG&E's interpretation that the balancing charge only applies to core aggregators when service to Service Level 1 customers is curtailed. CACD also disagrees with Pacific Gas and Electric Company's (PG&E) interpretation of this rule, which would impose a balancing charge when any noncore balancing service is curtailed.

CACD recommends instead that balancing and standby charges be imposed on core aggregators only when customers in Service Level 2 are curtailed. Under a single portfolio, balancing and standby services required by core aggregation customers will impose a gas cost on 1) other core (SL-1) and then, 2) non-transportation, core subscription (SL-2) customers, because the utility must supply additional gas to meet their demands. In order to compensate the utility for these costs, but still allow core aggregation customers the gas they require, the penalties should apply when balancing services to Service Level 2 customers are curtailed.

In this way, core aggregation customers will be provided with the highest reliability, while at the same time, they will not be subsidized with gas by the utility core and core subscription customers. CACD recommends that SoCal and SDG&E revise their tariffs accordingly to state that when balancing services for SL-2 customers are curtailed, standby penalties for core aggregation customers should then apply.

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Capacity Allocation

In D.90-12-100, the Commission clarified the superior right of the core transporter to pipeline capacity specifically at page 7 of the decision:

"We will clarify D.90-09-089 to provide that core transportation customers are permitted to use the utility's capacity rights and are not part of the pro rata allocation mechanism established for noncore customers."

Access states that, notwithstanding the decision's clarification, core transporters under SoCal's Targeted Sales Program will share specific receipt point capacity on transporting pipelines on a pro rata basis with noncore transporters. Therefore, the superior right to pipeline capacity is meaningless if there is no corresponding superior right to deliver gas into those pipelines at specific receipt points along the way.

Access requests that the Commission clarify that the aggregated-load core transportation customers have a first and best right, along with the utility to meet its own core requirements, to the local distribution company's pipeline capacity, including the capacity available at specified receipt points along the way. In addition, the Commission should specify that such capacity can be used by aggregated-load core transportation customers to the extent required to meet their gas requirements, as those requirements may fluctuate from time to time, without the hindrance of artificial seasonal nomination limits.

SoCal replies that Access has misunderstood D.90-09-089, which makes clear that SoCal must reserve capacity on interstate pipelines for the core market on a pro rata basis (D.90-09-89, Appendix A, page 4). Thus, the entire core market will receive its pro rata share of capacity at interstate pipeline constraint points and so will the noncore market. SoCal Gas will not treat core transporters as noncore transporters. SoCal states that it has no intention of treating capacity for core transporters any different than for core procurement customers and has made no filing suggesting such an intention.

SoCal points out that the limitations on seasonal nominations by core transporters was addressed by D.90-09-89, which provided that the total capacity allocated to the service of P-1 and P-2A customers on El Paso Pipeline Company (El Paso) and Transwestern Natural Gas Pipeline Company (Transwestern) need not be the same each month (D. 90-09-089, Appendix A., page 4). Moreover, seasonal limitations are necessary to avoid increasing SoCal's operational costs and decreasing efficiency and will further the Commission's intention throughout Decision 91-02-040 to place core transporters on an equal footing with SoCal's own core procurement.

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SDG&E points out that it has no firm interstate capacity rights. SDG&E must use SoCal's targeted sales capacity for SDG&E's core load. SoCal plans to provide SDG&E with a pro rata share of capacity at all constraint points. Therefore, SDG&E will allocate its share of capacity at each constraint point on an equal basis with nonparticipating core customers. CACD notes that SDG&E's tariffs do not have any language for its pro rata share of interstate capacity provided by SoCal.

DRA points out that SDG&E's Schedule GTC (Natural Gas Transmission Service for Core Customers) has two sentences that appear to be inconsistent with the intent of D.91-02-040. The first sentence states that "Service under this schedule shall be limited to those instances, when in the utility's judgment, capacity is available to transport customer's gas during the contracted period." DRA is concerned that this may be contrary to the intent of D.91-02-040 to create a more competitive market for natural gas. The second sentence states that "The total volume of customer-owned gas transported per day on the utility's system shall be determined solely by the utility for all transportation customers receiving service under this schedule." DRA believes that this condition is contrary to the intent of Rule 9 of the decision to allow transport capacity for each core customer in proportion to that customer's part of the total core demand. SDG&E did not respond to DRA's comments.

Discussion: D.91-02-040 clearly states that core transporters will receive pro rata access to pipeline capacity. This access should be equivalent to access provided to other core customers and would be in addition to volumes reserved for the noncore in D.90-09-089. SoCal's proposed tariffs for core aggregation do not contain any language for pro rata access to interstate pipeline capacity with its own core loads. Also, SDG&E's proposed tariffs do not contain any language stating that SDG&E will use SoCal's interstate capacity for SDG&E's core load, and that SDG&E's core aggregation customers will have pro rata access to pipeline capacity provided by SoCal to SDG&E's own core load. CACD recommends that SoCal and SDG&E include in their tariffs language allowing pro rata access to interstate pipeline capacity for core aggregators.

The two sentences cited by DRA regarding transportation service limitations under SDG&E's A.L. 748-G inadvertently include the language of an old tariff. CACD recommends that SDG&E's supplemental filing delete these two sentences for compliance with D.91-02-040.

Creditworthiness

Access argues that the creditworthiness requirements proposed by SoCal at a meeting of April 18, 1991 were met with disapproval by more than 100 marketer/aggregator representatives in attendance. SoCal's proposal provides for a continuing default

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by the authorized marketer/aggregator for six consecutive months. Access requests that the Commission reject any financial requirement imposed by a local distribution company (LDC) which unreasonably and unnecessarily restricts participation in and development of the core aggregation pilot program.

SoCal replies that it is still developing its creditworthiness requirements. It is working with different groups to determine creditworthiness standards that will promote marketer/aggregator participation and still protect SoCal and its ratepayers. It has not included creditworthiness requirements in any of its advice letter filings and therefore Access should not be permitted to file a protest based on a customer meeting.

SDG&E replies that it plans to require its core aggregators to post security equal to the full potential risk: four months of 150% of weighted average cost of gas (WACOG).

Discussion: D.91-02-040 states that the Commission will continue to provide a forum for any dispute between the utility and its customers, even if a marketer or broker performs the administrative function of billing individual core customers. Since SoCal and SDG&E are under Commission jurisdiction, any future dispute between utilities and their customers may be brought to the Commission's attention for resolution. SoCal and SDG&E have not included creditworthiness criteria in their tariffs. No Commission action is required at this time.

Program Documents

Access mentions that the beginning of the open season starts on May 15 and that the distribution of numerous documents necessary to get the program operational has been delayed. This delay is affecting Access' ability to effectively promote the core aggregation pilot program. Access requests that the Commission direct the utilities to hasten action so that the program will have a fair opportunity of full enforcement on August 1, 1991.

SoCal replies that it has been working diligently to finalize the necessary documents. It plans to file its proposed agreements and core aggregation tariffs soon to allow all parties to review the language and give comments timely to insure implementation.

SDG&E replies that it had tried to keep both end-use customers and aggregators informed of its proposed core aggregation program through SDG&E's Core Transportation Customer Manual.

Discussion: CACD received SoCal's supplemental filing on June 7, 1991. CACD recommends that SoCal include all service agreement forms for its core aggregation program in its tariffs. CACD notes that although SDG&E had filed its contract forms in

its noncore program, SDG&E fails to include Exhibit A, Attachment 3, to its service agreement Form 142-159-C. CACD recommends that SDG&E should submit Exhibit A, Attachment 3 of its service agreement Form 142-159-C.

Pricing System

SoCal has embedded an "addor" into its tariff transportation rates. According to the SoCal staff, this "addor" is in compliance with D.91-02-040 (pages 10 & 11) and represents a rate component that reflects over- and undercollections in the gas commodity balancing account.

SDG&E also has an "addor" in its transportation rates, but it is shown separately as an unbundled rate.

Discussion: D.91-02-040 provides that rates to core transport customers under the core aggregation program will include a one-year rate component for balancing account imbalances, including transition costs. D.91-02-040 (page 11) states that:

"We will amend our rules to provide that rates to core transport customers will, in the first year, include a component for balancing account imbalances, including transition costs. Similarly, rates for customers returning to utility procurement services will not include the positive or negative imbalances for the prior year when they were transportation-only customers. These provisions will discourage uneconomic bypass by core customers, and will assure that other core customers are not liable for costs incurred by core transportation customers."

"Also, this provision will insure that core customers cannot avoid the full cost of past gas services."

SDG&E has submitted a one-page workpaper showing the development of its rate "addor", but it did not include explanations and details of the calculations. SoCal did not submit supporting workpapers with its advice letter filing. So that CACD can complete its compliance review, both utilities should submit detailed workpapers supporting their rate components. The workpapers should unbundle the costs to permit verifications of the calculations. The rate component should not be embedded in the transportation cost on the tariff sheet; rather, it should be shown separately with an explanation to the customers of why it is being collected.

CACD notes that neither utility has noted this "addor" in the Preliminary Statement. CACD recommends that the appropriate rate component should be addressed in the Preliminary Statement, as a subaccount under the Purchased Gas Account, explaining that

it applies to core aggregation customers only, and also identifying the interest that it will earn.

Missing Program Details

Although SoCal's proposed revised Rule 30 (Transportation of Customer-Procured Gas) provides for imbalances and storage for core aggregation customers, its proposed tariff schedules fail to provide or make reference to the following, program-adopted rules:

- Service Level 1 transportation for core-aggregate transportation customers;
- pro rata access to pipeline capacity, exclusive of the pipeline access to noncore customers in D.90-09-089;
- trading of imbalances;
- standby charge of \$10 per decatherm;
- pro rata storage access reserved for core customers;
- change of membership after 90 days' notice;
- negative (overcollection) and positive (undercollections) gas balancing account imbalances in the transmission rate (Proposed schedules mention only undercollections in the transmission charge. Though a positive adder may be applicable at this time, the proposed tariff should mention that in case of an overcollection a negative adder will apply.);
- occurrence of a lottery to choose initial participants when the 10% service requirement is oversubscribed;

Also, SoCal fails to include the following in its tariffs:

- appropriate gas core transportation service agreement forms;
- provision for abandonment of customers during the contract period.

Though D.91-02-040 is silent on this matter, the tariff should provide for this concern. SoCal has presented to the Commission staff a draft of "Rules and Guidelines" for its core aggregation program. The draft included the following language for its abandoned customers:

"In the event that a customer is abandoned during the contract period because his Aggregator goes out of business or defaults on his bill, the customer will return to SoCal and receive procurement service at the

core subscription WACOG for the remainder of the contract period. If he finds another Aggregator while he is served by SoCal, both he and the Aggregator must give SoCal a 90-day notice prior to returning to the CAT (Core Aggregation Transportation) program."

CACD believes that the provision for a 90-day notice prior to returning to the core aggregation program is appropriate because it is consistent with the provision of D.91-02-040 (Appendix A, page 2). D.91-02-040 provides that a 90-day notice to the utility is required before any membership change is made. CACD notes that SDG&E's tariffs do not contain any language for abandonment of customers. CACD recommends that SoCal and SDG&E's core aggregation tariffs incorporate the above mentioned language.

SDG&E's proposed core aggregation tariffs fail to provide for the following, program-adopted rules:

- a minimum aggregate volume of 250,000 therms per year;
- one open season for the experimental three-year core aggregation program;
- pro rata access to pipeline capacity (provided to SDG&E by SoCal at SoCal's interstate pipeline capacity), exclusive of the pipeline access to noncore customers in D.90-09-089;
- split core loads between utility procurement and third-party procurement

CACD notes that SDG&E's proposed core aggregation tariffs were incorporated under its old Schedule GTC (Natural Gas Transmission Service for Core Customers). For consistency with other utilities' core aggregation tariffs and for better informed core customers, CACD recommends that SDG&E provide a separate, new schedule for its core aggregation program. In addition to the new schedule, all of SDG&E's applicable residential schedules should make reference to the availability of SDG&E's core aggregation service in the new schedule.

Required Customer Notices

Public Utilities Code Section 454(a) states that whenever a gas utility files an application to change its rates it shall furnish to the customer notice of its proposed change. Gas utilities are presently required to notify all customers within 45 days of any request to increase charges for services by Advice Letter. (Rules of Practice and Procedure, Rule 24). In addition, they are required to include in customer billings the units of gas consumed, the actual meter readings at the open and close of the billing cycle and the basis of computation of the

bill (Commission General Order 58-A, paragraph 19). The Commission, from time to time, often orders the utilities to make other informational or safety notices to its customers.

Core customers whose load is aggregated by a third party aggregator, may be billed directly by the aggregator for both the commodity costs and transportation charge from the utility. It is uncertain how these customers will obtain their utility notices, since the aggregator will handle the billing. One option is to require the utilities to provide the insert material to the aggregator to include in the bill sent to the customers. This seems inefficient and uncertain. A second option would be to have the utility continue to mail the notices directly to the end-use customer. CACD recommends the second option.

CACD notes that the utility will still read the meters and must "flag" data to be segregated and provided by account number to the aggregator. The utilities should have the discretion to send either only the notices or a "dummy bill" through their automated billing systems. The utility billing could read "VOID", "No Balance Due", or some other disclaimer indicating that the aggregator will be billing them.

CACD further notes that the existing base rates for the utilities already include allowances for the costs of inserts, postage and the processing of a normal bill. In the future, the companies may wish to seek incremental cost recovery but CACD sees no significant costs to them at this time. CACD recommends that the utilities send monthly "inserts" and dummy bills to the core aggregated, end-use customer to insure proper notice of utility-proposed changes and customer usage.

Supplemental Filings and Protests

This is an interim resolution. A final resolution will be issued not later than July 24, 1991 to address any protests to SoCal's and SDG&E's supplemental filing to core aggregation.

FINDINGS

1. SoCal's and SDG&E's proposed tariffs do not include details for storage injections, withdrawals, and use for imbalances.
2. SoCal's and SDG&E's tariffs do not accurately reflect the provision of D.91-02-040 on the balancing charge.
3. SoCal tariffs will permit transporters to use the trading mechanism as well as storage gas to eliminate or reduce imbalances.

4. SDG&E tariffs would not allow core aggregators to trade storage gas.
5. SoCal and SDG&E have not imposed a creditworthiness requirement on aggregators on their Advice Letter filings for core aggregation.
6. SoCal has not filed the gas transportation service agreement forms for its core-aggregation program.
7. SDG&E has an incomplete service agreement form for its core-aggregation program. It did not include Exhibit A, Attachment 3, in its core aggregation service agreement Form 142-159-C, as stated in its A.L. 748-G.
8. Any future disputes between a local distribution company and its customers may be brought to the Commission's attention for resolution.
9. SoCal fails to include in its applicable schedules the following:
 - Service Level 1 transportation for core-aggregate transportation customers
 - pro rata access to pipeline capacity, exclusive of the pipeline access to noncore customers in D.90-09-089
 - trading of imbalances
 - standby charge of \$10 per decatherm
 - pro rata storage access reserved for core customers
 - change of membership after 90 days' notice
 - both negative (overcollection) and positive (undercollection) gas balancing account imbalances in the transmission rate
 - occurrence of a lottery to choose initial participants when the 10% service requirement is oversubscribed
 - appropriate gas core transportation service agreement forms
 - provision for abandonment of customers during the contract period
10. SDG&E fails to include in its tariffs the following:
 - a minimum aggregate volume of 250,000 therms per year

- one open season for the experimental three-year core aggregation program
- pro rata access to pipeline capacity (provided to SDG&E by SoCal at SoCal's interstate pipeline capacity), exclusive of the pipeline access to noncore customers in D.90-09-089
- split core loads between utility procurement and third-party procurement
- provision for abandonment of customers during the contract period
- a new schedule for its core aggregation program (all its applicable residential schedules should make reference to the availability of core aggregation service in the new schedule)

11. SoCal and SDG&E did not submit adequate workpapers for their one-year transition cost.

12. Core customers whose load is aggregated by a third party aggregator may be billed directly by the aggregator for both the commodity costs and transportation charge from the utility.

CONCLUSIONS

1. SoCal and SDG&E should provide details for storage injections, withdrawals, and use for imbalances in its tariffs.
2. SoCal and SDG&E should revise their tariffs to accurately provide for the \$10 per decatherm balancing charge for core transportation customers who purchase utility's balancing services during periods when balancing services for SL-2 customers are curtailed.
3. SDG&E should allow core aggregators to trade storage gas.
4. SoCal should include service agreement forms for core aggregation program in its supplemental filing.
5. SDG&E should include Exhibit A, page 3 in its service agreement forms for its core aggregation program.
6. SoCal should include in its applicable schedules the following:
 - Service Level 1 transportation for core-aggregate transportation customers,
 - pro rata access to pipeline capacity, exclusive of the pipeline access to noncore customers in D.90-09-089,

- trading of imbalances,
- standby charge of \$10 per decatherm
- pro rata storage access reserved for core customers
- change of membership after 90 days' notice
- both negative (overcollection) and positive (undercollection) gas balancing account imbalances in the transmission rate
- occurrence of a lottery to choose initial participants when the 10% service requirement is oversubscribed
- appropriate gas core transportation service agreement forms
- provision for abandonment of customers during the contract period

7. SDG&E should include in its applicable schedules the following:

- a minimum aggregate volume of 250,000 therms per year
- one open season for the experimental three-year core aggregation program
- pro rata access to pipeline capacity (provided to SDG&E by SoCal at SoCal's interstate pipeline capacity), exclusive of the pipeline access to noncore customers in D.90-09-089
- split core loads between utility procurement and third-party procurement
- provision for abandonment of customers during the contract period
- a new schedule for its core aggregation program

8. SoCal and SDG&E should submit complete workpapers supporting their one-year transition costs.

9. The utilities should send monthly "inserts" and dummy bills to the core aggregated, end-use customer to insure proper notice of utility-proposed changes and customer usage.

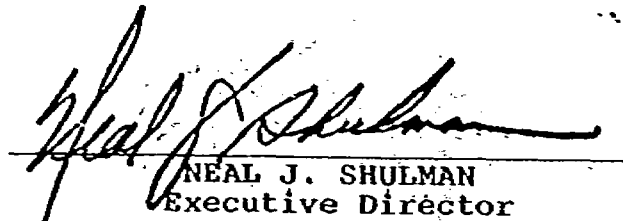
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THEREFORE, IT IS ORDERED that:

1. Southern California Gas Company shall file revised advice letter and tariff sheets in compliance with the provisions of General Order 96-A, consistent with each of the Findings and Conclusions listed above.
2. San Diego Gas and Electric Company shall file revised advice letter and tariff sheets in compliance with the provisions of General Order 96-A, consistent with each of the Findings and Conclusions listed above.
3. Southern California Gas Company and San Diego Gas and Electric Company shall file revised advice letter and tariffs five business days from the effective date of this resolution.
4. Southern California Gas Company Advice Letter 2022 and its tariff sheets shall be marked to show that they were supplemented.
5. San Diego Gas and Electric Company Advice Letters 748-G shall be marked to show that they were supplemented.
6. This interim resolution is effective today.

I hereby certify that this interim Resolution was adopted by the Public Utilities Commission at its regular meeting on June 19, 1991. The following Commissioners approved it:

PATRICIA M. ECKERT
President
G. MITCHELL WILK
JOHN B. OHANIAN
DANIEL Wm. FESSLER
NORMAN D. SHUMWAY
Commissioners


NEAL J. SHULMAN
Executive Director