Pacific Gas and Electric Company™

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March 11, 2011

Advice 3194-G
(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Gas Rule 21 In-Kind Shrinkage Allowance Adjustments for Backbone Transmission and Distribution

Pacific Gas and Electric Company ("PG&E") hereby submits for filing revisions to the natural gas in-kind shrinkage allowances for backbone transmission and distribution service shown in PG&E's gas Rule 21—*Transportation of Natural Gas.* The affected tariff sheets are listed on the enclosed Attachment I.

Purpose

In-kind shrinkage allowances represent the unaccounted-for gas and the utility fuel use attributable to the volume of natural gas received by PG&E for transmission, distribution and storage service. In Decision ("D.") 03-12-061, the California Public Utilities Commission ("Commission") authorized the shrinkage allowances to be updated annually or as necessary at other times of the year to match the actual shrinkage experienced on PG&E's system. This is reflected in Gas Preliminary Statement Part C—*Gas Accounting Terms and Definitions,* Part C.12.c. and Gas Rule 21, which state that PG&E may adjust distribution, transmission and storage[1] shrinkage annually through an advice letter compliance filing, or as necessary at other times of the year through a separate advice letter filing.

PG&E proposes two separate adjustments to the existing backbone transmission and distribution shrinkage allowances to be effective May 1, 2011. The first adjustment updates the base shrinkage allowances to reflect the current shrinkage

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[1] Per D.03-12-061 and Gas Preliminary Statement Part C, Section 12.c, PG&E is authorized to update its storage in-kind shrinkage allowances on an annual basis through an advice letter compliance filing to be effective April 1. After reviewing its current in-kind shrinkage allowance for storage, PG&E has determined that no revision to the current allowance is necessary at this time.

forecast data for 2011. The second adjustment reduces a natural gas shrinkage over-collection balance on PG&E's gas pipeline system.

Background

In Advice 3164-G, the Commission adopted PG&E's proposed transmission and distribution Shrinkage Base Allowances and eliminated the existing Shrinkage Adjustment Adder Allowance effective January 1, 2011, to better match the 2011 shrinkage forecast and to avoid the shrinkage imbalance from moving into an over-collection position. Based on the latest actual shrinkage data, the shrinkage imbalance is currently an over-collection balance of approximately 2.7 million decatherms. In order to avoid continuing to be in the over-collection position, PG&E proposes two separate adjustments to the existing backbone transmission and distribution shrinkage allowances to be effective May 1, 2011, as described herein.

Shrinkage Base Allowance Forecast Update

The proposed shrinkage base allowances are calculated using PG&E's latest forecast of shrinkage on its system and PG&E's 2011 customer demand forecast from its Gas Accord V Settlement (Application ("A.") 09-09-013). The proposed Shrinkage Base Allowances in this filing are shown in the following table:

Proposed In-Kind Shrinkage Base Allowance

	Current Base Allowance	Proposed Base Allowance	Proposed Change
Transmission – Redwood to Off-System	0.9%	0.9%	--
Transmission – Mission to On/Off-System	0.0%	0.0%	--
Transmission – All other backbone paths	1.1%	0.9%	-0.2%
Distribution – Noncore	0.2%	0.2%	--
Distribution – Core (Annual)[2]	2.6%	1.8%	-0.8%

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[2] The Gas Accord V ("GAV") Settlement filed on August 20, 2010 (A.09.09.13), includes a provision for seasonal core distribution shrinkage allowance structure. If and when the Commission approves GAV, PG&E will file to implement the corresponding core seasonal distribution shrinkage allowances via a separate compliance filing for the GAV implementation.

The proposed Shrinkage Base Allowances are designed to recover PG&E's current shrinkage forecast for 2011. The 2011 shrinkage forecast includes an adjustment volume for reduction in Gas Department Use ("GDU") associated with electric compressor units.

Temporary In-Kind Shrinkage Credit Adjustment

In this filing, PG&E is proposing an adjustment to reduce an existing over-collection of the in-kind shrinkage volumes. The in-kind shrinkage over-collection balance is approximately 2.7 million decatherms. PG&E has allocated this in-kind shrinkage over-collection quantity consistent with the existing methodology for allocating all other unaccounted-for gas volumes.[3] PG&E proposes to reduce the current volume of over-collected shrinkage to zero over a 16-month period. However, the actual time required to reduce the over-collection quantity will depend on the volume of on-system usage. At such time as the level of the over-collected shrinkage approaches zero, PG&E will file an advice letter to eliminate the in-kind shrinkage credit allowances. The proposed temporary in-kind Shrinkage Credit Adjustments in this filing are shown in the following table:

Proposed Temporary In-kind Shrinkage Credit Adjustment

	Existing Adjustment Allowance	Proposed Adjustment Allowance	Proposed Change
Transmission – All other backbone paths	0.0%	-0.1%	-0.1%
Distribution – Core	0.0%	-0.4%	-0.4%

Total In-Kind Shrinkage Allowance Forecast Update

The following table reflects the total proposed changes to the shrinkage allowances, combining the implementation of the in-kind Shrinkage Credit Adjustment and the 2011 Shrinkage Base Allowance update.

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[3] PG&E's proposal to implement a temporary credit to the shrinkage allowance to return an over-collection quantity is consistent with methodology formerly approved by the Commission in Advice 2365-G. The credit became effective March 2002 and was removed effective March 2003 pursuant to Advice 2438-G.

Proposed Total Shrinkage Allowance Update

	Current Total Allowance	Proposed Total Allowance	Proposed Change
Transmission – Redwood to Off-System	0.9%	0.9%	--
Transmission – Mission to On/Off-System	0.0%	0.0%	--
Transmission – All other backbone paths	1.1%	0.8%	-0.3%
Distribution – Noncore	0.2%	0.2%	--
Distribution – Core (Annual)[4]	2.6%	1.4%	-1.2%

PG&E will continue to monitor the shrinkage on its system and will adjust the shrinkage allowances through advice letter filings in the future, as necessary.

This filing will not affect any other rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule. Workpapers supporting the proposed changes are included in Attachment 2 to this filing.

Tariff Revisions

The revised backbone transmission shrinkage allowance percentages are reflected in gas Rule 21, Section B.1.a. The revised distribution shrinkage allowance percentages are reflected in Gas Rule 21, Section B.1.b.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **March 31, 2011,** which is 20 days from the date of this filing. Protests should be mailed to:

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[4] If and when the Commission approves GAV, PG&E will file to implement the corresponding core seasonal distribution shrinkage allowances via a separate compliance filing for the GAV implementation. The proposed annual Core Distribution Shrinkage Allowance from this filing will be replaced with seasonal allowances including the proposed in-kind shrinkage credit adjustment will be at 0.9% for summer (April-October) and 1.6% for winter season (November- March).

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Copies also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. Mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

In order to provide gas transportation customers notice of the shrinkage change, PG&E requests notice of this advice letter approval by April 11, 2011, and that the tariffs be approved effective **May 1, 2011**. PG&E will inform gas transportation customers of the new shrinkage allowances on its Pipe Ranger Web site: http://www.pge.com/pipeline/ once this filing is approved.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for A.09-09-013. Address changes to the General Order 96B service list and all electronic approvals should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at

Process_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at http://www.pge.com/tariffs/.

Jane Yura /emt

Vice President – Regulation and Rates

cc: Service List for A.09-09-013

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. Pacific Gas and Electric Company (ID U39 M)

Utility type:	Contact Person: Linda Tom-Martinez
☑ ELC ☑ GAS	Phone #: (415) 973-4612
☐ PLC ☐ HEAT ☐ WATER	E-mail: lmt1@pge.com

EXPLANATION OF UTILITY TYPE	(Date Filed/ Received Stamp by CPUC)
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water	

Advice Letter (AL) #: **3194-G**   **Tier: 2**

Subject of AL: **Gas Rule 21 In-Kind Shrinkage Allowance Adjustments for Backbone Transmission and Distribution**

Keywords (choose from CPUC listing): Transportation, Compliance

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☑ One-Time ☐ Other _____

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL[1]: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

Confidential information will be made available to those who have executed a nondisclosure agreement: ☐ Yes ☐ No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes ☐ ☑ No

Requested effective date: **May 1, 2011**   No. of tariff sheets: 4

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: Gas Rule 21

Service affected and changes proposed[1]: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, 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	**Pacific Gas and Electric Company**
Tariff Files, Room 4005	**Attn: Jane Yura**
DMS Branch	**Vice President, Regulation and Rates**
505 Van Ness Ave.,	**77 Beale Street, Mail Code B10B**
San Francisco, CA 94102	**P.O. Box 770000**
jnj@cpuc.ca.gov and mas@cpuc.ca.gov	**San Francisco, CA 94177**
	E-mail: PGETariffs@pge.com

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
28812-G	GAS RULE NO. 21 TRANSPORTATION OF NATURAL GAS Sheet 2	28608-G
28813-G	GAS RULE NO. 21 TRANSPORTATION OF NATURAL GAS Sheet 3	28609-G
28814-G	GAS TABLE OF CONTENTS Sheet 1	28810-G
28815-G	GAS TABLE OF CONTENTS Sheet 6	28611-G

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San Francisco, California
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Cancelling

Revised   *Cal. P.U.C. Sheet No.*   28812-G
Revised   *Cal. P.U.C. Sheet No.*   28608-G

GAS RULE NO. 21
TRANSPORTATION OF NATURAL GAS

Sheet 2

B.   QUANTITIES OF GAS (Cont'd.)

   1.   IN-KIND SHRINKAGE ALLOWANCE (Cont'd.)

      a.   Backbone Transmission Shrinkage

A Customer transporting gas over PG&E's Backbone Transmission System shall deliver each day at the Receipt Point to PG&E an additional in-kind quantity of natural gas supply equal to a percent of total volume of natural gas to be delivered at the Receipt Point. Thus, the quantity to be nominated at the Receipt Point equals the quantity desired at the Delivery Point divided by $(1 - x)$ where x is the decimal equivalent of the Backbone Transmission System In-Kind Shrinkage Allowance percentage, based on the transmission path utilized as follows:

Path	Percentage of In-Kind Shrinkage Base Allowance	Percentage of In-Kind Shrinkage Adjustment	Percentage of Effective In-Kind Shrinkage Allowance
Redwood to Off-System	0.9	–	0.9
Mission to On-System	0	–	0
Mission to Off-System	0	–	0
All other transmission	0.9 (R)	(0.1) (R)	0.8 (R)

Provided, however, that PG&E and the Customer shall not be prohibited under this Rule, where shrinkage requirements support a different shrinkage allowance, from mutually agreeing to a different shrinkage allowance for transportation over PG&E's Backbone Transmission System.

(Continued)

GAS RULE NO. 21   Sheet 3
TRANSPORTATION OF NATURAL GAS

B.   QUANTITIES OF GAS (Cont'd.)

1.   IN-KIND SHRINKAGE ALLOWANCE (Cont'd.)

b.   Distribution Shrinkage

For transportation on PG&E's Distribution System, an additional In-Kind Shrinkage Allowance shall apply, which is separate from backbone transmission and storage shrinkage. The Customer shall deliver each day to PG&E at the Citygate an additional in-kind quantity of natural gas supply equal to a percent of the total volume of natural gas flowing through the End-Use Customer's meter. Thus, the quantity to be nominated at the Citygate equals the quantity to be flowed through the meter multiplied by $(1 + y)$ where y is the decimal equivalent of the Distribution System In-Kind Shrinkage Allowance percentage, as follows:

End-Use Customer	Percentage of In-Kind Shrinkage Base Allowance	Percentage of In-Kind Shrinkage Adjustment	Percentage of Effective In-Kind Shrinkage Allowance
Core	1.8 (R)	(0.4) (R)	1.4 (R)
Noncore Distribution	0.2	0	0.2
Noncore Transmission*	–	–	–

As an example, for a Core End-Use Customer being served via the Redwood Path, the amount to be nominated at Malin is calculated as:

$$\text{Receipt Point Quantity} = \text{Est. Metered Usage} \times (1 + y) \;/\; (1 - x)$$

Where: x =   decimal equivalent of the Backbone Shrinkage percentage, and

y =   decimal equivalent of the Distribution Shrinkage percentage

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*   Noncore Transmission Level End-Use Customers or Agents require no Distribution System In-Kind Shrinkage Allowance.

(Continued)

Pacific Gas and Electric Company
San Francisco, California
U 39

Cancelling

Revised   Cal. P.U.C. Sheet No.   28814-G
Revised   Cal. P.U.C. Sheet No.   28810-G

GAS TABLE OF CONTENTS   Sheet 1

| | CAL P.U.C. |
| **TITLE OF SHEET** | **SHEET NO.** |

(Continued)

GAS TABLE OF CONTENTS   Sheet 6

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.

Rules

(Continued)

Advice 3194-G

Attachment 2

	(A)	(B)	(C)	(D)	(E)	(F)	
Line No.	*Forecast Customer Demand is based on data in the Gas Accord V Settlement Agreement filed August 20, 2010 (PG&E's June 2010 forecast plus 20 MDth/d EG-Backbone). Forecast Off-system Demand is based on the three-year actual off-system deliveries through February 2011. LUAF and GDU forecasts are based on the one-year average monthly percentage profile of actual LUAF and GDU (through November 2010 -- latest data available as of February 22, 2011.) GDU forecast reduced by an annual 630 MMCF due to a forecasted increase in electric compressor usage; this quantity is prorated to reflect seven months actual electric compressor usage in the forecast period.*	12 Month Forecast Throughput	% Served from Distr.	% Served from Trans.	Throughput Served from Trans.	Throughput Served from Distr.	Line No.
1	**Noncore Transmission/Distribution Split**	Mdth	Survey Results		Mdth	Mdth	1
2	Industrial	170,366	15.4192%	84.5808%	144,097	26,269	2
3	EG	189,881	0.0000%	100.0000%	189,881	0	3
4	Cogeneration	72,185	6.6834%	93.3166%	67,361	4,824	4
5	Wholesale	3,700	0.0000%	100.0000%	3,700	0	5
6	NGV4	523	0.0000%	100.0000%	523	0	6
7	Total Noncore (excludes EOR and SEGDA)	436,655			405,561	31,094	7
8	% of Noncore served from Trans. and Distr.				92.88%	7.12%	8

LUAF per Study (from the Gas Accord I Workpapers, 17-2 &17-3)
  Splits LUAF noncore volumes between distribution and transmission based on LUAF Study

Line No.		NCTotal			NC Trans.	NC Distr.	Line No.
9							9
10	LUAF (Mcf) - volumes from 1995 BCAP	3,054,276			2,268,089	786,187	10
11	LUAF % (NC Distr Vol/NC Total)				74.26%	25.74%	11
12	Throughput Vol. % - Data from Rate Dept Survey				79.00%	21.00%	12
13	Ratios set for Accord period:						13
14	Calculated as Line 11/Line 12				0.94	1.23	14
15	Calculated as (F) line 14/(E) line 14					1.30	15
16	Noncore % of System LUAF (adopted in 95 BCAP)	22.00%					16

LUAF & GDU Allocations to Transmission and Distribution

Line No.		System Forecast	Core	Noncore	Off-system	NC Trans.	NC Distr.	Line No.
	LUAF Calculations:							
17	LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)	8,262	6,281	1,772	209			17
18	Throughput per forecast (Mdth)	791,841	291,909	436,655	63,277			18
19	Less: SEGDA	0		0				19
20	Totals for Calculation of allocation	791,841	291,909	436,655	63,277			20
21	LUAF as % of throughput (Lines 17/20)	1.043%	2.152%	0.406%	0.330%			21
22	Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)					0.397%		22
23	Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)						0.518%	23
24	Off-System LUAF (per D.94-02-042)	0.33%						24
	GDU Calculations:							
25	GDU per forecast(Mdth) - Pipeline (Total Plus balancing service storage GDU)	4,377						25
26	GDU % = (B) line 24/(B) line 20	0.553%						26
	Shrinkage (LUAF+GDU)							
27	Noncore Transmission = (B) line 26 + (E) line 22	0.950%						27
28	Noncore Distribution = (B) line 26 + (F) line 23	1.071%						28
29	Core Total = (B) line 26 + (C) line 21	2.705%						29
30	Core Distribution = (B) line 29 - (B) line 27	1.755%						30
31	Off-System Transmission = (B) line 26 + (B) line 24	0.883%						31

Line No.		Core	NC Trans.	NC Dist.	Off-Sys.	Line No.
32	**Proposed Pipeline Shrinkage Allowances - Base Allowance Update**	Core	NC Trans.	NC Dist.	Off-Sys.	32
33	Transmission (assumes same % for core and noncore)	0.9%	0.9%	0.9%	0.9%	33
34	Distribution	1.8%	N/A	0.2%	N/A	34
35	Total	2.7%	0.9%	1.1%	0.9%	35

	(A)	(B)	(C)	(D)	(E)	(F)	
Line No.	*Forecast Customer Demand is based on data in the Gas Accord V Settlement Agreement filed August 20, 2010 (PG&E's June 2010 forecast plus 20 MDth/d EG-Backbone). Forecast Off-system Demand is based on the one-year actual off-system deliveries through February 2011. LUAF is set to return 2039 MDth (approximately 2 BCF) per year through the adjustment mechanism.*	**12 Month Forecast Throughput**	**% Served from Distr.**	**% Served from Trans.**	**Throughput Served from Trans.**	**Throughput Served from Distr.**	Line No.
1	**Noncore Transmission/Distribution Split**	**Mdth**	**Survey Results**		**Mdth**	**Mdth**	1
2	Industrial	170,366	15.4192%	84.5808%	144,097	26,269	2
3	EG	189,881	0.0000%	100.0000%	189,881	0	3
4	Cogeneration	72,185	6.6834%	93.3166%	67,361	4,824	4
5	Wholesale	3,700	0.0000%	100.0000%	3,700	0	5
6	NGV4	523	0.0000%	100.0000%	523	0	6
7	Total Noncore (excludes EOR and SEGDA)	436,655			405,561	31,094	7
8	% of Noncore served from Trans. and Distr.				92.88%	7.12%	8

LUAF per Study (from the Gas Accord I Workpapers, 17-2 &17-3)
Splits LUAF noncore volumes between distribution and transmission based on LUAF Study

		NCTotal			**NC Trans.**	**NC Distr.**	
9							9
10	LUAF (Mcf) - volumes from 1995 BCAP	3,054,276			2,268,089	786,187	10
11	LUAF % (NC Distr Vol/NC Total)				74.26%	25.74%	11
12	Throughput Vol. % - Data from Rate Dept Survey				79.00%	21.00%	12
13	Ratios set for Accord period:						13
14	Calculated as Line 11/Line 12				0.94	1.23	14
15	Calculated as (F) line 14/(E) line 14					1.30	15
16	Noncore % of System LUAF (adopted in 95 BCAP)	22.00%					16

LUAF & GDU Allocations to Transmission and Distribution

		System Forecast	**Core**	**Noncore**	**Off-system**	**NC Trans.**	**NC Distr.**	
	LUAF Calculations:							
17	LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)	- 2,039 -	1,590 -	449	-			17
18	Throughput per forecast (Mdth)	791,841	291,909	436,655	63,277			18
19	Less: SEGDA	0		0				19
20	Totals for Calculation of allocation	791,841	291,909	436,655	63,277			20
21	LUAF as % of throughput (Lines 17/20)	-0.258%	-0.545%	-0.103%	0.000%			21
22	Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)					-0.101%		22
23	Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)						-0.131%	23
24	Off-System LUAF (per D.94-02-042)	0.00% (Not allocated to off-system)						24
		Same for all customers						
	GDU Calculations:							
25	GDU per forecast(Mdth) - Pipeline (Total Plus balancing service storage GDU)	-						25
26	GDU % = (B) line 24/(B) line 20	0.000%						26
	Shrinkage (LUAF+GDU)							
27	Noncore Transmission = (B) line 26 + (E) line 22	-0.101%						27
28	Noncore Distribution = (B) line 26 + (F) line 23	-0.131%						28
29	Core Total = (B) line 26 + (C) line 21	-0.545%						29
30	Core Distribution = (B) line 29 - (B) line 27	-0.444%						30
31	Off-System Transmission = (B) line 26 + (B) line 24	0.000%						31

		Core	**NC Trans.**	**NC Dist.**	**Off-Sys.**	
32	**Proposed Pipeline Shrinkage Allowances - Credit Adjustment**					32
33	Transmission (assumes same % for core and noncore)	-0.1%	-0.1%	-0.1%	0.0%	33
34	Distribution	-0.4%	N/A	0.0%	N/A	34
35	Total	-0.5%	-0.1%	-0.1%	0.0%	35

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eMeter Corporation