

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

In the Matter of the Application of Southern California Gas Company (U 904 G) Regarding Year 28 (2021-2022) of Its Gas Cost Incentive Mechanism.

A.22-06-\_\_\_\_\_  
(Filed June 15, 2022)

**APPLICATION OF SOUTHERN CALIFORNIA GAS  
COMPANY (U 904 G) REGARDING YEAR 28 (2021-2022)  
OF ITS GAS COST INCENTIVE MECHANISM**

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**I. INTRODUCTION**

Southern California Gas Company (SoCalGas) hereby submits its twenty-eighth annual application (Application) under the Gas Cost Incentive Mechanism (GCIM). The California Public Utilities Commission (CPUC or Commission) established the GCIM in Decision (D.) 94-03-076, which was modified and extended in D.97-06-061, extended on an annual basis beginning with Year 6 in D.98-12-057, and then further modified and extended on an annual basis beginning in Year 8 in D.02-06-023.<sup>1</sup> Pursuant to these decisions and SoCalGas' Tariff Preliminary Statement Part VIII, "Gas Cost Incentive Mechanism," SoCalGas is to file an application and report in June of each year to address its performance under the GCIM for the previous April 1- March 31 period (GCIM Year).

In this Application, SoCalGas provides its report on gas supply and core storage activity for the 12-month GCIM year ending March 31, 2022 (Year 28), wherein SoCalGas was able to

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<sup>1</sup> Pursuant to D.02-06-023, the GCIM will continue on an annual basis until the Commission modifies or terminates it after giving interested parties notice and an opportunity to be heard. *See* D.02-06-023, mimeo., at 16, 21-22, and p. 1 of Attachment A.

purchase gas at \$122.2 million below the GCIM benchmark, resulting in a ratepayer benefit of \$99.9 million in lower gas costs. SoCalGas further submits its request for Commission approval of a shareholder reward of \$22,313,352 for its Year 28 performance. SoCalGas' Year 28 Annual Report is Attachment A to this Application.

## **II. BACKGROUND**

### **A. Establishment of the GCIM**

On March 16, 1994, the Commission approved SoCalGas' Application (A.) 93-10-034, implementing a new method by which the Commission oversees the reasonableness of gas purchases and gas storage decisions made by SoCalGas on behalf of core sales customers (D.94-03-076). The Commission initially established a three-year experimental GCIM program beginning April 1, 1994. As stated in D.94-03-076, the GCIM program originally consisted of two separate elements, one that measured performance for gas procurement efforts, and the other that measures performance for efficient gas storage operations for the core class. The original GCIM affected approximately 75 percent of SoCalGas' total gas purchases.

The original GCIM established a benchmark against which to measure the price SoCalGas pays for core and core subscription gas supply. The benchmark was based on a combination of monthly gas price indices published in Natural Gas Intelligence, Inside FERC Gas Market Report, and a New York Mercantile Exchange (NYMEX) component for gas futures. The GCIM proposal included a "tolerance band" to allow SoCalGas to meet objectives related to service reliability and supply security. The approved tolerance band was initially established at four and one-half percent during the first year of the GCIM and four percent for the subsequent two years.

In establishing the GCIM in D.94-03-076, the Commission ordered the Commission Advisory and Compliance Division (CACD) to conduct an evaluation of the GCIM by August 1,

1996, to provide the Commission with guidance regarding the success or failure of the program prior to its three-year completion. The Public Advocates Office of the California Public Utilities Commission (Cal PA), formerly the Office of Ratepayer Advocates (ORA) was given the task of auditing SoCalGas' annual reports on the GCIM.<sup>2</sup>

In D.02-06-023, the Commission approved a Settlement Agreement executed in July of 2001 by SoCalGas, Cal PA, and The Utility Reform Network (TURN). The Settlement Agreement extends the GCIM on an annual basis into Year 8 and beyond, until such time as the Commission approves -- after giving the parties notice and an opportunity to be heard -- a request for modification to or termination of the GCIM.

**B. GCIM Year 1**

Consistent with D.94-03-076, SoCalGas filed its first annual GCIM report on June 22, 1995 (A.95-06-043). A.95-06-043 outlined the performance for SoCalGas during GCIM Year 1 and proposed six modifications to the GCIM. Cal PA conducted its audit of SoCalGas' report, opposing only two of the proposed modifications. SoCalGas settled with Cal PA in agreeing on four of the six proposed modifications, and the Commission granted SoCalGas its requested shareholder reward.

**C. GCIM Year 2**

On June 17, 1996, SoCalGas filed A.96-06-029 reporting on its gas supply and storage operations during Year 2. The deadline set in D.94-03-076 for the Commission Advisory & Compliance Division (CACD), or its successor the Energy Division, to file an evaluation report passed on August 1, 1996.

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<sup>2</sup> At the time of the original GCIM decision, Cal PA was known as the Division of Ratepayer Advocates (DRA). Over the ensuing GCIM years, the name of this organization changed from DRA to ORA, back to DRA, back to ORA, and then changed to Cal PA. To avoid confusion, this Application will simply refer to Cal PA throughout because that is the current name of this organization.

On February 13, 1997, SoCalGas and Cal PA filed a *Joint Motion for Order Adopting Stipulation and Agreement, Suspending Procedural Schedule, Waiving Oral Hearings, Limited Consolidation of Indicated Docket, and for Other Relief*. Among other things, the Stipulation and Agreement resolved all issues related to the Year 2 application, proposed to replace the four percent tolerance band with a tolerance band of two percent above and one-half percent below the benchmark, and provided for revisions to, and extension of, the GCIM program on an annual basis beyond the original expiration date of March 31, 1997.

In D.97-06-061, the Commission adopted the joint recommendation of Cal PA and SoCalGas with one modification. The sole modification was to limit the current extension of the GCIM to a two-year term ending March 31, 1999, “in order for the Commission to revisit this program, if it chooses, as part of its gas strategy.”<sup>3</sup>

#### **D. GCIM Year 3**

On June 16, 1997, SoCalGas filed its Year 3 report. That filing was reviewed and accepted without modification by Cal PA on December 5, 1997, and approved without hearings, by the Commission in D.98-06-024.

#### **E. GCIM Year 4**

On June 18, 1998, SoCalGas filed its Year 4 report. That filing was also reviewed and accepted without modification by Cal PA and approved by the Commission, without hearings, in D.98-12-057. The Commission stated in Ordering Paragraph 2 of D.98-12-057 that:

SoCalGas’ GCIM is extended on an annual basis for 12-month cycles, beginning in Year 6, the period April 1, 1999 through March 31, 2000, unless the mechanism is modified or discontinued by order of the Commission.

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<sup>3</sup> D.97-06-061, mimeo., at 1.

## **F. GCIM Year 5**

On June 15, 1999, SoCalGas filed its Year 5 report in A. 99-06-027, which was reviewed and approved without modification by Cal PA and was approved, without hearings, in D.00-06-039. In D.00-06-039, the Commission did not order modifications to or termination of the GCIM, but did order the Energy Division to conduct an evaluation of the GCIM before the Commission would consider modifications to the GCIM, including whether to extend or terminate the mechanism.

## **G. GCIM Year 6**

On June 15, 2000, SoCalGas filed its Year 6 report in A.00-06-023. On October 30, 2000, Cal PA issued its Monitoring and Evaluation Report of A.00-06-023, which “verified that the Commission approved sharing mechanism results in a \$14.4 million benefit to ratepayers and a shareholder reward of \$9.8 million.” In its report, Cal PA supported the continuation of the GCIM into Year 7 and recommended the continuation of the GCIM program into Year 8 with two refinements to the mechanism.<sup>4</sup> Pursuant to D.00-06-039, on January 4, 2001, the Energy Division issued a comprehensive 37-page analysis of the history, function, and results of the GCIM. In its analysis, the Energy Division concluded that gas purchases made by SoCalGas under the GCIM “are definitely far more favorable to ratepayers than those made when reasonableness reviews were in effect.”<sup>5</sup> The Energy Division noted that “the GCIM has achieved the Commission’s goals for the GCIM,” and recommended that the GCIM be continued, explaining that “the GCIM is superior to various alternatives, such as traditional reasonableness reviews, elimination of SoCalGas from the gas procurement function, or

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<sup>4</sup> The two refinements to the GCIM for Year 8 were: 1) modification of the lower tolerance band from the current 0.5% to 1.0%, and 2) replacement of the NYMEX benchmark with published (daily or weekly) indices with a set 25% weighting. Cal PA GCIM Year 6 Monitoring and Evaluation Report, pp. 1-4 dated October 30, 2000.

<sup>5</sup> Energy Division Analysis at 20; *see also* D.02-06-023, mimeo., at p. 5 referencing the analysis.

inclusion of gas procurement costs in an overall performance-based ratemaking mechanism.”<sup>6</sup> In D.01-05-002, the Commission approved, without hearings, SoCalGas’ GCIM reward for its Year 6 performance and opened Phase 2 of A.00-06-023 to address whether the GCIM should be extended with or without modification.

In D.02-06-023, the Commission approved a settlement agreement among SoCalGas, Cal PA, and TURN, which extended and made the following changes to SoCalGas’ GCIM:

1. Elimination of the NYMEX Program as a benchmark index, beginning in Year 8.
2. Shareholder rewards will be capped at 1.5 percent of the actual annual gas commodity cost.
3. The sharing bands below the benchmark will be:

<u>Sharing Band</u>	<u>Ratepayer%</u>	<u>Shareholder%</u>
0.0%-1.00%	100%	0%
1.00%-5.00%	75%	25%
5.00% & Above	90%	10%

Pursuant to D.02-06-023, SoCalGas’ GCIM will continue on an annual basis until further modified or terminated upon Commission order.<sup>7</sup>

#### **H. GCIM Year 7**

On June 15, 2001, SoCalGas filed its Year 7 GCIM report in A.01-06-027, seeking a shareholder reward of \$106.1 million. Year 7 represented an extremely volatile year in gas prices, compounded by unusually cold weather, higher wholesale electric prices, lower hydroelectric generation in the Pacific Northwest, higher electric generation demand, and lower throughput on the El Paso Natural Gas Company interstate pipeline system due to a system rupture. Despite all of these factors, SoCalGas was able to effectively manage its assets to the benefit of core ratepayers, resulting in gas for the core being purchased at an average price of \$5.16 per MMBtu -- well below the benchmark of \$5.72 per MMBtu.

<sup>6</sup> Energy Division Evaluation Report of the SoCalGas GCIM, p. 1, dated January 4, 2001.

<sup>7</sup> D.02-06-023, mimeo, at 25-26 and p. 1 of Attachment A (the Settlement Agreement).

Pursuant to the Settlement Agreement adopted in D.02-06-023, SoCalGas retroactively applied its new 1.5% commodity cost cap, and reduced its proposed GCIM Year 7 shareholder reward from \$106.1 million to \$30.8 million. The Commission approved SoCalGas' revised \$30.8 million GCIM Year 7 shareholder reward request in D.03-08-065.

**I. GCIM Year 8**

SoCalGas filed A.02-06-035 on June 17, 2002, requesting an authorized shareholder reward of \$17.4 million for GCIM Year 8, an amount that also reflected the retroactive application of the new 1.5% commodity cost cap on shareholder rewards. In GCIM Year 8, California continued to experience a volatile natural gas market. Despite this volatility, the GCIM continued to provide SoCalGas' core customers with reliable natural gas supplies at below market cost. SoCalGas realized an average gas cost of \$3.13 per MMBtu, \$0.51 per MMBtu below the benchmark price of \$3.64 per MMBtu. The Commission approved SoCalGas' \$17.4 million GCIM Year 8 shareholder reward request in D.03-08-064.

**J. GCIM Year 9**

SoCalGas filed A.03-06-021 on June 16, 2003 summarizing its GCIM Year 9 activities and requesting an authorized shareholder reward of \$6.3 million. While Year 9 provided more stability to the gas market than in the two preceding years, California's natural gas market continued to be very dynamic. Despite these changing conditions, SoCalGas' core customers continued to receive reliable natural gas supplies at \$39 million below market cost. The Commission approved SoCalGas' \$6.3 million GCIM Year 9 shareholder reward request in D.04-02-060.

**K. GCIM Year 10**

SoCalGas filed A.04-06-025 on June 15, 2004, summarizing its GCIM Year 10 activities and requesting a GCIM Year 10 shareholder reward of \$2.4 million. During GCIM Year 10, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$27

million below market cost.<sup>8</sup> The Commission approved SoCalGas' \$2.4 million GCIM Year 10 shareholder reward request in D.05-04-003.

#### **L. GCIM Year 11**

A.05-06-030 was filed on June 15, 2005, which requested a GCIM shareholder reward of \$2.5 million for Year 11. SoCalGas provided natural gas supplies to its core customers at \$31.4 million below the benchmark during GCIM Year 11. On November 30, 2005, Cal PA issued its GCIM Year 11 Monitoring and Evaluation Report which concurred with SoCalGas' proposed shareholder reward of \$2.5 million, but also recommended two modifications to the GCIM mechanism.<sup>9</sup>

1. SoCalGas should inject gas into storage on a uniform ratable basis during the injection months.
2. SoCalGas should meet a strict minimum of 70 Bcf inventory level in storage by November 1.

On February 17, 2006, Cal PA, TURN, and SoCalGas filed a Joint Recommendation, which resolved the concerns raised by Cal PA in its Monitoring and Evaluation Report. Specifically, the Joint Recommendation proposed the following changes to the GCIM:

- The core's October 31 physical inventory storage target will change from 70 Bcf +5/-5 Bcf to 70 Bcf +5/-2 Bcf. This core physical inventory does not include any net park and net loan positions.
- If additional storage inventory capacity is allocated to SoCalGas' core beyond 70 Bcf, core's October 31 physical inventory storage target will be increased by that amount.
- SoCalGas must obtain the consent of Cal PA and TURN to rely upon its existing secondary storage target.
- Unless otherwise agreed to by Cal PA and TURN, SoCalGas must have a minimum core-purchased inventory of 49 Bcf on July 31, 2006. This target may include net loan positions.

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<sup>8</sup> D.05-04-003, p. 3.

<sup>9</sup> Cal PA GCIM Year 11 Monitoring and Evaluation Report, pp. 1-2.

- For the years beyond 2006, SoCalGas will obtain agreement from Cal PA and TURN for mid-season core-purchased inventory target(s) which must be met unless otherwise agreed to by Cal PA and TURN. Each of these changes would be reflected in SoCalGas' GCIM tariff.

The Joint Recommendation of Cal PA, TURN and SoCalGas was adopted by the Commission in D.06-10-029 along with SoCalGas' requested shareholder reward for Year 11 of \$2.5 million.<sup>10</sup>

#### **M. GCIM Year 12**

SoCalGas filed A.06-06-017 on June 15, 2006 and requested a GCIM shareholder reward of \$9.8 million for Year 12. During GCIM Year 12, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$69.1 million below market cost. In October 2006, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 12 and recommended approval of SoCalGas' requested shareholder reward. The Commission approved SoCalGas' \$9.8 million GCIM Year 12 shareholder reward request in D.07-11-005.

#### **N. GCIM Year 13**

SoCalGas filed A.07-06-021 on June 15, 2007, and requested a GCIM shareholder reward of \$8.9 million for Year 13. During GCIM Year 13, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$57.7 million below benchmark cost. In October 2007, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 13 and recommended approval of SoCalGas' requested shareholder reward. A.07-06-021 was approved by the Commission on January 31, 2008 (D.08-01-035), finding that SoCalGas reasonably managed its gas acquisition and operations in Year 13 within the context of the GCIM

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<sup>10</sup> As with GCIM Year 7, Year 8, Year 9, and Year 10 shareholder rewards granted by the Commission, the GCIM Year 11 reward was made subject to refund or adjustment, to be determined in Investigation (I.)02-11-040. However, in D.06-12-034, the Commission closed I.02-11-040 with prejudice and terminated the conditions imposed upon these GCIM shareholder rewards.

that existed at the time, and that the calculation and amount of the shareholder reward is correct pursuant to the GCIM modifications adopted in D.02-06-023.

**O. GCIM Year 14**

SoCalGas filed A.08-06-016 on June 16, 2008, requesting a GCIM shareholder reward of \$6.5 million for Year 14. During GCIM Year 14, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$50.1 million below benchmark cost. In November 2008, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 14 and recommended approval of SoCalGas' requested shareholder reward. In February 2009, the Commission issued D.09-02-005, approving A.08-06-016 and SoCalGas' requested shareholder reward of \$6.5 million.

**P. GCIM Year 15**

SoCalGas filed A.09-06-014 on June 15, 2009, requesting a GCIM shareholder reward of \$12 million for Year 15. During GCIM Year 15, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$75.6 million below benchmark cost. In October 2009, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 15 and recommended approval of SoCalGas' requested shareholder reward. In January 2010, the Commission issued D.10-01-018, approving A.09-06-014 and SoCalGas' requested shareholder reward of \$12 million.

**Q. GCIM Year 16**

SoCalGas filed A.10-06-006 on June 14, 2010, requesting a GCIM shareholder reward of \$6.0 million for Year 16. During GCIM Year 16, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$39.9 million below benchmark cost. In May 2011, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 16 and recommended approval of SoCalGas' requested shareholder reward. In September 2011, the Commission

issued D.11-09-011, approving A.10-06-006 and SoCalGas' requested shareholder reward of \$6 million.

**R. GCIM Year 17**

SoCalGas filed A.11-06-017 on June 15, 2011, requesting a GCIM shareholder reward of \$6.2 million for Year 17. During GCIM Year 17, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$40.9 million below benchmark cost. In November 2011, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 17 and recommended approval of SoCalGas' requested shareholder reward. In March 2012, the Commission issued D.12-03-016, approving A.11-06-017 and SoCalGas' requested shareholder reward of \$6.2 million.

**S. GCIM Year 18**

SoCalGas filed A.12-06-005 on June 15, 2012, requesting a GCIM shareholder reward of \$5.4 million for Year 18. During GCIM Year 18, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$37.5 million below benchmark cost. On January 18, 2013, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 18 and recommended approval of SoCalGas' requested shareholder reward. In July 2013, the Commission issued D.13-07-037, approving A.12-06-005 and SoCalGas' requested shareholder reward of \$6.2 million.

**T. GCIM Year 19**

SoCalGas filed A.13-06-013 on June 14, 2013, requesting a GCIM shareholder reward of \$5.8 million for Year 19. During GCIM Year 19, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$34.7 million below benchmark cost. On October 25, 2013, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 19 and recommended approval of SoCalGas' requested shareholder reward. In August 2014, the

Commission issued D.14-08-017, approving A.13-06-013 and SoCalGas' requested shareholder reward of \$5.8 million.

**U. GCIM Year 20**

SoCalGas filed A.14-06-009 on June 13, 2014, requesting a GCIM shareholder reward of \$13.7 million for Year 20. During GCIM Year 20, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$70.4 million below benchmark cost. On November 14, 2014, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 20 and recommended approval of SoCalGas' requested shareholder reward. In February 2015, the Commission issued D.15-02-008, approving A.14-06-009 and SoCalGas' requested shareholder reward of \$13.7 million.

**V. GCIM Year 21**

SoCalGas filed A.15-06-011 on June 15, 2015, requesting a GCIM shareholder reward of \$7.2 million for Year 21. During GCIM Year 21, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$43.1 million below benchmark cost. On October 12, 2015 Cal PA issued its Monitoring and Evaluation Report for GCIM Year 21 and recommended approval of SoCalGas' requested shareholder reward. In December 2015, the Commission issued D.15-12-011, approving A.15-06-011 and SoCalGas' requested shareholder reward of \$7.2 million.

**W. GCIM Year 22**

SoCalGas filed A.16-06-009 on June 15, 2016, requesting a GCIM shareholder reward of \$5.0 million for Year 22. During GCIM Year 22, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$28.1 million below benchmark cost. On October 14, 2016, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 22 and recommended approval of SoCalGas' requested shareholder reward. In January 2017, the

Commission issued D.17-01-007, approving A.16-06-009 and SoCalGas' requested shareholder reward of \$5.0 million.

**X. GCIM Year 23**

SoCalGas filed A.17-06-016 on June 15, 2017, requesting a GCIM shareholder reward of \$4.247 million for Year 23. SoCalGas amended its application on July 28, 2017, revising its GCIM shareholder reward slightly downward, to \$4.235 million. During GCIM Year 23, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$27.2 million below benchmark cost. On October 16, 2017, Cal PA issued its Monitoring and Evaluation Report for GCIM Year 23 and recommended approval of SoCalGas' requested shareholder reward. In January 2018, the Commission issued D.18-01-005, approving A.17-06-016 and SoCalGas' requested shareholder reward of \$4.235 million. The decision also directs SoCalGas to meet with Cal PA in the event that SoCalGas anticipates that it will have less than 47.0 Bcf of mid-season core storage inventory on July 31 of each year, starting on July 31, 2018. The decision also requires SoCalGas to provide written notification of its mid-season (July 31) and annual (November 1) core purchased storage inventory targets to the Commission's Energy Division, also beginning in 2018.

**Y. GCIM Year 24**

SoCalGas filed A.18-06-009 on June 15, 2018, requesting a GCIM shareholder reward of \$11.4 million for Year 24. During GCIM Year 24, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$61.7 million below benchmark cost. On November 8, 2018, Cal PA filed its Monitoring and Evaluation Report for GCIM Year 24 and recommended approval of SoCalGas' requested shareholder reward. In April 2019, the Commission issued D.19-03-014, approving A.18-06-009 and SoCalGas' requested shareholder reward of \$11.4 million.

## **Z. GCIM Year 25**

SoCalGas filed A.19-06-009 on June 14, 2019, requesting a GCIM shareholder reward of \$16,798,695 for Year 25. During GCIM Year 25, Cal PA verified that SoCalGas' recorded gas costs were \$105,458,697 below the benchmark cost, which resulted in a ratepayer benefit of \$88,660,002. In February 2020, the Commission issued D.20-02-007, approving A.19-06-009 and SoCalGas' requested shareholder reward of \$16,798,695. In D.20-02-007, the Commission ordered SoCalGas to include additional information in future GCIM applications:

- The table titled "Summary of GCIM Results to Date" must include a column showing the actual annual cost greater than 5% below the Benchmark Budget (measured as a percentage of the annual Benchmark Gas Commodity Cost) in which the gain in excess of 5% is allocated 90% to core ratepayers and 10% to shareholders.
- The calculation of the requested shareholder award for the GCIM Year showing: (i) the total benchmark costs for the GCIM Year broken down by transportation and commodity; (ii) total actual costs broken down by transportation and commodity; (iii) Secondary Market Services net revenues; and (iv) the net hedging gain or loss broken down by winter hedges and other hedges.
- A narrative and quantitative comparison of the previous GCIM Year and the current GCIM Year benchmark costs and actual costs, including total actual costs broken down by: (i) transportation and commodity; (ii) Secondary Market Services net revenues; and (iii) the net hedging gain or loss broken down by winter hedges and other hedges.<sup>11</sup>

## **AA. GCIM Year 26**

SoCalGas filed A.20-06-005 on June 15, 2020, requesting a GCIM shareholder reward of \$12,806,448 for Year 26. During GCIM Year 26, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$82.0 million below benchmark cost. On October 15, 2020, Cal PA filed its Monitoring and Evaluation Report for GCIM Year 26 and recommended approval of SoCalGas' requested shareholder reward. On February 18, 2021, the Commission issued D.21-02-004, approving A.20-06-005 and SoCalGas' requested shareholder reward of \$12,806,448.

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<sup>11</sup> D.20-02-007 at p. 13 (Ordering Paragraph 2).

## **BB. GCIM Year 27**

SoCalGas filed A.21-06-010 on June 15, 2021, requesting a GCIM shareholder reward of \$11,143,725 for Year 27. During GCIM Year 27, SoCalGas continued to provide its core customers with reliable natural gas supplies, at \$184.7 million below benchmark cost. On October 15, 2021, Cal PA filed its Monitoring and Evaluation Report for GCIM Year 27 and recommended approval of SoCalGas' requested shareholder reward. On March 24, 2022, the Commission issued D.22-03-007, approving A.21-06-010 and SoCalGas' requested shareholder reward of \$11,143,725.

## **III. PURPOSE OF APPLICATION AND RELIEF SOUGHT**

The purpose of this Application is to request a GCIM shareholder reward of \$22,313,352 for SoCalGas' performance in Year 28 pursuant to the revised GCIM established by D.02-06-023. As documented in Attachment A, in GCIM Year 28 SoCalGas was able to purchase gas at \$122.2 million below the GCIM benchmark, providing a benefit of \$99.9 million in lower gas costs. The actual cost of all purchases by SoCalGas subject to the GCIM was \$2,176,318,313, while the benchmark cost was \$2,298,535,046. Pursuant to the revisions to the GCIM adopted in D.02-06-023, if the Commission determines that these figures are accurate, SoCalGas will be entitled to a shareholder reward of \$22,313,352. SoCalGas has further included in Attachment A the additional information required by D.20-02-007.

The relief sought by SoCalGas in this Application is therefore a GCIM Year 28 shareholder reward of \$22,313,352.

## **IV. STATUTORY AND PROCEDURAL REQUIREMENTS**

### **A. Category, Need for Hearing, Issues to be Considered, Relevant Safety Considerations, and Schedule – Rule 2.1(c)**

SoCalGas proposes that this proceeding be categorized as “ratesetting” because SoCalGas' proposals will have a future effect on rates. SoCalGas does not believe that evidentiary hearings

are necessary. Given the record that has already been developed in other Commission proceedings, and given the GCIM settlement adopted by the Commission in D.02-06-023, SoCalGas does not believe that its proposals in this proceeding will raise any issues of fact that will require a hearing.

The issue to be considered in this proceeding is whether SoCalGas should be rewarded the GCIM Year 28 shareholder reward of \$22,313,352 it has requested. This application does not identify any safety consideration associated with its requested relief.

SoCalGas proposes the following schedule for this Application:

<u>EVENT</u>	<u>DATE</u>
SoCalGas files Application	June 15, 2022
Deadline for responses to Application	within 30 days Daily Calendar notice
Prehearing Conference	August 12, 2022
Cal PA Monitoring Report	October 15, 2022
Comments on Cal PA Report	October 29, 2022
Reply Comments (if any) on Report	November 5, 2022
Proposed Decision	December 2022
Commission Decision	January 2023

**B. Authority – Rule 2.1**

This Application is made pursuant to Sections 451, 454, 489, 491, 701, 728, and 729 of the Public Utilities Code of the State of California, the Commission’s Rules of Practice and Procedure, and relevant decisions, orders, and resolutions of the Commission, including D.02-06-023.

**C. Corporate Information and Correspondence – Rule 2.1(a) and (b)**

SoCalGas is a public utility organized and existing under the laws of the State of California. SoCalGas’ principal place of business and mailing address is 555 West Fifth Street, Los Angeles, California 90013. All correspondence and communications regarding this Application should be addressed to:

Jordan Calzadillas  
*Regulatory Case Manager for:*

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A copy should also be sent to:

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**D. Request for Ex Parte Approval – Rule 2.1(c)**

The Commission is familiar with SoCalGas' GCIM and the limited issues presented by this Application. SoCalGas believes that the information provided by this Application and accompanying Year 28 Report will be a sufficient basis for the Commission to reach a decision without hearings. Accordingly, SoCalGas respectfully requests that the Commission approve this Application expeditiously, and without evidentiary hearings.

**E. Articles of Incorporation – Rule 2.2**

SoCalGas previously filed a certified copy of its Restated Articles of Incorporation with Application No. 98-10-012, and these articles are incorporated herein by reference.

**F. Balance Sheet and Income Statement – Rule 3.2(a)(1)**

The most recent updated Balance Sheet and Income Statement for SoCalGas is attached to this application as Attachment B.

**G. Rates – Rule 3.2(a)(2) and (3)**

The rate changes that will result from this Application are described in Attachment C.

**H. Property and Equipment – Rule 3.2(a)(4)**

A general description of SoCalGas' property and equipment was previously filed with the Commission on May 3, 2004 in connection with SoCalGas' Application 04-05-008, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve as of December 31, 2021, is attached as Attachment D.

**I. Summary of Earnings – Rules 3.2(a)(5) and (6)**

The summary of earnings for SoCalGas is included herein as Attachment E.

**J. Exhibits and Readiness – Rule 3.2**

SoCalGas' GCIM Year 28 Annual Report accompanies this Application. SoCalGas is now ready to proceed with its showing.

**K. Depreciation – Rule 3.2(a)(7)**

For financial statement purposes, SoCalGas has computed depreciation of utility plants on a straight-line remaining life basis at rates based on the estimated useful lives of plant properties. For federal income tax accrual purposes, SoCalGas generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on property additions after 1954 and prior to 1981. For financial reporting and rate purposes, "flow through accounting" has been adopted for such properties.

For property additions in years 1981 through 1986, SoCalGas has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, the Company has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems, and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981, the Tax Reform Act of 1986, and the Tax Cuts and Jobs Act of 2017.

**L. Proxy Statement – Rule 3.2(a)(8)**

A copy of the most recent proxy statement, dated April 26, 2022, was provided to the Commission by letter dated April 27, 2022, and is incorporated herein by reference.

**M. Pass Through of Costs – Rule 3.2(a)(10)**

The shareholder reward sought by SoCalGas in this Application would not simply pass through to customers costs to SoCalGas for services and commodities furnished by it.

**N. Service and Notice – Rule 3.2(b)**

SoCalGas is serving this Application on all parties to A.21-06-010. Within twenty days of filing, SoCalGas will mail notice of this Application to the State of California and to cities and counties served by SoCalGas, and SoCalGas will post the notice in its offices and publish the notice in newspapers of general circulation in each county in its service territory. In addition, SoCalGas will include notices with the regular bills mailed to all customers affected by the proposed rate change.

**V. CONCLUSION**

For the reasons set forth above and in Attachment A, SoCalGas respectfully requests that the Commission approve a Year 28 GCIM shareholder reward of \$22,313,352 on an expedited basis.

Respectfully submitted,

**SOUTHERN CALIFORNIA GAS COMPANY**

By: \_\_\_\_\_



Elsa Valay-Paz

Vice President Gas Acquisition

By: /s/ Jeffrey B. Fohrer  
Jeffrey B. Fohrer

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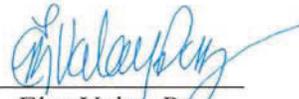
**Dated:** June 15, 2022

## VERIFICATION

I, Elsa Valay-Paz, am an officer of Southern California Gas Company, and I am authorized to make this verification on its behalf. The content of this Application is true, except as to matters that are stated on information and belief. As to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2022, at Los Angeles, California.



\_\_\_\_\_  
Elsa Valay-Paz

Vice President Gas Acquisition

# **ATTACHMENT A**

Southern California Gas Company

Annual Report on the Gas Cost Incentive Mechanism

**Southern California Gas Company**  
**Annual Report on the Gas Cost Incentive Mechanism**  
**April 1, 2021 through March 31, 2022**

**I. Introduction**

Over the past 28 years, the Gas Cost Incentive Mechanism (GCIM) has increased the efficiency of regulation by reducing the burden of regulatory oversight and providing a structure that enables Southern California Gas Company (SoCalGas) to focus on securing reliable gas at a reasonable cost for its core customers. This report summarizes the results of the Gas Acquisition Department's (Gas Acquisition) activities on behalf of the core procurement customers of SoCalGas and San Diego Gas & Electric Company (SDG&E) under the GCIM during the period April 1, 2021 through March 31, 2022 (Year 28). This report also details the shareholder reward calculation under the GCIM for Year 28 as set forth in SoCalGas's GCIM Preliminary Statement Part VIII.

**II. GCIM Year 28 Market Conditions <sup>1</sup>**

GCIM Year 28 began with U.S. natural gas production recovering from Winter Storm Uri that occurred in February 2021 (86 Bcf/day monthly average to 93 Bcf/day by May 2021) and then slowly increased to 96 Bcf/day by October 2021. Total U.S. demand increased from 84 Bcf/day to 88 Bcf/day over the same period including LNG exports and exports to Mexico. As a result, U.S. storage levels struggled to reach the 5-year average by the end of October 2021. Simultaneously, global LNG prices increased from \$6.92/MMBtu in April 2021 to \$31.35/MMBtu by October 2021 as it was reported that European storage levels were inadequate to achieve required levels to meet winter demand. As the U.S. was attempting to reach adequate end of October storage levels, Henry Hub prices reached a high of \$6.31/MMBtu prior to the upcoming winter. Late in the summer, mild weather across the U.S. reduced the storage deficit to the 5-year averages by the end of October. The mild weather continued into early winter and storage levels eventually exceeded the 5-year average which resulted in Henry Hub prices decreasing. Towards the end of GCIM Year 28, late winter demand decreased U.S. storage levels

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<sup>1</sup> Market fundamental information in this section is from the May 2022 issue of Energy Information Administration (EIA) Natural Gas Monthly.

to well below the 5-year average as U.S. natural gas production decreased from the peak of 97 Bcf/day in December 2021 to 95 Bcf/day by the end of March 2022.

Although the western U.S. was impacted by several cold events, the GCIM Year 28 winter was mild for SoCalGas's service territory. In late August 2021, an explosion on El Paso Line 2000 in Arizona reduced capacity and flows on El Paso's South Mainline delivering to Ehrenberg. In November 2021, Aliso Canyon storage capacity was increased by 7.16 Bcf. Due to the mild winter in SoCalGas's service territory, the capacity reduction on El Paso did not materially impact SoCalGas's ability to meet its southern system minimums. SoCal Citygate prices averaged \$5.54/MMBtu over the winter compared to \$4.50/MMBtu at Henry Hub. SoCal Citygate prices reached a peak of \$8.93/MMBtu during a cold event in December 2021. The mild winter resulted in Gas Acquisition storage to be 60 Bcf at the end of March 2022 which was approximately 22 Bcf higher than the prior year.

### III. Overview of Year 28 GCIM Results

Table 1 below summarizes overall performance under the GCIM during the last 28 years, highlighting that core customers have realized the vast majority of the benefits of gas costs below the GCIM benchmark (Benchmark) with over \$1.4 billion in lower gas commodity costs. Additionally, a GCIM Summary for the past 28 years that provides details on the comparison to benchmark sharing band amounts is included in Appendix A.

**TABLE 1  
GCIM PERFORMANCE  
YEAR ENDED MARCH 31\***

Year	GCIM Year	Net Purchases (Citygate Volumes)		Net Gas Cost		Benchmark Gas Commodity Cost		Comparison to Benchmark (\$Millions)		
		Million MMBtu/d	Million MMBtu	Total (\$ Millions)	Unit Cost (\$/MMBtu)	Total (\$ Millions)	Unit Cost (\$/MMBtu)	Customer Savings	Shareholder Award	Total
1995	1	0.76	277	445	1.61	441	1.59	(1.1)	0.0	(1.1)
1996	2	0.66	243	322	1.33	326	1.35	3.2	3.2	6.4
1997	3	0.66	243	530	2.18	550	2.27	10.6	10.6	21.2
1998	4	0.66	241	542	2.25	549	2.28	4.8	2.0	6.8
1999	5	0.75	275	520	1.89	538	1.95	10.4	7.7	18.1
2000	6	1.06	385	902	2.34	926	2.40	14.4	9.8	24.2
2001	7	1.09	398	2,055	5.16	2,279	5.72	192.8	30.8	223.6
2002	8	1.01	370	1,159	3.13	1,349	3.64	172.4	17.4	189.8
2003	9	1.03	376	1,333	3.55	1,373	3.65	32.7	6.3	39.0
2004	10	1.02	374	1,730	4.63	1,757	4.70	24.6	2.4	27.0
2005	11	1.03	375	2,103	5.61	2,134	5.69	28.9	2.5	31.4
2006	12	1.06	387	2,923	7.54	2,992	7.72	59.3	9.8	69.1
2007	13	1.02	372	2,135	5.74	2,192	5.89	48.8	8.9	57.7
2008	14	1.03	376	2,349	6.25	2,399	6.38	43.6	6.5	50.1
2009	15	1.15	418	2,661	6.36	2,737	6.54	63.6	12.0	75.6
2010	16	1.11	406	1,548	3.82	1,588	3.91	33.9	6.0	39.9
2011	17	1.11	406	1,559	3.84	1,600	3.94	34.7	6.2	40.9
2012	18	1.18	432	1,547	3.58	1,585	3.67	32.1	5.4	37.5
2013	19	1.06	387	1,107	2.86	1,141	2.95	28.9	5.8	34.7
2014	20	1.05	382	1,485	3.88	1,556	4.07	56.7	13.7	70.4
2015	21	0.99	361	1,368	3.79	1,411	3.91	35.9	7.3	43.1
2016	22	0.92	337	772	2.29	800	2.38	23.1	5.0	28.1
2017	23	1.01	368	994	2.70	1,021	2.77	23.0	4.2	27.2
2018	24	1.02	371	974	2.63	1,036	2.80	50.4	11.4	61.7
2019	25	1.00	364	1,145	3.15	1,251	3.44	88.7	16.8	105.5
2020	26	1.11	404	854	2.12	936	2.32	69.2	12.8	82.0
2021	27	1.01	369	743	2.01	928	2.51	173.6	11.1	184.7
2022	28	1.09	398	1,896	4.77	2,018	5.07	99.9	22.3	122.2
<b>Total GCIM Years</b>		0.987	10,095	37,701	3.73	39,413	3.90	1,458.9	258.0	1,716.8

Note: Numbers may not total exactly due to rounding.

\* Years 1- 3 exclude benefits related to Storage Incentive Mechanism ("SIM"), which was eliminated in Year 4. The SIM shareholder rewards for Years 1, 2, 3 were \$103,364, \$67,645, and \$171,106, respectively.

As indicated in Table 1, for GCIM Year 28 Gas Acquisition acquired gas at \$122.2 million below the Benchmark, providing core customers with a benefit of \$99.9 million in lower gas commodity costs. The Benchmark consists of a volume-weighted average of published indices for the locations where Gas Acquisition purchases gas for its core customers. Gas Acquisition's average Net Unit Cost was \$4.77/MMBtu, which is \$0.30/MMBtu below the Benchmark Unit Cost of \$5.07/MMBtu.

During GCIM Year 28, Gas Acquisition purchased a net 398 million MMBtus of gas for its retail core load. Gas Acquisition's interstate capacity rights, which are primarily on the El Paso, Transwestern, and Kern River pipeline systems, enabled the core procurement requirements to be met mostly through basin purchases, supplemented with purchases at the California border and SoCal Citygate.

Table 2 below provides details on the GCIM Year 28 below benchmark amount by showing (1) total benchmark costs broken down by transportation and commodity; (2) total actual costs broken down by transportation and commodity; (3) Secondary Market Services (SMS) net revenues; and (4) net hedging gains or losses broken down by winter hedges and other hedges.

**TABLE 2**  
**GCIM BENCHMARK AND ACTUAL COSTS**  
**YEAR ENDED MARCH 31, 2022**

	<u>Benchmark</u>	<u>Actual</u>	<u>Over/(Under)</u> <u>Benchmark</u>		
Commodity	\$ 2,018,335,750	\$ 1,929,677,459			
SMS Net Revenue		(31,034,821)			
Off System Park and Loans		195,953			
Hedging (Gain)/Loss (25% WH + Other)*		(2,719,575)			
<b>Total Commodity</b>	<u>2,018,335,750</u>	<u>1,896,119,017</u>	(122,216,733)		
Transportation	<u>280,199,297</u>	<u>280,199,297</u>	-		
<b>Total</b>	<u>2,298,535,046</u>	<u>2,176,318,313</u>	<u>(122,216,733)</u>		
				<u>Ratepayers'</u> <u>Share</u>	<u>Shareholders'</u> <u>Share</u>
1% Tolerance Band - 100% Ratepayer			\$ 20,183,357	\$ 20,183,357	\$ -
Amount Subject to 75%/25% Sharing			80,733,430	60,550,072	20,183,357
Amount Subject to 90%/10% Sharing			21,299,946	19,169,951	2,129,995
Excess of 1.5% Shareholder Cap - 100% Ratepayer			-	-	-
<b>Total</b>			<u>122,216,733</u>	<u>99,903,381</u>	<u>22,313,352</u>
				82%	18%
<b>Hedging (Gain)/Loss</b>					
	<u>Total</u>	<u>* Included in GCIM</u>			
Other	\$ (2,716,793)	\$ (2,716,793)			
Winter	<u>(11,129)</u>	<u>(2,782)</u>			
<b>Total Hedging</b>	<u>(2,727,922)</u>	<u>(2,719,575)</u>			

Note: Due to rounding to the dollar, some of the numbers may not total exactly.

Total benchmark costs for GCIM Year 28 were \$2,298,535,046 and total actual costs were \$2,176,318,313 which resulted in the below benchmark amount of \$122,216,733. Included in total actual costs are \$1,929,677,459 of commodity costs, \$280,199,297 of transportation costs, \$195,953 of off system park and loan costs, net SMS revenues of \$31,034,821, and a net hedging gain of \$2,719,575. The ratepayers' share of the below benchmark amount is \$99,903,381 or 82% of the total, with the remaining 18% allocated to shareholders.

Table 3 below is a comparison of GCIM Year 28 costs with GCIM Year 27 costs broken down by (1) Commodity Costs; (2) Transportation Costs (3) SMS Net Revenues; (4) Off System Park and Loan Costs and (5) Net Hedging Gains or Losses including winter hedge transactions.

**TABLE 3**  
**COMPARISON OF GCIM YEAR 28 AND YEAR 27**  
**BENCHMARK AND ACTUAL COSTS**  
**YEAR ENDED MARCH 31**

	<u>Year 28</u>	<u>Year 27</u>	<u>Difference</u>
Commodity Benchmark	\$ 2,018,335,750	\$ 927,660,001	\$ 1,090,675,749
Commodity Actual	1,929,677,459	760,815,518	1,168,861,941
SMS Net Revenue	(31,034,821)	(18,447,277)	(12,587,544)
Off System Park and Loans	195,953	152,862	43,092
Hedging (Gain)/Loss (25% WH + Other)*	<u>(2,719,575)</u>	<u>393,926</u>	<u>(3,113,501)</u>
Total Commodity	1,896,119,017	742,915,029	1,153,203,987
Over/(Under) Benchmark	<u>(122,216,733)</u>	<u>(184,744,972)</u>	<u>62,528,238</u>
Ratepayers' Share	\$ 99,903,381	\$ 173,601,246	\$ (73,697,865)
Shareholders' Share	<u>22,313,352</u>	<u>11,143,725</u>	<u>11,169,627</u>
	122,216,733	184,744,972	(62,528,238)
Transportation	\$ 280,199,297	\$ 272,911,089	\$ 7,288,208
<u>Hedging (Gain)/Loss</u>			
Other	\$ (2,716,793)	\$ (34,125)	\$ (2,682,668)
Winter	<u>(11,129)</u>	<u>1,712,205</u>	<u>(1,723,334)</u>
Total Hedging	<u>(2,727,922)</u>	<u>1,678,080</u>	<u>(4,406,002)</u>
*Included in GCIM (25% WH + Other)	\$ (2,719,575)	\$ 393,926	\$ (3,113,501)
Note: Due to rounding to the dollar, some of the numbers may not total exactly.			

The commodity benchmark for GCIM Year 28 was \$1,090,675,749 higher than the commodity benchmark for GCIM Year 27 because published indices, that the benchmark is based on, for GCIM Year 28 were significantly higher and the volume of gas purchased for GCIM Year 28 was approximately 30 million MMBtus higher. Actual commodity costs for GCIM Year 28 were \$1,168,861,941 higher than for GCIM Year 27 due to the higher gas purchase prices and the higher volume purchased in GCIM Year 28. GCIM Year 28 SMS revenue of \$31,034,821 was higher than in GCIM Year 27 and hedging activity resulted in a gain of \$2,727,922 for GCIM Year 28 compared to a loss of \$1,678,080 for GCIM Year 27. Off system park and loan costs in

GCIM Year 28 are minimal but did increase by \$43,092 over GCIM Year 27 costs. Each of these factors contributed to a below benchmark amount for GCIM Year 28 that was \$62,528,238 lower than in GCIM Year 27. The GCIM Year 28 shareholders share of the below benchmark amount increased for GCIM Year 28 commensurate with gas prices but the shareholders share of the under benchmark amount was less than the 1.5% shareholder cap<sup>2</sup> In contrast GCIM Year 27 under benchmark amount exceeded the 1.5% shareholder cap (which was low due to historically low commodity costs). Transportation costs for GCIM Year 28 were \$7,288,208 higher than in GCIM Year 27. Actual transportation costs are included in both the benchmark and actual costs and do not impact the over/(under) benchmark amount or the ratepayer and shareholder's share.

#### **IV. Description of Gas Procurement Activities**

The GCIM encourages SoCalGas's Gas Acquisition organization on behalf of its core customers to proactively manage gas costs and mitigate from price volatility through the use of physical and financial trades, storage, and interstate pipeline capacity. SoCalGas's Gas Acquisition personnel have a high level of expertise in fundamental market analysis, gas trading, gas transportation, risk management, and back-office operations. This expertise has continually been developed over the prior 27 years of operation under the GCIM. As a result, Gas Acquisition was able to effectively manage its gas procurement activities during GCIM Year 28, effectively lowering gas commodity costs for retail core customers.

As in the previous 27 years of the GCIM, GCIM Year 28 results continue to show that the GCIM program is successful in meeting its objectives as originally established in D.90-07-065 and R.90-02-008:

- Improve the utility's incentives to operate efficiently
- Reduce the burden of regulatory oversight, both for the regulators and the utility
- Provide a more stable and predictable regulatory environment
- Align the interests of utility shareholders with those of utility customers
- Implement a system that is readily understandable

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<sup>2</sup> The 1.5% shareholder cap for GCIM Year 28 is \$28,441,785.

- Fairly balance risk and reward for the utility, and provide positive as well as negative incentives; and
- Implement a regulatory structure that allows management to focus primarily on costs and markets, rather than on CPUC proceedings.

Gas Acquisition’s procurement activities were conducted to achieve the primary objectives of supply security and service reliability at a reasonable cost. Gas Acquisition accomplished these objectives in GCIM Year 28 by:

- Meeting retail core requirements during the peak demand season (November to March) with firm long-term contracts<sup>3</sup>, monthly baseload, and after-market purchases, despite upstream and system constraints. In GCIM Year 28, Gas Acquisition maintained a gas supply portfolio comprised of long-term supply agreements (46%) and month-to-month baseload agreements (50%). Daily purchase and sale (swing) transactions, while significant in absolute volumes, contributed 4% on a net basis.
- Reaching a core purchased inventory level of 61.34 Bcf on July 31<sup>st</sup>, which met its 47 Bcf mid-season target.
- Meeting its share of the January, February, March 2022 month-end minimum storage targets.<sup>4</sup>
- Reaching a core physical storage inventory on October 31<sup>st</sup> of 73.10 Bcf (reflects a 0.00 Bcf net SMS position and includes 2.69 Bcf of Core Aggregation Transportation (CAT) volumes) which was within the November 1 GCIM target of 74.593 Bcf +0/- 2 Bcf.
- Managing the use of the rights and assets assigned to the retail core including storage inventory, injection and withdrawal rights, and flowing supply through the use of SMS transactions with fees based on existing market conditions and are completed

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<sup>3</sup>Contracts with terms greater than one month.

<sup>4</sup> Provided in the Southern California Gas Company Winter 2021-22 Technical Assessment dated October 21, 2021.

on a non-discriminatory basis. SMS transactions continued to contribute towards lowering overall gas costs by using assets when not directly needed for reliability.

- Making physical and financial trades on behalf of retail core customers to reduce retail core gas costs.
- Utilizing Gas Acquisition’s interstate and Backbone Transportation Service (BTS) capacity rights to provide portfolio supply diversification and to lower the cost of gas by accessing lower cost basin supplies.

In summary, the GCIM provides an incentive for Gas Acquisition to efficiently use retail core’s available interstate pipeline and storage rights to deliver reliable gas at a reasonable cost to its retail core customers. Reliability is achieved by constructing a portfolio of gas supplies that is diversified by contract type, geographic region, and supplier. SoCalGas uses Commission-approved tools available to a typical trading organization, including purchases, sales, loans, parks, wheels, derivatives, and transportation contracts. These tools enhance SoCalGas’s ability to make economic use of core assets, when not directly needed for reliability, to lower overall gas costs for its core customers.

### **Interstate Capacity**

Pursuant to D.04-09-022 and Advice Nos. (AL) 3969 and 5254, SoCalGas filed Advice Letter 5699 on September 28, 2020, to update the capacity planning range for the combined portfolio of SoCalGas and SDG&E for GCIM Years 28 and 29 based on the 2020 California Gas Report core procurement load forecasts for SoCalGas and SDG&E.<sup>5</sup> The minimum firm capacity required for the period April to October 2021 was established at 912 MDth/day, while the minimum required for November 2021 to March 2022 was 1,013 MDth/day. Appendix C to this report shows that SoCalGas’s interstate capacity holding during each month of GCIM Year 28 met these minimum capacity requirements and did not exceed maximum requirements.

### **Financial Derivatives and Winter Hedging**

In compliance with D.10-01-023 issued on January 25, 2010, which adopted an incentive framework to motivate optimal use of gas hedging for California utilities and modified the

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<sup>5</sup> Details on the calculation of the capacity planning range are in AL 5699 Attachment A “SoCalGas’s Combined Portfolio Calculations and Workpapers based on the 2020 California Gas Report”.

treatment of financial gains and losses for SoCalGas and SDG&E, SoCalGas continued to include 25% of gains, losses and transaction costs from Gas Acquisition's winter hedging activities in the calculation of GCIM total actual costs. In GCIM Year 28, SoCalGas's winter hedge activities resulted in a gain of \$11,129, of which \$2,782 was included in the GCIM.

The Public Advocates Office (Cal PA) and Energy Division staff were kept apprised of SoCalGas's winter hedge positions primarily via bi-weekly conference calls during GCIM Year 28.

## **V. GCIM Monitoring and Evaluation**

Throughout the GCIM program, SoCalGas has worked closely with the Cal PA and Energy Division to establish an efficient monitoring and timely reporting system to keep the Cal PA and Energy Division informed of Gas Acquisition's activities. Pursuant to the provisions of General Order 66-D and D.17-09-023, SoCalGas provided a monthly report, 60 days after the end of each month, to the Cal PA and Energy Division on a confidential basis. These reports included a calculation of year-to-date GCIM benefit, total monthly actual costs and benchmark dollars, benchmark prices, current year capacity holdings and a capacity utilization by pipeline report.

SoCalGas also communicated frequently with the Cal PA and the Energy Division on all important Gas Acquisition issues during Year 28, including its winter hedging activities. Finally, SoCalGas at all times operated within the CPUC's Affiliate Transaction Rules and related Remedial Measures. Appendix B contains SoCalGas's Annual Report on Affiliate Transactions Section C: Utility Provision of Goods and Services to Its Affiliated Entities and Section D: Affiliated Entities Provision of Goods and Services to the Utility.

## **VI. Recommendations**

SoCalGas concludes from its GCIM Year 28 results that the GCIM continues to be a successful program that provides measurable and substantive benefits to SoCalGas's core customers. During Year 28, each of the CPUC established objectives for incentive regulation as summarized in Section IV were met, in addition to SoCalGas's primary objectives of supply security and reliable service at a reasonable cost. SoCalGas therefore recommends that the Commission approve a GCIM Year 28 shareholder reward of \$22,313,352.

## **Appendix A**

### Summary of GCIM Results to Date

**SOUTHERN CALIFORNIA GAS COMPANY**

**APPENDIX A**

**Summary of GCIM Results to Date**

GCIM Year	Benchmark Dollars	Actual Dollars	(Over)/Under Benchmark	Upper Tolerance Band *	100% Ratepayer Lower Tolerance** 0.0% - 0.5%	100% Ratepayer Lower Tolerance** 0.0% - 1.0%	75% Ratepayer/ 25% Shareholder Sharing Band 1.0% - 5.0%	90% Ratepayer/ 10% Shareholder Sharing Band 5.0% - Cap	100% Ratepayer Excess of Cap** > 1.5% Cap	Subject to Sharing**
1	\$ 567,448,362	\$ 568,566,020	\$ (1,117,658)	\$ 17,089,530	N/A	N/A	N/A	N/A	N/A	\$ -
2	\$ 448,713,459	\$ 442,313,459	\$ 6,400,000	\$ 13,058,694	N/A	N/A	N/A	N/A	N/A	\$ 6,400,000
3	\$ 680,061,509	\$ 658,875,670	\$ 21,185,839	\$ 22,014,554	N/A	N/A	N/A	N/A	N/A	\$ 21,185,839
4	\$ 672,131,591	\$ 665,307,357	\$ 6,824,234	\$ 10,977,634	\$ 2,744,409	N/A	N/A	N/A	N/A	\$ 4,079,825
5	\$ 649,294,620	\$ 631,138,278	\$ 18,156,342	\$ 10,761,348	\$ 2,690,337	N/A	N/A	N/A	N/A	\$ 15,466,005
6	\$ 1,061,264,614	\$ 1,037,113,228	\$ 24,151,386	\$ 18,527,592	\$ 4,631,898	N/A	N/A	N/A	N/A	\$ 19,519,488
7	\$ 2,411,105,910	\$ 2,187,533,957	\$ 223,571,953	\$ 45,580,915	N/A	\$ 22,790,458	\$ 91,161,830	\$ 80,361,297	\$ 29,258,368	\$ 171,523,127
8	\$ 1,480,091,362	\$ 1,290,296,698	\$ 189,794,664	\$ 26,979,670	N/A	\$ 13,489,835	\$ 53,959,340	\$ 38,983,224	\$ 83,362,266	\$ 92,942,563
9	\$ 1,506,037,786	\$ 1,467,033,460	\$ 39,004,326	\$ 27,458,164	N/A	\$ 13,729,082	\$ 25,275,244	N/A	N/A	\$ 25,275,244
10	\$ 1,892,688,526	\$ 1,865,659,816	\$ 27,028,710	\$ 35,140,805	N/A	\$ 17,570,403	\$ 9,458,308	N/A	N/A	\$ 9,458,308
11	\$ 2,277,899,575	\$ 2,246,521,573	\$ 31,378,002	\$ 42,689,291	N/A	\$ 21,344,646	\$ 10,033,356	N/A	N/A	\$ 10,033,356
12	\$ 3,126,842,590	\$ 3,057,709,957	\$ 69,132,633	\$ 59,836,552	N/A	\$ 29,918,276	\$ 39,214,357	N/A	N/A	\$ 39,214,357
13	\$ 2,308,210,816	\$ 2,250,470,333	\$ 57,740,483	\$ 43,849,020	N/A	\$ 21,924,510	\$ 35,815,973	N/A	N/A	\$ 35,815,973
14	\$ 2,513,802,467	\$ 2,463,728,945	\$ 50,073,522	\$ 47,972,531	N/A	\$ 23,986,266	\$ 26,087,256	N/A	N/A	\$ 26,087,256
15	\$ 2,894,131,587	\$ 2,818,571,496	\$ 75,560,091	\$ 54,736,539	N/A	\$ 27,368,269	\$ 48,191,822	N/A	N/A	\$ 48,191,822
16	\$ 1,753,539,090	\$ 1,713,612,056	\$ 39,927,034	\$ 31,756,473	N/A	\$ 15,878,237	\$ 24,048,797	N/A	N/A	\$ 24,048,797
17	\$ 1,750,392,490	\$ 1,709,500,858	\$ 40,891,632	\$ 32,006,773	N/A	\$ 16,003,387	\$ 24,888,245	N/A	N/A	\$ 24,888,245
18	\$ 1,742,334,582	\$ 1,704,835,267	\$ 37,499,315	\$ 31,696,187	N/A	\$ 15,848,094	\$ 21,651,221	N/A	N/A	\$ 21,651,221
19	\$ 1,308,126,351	\$ 1,273,387,819	\$ 34,738,531	\$ 22,829,340	N/A	\$ 11,414,670	\$ 23,323,861	N/A	N/A	\$ 23,323,861
20	\$ 1,737,216,795	\$ 1,666,818,834	\$ 70,397,961	\$ 31,115,453	N/A	\$ 15,557,726	\$ 54,840,235	N/A	N/A	\$ 54,840,235
21	\$ 1,598,485,093	\$ 1,555,377,080	\$ 43,108,013	\$ 28,217,182	N/A	\$ 14,108,591	\$ 28,999,422	N/A	N/A	\$ 28,999,422
22	\$ 996,287,032	\$ 968,124,520	\$ 28,162,512	\$ 16,006,729	N/A	\$ 8,003,365	\$ 20,159,148	N/A	N/A	\$ 20,159,148
23	\$ 1,237,875,858	\$ 1,210,673,619	\$ 27,202,239	\$ 20,429,693	N/A	\$ 10,214,847	\$ 16,987,393	N/A	N/A	\$ 16,987,393
24	\$ 1,282,690,267	\$ 1,220,968,072	\$ 61,722,195	\$ 20,723,318	N/A	\$ 10,361,659	\$ 41,446,636	\$ 9,913,900	N/A	\$ 51,360,536
25	\$ 1,474,431,952	\$ 1,368,973,255	\$ 105,458,697	\$ 25,011,300	N/A	\$ 12,505,650	\$ 50,022,600	\$ 42,930,447	N/A	\$ 92,953,047
26	\$ 1,192,981,598	\$ 1,111,009,145	\$ 81,972,454	\$ 18,714,713	N/A	\$ 9,357,356	\$ 37,429,426	\$ 34,490,914	\$ 694,757	\$ 71,920,340
27	\$ 1,200,571,089	\$ 1,015,826,118	\$ 184,744,972	\$ 18,553,200	N/A	\$ 9,276,600	\$ 37,106,400	\$ 18,671,254	\$ 119,690,717	\$ 55,777,654
28	\$ 2,298,535,046	\$ 2,176,318,313	\$ 122,216,733	\$ 40,366,715	N/A	\$ 20,183,358	\$ 80,733,430	\$ 21,299,946	N/A	\$ 102,033,376
	<b>\$ 44,063,192,020</b>	<b>\$ 42,346,265,202</b>	<b>\$ 1,716,926,818</b>	<b>\$ 814,099,917</b>	<b>\$ 10,066,644</b>	<b>\$ 360,835,282</b>	<b>\$ 800,834,300</b>	<b>\$ 246,650,982</b>	<b>\$ 233,006,109</b>	<b>\$ 1,114,136,440</b>

\* Upper Tolerance band of 4.5% for GCIM Year 1, 4% for Years 2 - 3, and 2% for Years 4 - 28.

\*\* For Years 4-6, GCIM Gain/(Loss) subject to sharing is the Amount Under Benchmark less the 0.5% Lower Tolerance Band. For Years 7-28, the Gain/(Loss) subject to sharing is the Amount Under Benchmark less the 1% Lower Tolerance Band, pursuant to D.02-06-023

Note: Benchmark and Actual Dollars are inclusive of all transportation costs for delivery of gas to SoCalGas' system.

## **Appendix B**

### Annual Report on Affiliate Transactions



# Southern California Gas Company

## Annual Report on Affiliate Transactions

Section C: Utility Provision of Goods  
and Services to Its Affiliated Entities

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **C. UTILITY PROVISION OF GOODS AND SERVICES TO ITS AFFILIATED ENTITIES**

#### **Request No. 1-7:**

1. Using the format of Table II-C-1, each utility shall report any goods and/or services that the utility provided to any of its affiliated entities during the period covered by the annual report. All goods and/or services shall be reported regardless of whether or not the utility was reimbursed.
2. For purposes of this section, and section II-D, "Goods" are defined as any tangible item having economic value. Examples of "goods" include office supplies, office computers, and personal automobiles. No item shall qualify as a good if it has:
  - a) A depreciable life, for federal tax purposes, of more than 3 years, except for cars, personal computers, and office machinery<sup>1</sup>; and
  - b) A value of greater than \$20,000.

The transfer of an item of tangible property described in (a) or (b) above shall be reported under Section E ("Transfer of Tangible Asset").

3. For purposes of this section, "Services" includes any activity of economic value provided by the utility, or a company under contract to the utility, to any affiliated entity. Examples of "services" include, but are not limited to the provision of professional expertise (e.g., legal, consulting, engineering), administrative support, (e.g., data and payroll processing, arranging travel, transportation services, etc.) and general corporate management and support activities (e.g., time spent by corporate executives and employees on affiliated entity issues, investor relations, shareholder services, etc.).
4. The cost of each good and/or service that the utility provided to any of its affiliated entities shall be assigned to an appropriate Uniform System of Accounts (USOA).
5. Using the format shown, each utility shall create a table entitled (Table II-C-1), containing:
  - A set of columns by listing horizontally across the top each affiliated entity of the utility excluding, however, any affiliated entities to which the utility provided no goods and/or services during the calendar year;
  - A set of rows by listing vertically down the left side of Table II-C-1 each USOA account (listed in ascending order) for which the utility had incurred a cost (whether or not reimbursed) for providing any good or service to an affiliated entity.

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<sup>1</sup> See Section 1240, "Classes of Depreciable Property", 1992 U.S. Master Tax Guide (Commerce Clearing House) discussing Internal Revenue Code sections 1245 and\*1250.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **C. UTILITY PROVISION OF GOODS AND SERVICES TO ITS AFFILIATED ENTITIES**

#### **Request No. 1-7 (Cont'd):**

- The middle portions of Table II-C-1 corresponding to each horizontal column and vertical row will be called cells.
6. For each cell in Table II-C-1 the utility shall aggregate all transactions for goods and/or services it provided to each affiliated entity under:
- a) The appropriate column heading for that affiliated entity; and,
  - b) The row corresponding to the appropriate USOA account category.
7. The following information shall be reported in the corresponding cells of Table II-C-1:
- The total transfer price assigned to this USOA account for any goods or services provided by the utility to the affiliated entity;
  - The allocated cost, if different from the transfer price, for any goods or services provided by the utility to the affiliated entity;
  - Allocated costs as a percentage of total recorded costs for the USOA account;
  - The ratio for each USOA account of the actual total recorded expenses versus total expenses authorized in the utility's most recent General Rate Case (expressed as a percentage).

#### **Response:**

See attached Table II-C-1 for charges to affiliates.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### C. UTILITY PROVISION OF GOODS AND SERVICES TO ITS AFFILIATED ENTITIES

#### Request No. 8:

8. Briefly list the applicable cost allocation methodology and transfer pricing method used to determine the corresponding dollar volumes listed on the previous table.

#### Response:

All dollar values in Table II-C-1 represent fully loaded costs. SoCalGas considers “fully loaded/allocated costs” to mean the same as “transfer pricing” as referred to in this requirement. Therefore, the information that is requested relative to transfer pricing differences is not applicable. Following is a description of the costing methodologies that are referenced in Table II-C-1:

- (A) All services provided by SoCalGas are billed at fully loaded cost. In the case of labor charges, “fully loaded” costs include all associated labor, indirect overheads and, where applicable, a labor premium. For the shared service labor billed to the unregulated affiliates, a 5% premium is applied to fully loaded labor costs. For non-shared services to unregulated, energy-related affiliates, a 10% premium is applied to direct non-executive labor and a 15% premium is applied to direct executive labor. The Enova/Pacific Enterprises Merger Decision (D.98-03-073) requires these additional labor premiums.
- (B) In most circumstances where a SoCalGas employee transfers to an affiliate company, the Enova/Pacific Enterprises Merger Decision (D.98-03-073) requires that Employee Transfer fees be charged to the affiliate. These costs are included under Human Resources and do not require overhead loadings or add-on-costs.
- (C) SoCalGas sold natural gas supplies to Sempra Generation during the reporting period:

All gas sales transactions reported under USOA 803 were the results of “arms-length” transactions through brokerage firms. Neither party had knowledge of the counterparty’s identity until after commitment to the broker was made, in accordance with Affiliate Transaction Rules. Revenues from these gas sales are recorded as a reduction to cost of gas purchased.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **C. UTILITY PROVISION OF GOODS AND SERVICES TO ITS AFFILIATED ENTITIES**

#### **Request No. 9:**

9. In addition to the information requested in Table II-C-1, each utility shall provide, as a separate document, a brief narrative description for any affiliated entity that had over \$10,000 of transfer price recorded in any USOA account. This narrative description will describe in greater detail the types of goods and services provided, as well as the methodologies used to calculate their transfer price and allocated cost.

#### **Response:**

Individual “Internal Orders” have been established for charging to each affiliate company for services performed. Generally, one internal order is created for each project or type of work done. All services are billed on a monthly basis.

#### **USOA Account 146**

This account is used by SoCalGas for amounts due from affiliated companies for services provided. These amounts are billed at fully loaded cost, plus appropriate labor premiums.

The nature of services billed in account 146 is as follows:

#### **Accounting & Finance**

This category includes services such as affiliate billing and costing, accounts payable, business planning and budgets, management accounting rotation program.

#### **Corporate Budgets**

This category supports projects identifying potential efficiencies in programs and processes at the utility. It also includes invoices from the Claims department.

#### **Human Resources**

This category includes the reimbursements from Sempra Energy for SoCalGas executive long-term incentive plan. It also contains human resources, disability management services, diversity, employee development, wellness, and incentive compensation billing for employees that transferred from affiliates to SoCalGas.

#### **Information Technology**

This category includes service charges for IT budgeting, service management, server engineering, mainframe, internet engineering, information protection, disaster recovery, network engineering, LAN/WAN, hardware and software maintenance, production control operations, operation control and telecom.

**SOUTHERN CALIFORNIA GAS COMPANY**

**Affiliate Transactions Annual Report**

**2021**

Response to Affiliate Transaction Reporting Requirements Section:

**C. UTILITY PROVISION OF GOODS AND SERVICES TO ITS AFFILIATED ENTITIES**

**Request No. 9 (Cont'd):**

**Oil/Gas Assessment & Extraction**

This category includes billings to Pacific Enterprises Oil Company (PEOC) for lifting costs provided at the Aliso Canyon underground storage facility.

**Depreciation**

This category contains charges for depreciation, usage, and return on shared assets.

**Real Estate & Facilities**

This category includes services such as real estate management, rent management, capital facilities, operational/maintenance programs.

**USOA Account 803**

**Gas Sales**

This account is used by the SoCalGas core procurement group for amounts related to natural gas sales and purchases transactions, and associated financial derivatives gains and losses. In this report, gas sales are recorded in Section C, and gas purchases are recorded in Section D.

All purchases and sales with affiliates were the result of "arms-length" transactions through brokerage firms. Neither party had knowledge of the counterparty's identity until after commitment to the broker was made, in accordance with Affiliate Transactions Rules.

Revenues from gas sales are recorded as a reduction to Cost of Gas Purchased.

Table II-C-1  
**SOUTHERN CALIFORNIA GAS COMPANY**  
**Provision of Goods and Services**  
**From the Utility to its Affiliated Entities**  
**For the Year Ended December 31, 2021**

USOA Acct	Item/Services Description	Cost Allocation Methodology	Sempra Energy	Pacific		Sempra LNG *		Sempra Gas & Power Marketing, LLC	Total
				Oil Company	Enterprise	SEI - Mexico *	Sempra LNG *		
146	Accounting & Finance	A	\$ 145,927	\$ -	\$ -	\$ -	\$ -	\$ -	145,927
	Corporate Budgets	A	\$ 15,637	\$ -	\$ -	\$ -	\$ -	\$ -	15,637
	Human Resources	A & B	\$ 7,531,360	\$ -	\$ -	\$ 56,344	\$ -	\$ -	7,587,705
	Information Technology	A	\$ 1,123,677	\$ -	\$ 154,211	\$ 38,973	\$ -	\$ -	1,316,861
	Oil/Gas Assessment & Extraction	A	\$ -	\$ 20,136	\$ -	\$ -	\$ -	\$ -	20,136
	Depreciation	A	\$ 4,021,329	\$ -	\$ 79,277	\$ 57,654	\$ -	\$ -	4,158,259
	Real Estate	A	\$ 355,729	\$ -	\$ -	\$ -	\$ -	\$ -	355,729
803	Gas Sales	C	\$ -	\$ -	\$ -	\$ -	\$ 5,524,114	\$ -	5,524,114
	<b>Total</b>		<b>\$ 13,193,660</b>	<b>\$ 20,136</b>	<b>\$ 233,488</b>	<b>\$ 152,971</b>	<b>\$ 5,524,114</b>	<b>\$ -</b>	<b>\$ 19,124,368</b>

\* As of October 2021, SEI - Mexico and Sempra LNG were aligned under Sempra Infrastructure Services.



# Southern California Gas Company

## Annual Report on Affiliate Transactions

Section D: Affiliated Entities Provision  
of Goods and Services to the Utility

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **D. AFFILIATED ENTITIES PROVISION OF GOODS AND SERVICES TO THE UTILITY**

#### **Request No. 1-9:**

1. Section C required each utility to report goods and/or services that it provided to its affiliated entities. This section (Section D), requires the reporting of all goods and/or services that the affiliated entities provided to the utility.
2. Each utility shall report any goods and/or services that were provided to it by any of its affiliated entities during the period covered by the annual report. All goods and/or services shall be reported regardless of whether or not the affiliated entity was reimbursed.
3. For purposes of this section, "Goods" has the same meaning as used in Section C above.
4. For purposes of this section, "Services" includes any activity of economic value provided by the affiliated entity, or any company under contract to the affiliated entity, to the utility. The examples of the types of services listed in #3 of Section II-C above are applicable to this section as well. Purchases of natural gas or electric energy from any affiliated entity should be reported in this section.
5. The cost of each good and/or service that the affiliated entity provided to the utility shall be assigned by the utility to an appropriate USOA Account of the utility.
6. Using the format shown, each utility shall create a table (entitled Table II-D-I), containing:
  - A set of columns by listing horizontally across the top of Table II-D-1 each affiliated entity listed in Table II-A-1, excluding, however, any affiliated entities which provided no goods and/or services to the utility during the calendar year.
  - A set of rows by listing vertically down the left side of Table II-D-1 each USOA account (listed in ascending order) for which the utility had incurred a cost for goods and/or services provided by the affiliated entity.
  - The middle portions of Table II-D-1, corresponding to each horizontal column and vertical row, will be called cells.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **D. AFFILIATED ENTITIES PROVISION OF GOODS AND SERVICES TO THE UTILITY**

#### **Request No. 1-9 (Cont'd):**

7. For each cell in Table II-D-1, the utility shall aggregate all transactions for goods and/or services provided by the affiliated entity under:
  - 1) The-appropriate column heading for that affiliated entity; and,
  - 2) The row corresponding to the appropriate USOA account category.
8. The following information shall be reported in the corresponding cells of Table II-D-1;
  - The total transfer price assigned to this USOA account for any goods or services provided by the affiliated entity to the utility;
  - The allocated cost, if different from the transfer price, as calculated by the affiliated entity as the cost for any goods or services provided to the utility;
  - The fair market value of the goods and service provided, if determined;
  - Allocated costs as a percentage of total recorded costs for the USOA account.
9. At the end of each row, each utility shall briefly list the applicable methodology used to determine allocated cost and transfer price as well as any calculations and reviews utilized to determine fair market value.

#### **Response:**

Using the format provided for Table II-D-1 (attached), the costs of all goods and services provided to Southern California Gas Company by affiliated entities during the reporting period have been presented. The costs have been accumulated by USOA account and by affiliated entity.

In accordance with the Affiliate Compliance Guidelines (see Section II-B-VII), the “transfer price” for goods and services provided to Southern California Gas Company by Sempra Energy is recorded at fully loaded costs.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **D. AFFILIATED ENTITIES PROVISION OF GOODS AND SERVICES TO THE UTILITY**

#### **Request No. 10:**

10. In addition to the information requested in Table II-D-1, each utility shall provide, as a separate document, a brief narrative description for any USOA account that had recorded over \$10,000 in goods and services provided by an affiliated entity. This narrative description will describe in greater detail the types of goods and services provided, as well as the methodologies used to calculate their transfer price and a summary of all methodologies and calculations used to determine fair market value.

#### **Response No. 10:**

All values in Table II-D-1 related to purchased goods and services from Sempra Energy are at fully loaded cost as required by the Affiliate Compliance Guidelines (see Section II-B-VII). Goods or services directly requested by Southern California Gas Company are recorded in the appropriate USOA account. Shared services costs are allocated to Southern California Gas Company on a causal or beneficial relationship when identifiable; otherwise the shared services costs are allocated using an approved multifactor allocation method. Shared services costs received by Southern California Gas Company from Sempra Energy are analyzed and recorded to the appropriate USOA account.

All values in Table II-D-1 related to purchases/sales of energy between Sempra Generation and Southern California Gas Company are at fair market value.

#### **USOA Account 107: Construction Work in Progress (CWIP)**

This account includes gas construction work in progress assets and allocations for services provided by affiliates that support capital activities at Southern California Gas Company.

#### **USOA Account 165: Prepayments**

This account includes prepayments for taxes, insurance, interest, and disbursements made prior to the period to which they apply. The costs in this account are related to insurance premiums.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **D. AFFILIATED ENTITIES PROVISION OF GOODS AND SERVICES TO THE UTILITY**

#### **Response No. 10 (Cont'd):**

##### **USOA Account 184: Clearing Accounts**

This account includes undistributed balances in clearing accounts at the date of the balance sheet. When services are provided to Southern California Gas Company, a portion of the cost of this service is charged to a clearing account. These are administrative and general costs related to affiliate and third-party transactions. Balances in this clearing account shall be substantially cleared not later than the end of the calendar year unless items held therein relate to a further period.

##### **USOA Account 417.1: Expenses of Nonutility Operations**

This account includes expenses applicable to operations which are nonutility in character but nevertheless constitute a distinct operating activity of the enterprise as a whole, such as the operation of an ice department where applicable statutes do not define such operation as a utility, or the operation of a servicing organization for furnishing supervision, management engineering, and similar services to others.

##### **USOA Account 803: Natural Gas Transmission Line Purchases**

This account is used by the SoCalGas core procurement group for amounts related to natural gas sales and purchases transactions, and associated financial derivatives gains and losses. In this report, gas sales are recorded in Section C, and gas purchases are recorded in Section D.

All purchases and sales with affiliates were the result of "arms-length" transactions through brokerage firms. Neither party had knowledge of the counterparty's identity until after commitment to the broker was made, in accordance with Affiliate Transactions Rules.

During the reporting period, Southern California Gas Company did not enter into any over-the-counter financial swap transactions with its affiliates.

##### **USOA Account 832: Maintenance of Reservoirs and Wells**

This account includes the cost of labor, materials used and expenses incurred in the maintenance of reservoirs and wells.

##### **USOA Account 908: Customer Assistance Expenses**

This account includes the cost of labor, materials utilized and expenses incurred in providing instructions or assistance to customers, the object of which is to promote safe, efficient and economical use of the utility's service.

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **D. AFFILIATED ENTITIES PROVISION OF GOODS AND SERVICES TO THE UTILITY**

#### **Response No. 10 (Cont'd):**

#### **USOA Account 910: Miscellaneous Customer Service and Informational Expenses**

This account includes the cost of labor, materials utilized, and expenses incurred in providing customer service and informational activities, which are not includible in other customer information expense accounts.

#### **USOA Account 923: Outside Services Employed**

This account includes the fees and expenses of professional consultants (such as lawyers, auditors, appraisers, expert witnesses, or management, accounting, and engineering consultants) and others for general services that are not applicable to a particular operation function or to other accounts. This account includes the salaries and wages expenses of affiliate administrative and general departments that provide service to Southern California Gas Company. In addition, this account includes office supplies and expenses incurred in connection with this general administration.

#### **USOA Account 924: Property Insurance**

This account includes the cost of insurance or reserve accruals to protect the utility against losses and damages to owned or leased property used in its utility operations. It also includes the cost of labor and related supplies and expenses incurred in property insurance activities.

#### **USOA Account 925: Injuries and Damages**

This account includes the cost of insurance or reserve accruals to protect the utility against injuries and damages claims of employees or others, losses of such character not covered by insurance, and expenses incurred in settlement of injuries and damages claims. It also includes the cost of labor and related supplies and expenses incurred in injuries and damages activities.

#### **USOA Account 926: Employee Pensions and Benefits**

This account includes stock option expenses, pension accruals or actual payments made on behalf of current employees or retired employees, payments for the purchase of annuities relating to pensions, education reimbursements, and audit fees.

#### **USOA Account 928: Regulatory Commission Expenses**

This account includes all expenses properly includible in utility operating expenses, incurred by the utility in connection with formal cases before regulatory commissions, or other regulatory bodies, or cases in which such a body is a party, including payments

# SOUTHERN CALIFORNIA GAS COMPANY

## Affiliate Transactions Annual Report

2021

Response to Affiliate Transaction Reporting Requirements Section:

### **D. AFFILIATED ENTITIES PROVISION OF GOODS AND SERVICES TO THE UTILITY**

#### **Response No. 10 (Cont'd):**

made to a regulatory commission for fees assessed against the utility for pay and expenses of such commission, its officers, agents, and employees.

#### **USOA Account 930: Miscellaneous General Expenses**

This account includes the cost of labor and expenses incurred in connection with the general management of the Southern California Gas Company not provided for elsewhere.

#### **Request No. 11 :**

1. For any USOA account classification containing greater than \$25,000 in reported transactions, the utility shall provide as an addendum to Table II-D-1 any comparisons performed by the utility of the cost of goods or services provided by the affiliated entities with other providers not affiliated with the utility.

#### **Response:**

During 2021, the utility did not conduct any studies for the purpose of comparing the cost of goods or services provided during the year by affiliated entities with the costs provided by unaffiliated providers.

TABLEII-D-I  
SOUTHERNCALIFORNIA GAS COMPANY  
Provision of Goods And Services  
from Affiliated Entities To The Utility  
For The Year Ended December 31, 2021

USOA Account	Account Description	Sempra Energy		Sempra Gas & Power Marketing, LLC		Total	% of USOA Account
107	Construction Work In Progress	8,109,598	-	-	-	8,109,598	<1.00%
165	Prepayments	13,248,838	-	-	-	13,248,838	17.74%
184	Clearing Accounts	2,212,574	-	-	-	2,212,574	87.48%
417.1	Expenses of nonutility operations	4,686,911	-	-	-	4,686,911	44.34%
803	Natural Gas Transmission Line Purchases	-	6,676,456	-	-	6,676,456	<1.00%
832	Maintenance of Reservoirs - Wells	53,671,219	-	-	-	53,671,219	411.92%
908	Customer Assistance Expenses	959,660	-	-	-	959,660	<1.00%
910	Miscellaneous Customer Serv And Informational Expe	626,312	-	-	-	626,312	25.72%
923	Outside Services Employed	73,428,912	-	-	-	73,428,912	38.71%
924	Property Insurance	562,611	-	-	-	562,611	8.70%
925	Injuries And Damages	50,819,751	-	-	-	50,819,751	76.91%
926	Employee Pensions And Benefits	10,601,625	-	-	-	10,601,625	4.64%
928	Regulatory Commission Expenses	139,784	-	-	-	139,784	1.89%
930	Miscellaneous General Expenses	66,028	-	-	-	66,028	<1.00%
<b>Total:</b>		219,133,823	6,676,456	-	-	225,810,279	

## **Appendix C**

### Southern California Gas Company Core Firm Transportation Capacity Holdings



## **Attachment B**

Southern California Gas Company  
Balance Sheet and Income Statement

**SOUTHERN CALIFORNIA GAS COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**December 31, 2021**

		2021
<b>1. UTILITY PLANT</b>		
101	UTILITY PLANT IN SERVICE	\$21,966,045,795
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,172,831,022
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(6,916,541,135)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(126,892,703)
117	GAS STORED-UNDERGROUND	61,422,045
	TOTAL NET UTILITY PLANT	16,156,865,024
<b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	50,001,795
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(15,788,930)
123	INVESTMENTS IN SUBSIDIARY COMPANIES NONCURRENT PORTION OF ALLOWANCES	-
124	OTHER INVESTMENTS	13,906
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	250,000
	TOTAL OTHER PROPERTY AND INVESTMENTS	34,476,771

Data from SPL as of April 12, 2022

**SOUTHERN CALIFORNIA GAS COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**December 31, 2021**

<b>3. CURRENT AND ACCRUED ASSETS</b>		2021
131	CASH	36,540,015
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	124,310
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	1,200,189,867
143	OTHER ACCOUNTS RECEIVABLE	27,349,514
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(52,146,164)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	48,587,080
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	65,353,863
155	MERCHANDISE	-
156	OTHER MATERIALS AND SUPPLIES	-
158	GHG ALLOWANCE	364,684,939
	(LESS) NONCURRENT PORTION OF ALLOWANCES	-
163	STORES EXPENSE UNDISTRIBUTED	(2,185,908)
164	GAS STORED	114,070,748
165	PREPAYMENTS	74,668,176
171	INTEREST AND DIVIDENDS RECEIVABLE	803,502
173	ACCRUED UTILITY REVENUES	-
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	12,183,501
175	DERIVATIVE INSTRUMENT ASSETS	19,455,606
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<b>1,909,679,049</b>
<b>4. DEFERRED DEBITS</b>		
181	UNAMORTIZED DEBT EXPENSE	29,015,395
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,395,436,369
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	281,390
184	CLEARING ACCOUNTS	2,529,288
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	911,443,271
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	392,581
190	ACCUMULATED DEFERRED INCOME TAXES	899,867,068
191	UNRECOVERED PURCHASED GAS COSTS	-
	<b>TOTAL DEFERRED DEBITS</b>	<b>5,238,965,362</b>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>\$ 23,339,986,206</b>

Data from SPL as of April 12, 2022

**SOUTHERN CALIFORNIA GAS COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**December 31, 2021**

**5. PROPRIETARY CAPITAL**

	2021
201 COMMON STOCK ISSUED	(834,888,907)
204 PREFERRED STOCK ISSUED	(21,551,075)
207 PREMIUM ON CAPITAL STOCK	-
208 OTHER PAID-IN CAPITAL	-
210 GAIN ON RETIRED CAPITAL STOCK	(9,722)
211 MISCELLANEOUS PAID-IN CAPITAL	(831,306,681)
214 CAPITAL STOCK EXPENSE	143,261
216 UNAPPROPRIATED RETAINED EARNINGS	(3,784,507,576)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	30,640,471
TOTAL PROPRIETARY CAPITAL	(5,441,480,229)

**6. LONG-TERM DEBT**

221 BONDS	(4,450,000,000)
224 OTHER LONG-TERM DEBT	(309,338,770)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	7,269,051
TOTAL LONG-TERM DEBT	(4,752,069,719)

**7. OTHER NONCURRENT LIABILITIES**

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(90,607,820)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(117,097,484)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(582,491,432)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
245 NONCURRENT DERIVATIVE INSTRUMENT LIABILITIES	-
230 ASSET RETIREMENT OBLIGATIONS	(2,582,790,963)
TOTAL OTHER NONCURRENT LIABILITIES	(3,372,987,699)

Data from SPL as of April 12, 2022

**SOUTHERN CALIFORNIA GAS COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**December 31, 2021**

**8. CURRENT AND ACCRUED LIABILITES**

		2021
231	NOTES PAYABLE	(384,980,882)
232	ACCOUNTS PAYABLE	(2,828,717,423)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(36,279,564)
235	CUSTOMER DEPOSITS	(13,433,895)
236	TAXES ACCRUED	(17,038,735)
237	INTEREST ACCRUED	(41,414,029)
238	DIVIDENDS DECLARED	(323,265)
241	TAX COLLECTIONS PAYABLE	(26,427,016)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(367,506,496)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(25,671,156)
244	DERIVATIVE INSTRUMENT LIABILITIES	(35,726,041)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	
	TOTAL CURRENT AND ACCRUED LIABILITIES	(3,777,518,502)

**9. DEFERRED CREDITS**

252	CUSTOMER ADVANCES FOR CONSTRUCTION	(125,961,975)
	OTHER DEFERRED CREDITS	(376,749,009)
254	OTHER REGULATORY LIABILITIES	(3,530,765,780)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(6,808,190)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,485,725,121)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(469,919,982)
	TOTAL DEFERRED CREDITS	(5,995,930,057)

	\$ (23,339,986,206)
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Data from SPL as of April 12, 2022

**SOUTHERN CALIFORNIA GAS COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**TWELVE MONTHS ENDED DECEMBER 31, 2021**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		5,512,266,673
401	OPERATING EXPENSES	4,794,582,846	
402	MAINTENANCE EXPENSES	427,699,291	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	715,056,326	
408.1	TAXES OTHER THAN INCOME TAXES	160,351,975	
409.1	INCOME TAXES	189,457,421	
410.1	PROVISION FOR DEFERRED INCOME TAXES	643,051,690	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(1,140,482,425)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(1,052,510)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
411.7	LOSS FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		5,788,664,614
	NET OPERATING INCOME		(276,397,941)

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES FROM NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(10,571,559)	
418	NONOPERATING RENTAL INCOME	708,127	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	1,358,684	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	47,965,344	
421	MISCELLANEOUS NONOPERATING INCOME	(1,492,592)	
421.1	GAIN ON DISPOSITION OF PROPERTY	0	
	TOTAL OTHER INCOME	37,968,004	
421.2	LOSS ON DISPOSITION OF PROPERTY	(2,983,459)	
425	MISCELLANEOUS AMORTIZATION	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	(27,908,711)	
		<b>(30,892,170)</b>	
408.2	TAXES OTHER THAN INCOME TAXES	(301,390)	
409.2	INCOME TAXES	5,803,216	
410.2	PROVISION FOR DEFERRED INCOME TAXES	(34,754,062)	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	30,168,204	
420	INVESTMENT TAX CREDITS	-	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	915,968	
	TOTAL OTHER INCOME AND DEDUCTIONS		7,991,802
	INCOME BEFORE INTEREST CHARGES		(268,406,139)
	NET INTEREST CHARGES*		157,860,205
	NET INCOME		(\$426,266,344)

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION. (\$47,965,344)

Data from SPL as of April 12, 2022

**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**TWELVE MONTHS ENDED DECEMBER 31, 2021**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$4,212,066,985
NET INCOME (FROM PRECEDING PAGE)	(426,266,344)
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(1,293,065)
OTHER RETAINED EARNINGS ADJUSTMENT	<u>-</u>
RETAINED EARNINGS AT END OF PERIOD	<u>\$3,784,507,576</u>

## **Attachment C**

Southern California Gas Company

Statement of Proposed Rates

**Rate Tables**

**Impact of GCIM Award on Gas Rate over Last 12 Months**

**Calculation of GCIM Award \$/therm:**

GCIM Award \$000	\$22,300
Core Sales per 2020TCAP Mth/yr	3,764,211
<b>GCIM Award \$/th</b>	<b>\$0.00592</b>

## **Attachment D**

### Southern California Gas Company Statement of Original Cost and Depreciation Reserve

**SOUTHERN CALIFORNIA GAS COMPANY**  
Plant Investment and Accumulated Depreciation  
As of December 31, 2021

ACCOUNT NUMBER	DESCRIPTION	ORIGINAL COSTS	ACCUMULATED RESERVE	NET BOOK VALUE
<b>INTANGIBLE ASSETS</b>				
301	Organization	76,457	-	76,457
302	Franchise and Consents	587,060	-	587,060
303	Cloud Compute	640,315	-	640,315
	Total Intangible Assets	<u>1,303,833</u>	<u>-</u>	<u>1,303,833</u>
<b>PRODUCTION:</b>				
325	Other Land Rights	-	-	-
330	Prd Gas Wells Const	-	-	-
331	Prd Gas Wells Eqp	-	-	-
332	Field Lines	-	-	-
334	FldMeas&RegStnEquip	-	-	-
336	Prf Eqpt	-	-	-
	Total Production	<u>-</u>	<u>-</u>	<u>-</u>
<b>UNDERGROUND STORAGE:</b>				
350	Land	4,539,484	-	4,539,484
350SR	Storage Rights	19,069,515	(17,580,607)	1,488,907
350RW	Rights-of-Way	25,354	(18,789)	6,565
351	Structures and Improvements	130,243,659	(35,146,485)	95,097,175
352	Wells	598,590,798	107,213,422	705,804,219
353	Lines	196,882,073	(60,795,938)	136,086,135
354	Compressor Station and Equipment	471,034,627	(98,644,895)	372,389,732
355	Measuring And Regulator Equipment	18,374,050	(4,438,712)	13,935,338
356	Purification Equipment	170,515,026	(92,676,604)	77,838,422
357	Other Equipment	92,512,870	(28,758,287)	63,754,584
	Total Underground Storage	<u>1,701,787,458</u>	<u>(230,846,895)</u>	<u>1,470,940,563</u>
<b>TRANSMISSION PLANT- OTHER:</b>				
365	Land	9,217,918	-	9,217,918
365LRTS	Land Rights	129,194,889	(21,162,448)	108,032,441
366	Structures and Improvements	143,727,588	(22,238,585)	121,489,003
367	Mains	3,004,328,727	(777,642,031)	2,226,686,696
368	Compressor Station and Equipment	541,246,895	(106,642,723)	434,604,172
369	Measuring And Regulator Equipment	344,966,875	(48,459,707)	296,507,168
370	Communication Equipment	81,964,952	(16,923,474)	65,041,479
371	Other Equipment	11,495,327	(4,772,317)	6,723,010
	Total Transmission Plant	<u>4,266,143,172</u>	<u>(997,841,286)</u>	<u>3,268,301,886</u>
<b>DISTRIBUTION PLANT:</b>				
374	Land	29,737,007	-	29,737,007
374LRTS	Land Rights	2,890,157	(2,236,503)	653,654
375	Structures and Improvements	361,003,945	(97,104,264)	263,899,681
376	Mains	6,152,508,423	(2,816,036,120)	3,336,472,302
378	Measuring And Regulator Equipment	155,426,546	(88,006,090)	67,420,456
380	Services	3,551,498,851	(2,268,159,415)	1,283,339,436
381	Meters	986,390,272	(317,191,251)	669,199,021

**SOUTHERN CALIFORNIA GAS COMPANY**  
Plant Investment and Accumulated Depreciation  
As of December 31, 2021

ACCOUNT NUMBER	DESCRIPTION	ORIGINAL COSTS	ACCUMULATED RESERVE	NET BOOK VALUE
382	Meter Installation	640,766,147	(230,243,700)	410,522,447
383	House Regulators	188,953,322	(85,150,604)	103,802,718
387	Other Equipment	76,602,610	(30,416,583)	46,186,027
	Total Distribution Plant	<u>12,145,777,280</u>	<u>(5,934,544,529)</u>	<u>6,211,232,750</u>
<b>GENERAL PLANT:</b>				
389	Land	1,342,839	-	1,342,839
389LRTS	Land Rights	74,300	(43,925)	30,375
390	Structures and Improvements	256,344,336	(196,914,890)	59,429,446
391	Office Furniture and Equipment	1,671,152,913	(1,199,650,406)	471,502,507
392	Transportation Equipment	149,370	(77,425)	71,945
393	Stores Equipment	112,635	(80,923)	31,712
394	Shop and Garage Equipment	123,277,589	(33,591,719)	89,685,870
395	Laboratory Equipment	8,399,288	(1,822,398)	6,576,891
396	Construction Equipment	1,124	1,828	2,952
397	Communication Equipments	215,572,989	(89,307,024)	126,265,965
398	Miscellaneous Equipment	1,444,836	(288,478)	1,156,358
	Total General Plant	<u>2,277,872,219</u>	<u>(1,521,775,360)</u>	<u>756,096,859</u>
	Subtotal	<u><b>20,392,883,962</b></u>	<u><b>(8,685,008,070)</b></u>	<u><b>11,707,875,892</b></u>
121	Non-Utility Plant	32,518,285	(14,439,785)	18,078,501
117GSUNC	Gas Stored Underground - NonCurrent	61,422,045	-	61,422,045
GCL	GCT - Capital Lease	-	-	-
	Total Other - Non-Utility Plant	<u>93,940,330</u>	<u>(14,439,785)</u>	<u>79,500,545</u>
	Total-Reconciliation to Asset History Totals	<u>20,486,824,292</u>	<u>(8,699,447,854)</u>	<u>11,787,376,437</u>
	Dec 2021 Asset 1020 Report	<u>20,486,824,292</u>	<u>(8,699,447,854)</u>	<u>11,787,376,437</u>
	Difference	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>

## **Attachment E**

Southern California Gas Company

Summary of Earnings

**SOUTHERN CALIFORNIA GAS COMPANY  
SUMMARY OF EARNINGS  
TWELVE MONTHS ENDED DECEMBER 31, 2021  
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$5,512
2	Operating Expenses	<u>5,789</u>
3	Net Operating Income	<u><u>(\$276)</u></u>
4	Weighted Average Rate Base	\$9,372
5	Rate of Return*	7.30%

\*Authorized Cost of Capital