

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 19, 2011

Advice Letter 3194-G

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

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

Dear Ms. Yura:

Advice Letter 3194-G is effective May 1, 2011.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



March 11, 2011

Advice 3194-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

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

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

Purpose

In-kind shrinkage allowances represent the unaccounted-for gas and the utility fuel use attributable to the volume of natural gas received by PG&E for transmission, distribution and storage service. In Decision (“D.”) 03-12-061, the California Public Utilities Commission (“Commission”) authorized the shrinkage allowances to be updated annually or as necessary at other times of the year to match the actual shrinkage experienced on PG&E’s system. This is reflected in Gas Preliminary Statement Part C—*Gas Accounting Terms and Definitions*, Part C.12.c. and Gas Rule 21, which state that PG&E may adjust distribution, transmission and storage¹ shrinkage annually through an advice letter compliance filing, or as necessary at other times of the year through a separate advice letter filing.

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

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

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

Background

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

Shrinkage Base Allowance Forecast Update

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

Proposed In-Kind Shrinkage Base Allowance

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

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

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

Temporary In-Kind Shrinkage Credit Adjustment

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

Proposed Temporary In-kind Shrinkage Credit Adjustment

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

Total In-Kind Shrinkage Allowance Forecast Update

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

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

Proposed Total Shrinkage Allowance Update

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

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

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

Tariff Revisions

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

Protests

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

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

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

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

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

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

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

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

Effective Date

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

Notice

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

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

A handwritten signature in cursive script that reads "Jane Yura" followed by a horizontal line and the word "Vice" written below it.

Vice President – Regulation and Rates

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

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Linda Tom-Martinez

Phone #: (415) 973-4612

E-mail: lmt1@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

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

Tier: **2**

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

Keywords (choose from CPUC listing): Transportation, Compliance

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

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

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

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

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

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

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

Resolution Required? Yes No

Requested effective date: **May 1, 2011**

No. of tariff sheets: 4

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

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

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Gas Rule 21

Service affected and changes proposed¹: N/A

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

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave.,

San Francisco, CA 94102

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Jane Yura

Vice President, Regulation and Rates

77 Beale Street, Mail Code B10B

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3194-G**

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



GAS RULE NO. 21
 TRANSPORTATION OF NATURAL GAS

Sheet 2

B. QUANTITIES OF GAS (Cont'd.)

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

a. Backbone Transmission Shrinkage

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

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

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

(Continued)



GAS RULE NO. 21
 TRANSPORTATION OF NATURAL GAS

Sheet 3

B. QUANTITIES OF GAS (Cont'd.)

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

b. Distribution Shrinkage

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

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

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

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

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

y = decimal equivalent of the Distribution Shrinkage percentage

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

(Continued)



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page	28814-G	(T)
Rate Schedules	28811,28807-G	
Preliminary Statements.....	28808,28672-G	
Rules	28815-G	(T)
Maps, Contracts and Deviations.....	28468-G	
Sample Forms	27715,28300,27262,28662,28503-G	

(Continued)

Advice Letter No: 3194-G
 Decision No. 03-12-061

Issued by
Jane K. Yura
 Vice President
 Regulation and Rates

Date Filed March 11, 2011
 Effective May 1, 2011
 Resolution No. _____



GAS TABLE OF CONTENTS

Sheet 6

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rules		
Rule 01	Definitions.....	27880,26782,25123,18197,26823,26824,24120,18200, 22924,18202,21978,18204-18205,21979,28651,28652-G
Rule 02	Description of Service.....	23062-23066,26825-G
Rule 03	Application for Service.....	27248,27249-G
Rule 04	Contracts.....	17051-G
Rule 05	Special Information Required on Forms.....	17641,13348-13349-G
Rule 06	Establishment and Reestablishment of Credit.....	22126-22127,28653-G
Rule 07	Deposits.....	28654,28655-G
Rule 08	Notices.....	21928,17580,21929,17581,15728-G
Rule 09	Rendering and Payment of Bills.....	24128-24129,27941,23518,24856, 27345,27346,28562-G
Rule 10	Disputed Bills.....	18214-18216-G
Rule 11	Discontinuance and Restoration of Service.....	18217-18220,27251,23520, 18223-18227,27252,24860,19710-G
Rule 12	Rates and Optional Rates.....	18229,27253,24132,21981-21982,24474-G
Rule 13	Temporary Service.....	22832-G
Rule 14	Capacity Allocation and Constraint of Natural Gas Service.....	18231-18235,28274, 28275-28292-G
Rule 15	Gas Main Extensions.....	21543,18802-18803,27503,20350-20352,26827,21544, 21545,22376,22377-22379,26828,26829,18814-G
Rule 16	Gas Service Extensions.....	21546,18816,17728,17161,18817-18825,17737, 18826,18827-G
Rule 17	Meter Tests and Adjustment of Bills for Meter Error.....	14450,28656,28764,28770,28771, 28772,28773,28774-G
Rule 17.1	Adjustment of Bills for Billing Error.....	22936,28657,28658-G
Rule 17.2	Adjustment of Bills for Unauthorized Use.....	22937,14460,14461-G
Rule 18	Supply to Separate Premises and Submetering of Gas.....	22790,17796,13401-G
Rule 19	Medical Baseline Quantities.....	21119,21120,21121-G
Rule 19.1	California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers.....	24135,28208,28209,28210-G
Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities	24609,28211,17035,28212,27255-G
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities	24138,28213,28214,27256-G
Rule 21	Transportation of Natural Gas.....	27591,28812,28813,23786,23194,23195,21845,23196- 23199,22086,22087,24444,24445,22735,22736,22737-G (T)
Rule 21.1	Use of Pacific Gas and Electric Company's Firm Interstate Rights	20461,18260,18261-G
Rule 23	Gas Aggregation Service for Core Transport Customers.....	24476,18263,26664,18265, 26665-26666,24825-24830,26667,24832-24833,24849,21750-21751,18272-G
Rule 25	Gas Services-Customer Creditworthiness and Payment Terms.....	27747-27755-G
Rule 26	Standards of Conduct and Procedures Related to Transactions with Intracompany Departments, Reports of Negotiated Transactions, and Complaint Procedures	18284,18285,18633,20462-G

(Continued)

Advice Letter No: 3194-G
 Decision No. 03-12-061

Issued by
Jane K. Yura
 Vice President
 Regulation and Rates

Date Filed March 11, 2011
 Effective May 1, 2011
 Resolution No. _____

Advice 3194-G

Attachment 2

PACIFIC GAS AND ELECTRIC COMPANY
Workpaper for In-Kind Shrinkage Allowance Update
Advice 3194-G (effective May 1, 2011)
Shrinkage Base Allowance

	(A)	(B)	(C)	(D)	(E)	(F)	
<p><i>Forecast Customer Demand is based on data in the Gas Accord V Settlement Agreement filed August 20, 2010 (PG&E's June 2010 forecast plus 20 MDth/d EG-Backbone). Forecast Off-system Demand is based on the three-year actual off-system deliveries through February 2011. LUAF and GDU forecasts are based on the one-year average monthly percentage profile of actual LUAF and GDU (through November 2010 -- latest data available as of February 22, 2011.) GDU forecast reduced by an annual 630 MMCF due to a forecasted increase in electric compressor usage; this quantity is prorated to reflect seven months actual electric compressor usage in the forecast period.</i></p>							
Line No.		12 Month Forecast Throughput	% Served from Distr.	% Served from Trans.	Throughput Served from Trans.	Throughput Served from Distr.	Line No.
1	Noncore Transmission/Distribution Split	Mdth	Survey Results		Mdth	Mdth	1
2	Industrial	170,366	15.4192%	84.5808%	144,097	26,269	2
3	EG	189,881	0.0000%	100.0000%	189,881	0	3
4	Cogeneration	72,185	6.6834%	93.3166%	67,361	4,824	4
5	Wholesale	3,700	0.0000%	100.0000%	3,700	0	5
6	NGV4	523	0.0000%	100.0000%	523	0	6
7	Total Noncore (excludes EOR and SEGDA)	436,655			405,561	31,094	7
8	% of Noncore served from Trans. and Distr.				92.88%	7.12%	8
<p>LUAF per Study (from the Gas Accord I Workpapers, 17-2 & 17-3) Splits LUAF noncore volumes between distribution and transmission based on LUAF Study</p>							
9		NCTotal			NC Trans.	NC Distr.	9
10	LUAF (Mcf) - volumes from 1995 BCAP	3,054,276			2,268,089	786,187	10
11	LUAF % (NC Distr Vol/NC Total)				74.26%	25.74%	11
12	Throughput Vol. % - Data from Rate Dept Survey				79.00%	21.00%	12
13	Ratios set for Accord period:						13
14	Calculated as Line 11/Line 12				0.94	1.23	14
15	Calculated as (F) line 14/(E) line 14					1.30	15
16	Noncore % of System LUAF (adopted in 95 BCAP)	22.00%					16
<p>LUAF & GDU Allocations to Transmission and Distribution</p>							
		System Forecast	Core	Noncore	Off-system	NC Trans.	NC Distr.
17	LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)	8,262	6,281	1,772	209		
18	Throughput per forecast (Mdth)	791,841	291,909	436,655	63,277		
19	Less: SEGDA	0		0			
20	Totals for Calculation of allocation	791,841	291,909	436,655	63,277		
21	LUAF as % of throughput (Lines 17/20)	1.043%	2.152%	0.406%	0.330%		
22	Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)					0.397%	
23	Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)						0.518%
24	Off-System LUAF (per D.94-02-042)	0.33%					
<p>GDU Calculations:</p>							
25	GDU per forecast(Mdth) - Pipeline (Total Plus balancing service storage GDU)	4,377					
26	GDU % = (B) line 24/(B) line 20	0.553%					
<p>Shrinkage (LUAF+GDU)</p>							
27	Noncore Transmission = (B) line 26 + (E) line 22	0.950%					
28	Noncore Distribution = (B) line 26 + (F) line 23	1.071%					
29	Core Total = (B) line 26 + (C) line 21	2.705%					
30	Core Distribution = (B) line 29 - (B) line 27	1.755%					
31	Off-System Transmission = (B) line 26 + (B) line 24	0.883%					
32	Proposed Pipeline Shrinkage Allowances - Base Allowance Update		Core	NC Trans.	NC Dist.	Off-Sys.	32
33	Transmission (assumes same % for core and noncore)		0.9%	0.9%	0.9%	0.9%	33
34	Distribution		1.8%	N/A	0.2%	N/A	34
35	Total		2.7%	0.9%	1.1%	0.9%	35

PACIFIC GAS AND ELECTRIC COMPANY
Workpaper for In-Kind Shrinkage Allowance Update
Advice 3194-G (effective May 1, 2011)
Shrinkage Credit Adjustment

	(A)	(B)	(C)	(D)	(E)	(F)	
<i>Forecast Customer Demand is based on data in the Gas Accord V Settlement Agreement filed August 20, 2010 (PG&E's June 2010 forecast plus 20 MDth/d EG-Backbone). Forecast Off-system Demand is based on the one-year actual off-system deliveries through February 2011. LUAF is set to return 2039 MDth (approximately 2 BCF) per year through the adjustment mechanism.</i>							
Line No.		12 Month Forecast Throughput	% Served from Distr.	% Served from Trans.	Throughput Served from Trans.	Throughput Served from Distr.	Line No.
1	Noncore Transmission/Distribution Split	Mdth	Survey Results		Mdth	Mdth	1
2	Industrial	170,366	15.4192%	84.5808%	144,097	26,269	2
3	EG	189,881	0.0000%	100.0000%	189,881	0	3
4	Cogeneration	72,185	6.6834%	93.3166%	67,361	4,824	4
5	Wholesale	3,700	0.0000%	100.0000%	3,700	0	5
6	NGV4	523	0.0000%	100.0000%	523	0	6
7	Total Noncore (excludes EOR and SEGDA)	436,655			405,561	31,094	7
8	% of Noncore served from Trans. and Distr.				92.88%	7.12%	8
LUAF per Study (from the Gas Accord I Workpapers, 17-2 & 17-3)							
Splits LUAF noncore volumes between distribution and transmission based on LUAF Study							
9		NC Total			NC Trans.	NC Distr.	9
10	LUAF (Mcf) - volumes from 1995 BCAP	3,054,276			2,268,089	786,187	10
11	LUAF % (NC Distr Vol/NC Total)				74.26%	25.74%	11
12	Throughput Vol. % - Data from Rate Dept Survey				79.00%	21.00%	12
13	Ratios set for Accord period:						13
14	Calculated as Line 11/Line 12				0.94	1.23	14
15	Calculated as (F) line 14/(E) line 14					1.30	15
16	Noncore % of System LUAF (adopted in 95 BCAP)	22.00%					16
LUAF & GDU Allocations to Transmission and Distribution							
		System Forecast	Core	Noncore	Off-system	NC Trans.	NC Distr.
17	LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)	- 2,039 -	1,590	449	-		
18	Throughput per forecast (Mdth)	791,841	291,909	436,655	63,277		
19	Less: SEGDA	0		0			
20	Totals for Calculation of allocation	791,841	291,909	436,655	63,277		
21	LUAF as % of throughput (Lines 17/20)	-0.258%	-0.545%	-0.103%	0.000%		
22	Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)					-0.101%	
23	Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)						-0.131%
24	Off-System LUAF (per D.94-02-042)				0.00% (Not allocated to off-system)		
			Same for all customers				
GDU Calculations:							
25	GDU per forecast(Mdth) - Pipeline (Total Plus balancing service storage GDU)	-					
26	GDU % = (B) line 24/(B) line 20	0.000%					
Shrinkage (LUAF+GDU)							
27	Noncore Transmission = (B) line 26 + (E) line 22	-0.101%					
28	Noncore Distribution = (B) line 26 + (F) line 23	-0.131%					
29	Core Total = (B) line 26 + (C) line 21	-0.545%					
30	Core Distribution = (B) line 29 - (B) line 27	-0.444%					
31	Off-System Transmission = (B) line 26 + (B) line 24	0.000%					
32	Proposed Pipeline Shrinkage Allowances - Credit Adjustment		Core	NC Trans.	NC Dist.	Off-Sys.	
33	Transmission (assumes same % for core and noncore)		-0.1%	-0.1%	-0.1%	0.0%	
34	Distribution		-0.4%	N/A	0.0%	N/A	
35	Total		-0.5%	-0.1%	-0.1%	0.0%	

**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

Alcantar & Kahl LLP	Division of Business Advisory Services	Occidental Energy Marketing, Inc.
Ameresco	Douglass & Liddell	OnGrid Solar
Anderson & Poole	Downey & Brand	Praxair
Arizona Public Service Company	Duke Energy	R. W. Beck & Associates
BART	Dutcher, John	RCS, Inc.
Barkovich & Yap, Inc.	Economic Sciences Corporation	Recurrent Energy
Bartle Wells Associates	Ellison Schneider & Harris LLP	SCD Energy Solutions
Bloomberg	Foster Farms	SCE
Bloomberg New Energy Finance	G. A. Krause & Assoc.	SMUD
Boston Properties	GLJ Publications	SPURR
	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
Braun Blaising McLaughlin, P.C.	Green Power Institute	Santa Fe Jets
Brookfield Renewable Power	Hanna & Morton	Seattle City Light
CA Bldg Industry Association	Hitachi	Sempra Utilities
CLECA Law Office	In House Energy	Sierra Pacific Power Company
CSC Energy Services	International Power Technology	Silicon Valley Power
California Cotton Ginners & Growers Assn	Intestate Gas Services, Inc.	Silo Energy LLC
California Energy Commission	Lawrence Berkeley National Lab	Southern California Edison Company
California League of Food Processors	Los Angeles Dept of Water & Power	Spark Energy, L.P.
California Public Utilities Commission	Luce, Forward, Hamilton & Scripps LLP	Sun Light & Power
Calpine	MAC Lighting Consulting	Sunshine Design
Casner, Steve	MBMC, Inc.	Sutherland, Asbill & Brennan
Chris, King	MRW & Associates	Tabors Caramanis & Associates
City of Palo Alto	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto Utilities	McKenzie & Associates	Tiger Natural Gas, Inc.
Clean Energy Fuels	Merced Irrigation District	TransCanada
Coast Economic Consulting	Modesto Irrigation District	Turlock Irrigation District
Commercial Energy	Morgan Stanley	United Cogen
Consumer Federation of California	Morrison & Foerster	Utility Cost Management
Crossborder Energy	NLine Energy, Inc.	Utility Specialists
Davis Wright Tremaine LLP	NRG West	Verizon
Day Carter Murphy	Navigant Consulting	Wellhead Electric Company
Defense Energy Support Center	Norris & Wong Associates	Western Manufactured Housing Communities Association (WMA)
		eMeter Corporation
Department of Water Resources	North America Power Partners	
Dept of General Services	North Coast SolarResources	