

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Pacific Gas & Electric Company**  
**GAS (Corp ID 39)**  
**Status of Advice Letter 4714G**  
**As of March 23, 2023**

Subject: Revision to Gas Rule 21 -Transportation of Natural Gas to update In-Kind Shrinkage Allowance Adjustments for Storage In-kind Shrinkage Allowance

Division Assigned: Energy

Date Filed: 02-15-2023

Date to Calendar: 02-24-2023

Authorizing Documents: D0312061

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>03-21-2023</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Stuart Rubio  
(951)965-8905  
[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**



**Sidney Bob Dietz II**  
Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B13U  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-3582

February 15, 2023

**Advice 4714-G**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Revision to Gas Rule 21 -Transportation of Natural Gas to update In-Kind Shrinkage Allowance Adjustments for Storage In-kind Shrinkage Allowance**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits for filing a proposed adjustment to the natural gas in-kind shrinkage allowance for scheduled storage injection volumes shown in PG&E's Gas Rule 21 Part B.1.c— In-Kind Shrinkage Allowance - Storage Shrinkage. In this filing, PG&E proposes to update the storage in-kind shrinkage allowance from the current 0.9 percent to 0.7 percent. The affected tariff sheet is listed on Attachment A.

PG&E requests approval by March 17, 2023, with the tariff effective on April 1, 2023 (the first day of the storage injection season).

**Background**

In-kind shrinkage quantities represent the lost and unaccounted-for (LUAF) gas and utility fuel use (Gas Department Usage or GDU) attributable to the volume of natural gas received by PG&E. There are separate in-kind shrinkage allowances, for backbone transmission, distribution, and storage service. Decision (D.) 03-12-061 authorizes PG&E to adjust the in-kind shrinkage allowances through an advice letter compliance filing.

PG&E has reviewed the associated in-kind shrinkage utilized for the new restructured Natural Gas Storage Strategy (NGSS) storage services<sup>1</sup>. PG&E hereby provides notice that PG&E proposes an adjustment to the current natural gas in-kind shrinkage storage allowance from 0.9 percent to 0.7 percent.

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<sup>1</sup> NGSS' Modified Storage Services: Core Firm Storage (5 Bcf Inventory, 24 MMcf/d Injection Capacity, 307MMcf/d withdrawal capacity); Inventory Management/Balancing (5 Bcf Inventory, 200 MMcf/d injection capacity, 300 MMcf/d withdrawal capacity), and Reserve Capacity (1 Bcf Inventory, 25 MMcf/d injection capacity, 250 MMcf/d withdrawal capacity)

As shown in Attachment II, PG&E's total average annual forecasted storage GDU and LUAF forecast is 239,551 Dth based on the data for the period January 2021 through December 2022. PG&E determines the in-kind shrinkage storage allowance by dividing this total forecasted storage related GDU and LUAF by the historical total scheduled injection volumes in this same period. This calculation yields the storage in-kind allowance percentage of PG&E's storage inventory injection volumes. Thus, in this filing, PG&E proposes to adjust the storage in-kind shrinkage allowance to 0.7 percent.

PG&E will continue to monitor shrinkage and, if necessary, will update the storage in-kind shrinkage allowances through a future advice letter.

### **Tariff Revisions**

This update will affect gas Rule 21, B.1.c - Storage Shrinkage.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than March 7, 2023 which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

### **Effective Date**

In order to provide sufficient notice to customers of the shrinkage change, PG&E requests that this Tier 2 advice submittal be approved by March 17, 2023, which is 30 calendar days after the date of submittal, with the tariffs effective on April 1, 2023. PG&E will inform

gas storage customers of the new shrinkage allowances on its Pipe Ranger Web site: <http://www.pge.com/pipeline/> once this submittal is approved.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for A.13-12-012 and A. 17-11-019. Address changes to the General Order 96-B service list should be directed to PG&E at email address [PGETariffs@pge.com](mailto: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](mailto:Process_Office@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

\_\_\_\_\_  
/S/

Sidney Bob Dietz II  
Director, Regulatory Relations

**Attachments:**

Attachment A – Affected Tariffs  
Attachment 1 – Redline Tariff Revisions  
Attachment 2 – Workpaper for Annual Storage Shrinkage

cc: Service List A.13-12-012 and A.17-11-019



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 G)

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: (951)965-8905

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: stuart.rubio@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4714-G

Tier Designation: 2

Subject of AL: Revision to Gas Rule 21 -Transportation of Natural Gas to update In-Kind Shrinkage Allowance Adjustments for Storage In-kind Shrinkage Allowance

Keywords (choose from CPUC listing): Compliance, Tariffs, Rule 21

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.03-12-061

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 3/17/23

No. of tariff sheets: 3

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: See attachment A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
38398-G	GAS RULE NO. 21 TRANSPORTATION OF GAS Sheet 4	36479-G
38399-G	GAS TABLE OF CONTENTS Sheet 1	38396-G
38400-G	GAS TABLE OF CONTENTS Sheet 7	38356-G





**GAS RULE NO. 21**  
**TRANSPORTATION OF GAS**

Sheet 4

B. QUANTITIES OF GAS (Cont'd.)

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

c. Storage Shrinkage

An In-Kind Shrinkage Allowance is applicable to all injection storage quantities under rate Schedules G-CFS, G-SFS, G-NFS, and G-NAS, in addition to any applicable transmission and distribution shrinkage. Customers shall deliver to PG&E's storage system an additional in-kind quantity of gas equal to the Shrinkage Allowance percentage of the total volume of their storage injection volume. The quantity injected into PG&E's storage will equal the quantity nominated for storage injection multiplied by (1-z), where z is the decimal equivalent of the Storage In-Kind Shrinkage Allowance percentage, as follows.

$$\text{Storage Injection} = \text{Nominated Injection Quantity} * (1 - z)$$

Where: z = decimal equivalent of the Storage In-Kind Shrinkage Allowance

Storage In-Kind Shrinkage Allowance: 0.7 Percent (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 the injection into PG&E's storage system.

(Continued)



**GAS TABLE OF CONTENTS**

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page .....	<b>38399</b> -G	(T)
Rate Schedules .....	38397,38389-G	
Preliminary Statements .....	38390,37687-G	
Preliminary Statements, Rules .....	38343-G	
Rules, Maps, Contracts and Deviations.....	<b>38400</b> -G	(T)
Sample Forms .....	37455,37445,36188,36189,37392-G	

(Continued)

*Advice* 4714-G  
*Decision* D. 03-12-061

*Issued by*  
**Meredith Allen**  
*Vice President, Regulatory Affairs*

*Submitted* February 15, 2023  
*Effective* April 1, 2023  
*Resolution*



**GAS TABLE OF CONTENTS**

Sheet 7

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
<b>Rules</b>			
Rule 16	Gas Service Extensions .....	21546,18816,34880,17161,18817,18818,18819,18820,18821, 18822,29273,18824,18825,17737,18826,18827-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 .....	22936,28657,29274-G	
Rule 17.2	Adjustment of Bills for Unauthorized Use .....	22937,14460,14461-G	
Rule 19	Medical Baseline Quantities.....	37143,37144,37145-G	
Rule 19.1	California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers.....	34521,37888,30445,28210-G	
Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities .....	32051,37889,17035,31217,34522-G	
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities .....	32053,37890,31219,34523-G	
Rule 19.4	California Alternate Rates for Energy for Qualified Food Bank Facilities .....	35059-G	
Rule 19.5	Percentage of Income Payment Plan (PIPP) Pilot Program Eligibility and Certification Rules for Individually Metered Gas Customers.....	38351,38352,38353-G	
Rule 21	Transportation of Gas .....	27591,38117,38118, <b>38398</b> ,32557,32558,32559,32560, 32561,32562,32563,32564,32565,31955,29231,33640, 31957,35069,35070,35071,35072, 35073,35074,35075, 35076, 35077,35078,35079,35080,35081,35082,35083,35084-G	(T)
Rule 23	Gas Aggregation Service for Core Transport Customers .....	34093,34094,34095,34096, 34097,37864,34099,34100,34101,34102,34103,34104,34105,34106,34107, 34655,37865,34110,34111,34657,34658,34659,34660,34661,34662,37328, 34664,34665,34666,34667,34123-G	
Rule 25	Gas Services-Customer Creditworthiness and Payment Terms .....	28816,28817,28818, 28819,28820,28821,28822,28823,28824,28825,28826,28827,28828-G	
Rule 26	Standards of Conduct and Procedures Related to Transactions with Intracompany Departments, Reports of Negotiated Transactions, and Complaint Procedures.	29688,29689,29690,31933-G	
Rule 27	Privacy and Security Protection for Energy Usage.....	30095,30096,30097,30098,30099 30100,30101,30102,30103,30104,30105,30106,30107,30108,30109,30110,30111-G	
Rule 27.1	Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data ....	31387,31388,31389,31390,31391-G	
Rule 28	Mobilehome Park Utility Upgrade Program .....	36153,36261,36155,36156, 36157, 37278,36159,36160-G	

**Maps, Contracts and Deviations**

SERVICE AREA MAPS:

Gas Service Area Map ..... 31641-G

LIST OF CONTRACTS AND DEVIATIONS:

..... 20211,13247,13248,28466,17112,22437,29938,31542,13254,14426,13808,35193,  
..... 20390,16287,29333,29053,29334,14428,13263,14365,32879,35654,16264,13267-G

(Continued)

Advice	4714-G	Issued by	Submitted	February 15, 2023
Decision	D. 03-12-061	<b>Meredith Allen</b>	Effective	April 1, 2023
		Vice President, Regulatory Affairs	Resolution	

# **Attachment 1**

Redline Tariff Revisions



**GAS RULE NO. 21**  
**TRANSPORTATION OF GAS**

Sheet 4

B. QUANTITIES OF GAS (Cont'd.)

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

c. Storage Shrinkage

An In-Kind Shrinkage Allowance is applicable to all injection storage quantities under rate Schedules G-CFS, G-SFS, G-NFS, and G-NAS, in addition to any applicable transmission and distribution shrinkage. Customers shall deliver to PG&E's storage system an additional in-kind quantity of gas equal to the Shrinkage Allowance percentage of the total volume of their storage injection volume. The quantity injected into PG&E's storage will equal the quantity nominated for storage injection multiplied by (1-z), where z is the decimal equivalent of the Storage In-Kind Shrinkage Allowance percentage, as follows.

$$\text{Storage Injection} = \text{Nominated Injection Quantity} * (1 - z)$$

Where: z = decimal equivalent of the Storage In-Kind Shrinkage Allowance

Storage In-Kind Shrinkage Allowance: ~~0.70-9~~ Percent (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 the injection into PG&E's storage system.

(Continued)

## **Attachment 2**

Workpaper for Annual Storage Shrinkage

Attachment II  
Workpaper for Annual Storage Shrinkage Update Filing  
Advice 4714-G

<b>Calculation of Storage Shrinkage for April 1, 2023 Update</b>	
(a) Total Storage GDU - 2021	216,926
(b) Total Storage GDU - 2022	224,527
(c) Two Year Total Storage GDU (a+b)	441,454
(d) Average Storage GDU (c/2)	220,727
(e) Storage LUF (2021 - 2022 Fugitive Emissions report plus other LUF) (Dth)	18,824
(f) Total Storage Shrinkage Forecast (GDU & LUF) (d+e)	239,551
(g) Total Scheduled Injections	32,811,413
<b>(h) Storage Shrinkage (% of scheduled injection volume) (f / g)</b>	<b>0.7%</b>
(i) Portion of Storage Shrinkage allocated to balancing (allocated to transmission shrinkage)	220,277

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

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
Braun Blaising Smith Wynne, P.C.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell  
Downey Brand LLP  
Dish Wireless L.L.C.

East Bay Community Energy Ellison  
Schneider & Harris LLP  
Engineers and Scientists of California

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Stoel Rives LLP

Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy