

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



**Pacific Gas & Electric Company**  
**GAS (Corp ID 39)**  
**Status of Advice Letter 4971G**  
**As of October 18, 2024**

Subject: Revision to Gas Rule 21 (Transportation of Natural Gas) to update In-Kind Shrinkage Allowances for Backbone Transmission and Distribution Service

Division Assigned: Energy

Date Filed: 09-13-2024

Date to Calendar: 09-20-2024

Authorizing Documents: D0312061

|                        |                   |
|------------------------|-------------------|
| <b>Disposition:</b>    | <b>Accepted</b>   |
| <b>Effective Date:</b> | <b>11-01-2024</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:

Michael Finnerty

(279) 789-6216

[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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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)**



September 13, 2024

**Advice 4971-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 Allowances for Backbone Transmission and Distribution Service**

Pacific Gas and Electric Company (PG&E) hereby submits revisions to PG&E's Gas Rule 21 — *Transportation of Natural Gas* to update the natural gas in-kind shrinkage allowances for backbone transmission and distribution service pursuant to Decision (D.) 03-12-061. The affected tariff sheets are listed on Attachment 1.

**Purpose**

In-kind shrinkage allowances collect the lost and 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 D.03-12-061, the California Public Utilities Commission (Commission or CPUC) authorized PG&E to update the in-kind shrinkage allowances annually or as necessary at other times of the year to match the actual shrinkage experienced on PG&E's system. This is reflected in Gas Preliminary Statement Part C — Gas Accounting Terms and Definitions, Part C.12.c., and Gas Rule 21, which state that PG&E may adjust distribution, transmission and storage shrinkage allowances annually or as necessary at other times of the year through advice letter submittals.

PG&E proposes revisions to its existing backbone transmission and distribution in-kind shrinkage allowances to be effective November 1, 2024.

**Background**

In Advice 4799-G, the Commission adopted PG&E's current transmission and distribution shrinkage base allowances effective November 1, 2023. Based on the latest cumulative shrinkage data and to better match the shrinkage expected on PG&E's system for the next 12 months, PG&E proposes revisions to the transmission and core seasonal distribution shrinkage allowances, effective November 1, 2024. The proposed shrinkage allowances are designed to recover PG&E's shrinkage forecast and to return an over-collected cumulative shrinkage imbalance forecasted. PG&E proposes to amortize the

over-collected cumulative imbalance forecasted volumes over 24-month period. PG&E will monitor actual shrinkage collected to determine if further adjustments are warranted.

### **Annual Shrinkage 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 2024-2025 customer demand forecast from the 2024 California Gas Report. In addition, the core distribution in-kind shrinkage allowance, with separate seasonal allowances for winter season (November-March) and summer season (April-October), as adopted in D.11-04-031, are adjusted. The proposed total in-kind shrinkage allowances, and the Base and Adjustment components of each allowance, are shown in the following table:

**Proposed Total In-kind Shrinkage Allowance**

|  | <b>Current Effective In-Kind Shrinkage Allowance</b> | <b>Proposed In-Kind Shrinkage Base<sup>1</sup> Allowance</b> | <b>Proposed In-Kind Shrinkage Adjustment<sup>2</sup> Allowance (Credit)</b> | <b>Proposed Total In-Kind Shrinkage Allowance (Base + Adjustment)</b> | <b>Proposed Total Change</b> |
|--|--|--|---|---|------------------------------|
| Transmission – Redwood to Off-System         | 0.9%   | 0.9%   | 0.00%   | 0.9%  | 0.0%                         |
| Transmission – Mission to On/Off-System      | 0.0%   | 0.00%  | 0.00%   | 0.00%   | 0.0%                         |
| Transmission – All other backbone paths      | 1.3%   | 1.1%   | -0.1%   | 1.0%  | -0.3%                        |
| Distribution – Noncore                       | 0.2%   | 0.2%   | 0.00%   | 0.2%  | 0.0%                         |
| Distribution -Core Summer Season (Apr - Oct) | 0.8%   | 0.6%   | -0.1%   | 0.5%  | -0.3%                        |
| Distribution – Core Winter Season (Nov- Mar) | 3.9%   | 4.0%   | -0.7%   | 3.3%  | -0.6%                        |

<sup>1</sup> The Base Allowance is designed to recover shrinkage forecasted to occur during the effective period of the shrinkage allowances (November 2024 through October 2025).

<sup>2</sup> The Adjustment Allowance is designed to recover (or return) any cumulative shrinkage imbalance forecasted to exist at the start of the effective period of the shrinkage allowances (November 1, 2024).

Based on the 2024-2025 shrinkage forecast, PG&E estimates that the proposed in-kind shrinkage base allowances, expects to recover the forecasted shrinkage on PG&E's system. PG&E will continue to monitor any cumulative shrinkage imbalance and will adjust the shrinkage allowances through advice letter submittals in the future, as necessary.

This submittal 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 3 to this submittal.

### **Tariff Revisions**

The revised in-kind shrinkage allowances will be revised in Gas Rule 21, Section B. (Quantities).

- The above revised backbone transmission shrinkage allowance percentages will be reflected in Gas Rule 21, Section B.1.a.
- The above revised distribution shrinkage allowance percentages will be reflected in Gas Rule 21, Section B.1.b.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **October 3, 2024**, 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 of the shrinkage change to gas transportation customers, PG&E requests that this Tier 2 advice submittal be approved by **October 13, 2024**, which is 30 calendar days after the date of submittal, with the tariffs effective on **November 1, 2024**. 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 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.21-06-021. 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  
CPUC Communications

**Attachments:**

Attachment 1 – Clean Tariffs  
Attachment 2 – Redline Tariff Revisions  
Attachment 3 – Workpapers

cc: Service List A.21-06-021



# 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: Michael Finnerty

Phone #: (279) 789-6216

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: michael.finnerty@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) #: 4971-G

Tier Designation: 2

Subject of AL: Revision to Gas Rule 21 (Transportation of Natural Gas) to update In-Kind Shrinkage Allowances for Backbone Transmission and Distribution Service

Keywords (choose from CPUC listing): Compliance, 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: 10/13/24

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: See Attachment 1

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:  
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.<br/>Sheet No.</b> | <b>Title of Sheet</b>                               | <b>Cancelling<br/>Cal P.U.C.<br/>Sheet No.</b> |
|---------------------------------|---|--|
| 39658-G                         | GAS RULE NO. 21<br>TRANSPORTATION OF GAS<br>Sheet 2 | 38117-G  |
| 39659-G                         | GAS RULE NO. 21<br>TRANSPORTATION OF GAS<br>Sheet 3 | 38834-G  |
| 39660-G                         | GAS TABLE OF CONTENTS<br>Sheet 1                    | 39656-G  |
| 39661-G                         | GAS TABLE OF CONTENTS<br>Sheet 7                    | 39657-G  |



**GAS RULE NO. 21**  
**TRANSPORTATION OF 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 gas supply equal to a percent of total volume of 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<br>In-Kind<br>Shrinkage<br>Base Allowance | Percentage of<br>In-Kind<br>Shrinkage<br>Adjustment | Percentage of<br>Effective In-Kind<br>Shrinkage<br>Allowance |     |
|------------------------|---|---|--|-----|
| Redwood to Off-System  | 0.9   | —   | 0.9  |     |
| Mission to On-System   | 0   | —   | 0  |     |
| Mission to Off-System  | 0   | —   | 0  |     |
| All other transmission | 1.1 (R)   | -0.1 (R)  | 1.0 (R)  | (T) |

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)

Advice 4971-G  
Decision D.03-12-061

Issued by  
**Shilpa Ramaiya**  
Vice President  
Regulatory Proceedings and Rates

Submitted September 13, 2024  
Effective November 1, 2024  
Resolution



**GAS RULE NO. 21**  
**TRANSPORTATION OF 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 gas supply equal to a percent of the total volume of 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 – Summer Season (April - October)  | 0.6 (R)  | -0.1 (R)                                   | 0.5 (R)   | (T) |
| Core – Winter Season (November – March) | 4.0 (I)  | -0.7 (R)                                   | 3.3 (R)   | (T) |
| Noncore Distribution                    | 0.2  | –  | 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:

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

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.<br>SHEET NO.                    |     |
|---|--|-----|
| Title Page .....                            | <b>39660</b> -G                            | (T) |
| Rate Schedules .....                        | 39648, 39637-G                             |     |
| Preliminary Statements .....                | 39638, 37687-G                             |     |
| Preliminary Statements, Rules .....         | 39566-G                                    |     |
| Rules, Maps, Contracts and Deviations ..... | <b>39661</b> -G                            | (T) |
| Sample Forms, Rules .....                   | 38409, 39226, 36188, 36189, 37392, 38639-G |     |

(Continued)



**GAS TABLE OF CONTENTS**

Sheet 7

| RULE      | TITLE OF SHEET   | CAL P.U.C.<br>SHEET NO.  |     |
|-----------|--|--|-----|
| Rules     |  |  |     |
| Rule 16   | Gas Service Extensions .....   | 21546,39151,39152,39153,39154,39155,39156,39157,59158,<br>39159,39160,39161,39162,39163,39164,39165,39166,39167-G  |     |
| Rule 17   | Meter Tests and Adjustment of Bills for Meter Error.....   | 14450,28656,28764,28770,28771,<br>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<br>Master-Metered Customers.....  | 38578,39390,38580,38581-G  |     |
| Rule 19.2 | California Alternate Rates for Energy for Nonprofit Group-Living Facilities .....  | 38582,39391,38584,38585,38586-G  |     |
| Rule 19.3 | California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities .....   | 38587,39392,31219,34523-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<br>Individually Metered Gas Customers.....                        | 38351,39393,38353-G  |     |
| Rule 21   | Transportation of Gas .....  | 27591, <b>39658,39659</b> ,38398,32557,32558,32559,32560,<br>32561,32562,32563,32564,32565,31955,29231,33640,<br>31957,35069,35070,35071,35072, 35073,35074,35075,<br>35076, 35077,35078,35079,35080,35081,35082,35083,35084-G | (T) |
| Rule 23   | Gas Aggregation Service for Core Transport Customers .....   | 34093,34094,34095,34096,<br>34097,37864,34099,34100,34101,34102,34103,34104,34105,34106,34107,<br>34655,37865,34110,34111,34657,34658,34659,34660,34661,34662,37328,<br>34664,34665,34666,34667,34123-G                        |     |
| Rule 25   | Gas Services-Customer Creditworthiness and Payment Terms .....   | 28816,28817,28818,<br>28819,28820,28821,28822,28823,28824,28825,28826,28827,28828-G  |     |
| Rule 26   | Standards of Conduct and Procedures Related to Transactions with Intracompany Departments,<br>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<br>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,<br>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,<br>20390,16287,29333,29053,29334,14428,13263,14365,32879, 39655,16264,13267-G |
|-------|--|

(Continued)

|                 |             |   |                   |                           |
|-----------------|-------------|---|-------------------|---------------------------|
| <b>Advice</b>   | 4971-G      | <b>Issued by</b>                        | <b>Submitted</b>  | <b>September 13, 2024</b> |
| <b>Decision</b> | D.03-12-061 | <b>Shilpa Ramaiya</b>                   | <b>Effective</b>  | <b>November 1, 2024</b>   |
|                 |             | <b>Vice President</b>                   | <b>Resolution</b> |                           |
|                 |             | <b>Regulatory Proceedings and Rates</b> |                   |                           |

## **Attachment 2**

Redline Tariff Revisions



**GAS RULE NO. 21**  
**TRANSPORTATION OF 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 gas supply equal to a percent of total volume of 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<br>In-Kind<br>Shrinkage<br>Base Allowance | Percentage of<br>In-Kind<br>Shrinkage<br>Adjustment | Percentage of<br>Effective In-Kind<br>Shrinkage<br>Allowance |     |
|------------------------|---|---|--|-----|
| Redwood to Off-System  | 0.9   | —   | 0.9  |     |
| Mission to On-System   | 0   | —   | 0  |     |
| Mission to Off-System  | 0   | —   | 0  |     |
| All other transmission | <u>1.13(R)</u>  | <u>-0.1-(R)</u>                                     | <u>1.03 (R+)</u>   | (T) |

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 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 gas supply equal to a percent of the total volume of 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 – Summer Season<br>(April - October)  | 0. <del>68</del> (R)                           | <del>-0.1</del> -(R)                       | 0. <del>58</del> (R)                                | (T) |
| Core – Winter Season<br>(November – March) | <del>4.03</del> -9 (I)                         | <del>-0.7</del> -(R)                       | 3. <del>39</del> (R)                                | (T) |
| Noncore Distribution                       | 0.2  | –  | 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:

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

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)



# **Attachment 3**

Workpapers

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Workpaper for In-Kind Shrinkage Allowance Update**  
**Advice 4971-G (effective November 1, 2024)**  
**Shrinkage Base Allowance**

|          | (A)   | (B)                                | (C)                     | (D)                     | (E)                                 | (F)                                 |          |
|----------|---|------------------------------------|-------------------------|-------------------------|-------------------------------------|-------------------------------------|----------|
|          | <u>Forecast Customer Demand is based on data in the 2024 California Gas Report filed August 1, 2024. Forecast Off-system Demand is based on the three-year actual off-system deliveries through July 2024. LUAF and GDU forecasts are based on the five-year average monthly percentage profile of actual LUAF and GDU (through May 2024 -- latest data available as of August 16, 2024.)</u> |                                    |                         |                         |                                     |                                     |          |
| Line No. |   | 12 Month<br>Forecast<br>Throughput | % Served<br>from Distr. | % Served<br>from Trans. | Throughput<br>Served from<br>Trans. | Throughput<br>Served from<br>Distr. | Line No. |
| 1        | <b>Noncore Transmission/Distribution Split</b>  | <b>Mdth</b>                        | <b>Survey Results</b>   |                         | <b>Mdth</b>                         | <b>Mdth</b>                         | 1        |
| 2        | Industrial  | 178,432                            | 14.6701%                | 85.3299%                | 152,256                             | 26,176                              | 2        |
| 3        | EG  | 209,779                            | 0.0000%                 | 100.0000%               | 209,779                             | 0                                   | 3        |
| 4        | Cogeneration  | 55,913                             | 17.4400%                | 82.5600%                | 46,162                              | 9,751                               | 4        |
| 5        | Wholesale   | 3,420                              | 0.0000%                 | 100.0000%               | 3,420                               | 0                                   | 5        |
| 6        | NGV4  | 1,456                              | 0.0000%                 | 100.0000%               | 1,456                               | 0                                   | 6        |
| 7        | Total Noncore (excludes EOR and SEGDA)  | 449,000                            |                         |                         | 413,072                             | 35,927                              | 7        |
| 8        | % of Noncore served from Trans. and Distr.  |                                    |                         |                         | 92.00%                              | 8.00%                               | 8        |
|          |   |                                    |                         |                         |                                     |                                     |          |
|          | <b>LUAF per Study (from the Gas Accord I Workpapers, 17-2 &amp; 17-3)</b>   |                                    |                         |                         |                                     |                                     |          |
|          | Splits LUAF noncore volumes between distribution and transmission based on LUAF Study   |                                    |                         |                         |                                     |                                     |          |
| 9        |   | <b>NC Total</b>                    |                         |                         | <b>NC Trans.</b>                    | <b>NC Distr.</b>                    | 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       |
|          |   |                                    |                         |                         |                                     |                                     |          |
|          | <b>LUAF &amp; GDU Allocations to Transmission and Distribution</b>  |                                    |                         |                         |                                     |                                     |          |
|          |   | <b>System<br/>Forecast</b>         | <b>Core</b>             | <b>Noncore</b>          | <b>Off-system</b>                   | <b>NC Trans. NC Distr.</b>          |          |
| 17       | <b>LUAF Calculations:</b><br>LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)   | 11,161                             | 8,485                   | 2,393                   | 283                                 | 2,070 235                           | 17       |
| 18       | Throughput per forecast (Mdth)  | 818,040                            | 257,004                 | 475,176                 | 85,860                              |                                     | 18       |
| 19       | Less: SEGDA   | 0                                  |                         | 0                       |                                     |                                     | 19       |
| 20       | Totals for Calculation of allocation  | 818,040                            | 257,004                 | 475,176                 | 85,860                              |                                     | 20       |
| 21       | LUAF as % of throughput (Lines 17/20)   | 1.364%                             | 3.301%                  | 0.504%                  | 0.330%                              |                                     | 21       |
| 22       | Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)   |                                    |                         |                         |                                     | 0.501%                              | 22       |
| 23       | Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)  |                                    |                         |                         |                                     | 0.492% 0.653%                       | 23       |
| 24       | Off-System LUAF (per D.94-02-042)   | 0.33%                              |                         |                         |                                     | 0.653%                              | 24       |
|          | <b>GDU Calculations:</b>  |                                    |                         |                         |                                     |                                     |          |
| 25       | GDU per forecast(Mdth) - Pipeline (Total Plus balancing service storage GDU)  | 4,748                              |                         |                         |                                     |                                     | 25       |
| 26       | GDU % = (B) line 24/(B) line 20   | 0.580%                             |                         |                         |                                     |                                     | 26       |
|          | <b>Shrinkage (LUAF+GDU)</b>   |                                    |                         |                         |                                     |                                     |          |
| 27       | Noncore Transmission = (B) line 26 + (E) line 22  | 1.081%                             |                         |                         |                                     |                                     | 27       |
| 28       | Noncore Distribution = (B) line 26 + (F) line 23  | 1.234%                             |                         |                         |                                     |                                     | 28       |
| 29       | Core Total = (B) line 26 + (C) line 21  | 3.882%                             |                         |                         |                                     |                                     | 29       |
| 30       | Core Distribution = (B) line 29 - (B) line 27   | 2.800%                             |                         |                         |                                     |                                     | 30       |
| 31       | Off-System Transmission = (B) line 26 + (B) line 24   | 0.910%                             |                         |                         |                                     |                                     | 31       |
|          |   |                                    |                         |                         |                                     |                                     |          |
| 32       | <b>Proposed Pipeline Shrinkage Allowances - Base Allowance Update</b>   |                                    | <b>Core</b>             | <b>NC Trans.</b>        | <b>NC Dist.</b>                     | <b>Off-Sys.</b>                     | 32       |
| 33       | Transmission (assumes same % for core and noncore)  |                                    | 1.1%                    | 1.1%                    | 1.1%                                | 0.9%                                | 33       |
| 34       | Distribution  |                                    | 2.8%                    | N/A                     | 0.2%                                | N/A                                 | 34       |
| 35       | Total   |                                    | 3.9%                    | 1.1%                    | 1.2%                                | 0.9%                                | 35       |

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Workpaper for In-Kind Shrinkage Allowance Update**  
**Advice 4971-G (effective November 1, 2024)**  
**Shrinkage Adjustment Allowance**

|   | (A)  | (B)                      | (C)                         | (D)                         | (E)                                  | (F)                                  |          |
|---|--|--------------------------|-----------------------------|-----------------------------|--------------------------------------|--------------------------------------|----------|
|   | <i>Forecast Customer Demand is based on data in the 2024 California Gas Report filed August 1, 2024. Current over-collection of -3891.32 MDth is amortized over 24 months; resulting in forecast annual credit quantity of approximately -2017.2 MDth. The over collection is allocated in the same methodology as LUAF.</i> |                          |                             |                             |                                      |                                      |          |
| Line No.  |  | <b>12 Month Forecast</b> | <b>% Served from Distr.</b> | <b>% Served from Trans.</b> | <b>Throughput Served from Trans.</b> | <b>Throughput Served from Distr.</b> | Line No. |
| 1   | <b><u>Noncore Transmission/Distribution Split</u></b>  | <b>Mdth</b>              | <b>Survey Results</b>       |                             | <b>Mdth</b>                          | <b>Mdth</b>                          | 1        |
| 2   | Industrial   | 178,432                  | 14.6701%                    | 85.3299%                    | 152,256                              | 26,176                               | 2        |
| 3   | EG   | 209,779                  | 0.0000%                     | 100.0000%                   | 209,779                              | 0                                    | 3        |
| 4   | Cogeneration   | 55,913                   | 17.4400%                    | 82.5600%                    | 46,162                               | 9,751                                | 4        |
| 5   | Wholesale  | 3,420                    | 0.0000%                     | 100.0000%                   | 3,420                                | 0                                    | 5        |
| 6   | NGV4   | 1,456                    | 0.0000%                     | 100.0000%                   | 1,456                                | 0                                    | 6        |
| 7   | Total Noncore (excludes EOR and SEGDA)   | 449,000                  |                             |                             | 413,072                              | 35,927                               | 7        |
| 8   | % of Noncore served from Trans. and Distr.   |                          |                             |                             | 92.00%                               | 8.00%                                | 8        |
| <b><u>LUAF per Study</u></b> (from the Gas Accord I Workpapers, 17-2 & 17-3)          |  |                          |                             |                             |                                      |                                      |          |
| Splits LUAF noncore volumes between distribution and transmission based on LUAF Study |  |                          |                             |                             |                                      |                                      |          |
| 9   |  | <b>NCTotal</b>           |                             |                             | <b>NC Trans.</b>                     | <b>NC Distr.</b>                     | 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       |
| <b><u>LUAF &amp; GDU Allocations to Transmission and Distribution</u></b>             |  |                          |                             |                             |                                      |                                      |          |
|   | <b>LUAF Calculations:</b>  | <b>System Forecast</b>   | <b>Core</b>                 | <b>Noncore</b>              | <b>Off-system</b>                    | <b>NC Trans. NC Distr.</b>           |          |
| 17  | LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)   | (1,945.66)               | 1,518                       | 428                         | -                                    | 370 - 42                             | 17       |
| 18  | Throughput per forecast (Mdth)   | 818,040                  | 257,004                     | 475,176                     | 85,860                               |                                      | 18       |
| 19  | Less: SEGDA  | 0                        |                             | 0                           |                                      |                                      | 19       |
| 20  | Totals for Calculation of allocation   | 818,040                  | 257,004                     | 475,176                     | 85,860                               |                                      | 20       |
| 21  | LUAF as % of throughput (Lines 17/20)  | -0.238%                  | -0.591%                     | -0.090%                     | 0.000%                               |                                      | 21       |
| 22  | Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)  |                          |                             |                             |                                      | -0.088%                              | 22       |
| 23  | Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)   |                          |                             |                             |                                      | -0.090% -0.115%                      | 23       |
| 24  | Off-System LUAF (per D.94-02-042)  | 0.00%                    |                             |                             |                                      | -0.117%                              | 24       |
| <b>GDU Calculations:</b>  |  |                          |                             |                             |                                      |                                      |          |
| GDU per forecast(Mdth) - Pipeline (Total Plus balancing service storage               |  |                          |                             |                             |                                      |                                      |          |
| 25  | GDU)   | -                        |                             |                             |                                      |                                      | 25       |
| 26  | GDU % = (B) line 24/(B) line 20  | 0.000%                   |                             |                             |                                      |                                      | 26       |
| Shrinkage (LUAF+GDU)  |  |                          |                             |                             |                                      |                                      |          |
| 27  | Noncore Transmission = (B) line 26 + (E) line 22   | -0.088%                  |                             |                             |                                      |                                      | 27       |
| 28  | Noncore Distribution = (B) line 26 + (F) line 23   | -0.115%                  |                             |                             |                                      |                                      | 28       |
| 29  | Core Total = (B) line 26 + (C) line 21   | -0.591%                  |                             |                             |                                      |                                      | 29       |
| 30  | Core Distribution = (B) line 29 - (B) line 27  | -0.503%                  |                             |                             |                                      |                                      | 30       |
| 31  | Off-System Transmission = (B) line 26 + (B) line 24  | 0.000%                   |                             |                             |                                      |                                      | 31       |
| 32  | <b>Proposed Pipeline Shrinkage Allowances - Shrinkage Adjustment (Adder)</b>   |                          | <b>Core</b>                 | <b>NC Trans.</b>            | <b>NC Dist.</b>                      | <b>Off-Sys.</b>                      | 32       |
| 33  | Transmission (assumes same % for core and noncore)   |                          | -0.1%                       | -0.1%                       | -0.1%                                | 0.0%                                 | 33       |
| 34  | Distribution   |                          | -0.5%                       | N/A                         | 0.0%                                 | N/A                                  | 34       |
| 35  | Total  |                          | -0.6%                       | -0.1%                       | -0.1%                                | 0.0%                                 | 35       |

PACIFIC GAS AND ELECTRIC COMPANY  
Workpaper for Seasonal Core Distribution Shrinkage Allowance  
Advice 4971-G (effective November 1, 2024)

| Seasonal Core Distribution Shrinkage Base Allowance   |   | (B)             | (C)        |
|---|---|-----------------|------------|
| <b>Seasonal Core Distribution Shrinkage Rate Derivation</b>   |   |                 |            |
| The Core distribution forecast is based on the customer demand forecast agreed-upon in the 2024 California Gas Report filed August 1, 2024. The Core Distribution Shrinkage Quantity is calculated by multiplying the Annual Core Distribution Demand Forecast by the Annual Core Distribution Shrinkage Percentage. The Core Distribution Shrinkage Quantity is allocated between the summer and winter seasons in the same percentage as the Total LUAF Forecast. |   |                 |            |
| Line No.  |   |                 | Line No.   |
| <b>Core Customer Demand Forecast</b>  |   |                 |            |
| 1   |   | Quantity (MDth) | Percentage |
| 2   | Annual core distribution demand   | 257,004         |            |
| 3   | Summer Season (April -- October) Core Distribution Demand   | 89,164          | 34.69%     |
| 4   | Winter season (November -- March) Core Distribution Demand  | 167,840         | 65.31%     |
| <b>Total LUAF Forecast</b>  |   |                 |            |
| 5   | Annual LUAF Forecast  | 11,161          |            |
| 6   | Summer Season (April -- October) LUAF Forecast  | 1,910           | 7.11%      |
| 7   | Winter Season (November -- March) LUAF Forecast   | 9,251           | 92.89%     |
| <b>Core Distribution Shrinkage Quantity</b>   |   |                 |            |
| 8   | Annual Core Distribution Demand (MDth)  | 257,004         |            |
| 9   | Annual Base Core Distribution Shrinkage Percentage  | 2.800%          |            |
| 10  | Calculated Base Core Distribution Shrinkage Quantity (MDth)   | 7,197           |            |
| 11  | Summer Season Core Distribution Shrinkage Quantity (MDth)   | 512             |            |
| 12  | Winter Season Core Distribution Shrinkage Quantity (MDth)   | 6,685           |            |
| <b>Seasonal Core Distribution Shrinkage Percentages</b>   |   |                 |            |
| 13  | Summer Season (April -- October)  | 0.574%          |            |
| 14  | Winter Season (November -- March)   | 3.983%          |            |
| <b>Seasonal Core Distribution Shrinkage -- Tariff Percentages</b>   |   |                 |            |
| 15  | Summer Season (April -- October)  | 0.6%            |            |
| 16  | Winter Season (November -- March)   | 4.0%            |            |
| 17  | Distribution Shrinkage Seasonal Adjustment (based on historical seasonal split between calculated core at CityGate & Burnertip demands) |                 | 10%        |

PACIFIC GAS AND ELECTRIC COMPANY  
Workpaper for Seasonal Core Distribution Shrinkage Allowance  
Advice 4971-G (effective November 1, 2024)

| Seasonal Core Distribution Shrinkage Base Allowance   |   | (B)             | (C)        |
|---|---|-----------------|------------|
| <b>Seasonal Core Distribution Shrinkage Rate Derivation</b>   |   |                 |            |
| The Core distribution forecast is based on the customer demand forecast agreed-upon in the 2024 California Gas Report filed August 1, 2024. The Core Distribution Shrinkage Quantity is calculated by multiplying the Annual Core Distribution Demand Forecast by the Annual Core Distribution Shrinkage Percentage. The Core Distribution Shrinkage Quantity is allocated between the summer and winter seasons in the same percentage as the Total LUAF Forecast. |   |                 |            |
| Line No.  |   |                 | Line No.   |
| <b>Core Customer Demand Forecast</b>  |   |                 |            |
| 1   |   | Quantity (MDth) | Percentage |
| 2   | Annual core distribution demand   | 257,004         |            |
| 3   | Summer Season (April -- October) Core Distribution Demand   | 89,164          | 34.69%     |
| 4   | Winter season (November -- March) Core Distribution Demand  | 167,840         | 65.31%     |
| <b>Total LUAF Forecast</b>  |   |                 |            |
| 5   | Annual LUAF Forecast  | -1,946          |            |
| 6   | Summer Season (April -- October) LUAF Forecast  | -138            | 7.11%      |
| 7   | Winter Season (November -- March) LUAF Forecast   | -1,807          | 92.89%     |
| <b>Core Distribution Shrinkage Quantity</b>   |   |                 |            |
| 8   | Annual Core Distribution Demand (MDth)  | 257,004         |            |
| 9   | Annual Base Core Distribution Shrinkage Percentage  | -0.503%         |            |
| 10  | Calculated Base Core Distribution Shrinkage Quantity (MDth)   | -1,292          |            |
| 11  | Summer Season Core Distribution Shrinkage Quantity (MDth)   | -92             |            |
| 12  | Winter Season Core Distribution Shrinkage Quantity (MDth)   | -1,200          |            |
| <b>Seasonal Core Distribution Shrinkage Percentages</b>   |   |                 |            |
| 13  | Summer Season (April -- October)  | -0.103%         |            |
| 14  | Winter Season (November -- March)   | -0.715%         |            |
| <b>Seasonal Core Distribution Shrinkage -- Tariff Percentages</b>   |   |                 |            |
| 15  | Summer Season (April -- October)  | -0.1%           |            |
| 16  | Winter Season (November -- March)   | -0.7%           |            |
| 17  | Distribution Shrinkage Seasonal Adjustment (based on historical seasonal split between calculated core at CityGate & Burnertip demands) |                 | 10%        |

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

|   |  |  |
|---|--|--|
| AT&T  | East Bay Community Energy              | Pacific Gas and Electric Company                           |
| Albion Power Company  | Ellison Schneider & Harris LLP         | Peninsula Clean Energy                                     |
| Alta Power Group, LLC   | Electrical Power Systems, Inc.         | Pioneer Community Energy                                   |
|   | Fresno                                 |  |
| Anderson & Poole  | Engineers and Scientists of California | Public Advocates Office                                    |
| Atlas ReFuel BART   |  | Redwood Coast Energy Authority                             |
|   | GenOn Energy, Inc.                     | Regulatory & Cogeneration Service, Inc.                    |
| BART  | Green Power Institute                  | Resource Innovations                                       |
| Buchalter   |  | Rockpoint Gas Storage                                      |
| Barkovich & Yap, Inc.   | Hanna & Morton LLP                     |  |
| Braun Blaising Smith Wynne, P.C.  |  | San Diego Gas & Electric Company                           |
|   | ICF consulting                         | SPURR  |
| California Community Choice Association                                       | iCommLaw                               | San Francisco Water Power and Sewer                        |
| California Cotton Ginners & Growers Association                               | International Power Technology         | Sempra Utilities   |
| California Energy Commission  |  |  |
| California Hub for Energy Efficiency  | Intertie                               | Sierra Telephone Company, Inc.                             |
| California Alternative Energy and Advanced Transportation Financing Authority | Intestate Gas Services, Inc.           | Southern California Edison Company                         |
| California Public Utilities Commission  |  | Southern California Gas Company                            |
| Calpine   | Kelly Group                            | Spark Energy   |
| Cameron-Daniel, P.C.  | Ken Bohn Consulting                    | Sun Light & Power  |
| Casner, Steve   | Keyes & Fox LLP                        | Sunshine Design  |
| Center for Biological Diversity   |  | Stoel Rives LLP  |
| Chevron Pipeline and Power  | Leviton Manufacturing Co., Inc.        |  |
| City of Palo Alto   | Los Angeles County Integrated          | Tecogen, Inc.  |
| City of San Jose  |  | TerraVerde Renewable Partners                              |
| Clean Power Research  | Waste Management Task Force            | Tiger Natural Gas, Inc.                                    |
| Coast Economic Consulting   |  | TransCanada  |
| Commercial Energy   | MRW & Associates                       |  |
| Crossborder Energy  | Manatt Phelps Phillips                 | Utility Cost Management                                    |
| Crown Road Energy, LLC  | Marin Energy Authority                 | Utility Power Solutions                                    |
| Communities Association (WMA)   | McClintock IP                          |  |
|   | McKenzie & Associates                  | Water and Energy Consulting                                |
|   | Modesto Irrigation District            | Wellhead Electric Company                                  |
| Davis Wright Tremaine LLP   |  | Western Manufactured Housing Communities Association (WMA) |
|   | NOSSAMAN LLP                           |  |
| Day Carter Murphy   | NRG Solar                              | Yep Energy   |
| Dept of General Services  |  |  |
| Douglass & Liddell  | OnGrid Solar                           |  |
| Downey Brand LLP  |  |  |
| Dish Wireless L.L.C.  |  |  |