

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



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In the Matter of the Application of Southern
California Gas Company.(U 904 G) to
Establish a Biogas Conditioning & Upgrading
Services Tariff

Application 12-04-024
(Filed April 25, 2012)

**SOUTHERN CALIFORNIA GENERATION COALITION
MOTION FOR LEAVE TO FILE RESPONSE OUT-OF-TIME**

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GENERATION COALITION**

Dated: May 31, 2012

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

In the Matter of the Application of Southern
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Establish a Biogas Conditioning & Upgrading
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**SOUTHERN CALIFORNIA GENERATION COALITION
MOTION FOR LEAVE TO FILE RESPONSE OUT-OF-TIME**

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Southern California Generation Coalition (“SCGC”) hereby requests leave to file one day out-of-time the attached Response to Application of Southern California Gas Company to Establish a Biogas Conditioning and Upgrading Services Tariff (“Response”) in the captioned proceeding.

Due to a conflict with the workshop that was held in the Southern California Gas Company (“SoCalGas”) Triennial Cost Allocation (“TCAP”) proceeding, A.11-11-002, on May 30, 2012, the undersigned was unable to file the response on the due date, May 30, 2012. Given that SCGC is submitting its Response only one day out-of-time, no party would be unduly burdened or otherwise prejudiced by acceptance for filing. SCGC notes that the Division of Ratepayer Advocates plans to file a protest in the captioned proceeding on June 1, 2012.

Accordingly, SCGC requests that the attached Response be accepted for filing.

Respectfully submitted,

/s/ Norman A. Pedersen

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Attachment A

**BEFORE THE PUBLIC UTILITIES COMMISSION
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In the Matter of the Application of Southern
California Gas Company.(U 904 G) to
Establish a Biogas Conditioning & Upgrading
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Application 12-04-024
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**SOUTHERN CALIFORNIA GENERATION COALITION
RESPONSE TO APPLICATION OF
SOUTHERN CALIFORNIA GAS COMPANY
TO ESTABLISH A BIOGAS CONDITIONING & UPGRADING SERVICES TARIFF**

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**BEFORE THE PUBLIC UTILITIES COMMISSION
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In the Matter of the Application of Southern California Gas Company.(U 904 G) to Establish a Biogas Conditioning & Upgrading Services Tariff

Application 12-04-024
(Filed April 25, 2012)

**SOUTHERN CALIFORNIA GENERATION COALITION
RESPONSE TO APPLICATION OF
SOUTHERN CALIFORNIA GAS COMPANY
TO ESTABLISH A BIOGAS CONDITIONING & UPGRADING SERVICES TARIFF**

Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Southern California Generation Coalition (“SCGC”) hereby responds to the Application of Southern California Gas Company (“SoCalGas”) to Establish a Biogas Conditioning and Upgrading Services Tariff (“Application”). As discussed below, SCGC requests clarification of the provisions for crediting ratepayers for any embedded costs already included in general rates. SCGC reserves the right to address other issues that might arise in the course of the proceeding.

I. BACKGROUND

SoCalGas proposes a new tariff service to upgrade biogas for pipeline injection, on site power generation, or compressed natural gas (“CNG”) vehicle fueling stations.¹ SoCalGas proposes to “design, install, own, operate, and maintain” the biogas conditioning and upgrading facilities “on or adjacent to the tariff customers’ premises in order to process raw biogas and

¹ Application at 1.

upgrade it to the level specified by the customer.”² The contract terms, including cost and rate components, adjustments, performance requirements, technology to be utilized, and payment terms will be agreed upon in advance by the customer and SoCalGas.³

SoCalGas commits that “the applicable service fees will recover the fully allocated cost of serving that tariff service customer.”⁴ SoCalGas witness Krystal L. Joscelyne states: “To ensure that all costs associated with the BCS Tariff are appropriate identified and segregated, specific internal orders will be created within the SAP Financial System to track such costs.”⁵ Witness Joscelyne states further: “Ratepayers will be credited for any embedded costs already included in general rates, until such time as the revenues received for these services will be included in SoCalGas’ miscellaneous revenues forecast in the Company’s next general rate case and then deducted from customers’ overall base margin cost for setting rates.”⁶

II. REQUEST FOR CLARIFICATION

SoCalGas fails to explain adequately how “ratepayers will be credited for any embedded costs already included in general rates....” SoCalGas witness Joscelyne states: “This will be done by crediting the appropriate balancing accounts until such time these costs are incorporated in base rates in SoCalGas’ next GRC proceeding.”⁷ It is unclear how the alleged crediting will actually be accomplished. Witness Joscelyne does not identify the “appropriate balancing accounts,” and the identity of those accounts is not apparent from the Preliminary Statement in SoCalGas’ tariff.

² *Ibid*

³ *Ibid* at 1-2.

⁴ *Ibid* at 2.

⁵ Prepared Direct of Krystal L. Joscelyne at 2 (April 25, 2012) (“Joscelyne Direct”).

⁶ *Ibid*.

⁷ *Ibid* at 9.

III. CLASSIFICATION AND PROCEDURAL SCHEDULE

Given the rate implications of SoCalGas' implications, SCGC agrees with SoCalGas that this proceeding should be classified as a "ratesetting" proceeding. .

IV. CONCLUSION

For the reasons set forth above, SCGC requests clarification of how ratepayers will be "credited for any embedded costs already included in general rates." SCGC reserves the right to address other issues that might arise in the course of the proceeding.

Respectfully submitted,

/s/ Norman A. Pedersen

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