

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

Application of San Diego Gas & Electric Company (U 902-M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2012.

Application 10-12-005
(Filed December 15, 2010)

Application of Southern California Gas Company (U 904-G) for authority to update its gas revenue requirement and base rates effective on January 1, 2012.

Application 10-12-006
(Filed December 15, 2010)

**SOUTHERN CALIFORNIA GENERATION COALITION
PROTEST**

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Dated: January 18, 2011

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**SOUTHERN CALIFORNIA GENERATION COALITION
PROTEST**

Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Southern California Generation Coalition (“SCGC”) respectfully protests the December 15, 2011 General Rate Case (“GRC”) Application (“A.”) 10-12-006 of the Southern California Gas Company (“SoCalGas”) to update its Test Year 2012 (“TY 2012”) gas revenue requirement and base rates, effective January 1, 2012, and to implement a Post Test Year (“PTY”) ratemaking mechanism for subsequent years 2013-2015.¹

The members of SCGC operate electricity generation (“EG”) facilities that are served by SoCalGas. SCGC members will be directly affected by the Application: SoCalGas projects that the Application will raise EG rates by over **20 percent**.² On the basis of a preliminary review of the Application, SCGC believes that various features of the Application are not justified and requests an evidentiary hearing to be held regarding all issues raised by the Application.

¹ San Diego Gas & Electric Company (“SDG&E”) simultaneously filed A.10-12-005 on December 15, 2010. By Ruling dated January 7, 2011, Administrative Law Judge (“ALJ”) Wong consolidated A.10-12-005 and A.10-12-006 and set a prehearing conference for January 31, 2011.

I. PROTESTED FEATURES OF THE APPLICATION.

SCGC protests the features of the Application that are described below. However, the issues that are raised in this protest do not constitute an exhaustive or exclusive list of the issues that SCGC may raise in this proceeding. SCGC reserves the right to explore any and all issues that may be raised by the subject Application, including issues that may be raised by other parties in comments, protests, or testimony regarding the Application.

A. A Hearing Should Be Convened to Examine the Claimed Cost Elements that Would Raise EG Rates by over 20 Percent.

A hearing is required to provide parties with an opportunity to conduct discovery and to examine the claimed costs that would raise SoCalGas' EG transportation rates by 20 percent.

1. Transmission O&M Costs Increase Dramatically.

SoCalGas' Results of Operations³ shows transmission operation and maintenance ("O&M") expense would increase by 18 percent in TY 2012 in comparison to Base Year ("BY") 2009. SoCalGas witness Dagg presents testimony on the multiple factors that contribute to the claimed increase in transmission O&M. Those factors should be examined through discovery and a hearing.

2. "Engineering" O&M Costs Increase Dramatically.

SoCalGas' Results of Operations shows "Engineering" O&M costs increase by staggering 252 percent from BY 2009 to TY 2012.⁴ This is driven by a variety of factors. For example, SoCalGas' witness Stanford's Table SCG-RKS-3 projects that SoCalGas' non-shared

² Application at 12.

³ Ex. 38 at DAH.

⁴ Ex. 38 at DAH-A6. "Engineering" is an unusual cost function for a utility general rate case. SoCalGas' unusual functionalization of costs should be explored in this case. Improper or imprecise functionalization in a GRC can raise issues in a subsequent Triennial Cost Allocation Proceeding ("TCAP").

transmission pipeline integrity costs increasing by 126 percent (from \$10 million to \$25 million) between BY 2-A4.009 and TY 2012.

3. Capital Expenditures Increase Dramatically.

SoCalGas capital expenditures increase by 84 percent between BY 2009 and TY 2012 from \$86 million to \$158 million.⁵ Capital expenditures on transmission compressor stations increase most dramatically from \$2.5 million in BY 2009 to \$19.3 million, an increase of 666 percent.⁶

Additionally, there are capital expenditures on categories for which there were no expenditures previously. Witness Stanford says that SoCalGas plans to install two “BioEnergy” units at customer sites in TY 2012 to capture raw biogas and upgrade it to pipeline quality biomethane at a cost of \$11.3 million.⁷ Two more units would be installed subsequently. The SoCalGas witnesses do not explain why ratepayers should be paying these unprecedented costs.

SoCalGas’ projected O&M and capital expenditures should be carefully examined to mitigate their substantial cumulative impact on rates.

B. SoCalGas’ CS&I Activities and Expenses Should Be Closely Examined Through the Hearing Process.

The SoCalGas Customer Services and Information (“CS&I”) function includes a potpourri of activities, many of which are blatantly promotional.⁸ SoCalGas forecasts an O&M

⁵ Ex. 5, Table SCG-RKS-4.

⁶ Ex. 5 at RKS-76.

⁷ Ex. 5 at RKS-83.

⁸ (“CS&I”) is an unusual cost function for a utility general rate case. SoCalGas unusual functionalization of costs should be explored in this case. Improper or imprecise functionalization in a GRC can raise issues in a subsequent TCAP.

expense of \$42 million for CS&I activities during TY 2012, an increase of 42 percent over the BY 2009 level.⁹

Many CS&I activities appear to be promotional. For example, the activities include assisting customers “to analyze and assess the viability of CHP systems,” outreach to “raise customer awareness” about NGVs, and a Biofuel Market Development program. All of these programs would receive increased funding in 2012¹⁰

Biofuels get special attention. SoCalGas proposes to spend \$2 million on “bioenergy” RD&D alone in 2012. SoCalGas plans to do far more than RD&D, however. Under the Biofuel Market Development program, “The primary focus is in promoting and supporting the installation of biogas conditioning systems at certain customer sites for the purpose of capturing ‘raw biogas and converting it to pipeline quality gas (biomethane).’”¹¹ In addition to a variety of O&M expenditures, SoCalGas would spend the \$11.3 million discussed above to install two biogas conditioning systems at two sites in 2012, with another two being installed subsequently. SoCalGas calls this aspect of biogas development the “Sustainable SoCal Program.”¹²

The activities of the Biofuel Market Development team, including the capital investments in the biogas conditioning systems, would be entirely ratepayer-funded. However, SoCalGas clearly intends to reap a ratepayer benefit by treating biogas conditioning and other biogas services on a Non-Tariffed Products and Service (“NTP&S”) basis through which SoCalGas shareholders would earn more than their allowed return on equity. On November 22, 2010, SoCalGas submitted Advice Letter No. 4172 (“Advice 4172”) proposing to offer a Biogas

⁹ Ex 9 at GAW-1.

¹⁰ Ex 9 at GAW-7-8.

¹¹ *Id.* at 80.

¹² *Id.* at 89-93.

Conditioning Service and a Biogas Production Facilities Service on an NTP&S basis. SCGC's December 13, 2010 protest is attached as Attachment A. Other parties protested as well, and the advice letter is now suspended.

SoCalGas' involvement at ratepayer expense in producing and conditioning biofuels market is an issue that should be fully explored through discovery and the hearing in this proceeding, particularly given that SoCalGas is simultaneously proposing that the Commission change the rules governing NTP&S to make NTP&S much more remunerative for shareholders as discussed below.

C. SoCalGas' Proposal to Make NTP&S More Remunerative for Shareholders Should Be Closely Examined Through the Hearing Process.

SoCalGas witness Lane proposes three new NTP&S sharing formulas to replace the current NTP&S sharing formula. D.99-09-070 established a 90/10 shareholder/ratepayer sharing of gross revenues for "active" investments where the utility was making over a \$225,000 investment and a 70/30 sharing of gross revenues for "passive" investments where the utility was making less than a \$225,000 investment. SoCalGas proposes that for existing non-tariffed products and services any gross revenue above the forecasted miscellaneous revenue as adopted for TY 2012 by the Commission (SoCalGas proposes \$6.8 million) would be shared on a gross revenue basis 90/10 between shareholders and ratepayers.¹³

For new NTP&S that do not require "significant incremental shareholder expenditures to develop and market," SoCalGas propose that shareholders and ratepayers split gross revenues 90/10.¹⁴

¹³ Ex. 33 at RCL-2.

¹⁴ Ex. 33 at RCL-4.

For new NTP&S that do require “significant incremental shareholder expenditures to develop and market,” SoCalGas proposes “a 50/50 sharing of after-tax net earnings above a rate of return benchmark, where shareholders retain half of the net after-tax earnings above the benchmark and ratepayers retain the other half.”¹⁵ The “benchmark rate of return” would be set equal to SoCalGas’ authorized rate of return plus 50 basis points.¹⁶ SoCalGas proposes “an additional 25 to 50 basis points (above the 50 basis points described above) to the benchmark return for specific categories of NTP&S that: 1) provide significant environmental benefit; 2) support the development or renewable energy; and/or 3) promote the development of new technologies.”¹⁷ This is the award for shareholders that SoCalGas requested in Advice 4172 and which SCGC protested.

SoCalGas’ proposal to revise the current NTP&S sharing formula is excessive and should be examined through the hearing process if not rejected outright.

D. SoCalGas’ Complex Post-Test-Year Sharing Mechanism Should Be Closely Examined Through the Hearing Process.

SoCalGas witness Emmrich proposes an excessively complex “post-test-year” (“PTY”) adjustment mechanism that would consist of six components:

- (1) O&M Expenses Adjustment;
- (2) Capital-Related Cost;
- (3) Medical Cost Adjustments;
- (4) Z-factor Adjustment, if applicable;
- (5) Earnings Sharing Mechanism; and

¹⁵ *Id.*

¹⁶ Ex. 33 at RCL-7.

¹⁷ Ex. 33 at RCL-8.

(6) Productivity Investment Sharing Mechanism.¹⁸

Witness Emmrich proposes that different cost escalators be used for each of these different components with the cost escalators being tailored to the components.¹⁹ Witness Emmrich's proposal should be closely examined in hearing. It raises a number of issues, aside from its excessive complexity.

For example, SoCalGas does not propose to include a productivity factor in the mechanism to calculate the PTY O&M expenses. SoCalGas argues that the productivity factor should be omitted because SoCalGas will not adjust O&M cost annually to reflect customer growth. Witness Emmrich says: "This requires that SoCalGas achieve a level of productivity such that the costs associated with customer growth are offset by achieved productivity,"²⁰ conveniently ignoring the fact that adding new customers adds revenues, not just costs. If SoCalGas is to be allowed to enjoy the benefits of a PTY adjustment mechanism, SoCalGas should be required to include a productivity factor.

Second, SoCalGas witness Emmrich proposes an entire page of cost items that would be excluded from the PTY base margin, starting with pensions and post retirement benefits other than pensions ("PBOP"). These exclusions should be closely examined in hearing.

E. The GRC Term Should Be Three Years, Not Four Years as Proposed by SoCalGas.

SoCalGas witness Emmrich offers a variety of arguments for an extended GRC term of four years. However, given substantial changes that have occurred since the base year, 2009, and the test year, 2012, it appears that adhering to the usual practice of a 3 year term would be warranted, particularly, in this case. The term is an issue that should be explored in hearing.

¹⁸ Ex. SCG-38 at HSE-3.

¹⁹ *Ibid.* at HSE-4.

F. The Proposed NERBA Should Not Result in SoCalGas Recovering SoCalGas' Cost of the ARB's Administrative Fee or Cap-and-Trade Program from EGs that Bear the Cost of ARB Programs Directly.

SoCalGas witness Shimansky proposes creation of a New Environmental Regulation Balancing Account (“NERBA”) that would, among other things, provide for recordation and recovery of AB32 administrative fees. By Advice Letter 4184 dated December 17, 2010, SoCalGas proposed the establishment of the Environmental Fee Memorandum Account (“EFMA”) to track “approximately \$4-5” in AB32 fees that SoCalGas will pay to the ARB annually.²¹ Although witness Shimansky does not address the issue, the NERBA would presumably replace the EFMA.

Witness Shimansky did not propose explicit language to be included in the SoCalGas Preliminary Statement describing any of the accounts he addresses, including the NERBA. SCGC will propose in the hearing in this proceeding that the Preliminary Statement description of the NERBA, like the description of the EFMA, specify that the account does *not* apply to “any classes that may be specifically excluded by the Commission or direct billed by the CARB.”²² This is necessary to assure that large electric generators that are directly billed for the administrative fee by the ARB are not subject to SoCalGas recovery of the cost of administrative fees that are billed to SoCalGas.

II. PROPOSED SCHEDULE.

By Ruling dated January 7, 2011, Administrative Law Judge (“ALJ”) Wong directed that parties propose procedural schedules in the prehearing conference statements that are due on

²⁰ *Ibid* at HSE-6.

²¹ Southern California Gas Company Advice No. 4184 at 1 (December 17, 2010).

²² Advice Letter 4184, Attachment B.

January 26, 2011. SCGC will provide a recommended schedule at that time in compliance with ALJ Wong's Ruling.

III. CONCLUSION.

For the reasons set forth above, SCGC respectfully protests the SoCalGas Application and requests that the Commission set the Application for an evidentiary hearing.

Respectfully submitted,

/s/ Norman A. Pedersen

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Attorney for the **SOUTHERN CALIFORNIA
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Dated: January 18, 2011

Attachment A

HANNA AND MORTON LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

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December 13, 2010

VIA MAIL, FACSIMILE AND EMAIL (jnj@cpuc.ca.gov) and (mas@cpuc.ca.gov)

Mr. Honesto Gatchalian
Ms. Maria Salinas
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Fourth Floor
San Francisco, California 94102

Re: Southern California Gas Company Advice Letter No. 4172, Request for Authorization to Offer Biogas Conditioning Services in Bio Energy Production Facilities Services on a Non-Tariffed Basis

Dear Mr. Gatchalian and Ms. Salinas:

In accordance with the provisions of General Order No. 96-B of the California Public Utilities Commission (“Commission” or “CPUC”) and the Commission’s Affiliate Transaction Rules²³ the Southern California Generation Coalition (“SCGC”) respectfully protests the Southern California Gas Company (“SoCalGas”) Advice Letter (“Advice”) 4172 dated November 22, 2010.

In its Advice Letter, SoCalGas requests that the Commission approve two new non-tariffed products and services (“NTP&S” or “Non-Tariffed Services”). SoCalGas proposes to offer a Biogas Conditioning Service through which SoCalGas would design, install, own, operate, and maintain the Biogas Conditioning Systems on, or adjacent to, the customers’ premises. Another service is the Bioenergy Production Facilities Service under which SoCalGas would own facilities that are required to produce raw biogas from organic matter including agricultural waste, animal waste, biosolids, energy crops, food waste, green waste, manure, municipal solid waste, and sewage.

SCGC protests, particularly, the proposal to offer the Bioenergy Production Facilities Service on an NTP&S basis. Under the Commission’s Affiliate Transaction Rules, SoCalGas is required to submit an advice letter prior to offering a new category of non-tariffed products or services which addresses the amount of utility assets dedicated to the non-utility venture in order to ensure that a given product or service does not threaten the provision of utility service, and

²³ Decision (“D”) 06-12-029, Appendix A-3 (December 14, 2006).

show that the new product or service will not result in the degradation of the cost, quality, or reliability of tariffed goods and services.²⁴ SoCalGas states in its Advice Letter (at 9): “The proposed Services will use existing utility capacity (primarily labor, overhead and equipment)” and that “utility employees will be used to offer, implement and manage its services.” However, SoCalGas provides no information about the amount of utility assets that would be dedicated to the utility venture, and SoCalGas fails to show that the new product or service will not result in a degradation of cost, quality or reliability of tariffed goods and services.

Similarly, the Affiliate Transaction Rules require that the Advice Letter proposing a new non-tariffed product or service “address the potential impact of the new product or service on competition in the relevant market including but not limited to the degree in which the relevant market is already competitive in nature and the degree to which the new category of product or service is projected to affect that market.”²⁵ SoCalGas states summarily: “Very little market activity has been seen in the wastewater, dairy and food waste biomethane capture arena...²⁶” That statement is contrary to SCGC’s understanding. Moreover, such a summary statement falls far short of meeting the requirement of the Affiliate Transaction Rules that an offering of the non-tariffed service would impact competition in the relevant market.

The proposed offering of, particularly, the Bioenergy Production Facilities Service would compete directly with others who are engaged in the development of biogas from agricultural waste, animal waste, biosolids, energy crops, food waste, green waste, manure, municipal solid wastes, and sewage. If the SoCalGas parent, Sempra Energy, desires to get into that business, it should establish an affiliate to do so. SCGC is concerned about the attempt to utilize utility assets, including the existing personnel and capacity of the utility, to provide the service in competition with others.

Lastly, SCGC is concerned that the compensation to ratepayers would be unduly limited. SoCalGas proposes to share after-tax net earnings above a rate of return benchmark 50/50 between shareholders and ratepayers.²⁷ The benchmark return would be set to equal the utility’s authorized rate of return plus 75 basis points.²⁸ The ratepayers’ share of the after tax earnings would be extremely small, particularly given that SoCalGas would be permitted to earn its authorized rate of return plus 75 basis points before any sharing occurred whatsoever.

²⁴ *Ibid*, p. 21.

²⁵ *Ibid*.

²⁶ *Ibid*, p. 3.

²⁷ *Ibid* at 6.

²⁸ *Ibid* p. 8.

Mr. Honesto Gatchalian
Ms. Maria Salinas
California Public Utilities Commission
December 13, 2010
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Accordingly, SCGC protests Advice No. 4172.

Respectfully submitted,

/s/ Norman A. Pedersen

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **SOUTHERN CALIFORNIA GENERATION COALITION PROTEST** on the service list for **A.06-12-009, A.06-12-010, A.10-12-005 and A.10-12-006** by serving a copy to each party by electronic mail, or by mailing a properly addressed copy by first-class mail with postage prepaid to each party unable to accept service by electronic mail.

Executed on January 24, 2011 at Los Angeles, California.

/s/ Sylvia Cantos

Sylvia Cantos

**SERVICE LISTS –
A.06-12-009, A.06-12-010, A.10-12-005 and A.10-12-006**

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