Application of SOUTHERN CALIFORNIA GAS COMPANY for authority to update its gas revenue requirement and base rates effective January 1, 2019 (U 904-G)	))))

Application No. 17-10-008

Exhibit No.: (SCG-25-WP-R)

REVISED WORKPAPERS TO PREPARED DIRECT TESTIMONY OF DARRELL R. JOHNSON ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

DECEMBER 2017

SoCalGas

A Sempra Energy utility

2019 General Rate Case - REVISED

INDEX OF WORKPAPERS

Exhibit SCG-25-WP-R - ENVIRONMENTAL

Overall Summary For Exhibit No. SCG-25-WP-R

Area: **ENVIRONMENTAL**

Witness: **Darrell R. Johnson**

	In 2016 $ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
Description	**2016**	**2017**	**2018**	**2019**
Non-Shared Services	11,028	12,509	16,661	16,607
Shared Services	725	563	600	636
Total	**11,753**	**13,072**	**17,261**	**17,243**

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson

Summary of Non-Shared Services Workpapers:

	In 2016 $ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
Description	**2016**	**2017**	**2018**	**2019**
A. Environmental Programs	5,990	7,133	7,027	6,973
B. New Environmental Reg Balancing Acct (NERBA)	5,038	5,376	9,634	9,634
Total	**11,028**	**12,509**	**16,661**	**16,607**

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Workpaper: 2EV000.000

Summary for Category: A. Environmental Programs

	In 2016$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2016	2017	2018	2019
Labor	3,831	4,564	4,564	4,564
Non-Labor	2,159	2,645	2,550	2,498
NSE	0	-76	-87	-89
Total	**5,990**	**7,133**	**7,027**	**6,973**
FTE	40.9	43.7	43.7	43.7

Workpapers belonging to this Category:

2EV000.000 ENVIRONMENTAL

Labor	3,831	4,564	4,564	4,564
Non-Labor	2,159	2,645	2,550	2,498
NSE	0	-76	-87	-89
Total	**5,990**	**7,133**	**7,027**	**6,973**
FTE	40.9	43.7	43.7	43.7

Note: Totals may include rounding differences.

Beginning of Workpaper
2EV000.000 - ENVIRONMENTAL

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Activity Description:

Environmental Services responds dynamically to several changing factors in the SCG territory which cannot be expected to follow historical trending patterns. Regulatory instructions and requirements from government agencies expand the scope of Environmental attention annually. These Environmental Services cost centers includes subject matter experts in air and water quality, biological resources, cultural resources, land planning, and managing the internal environmental governance of the company. The group supports ongoing environmental compliance, including obtaining environmental permits and approvals, developing environmental plans and conducting specialized environmental training.

Forecast Explanations:

Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

Non-Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

NSE - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	2,216	3,439	2,745	2,973	3,831	4,564	4,564	4,564
Non-Labor	1,193	1,332	1,701	2,425	2,159	2,645	2,550	2,498
NSE	0	0	0	0	0	-76	-87	-89
Total	**3,409**	**4,771**	**4,447**	**5,398**	**5,990**	**7,133**	**7,027**	**6,973**
FTE	25.0	37.5	28.3	32.5	41.0	43.7	43.7	43.7

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2017	2018	2019	2017	2018	2019	2017	2018	2019
Labor	Zero-Based	0	0	0	4,564	4,564	4,564	4,564	4,564	4,564
Non-Labor	Zero-Based	0	0	0	2,645	2,550	2,498	2,645	2,550	2,498
NSE	Zero-Based	0	0	0	-76	-87	-89	-76	-87	-89
Total		**0**	**0**	**0**	**7,133**	**7,027**	**6,973**	**7,133**	**7,027**	**6,973**
FTE	Zero-Based	0.0	0.0	0.0	43.7	43.7	43.7	43.7	43.7	43.7

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	0	0	30	30	0.0	1-Sided Adj	TP5MXD20161205211115970
Explanation:	CC2200-0733 Increased Hazardous Materials and Waste Control Fees at five facilities to account for annual inflation associated with generator fees, increased hazardous waste generation and elimination of the flat fee payment on TSDF permit renewals. These costs were calculated using the Annual Fee Summary produced by the DTSC for 2017. See Supplemental Workpapers.							
2017	Other	0	-45	0	-45	0.0	1-Sided Adj	TP5MXD20161205211243670
Explanation:	CC2200-0733 Hazardous Waste Disposal fees associated with the storage and handling of hazardous materials are anticipated to proceed on a downward trend due to contract negotiations with vendors and the spreading of costs across capital and facility project accounts. These costs were calculated using an average of 2016 hazardous waste shipments and vendor rates.							
2017	Other	0	486	0	486	0.0	1-Sided Adj	TP5MXD20161205211423753
Explanation:	CC2200-0733-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support SCG Hazmat Operations cost for SoCalGas.							
2017	Other	0	0	-125	-125	0.0	1-Sided Adj	TP5MXD20161205211555093
Explanation:	CC2200-0733-Treatment Storage and Disposal Facility(TSDF) permit renewal applications are in progress for two facilities. This permit renewal process is currently underway and costs are projected on a downward trend due to funds requested in the 2016 GRC. These calculations were based upon 22 CCR 25200 and 22 CCR 66264.16.							
2017	Other	-49	0	0	-49	0.0	1-Sided Adj	TP5MXD20161205224736770
Explanation:	CC2200-0733-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Hazmat Operations cost for SoCalGas							
2017	Other	94	0	0	94	0.6	1-Sided Adj	TP5MXD20161205224902803
Explanation:	CC2200-2370-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support Environmental Research Manager cost for SoCalGas.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2017	Other	0	2	0	2	0.0	1-Sided Adj	TP5MXD20161205211900013
Explanation:	CC2200-2370-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Environmental Research Manager cost for SoCalGas.							
2017	Other	0	1,102	0	1,102	0.0	1-Sided Adj	TP5MXD20161205212100103
Explanation:	CC2200-2403-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Underground Storage Tanks cost for SoCalGas.							
2017	Other	0	140	0	140	0.0	1-Sided Adj	TP5MXD20161205212123987
Explanation:	CC2200-2403 Triennial Gasoline Fueling Dispensing/Underground Storage Tank Testing regulations require performance of triennial tests on secondary containment USTs to ensure performance integrity of the systems. These costs were calculated using a three-year average of vendor ratesheets, as well as anticipating the failure and repair of sites tested based upon test reports on similar UST tests conducted in the past.							
2017	Other	0	20	0	20	0.0	1-Sided Adj	TP5MXD20161205212151273
Explanation:	CC2200-2440-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support PSEP/PIP Major Projects cost for SoCalGas.							
2017	Other	0	129	0	129	0.0	1-Sided Adj	TP5MXD20161205212256633
Explanation:	CC2200-2443-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Innovative Solutions and Sustainability cost for SoCalGas.							
2017	Other	0	-4	0	-4	0.0	1-Sided Adj	TP5MXD20161205212322930
Explanation:	CC2200-2475-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service cost for SoCalGas.							
2017	Other	0	97	0	97	0.0	1-Sided Adj	TP5MXD20161205212350593
Explanation:	CC2200-2555-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Project Support cost for SoCalGas.							
2017	Other	0	115	0	115	0.0	1-Sided Adj	BCELLIS20170901001221643
Explanation:	CC2200-2558-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Greenhouse Gas cost for SoCalGas.							
2017	Other	0	268	0	268	0.0	1-Sided Adj	TP5MXD20161205212442020

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
Explanation:	CC2200-2556-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Cultural & Natural Resources Mgmnt cost for SoCalGas.							
2017	Other	0	0	19	19	0.0	1-Sided Adj	TP5MXD20161205212504233
Explanation:	CC2200-2557 National Pollutant Discharge Elimination System (NPDES) Hydrostatic Permit Fees are expected to increase due to the State Water Resources Control Board's (SWRCB) adoption of a new NPDES permit related to natural gas company discharges from hydrostatic testing of pipelines and related activities. These costs were calculated using the 2016-2017 SWRCB Fee schedule. See Supplemental Workpapers.							
2017	Other	0	69	0	69	0.0	1-Sided Adj	TP5MXD20161205212527273
Explanation:	CC2200-2557-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Water Quality cost for SoCalGas.							
2017	Other	0	12	0	12	0.0	1-Sided Adj	TP5MXD20161205212558213
Explanation:	CC2200-2579-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Major Project Support cost for SoCalGas.							
2017	Other	0	0	0	0	0.0	1-Sided Adj	TP5MXD20161205212620430
Explanation:	CC2200-2581-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Environmental Project Resources cost for SoCalGas.							
2017	Other	0	70	0	70	0.0	1-Sided Adj	TP5MXD20161205212643453
Explanation:	CC2200-2586-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service Distribution cost for SoCalGas.							
2017	Other	0	204	0	204	0.0	1-Sided Adj	TP5MXD20161205212708250
Explanation:	CC2200-2587-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Services Storage cost for SoCalGas.							
2017	Other	0	36	0	36	0.0	1-Sided Adj	TP5MXD20161205212733157
Explanation:	CC2200-2588-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service Transmission cost for SoCalGas.							
2017	Other	274	0	0	274	2.6	1-Sided Adj	TP5MXD20161205224944020

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
Explanation:	CC2200-2403-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Underground Storage Tanks cost for SoCalGas.							
2017	Other	83	0	0	83	0.2	1-Sided Adj	TP5MXD20161205225025443
Explanation:	CC2200-2440-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the PSEP/PIP Major Projects cost for SoCalGas							
2017	Other	480	0	0	480	5.1	1-Sided Adj	TP5MXD20161205225054600
Explanation:	CC2200-2443-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Innovative Solutions and Sustainability cost for SoCalGas.							
2017	Other	-177	0	0	-177	0.0	1-Sided Adj	TP5MXD20161205225121803
Explanation:	CC2200-2475-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services cost for SoCalGas							
2017	Other	403	0	0	403	4.3	1-Sided Adj	TP5MXD20161205225154037
Explanation:	CC2200-2555-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Project Support cost for SoCalGas.							
2017	Other	279	0	0	279	3.0	1-Sided Adj	TP5MXD20161205225227827
Explanation:	CC2200-2556-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required tosupport the SCG Cultural & Natural Resources Mgmnt cost.							
2017	Other	273	0	0	273	2.7	1-Sided Adj	TP5MXD20161205225251417
Explanation:	CC2200-2557-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Water Quality cost for SoCalGas							
2017	Other	284	0	0	284	2.5	1-Sided Adj	TP5MXD20161205225314287
Explanation:	CC2200-2558-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Greenhouse Gas cost for SoCalGas.							
2017	Other	31	0	0	31	0.3	1-Sided Adj	TP5MXD20161205225342150
Explanation:	CC2200-2579-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Major Project Support cost for SoCalGas							
2017	Other	145	28	0	173	1.3	1-Sided Adj	TP5MXD20161205225421180
Explanation:	CC2200-2581-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support to support Environmental Project Resources cost for SoCalGas.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2017	Other	104	0	0	104	2.1	1-Sided Adj	TP5MXD20161205225447367
Explanation:	CC2200-2586-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support Field Environmental Service Distribution cost for SoCalGas.							
2017	Other	16	0	0	16	2.8	1-Sided Adj	TP5MXD20161205225516133
Explanation:	CC2200-2587-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services Storage cost for SoCalGas.							
2017	Other	-76	0	0	-76	0.0	1-Sided Adj	TP5MXD20161205225549803
Explanation:	CC2200-2588-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services Transmission cost for SoCalGas							
2017	FOF-Ongoing	0	-17	0	-17	0.0	1-Sided Adj	TP5MXD20170214124642523
Explanation:	CC2200-2554 - Fuel the Future: Automate the Asbestos Work Authorization Approval process and utilize an electronic signature (#1260)							
2017	FOF-Ongoing	0	-35	0	-35	0.0	1-Sided Adj	TP5MXD20170214125023917
Explanation:	CC2200-0733 - Fuel The Future: Purchase aerosol can puncturing unit that is automated instead of manual (#1720)							
2017	FOF-Ongoing	0	-32	0	-32	0.0	1-Sided Adj	TP5MXD20170214125142327
Explanation:	CC2200-2557 - Fuel the Future: Reduce Pico Rivera coverage under the Industrial General Permit to just the Pico Transfer Storage Disposal Facility. (#1690)							
2017	RAMP Base	101	0	0	101	1.5	1-Sided Adj	TP5MXD20161205212420847
Explanation:	RAMP - Environmental Services and Safety Compliance Management Program (ESCMP): An Internal Environmental and Safety compliance certification program. This program encompasses Asbestos Safety Program, Environmental Self-Assessment, Environmental Inspections, Prop 65, and SoCalGas Environmental Training.							
2017	RAMP Base	444	0	0	444	3.0	1-Sided Adj	TP5MXD20170310223122473
Explanation:	RAMP - Environmental Inspections and Environmental Incident Evaluations: Tracking and reporting of agency inspections and addressing environmental incidents.							
2017	RAMP Base	439	0	0	439	3.0	1-Sided Adj	TP5MXD20170310222118203
Explanation:	RAMP - Environmental Self-Assessment: Environmental self-assessments are internal compliance reviews conducted by company personnel who are knowledgeable in environmental laws, rules and regulations and company policies and procedures. The environmental self-assessment process supports the day-to-day compliance of company operations which are subject to applicable federal, state and local environmental laws, regulations, rules and company policies, standards and procedures.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2017	RAMP Base	721	0	0	721	8.7	1-Sided Adj	TP5MXD20170310231848220
Explanation:	RAMP - Asbestos Safety Program: Provide guidance for identifying and managing asbestos-containing material by SoCalGas employees.							
2017	RAMP Base	695	0	0	695	0.0	1-Sided Adj	TP5MXD20170310232945077
Explanation:	RAMP - SoCalGas Environmental Training: Development and implementation of environmental training of all SCG non-represented, non-management, and management employees.							
2017 Total		**4,564**	**2,645**	**-76**	**7,133**	**43.7**		
2018	Other	0	0	30	30	0.0	1-Sided Adj	TP5MXD20161205212830130
Explanation:	CC2200-0733 Increased Hazardous Materials and Waste Control Fees at five facilities to account for annual inflation associated with generator fees, increased hazardous waste generation and elimination of the flat fee payment on TSDF permit renewals. These costs were calculated using the Annual Fee Summary produced by the DTSC for 2017. See Supplemental Workpapers.							
2018	Other	0	-45	0	-45	0.0	1-Sided Adj	TP5MXD20161205212902920
Explanation:	CC2200-0733 Hazardous Waste Disposal fees associated with the storage and handling of hazardous materials are anticipated to proceed on a downward trend due to contract negotiations with vendors and the spreading of costs across capital and facility project accounts. These costs were calculated using an average of 2016 hazardous waste shipments and vendor rates.							
2018	Other	0	509	0	509	0.0	1-Sided Adj	TP5MXD20161205212930340
Explanation:	CC2200-0733-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support SCG Hazmat Operations cost for SoCalGas.							
2018	Other	0	0	-150	-150	0.0	1-Sided Adj	TP5MXD20161205212958943
Explanation:	CC2200-0733 Treatment Storage and Disposal Facility (TSDF) permit renewal applications are in progress for two facilities. This permit renewal process is currently underway and costs are projected on a downward trend due to funds requested in the 2016 GRC. These calculations were based upon 22 CCR 25200 and 22 CCR 66264.16.							
2018	Other	0	2	0	2	0.0	1-Sided Adj	TP5MXD20161205213028023
Explanation:	CC2200-2370-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Environmental Research Manager cost for SoCalGas.							
2018	Other	0	1,036	0	1,036	0.0	1-Sided Adj	TP5MXD20161205213051917

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
Explanation:	CC2200-2403-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Underground Storage Tanks cost for SoCalGas.							
2018	FOF-Ongoing	0	-35	0	-35	0.0	1-Sided Adj	BCELLIS20170831111408240
Explanation:	CC2200-0733 - Fuel The Future: Purchase aerosol can puncturing unit that is automated instead of manual (#1720)							
2018	Other	0	20	0	20	0.0	1-Sided Adj	TP5MXD20161205213139323
Explanation:	CC2200-2440-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support PSEP/PIP Major Projects cost for SoCalGas.							
2018	FOF-Ongoing	0	-32	0	-32	0.0	1-Sided Adj	BCELLIS20170831111541930
Explanation:	CC2200-2557 - Fuel the Future: Reduce Pico Rivera coverage under the Industrial General Permit to just the Pico Transfer Storage Disposal Facility. (#1690)							
2018	Other	0	129	0	129	0.0	1-Sided Adj	TP5MXD20161205213226297
Explanation:	CC2200-2443-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Innovative Solutions and Sustainability cost for SoCalGas.							
2018	Other	0	-4	0	-4	0.0	1-Sided Adj	TP5MXD20161205213248973
Explanation:	CC2200-2475-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service cost for SoCalGas.							
2018	Other	0	97	0	97	0.0	1-Sided Adj	TP5MXD20161205213314813
Explanation:	CC2200-2555-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Project Support cost for SoCalGas.							
2018	Other	0	0	12	12	0.0	1-Sided Adj	TP5MXD20161205213338490
Explanation:	CC2200-2556 CDFW Incidental Take Permit Compensatory Mitigation requirements dictated by a Memorandum of Understanding entered into between SoCalGas and the California Department of Fish and Wildlife requires SoCalGas to provide compensatory mitigation credit for the temporary or permanent disturbance of identified species as a result of construction, operation or maintenance activities. These costs were calculated using guidance from the MOU, as well as a compensation formula provided by a CDFW representative. See Supplemental Workpapers.							
2018	Other	0	269	0	269	0.0	1-Sided Adj	TP5MXD20161205213359137
Explanation:	CC2200-2556-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Cultural & Natural Resources Mgmnt cost for SoCalGas.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	0	0	21	21	0.0	1-Sided Adj	TP5MXD20161205213421497
Explanation:	CC2200-2557 National Pollutant Discharge Elimination System (NPDES) Hydrostatic Permit Fees are expected to increase due to the State Water Resources Control Board's (SWRCB) adoption of a new NPDES permit related to natural gas company discharges from hydrostatic testing of pipelines and related activities. These costs were calculated using the 2016-2017 SWRCB Fee schedule. See Supplemental Workpapers.							
2018	Other	0	101	0	101	0.0	1-Sided Adj	TP5MXD20161205213445467
Explanation:	CC2200-2557-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Water Quality cost for SoCalGas.							
2018	Other	0	12	0	12	0.0	1-Sided Adj	TP5MXD20161205213509593
Explanation:	CC2200-2579-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Major Project Support cost for SoCalGas.							
2018	Other	0	28	0	28	0.0	1-Sided Adj	TP5MXD20161205213532100
Explanation:	CC2200-2581-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Environmental Project Resources cost for SoCalGas.							
2018	Other	0	71	0	71	0.0	1-Sided Adj	TP5MXD20161205213551960
Explanation:	CC2200-2586-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service Distribution cost for SoCalGas.							
2018	Other	0	206	0	206	0.0	1-Sided Adj	TP5MXD20161205213616730
Explanation:	CC2200-2587-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service Storage cost for SoCalGas.							
2018	Other	0	38	0	38	0.0	1-Sided Adj	TP5MXD20161205213645210
Explanation:	CC2200-2588-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Services Transmission cost for SoCalGas.							
2018	Other	-49	0	0	-49	0.0	1-Sided Adj	TP5MXD20161205225713093
Explanation:	CC2200-0733-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Hazmat Operations cost for SoCalGas							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	94	0	0	94	0.6	1-Sided Adj	TP5MXD20161205225743250
Explanation:	CC2200-2370-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support Environmental Research Manager cost for SoCalGas.							
2018	Other	274	0	0	274	2.6	1-Sided Adj	TP5MXD20161205225805130
Explanation:	CC2200-2403-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Underground Storage Tanks cost for SoCalGas.							
2018	Other	83	0	0	83	0.2	1-Sided Adj	TP5MXD20161205225831443
Explanation:	CC2200-2440-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the PSEP/PIP Major Projects cost for SoCalGas							
2018	Other	480	0	0	480	5.1	1-Sided Adj	TP5MXD20161205225856380
Explanation:	CC2200-2443-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Innovative Solutions and Sustainability cost for SoCalGas.							
2018	Other	-177	0	0	-177	0.0	1-Sided Adj	TP5MXD20161205225916247
Explanation:	CC2200-2475-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services cost for SoCalGas							
2018	Other	403	0	0	403	4.3	1-Sided Adj	TP5MXD20161205225936710
Explanation:	CC2200-2555-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Project Support cost for SoCalGas.							
2018	Other	279	0	0	279	3.0	1-Sided Adj	TP5MXD20161205225957007
Explanation:	CC2200-2556-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required tosupport the SCG Cultural & Natural Resources Mgmnt cost.							
2018	Other	273	0	0	273	2.7	1-Sided Adj	TP5MXD20161205230016447
Explanation:	CC2200-2557-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Water Quality cost for SoCalGas							
2018	Other	284	0	0	284	2.5	1-Sided Adj	TP5MXD20161205230043680
Explanation:	CC2200-2558-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Greenhouse Gas cost for SoCalGas.							
2018	Other	31	0	0	31	0.3	1-Sided Adj	TP5MXD20161205230101257
Explanation:	CC2200-2579-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Major Project Support cost for SoCalGas							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	145	0	0	145	1.3	1-Sided Adj	TP5MXD20161205230120583
Explanation:	CC2200-2581-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support to support Environmental Project Resources cost for SoCalGas.							
2018	Other	104	0	0	104	2.1	1-Sided Adj	TP5MXD20161205230143413
Explanation:	CC2200-2586-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support Field Environmental Service Distribution cost for SoCalGas.							
2018	FOF-Ongoing	0	-17	0	-17	0.0	1-Sided Adj	BCELLIS20170831111630007
Explanation:	CC2200-2554 - Fuel the Future: Automate the Asbestos Work Authorization Approval process and utilize an electronic signature (#1260)							
2018	Other	-76	0	0	-76	0.0	1-Sided Adj	TP5MXD20161205230223203
Explanation:	CC2200-2588-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services Transmission cost for SoCalGas							
2018	FOF-Ongoing	0	-12	0	-12	0.0	1-Sided Adj	BCELLIS20170831113926590
Explanation:	CC2200-0733 - Fuel the Future: Digitize and automate Transfer Storage & Disposal Facility (TSDF) shipments through bar coding and electronic documentation. (#1730)							
2018	RAMP Base	101	0	0	101	1.5	1-Sided Adj	TP5MXD20170310210240627
Explanation:	RAMP - Environmental Services and Safety Compliance Management Program (ESCMP): Internal Environmental and Safety compliance certification program.							
2018	RAMP Base	444	0	0	444	3.0	1-Sided Adj	BCELLIS20170901072107927
Explanation:	RAMP - Environmental Inspections and Environmental Incident Evaluations: Tracking and reporting of agency inspections and addressing environmental incidents.							
2018	Other	0	115	0	115	0.0	1-Sided Adj	BCELLIS20170901005553440
Explanation:	CC2200-2558-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Greenhouse Gas cost for SoCalGas.							
2018	Other	0	62	0	62	0.0	1-Sided Adj	TP5MXD20161205213117767
Explanation:	CC2200-2403 Triennial Gasoline Fueling Dispensing/Underground Storage Tank Testing regulations require performance of triennial tests on secondary containment USTs to ensure performance integrity of the systems. These costs were calculated using a three-year average of vendor ratesheets, as well as anticipating the failure and repair of sites tested based upon test reports on similar UST tests conducted in the past.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	16	0	0	16	2.8	1-Sided Adj	TP5MXD20161205230203113
Explanation:	CC2200-2587-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services Storage cost for SoCalGas.							
2018	RAMP Base	721	0	0	721	8.7	1-Sided Adj	TP5MXD20170310232243913
Explanation:	RAMP - Asbestos Safety Program: Provide guidance for identifying and managing asbestos-containing material by SoCalGas employees.							
2018	RAMP Base	695	0	0	695	0.0	1-Sided Adj	TP5MXD20170310233246977
Explanation:	RAMP - Socalgas Environmental Training: Development and implementation of environmental training of all SCG non-represented, non-management, and management employees.							
2018	RAMP Base	439	0	0	439	3.0	1-Sided Adj	BCELLIS20170901071553347
Explanation:	RAMP - Environmental Self-Assessment: Environmental self-assessments are internal compliance reviews conducted by company personnel who are knowledgeable in environmental laws, rules and regulations and company policies and procedures. The environmental self-assessment process supports the day-to-day compliance of company operations which are subject to applicable federal, state and local environmental laws, regulations, rules and company policies, standards and procedures.							
2018 Total		**4,564**	**2,550**	**-87**	**7,027**	**43.7**		
2019	Other	0	0	30	30	0.0	1-Sided Adj	TP5MXD20161205213910740
Explanation:	CC2200-0733 Increased Hazardous Materials and Waste Control Fees at five facilities to account for annual inflation associated with generator fees, increased hazardous waste generation and elimination of the flat fee payment on TSDF permit renewals. These costs were calculated using the Annual Fee Summary produced by the DTSC for 2017. See Supplemental Workpapers.							
2019	Other	0	-45	0	-45	0.0	1-Sided Adj	TP5MXD20161205213939633
Explanation:	CC2200-0733 Hazardous Waste Disposal fees associated with the storage and handling of hazardous materials are anticipated to proceed on a downward trend due to contract negotiations with vendors and the spreading of costs across capital and facility project accounts. These costs were calculated using an average of 2016 hazardous waste shipments and vendor rates.							
2019	Other	0	521	0	521	0.0	1-Sided Adj	TP5MXD20161205214004917
Explanation:	CC2200-0733-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support SCG Hazmat Operations cost for SoCalGas.							
2019	Other	0	0	-160	-160	0.0	1-Sided Adj	TP5MXD20161205214028667

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
Explanation:	CC2200-0733 Treatment Storage and Disposal Facility permit renewal applications are in progress for two facilities. This permit renewal process is currently underway and costs are projected on a downward trend due to funds requested in the 2016 GRC. These calculations were based upon 22 CCR 25200 and 22 CCR 66264.16.							
2019	Other	0	25	0	25	0.0	1-Sided Adj	TP5MXD20161205214055193
Explanation:	CC2200-2370-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Environmental Research Manager cost for SoCalGas.							
2019	FOF-Ongoing	0	-35	0	-35	0.0	1-Sided Adj	BCELLIS20170831114000733
Explanation:	CC2200-0733 - Fuel The Future: Purchase aerosol can puncturing unit that is automated instead of manual (#1720)							
2019	Other	-49	0	0	-49	0.0	1-Sided Adj	TP5MXD20161205230417640
Explanation:	CC2200-0733-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Hazmat Operations cost for SoCalGas							
2019	Other	0	21	0	21	0.0	1-Sided Adj	TP5MXD20161205214211637
Explanation:	CC2200-2440-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support PSEP/PIP Major Projects cost for SoCalGas.							
2019	FOF-Ongoing	0	-32	0	-32	0.0	1-Sided Adj	BCELLIS20170831114053200
Explanation:	CC2200-2557 - Fuel the Future: Reduce Pico Rivera coverage under the Industrial General Permit to just the Pico Transfer Storage Disposal Facility. (#1690)							
2019	Other	94	0	0	94	0.6	1-Sided Adj	TP5MXD20161205230438217
Explanation:	CC2200-2370-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support Environmental Research Manager cost for SoCalGas.							
2019	Other	0	129	0	129	0.0	1-Sided Adj	TP5MXD20161205214408387
Explanation:	CC2200-2443-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Innovative Solutions and Sustainability cost for SoCalGas.							
2019	Other	0	-4	0	-4	0.0	1-Sided Adj	TP5MXD20161205214434450
Explanation:	CC2200-2475-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service cost for SoCalGas.							
2019	Other	0	97	0	97	0.0	1-Sided Adj	TP5MXD20161205214456473
Explanation:	CC2200-2555-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Project Support cost for SoCalGas.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	0	20	20	0.0	1-Sided Adj	TP5MXD20161205214519277

Explanation: CC2200-2556 CDFW Incidental Take Permit Compensatory Mitigation requirements dictated by a Memorandum of Understanding entered into between SoCalGas and the California Department of Fish and Wildlife requires SoCalGas to provide compensatory mitigation credit for the temporary or permanent disturbance of identified species as a result of construction, operation or maintenance activities. These costs were calculated using guidance from the MOU, as well as a compensation formula provided by a CDFW representative. See Supplemental Workpapers.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	269	0	269	0.0	1-Sided Adj	TP5MXD20161205214545303

Explanation: CC2200-2556-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Cultural & Natural Resources Mgmnt cost for SoCalGas.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	0	21	21	0.0	1-Sided Adj	TP5MXD20161205214614200

Explanation: CC2200-2557 National Pollutant Discharge Elimination System (NPDES) Hydrostatic Permit Fees are expected to increase due to the State Water Resources Control Board's (SWRCB) adoption of a new NPDES permit related to natural gas company discharges from hydrostatic testing of pipelines and related activities. These costs were calculated using the 2016-2017 SWRCB Fee schedule. See Supplemental Workpapers.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	101	0	101	0.0	1-Sided Adj	TP5MXD20161205214640183

Explanation: CC2200-2557-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Water Quality cost for SoCalGas.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	12	0	12	0.0	1-Sided Adj	TP5MXD20161205214712207

Explanation: CC2200-2579-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Major Project Support cost for SoCalGas.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	28	0	28	0.0	1-Sided Adj	TP5MXD20161205214738600

Explanation: CC2200-2581-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Environmental Project Resources cost for SoCalGas.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	71	0	71	0.0	1-Sided Adj	TP5MXD20161205214802857

Explanation: CC2200-2586-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Services Distribution cost for SoCalGas.

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	206	0	206	0.0	1-Sided Adj	TP5MXD20161205214832660

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
Explanation:	CC2200-2587-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Services Storage cost for SoCalGas.							
2019	Other	0	38	0	38	0.0	1-Sided Adj	TP5MXD20161205214901387
Explanation:	CC2200-2588-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support Field Environmental Service Transmission cost for SoCalGas.							
2019	Other	274	0	0	274	2.6	1-Sided Adj	TP5MXD20161205230508443
Explanation:	CC2200-2403-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Underground Storage Tanks cost for SoCalGas.							
2019	Other	83	0	0	83	0.2	1-Sided Adj	TP5MXD20161205230529430
Explanation:	CC2200-2440-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the PSEP/PIP Major Projects cost for SoCalGas							
2019	Other	480	0	0	480	5.1	1-Sided Adj	TP5MXD20161205230553333
Explanation:	CC2200-2443-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Innovative Solutions and Sustainability cost for SoCalGas.							
2019	Other	-177	0	0	-177	0.0	1-Sided Adj	TP5MXD20161205230614803
Explanation:	CC2200-2475-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services cost for SoCalGas							
2019	Other	403	0	0	403	4.3	1-Sided Adj	TP5MXD20161205230635617
Explanation:	CC2200-2555-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Project Support cost for SoCalGas.							
2019	Other	279	0	0	279	3.0	1-Sided Adj	TP5MXD20161205230700680
Explanation:	CC2200-2556-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required tosupport the SCG Cultural & Natural Resources Mgmnt cost.							
2019	Other	273	0	0	273	2.7	1-Sided Adj	TP5MXD20161205230725433
Explanation:	CC2200-2557-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the SCG Water Quality cost for SoCalGas							
2019	Other	284	0	0	284	2.5	1-Sided Adj	TP5MXD20161205230806163
Explanation:	CC2200-2558-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Greenhouse Gas cost for SoCalGas.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	31	0	0	31	0.3	1-Sided Adj	TP5MXD20161205230837243
Explanation:	CC2200-2579-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Major Project Support cost for SoCalGas							
2019	Other	145	0	0	145	1.3	1-Sided Adj	TP5MXD20161205230858423
Explanation:	CC2200-2581-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support to support Environmental Project Resources cost for SoCalGas.							
2019	Other	104	0	0	104	2.1	1-Sided Adj	TP5MXD20161205230921570
Explanation:	CC2200-2586-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support Field Environmental Service Distribution cost for SoCalGas.							
2019	Other	16	0	0	16	2.8	1-Sided Adj	TP5MXD20161205230941917
Explanation:	CC2200-2587-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services Storage cost for SoCalGas.							
2019	Other	-76	0	0	-76	0.0	1-Sided Adj	TP5MXD20161205231002350
Explanation:	CC2200-2588-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Field Environmental Services Transmission cost for SoCalGas							
2019	FOF-Ongoing	0	-17	0	-17	0.0	1-Sided Adj	BCELLIS20170831114229397
Explanation:	CC2200-2554 - Fuel the Future: Automate the Asbestos Work Authorization Approval process and utilize an electronic signature (#1260)							
2019	RAMP Base	101	0	0	101	1.5	1-Sided Adj	TP5MXD20170310212833910
Explanation:	RAMP - Environmental Services and Safety Compliance Management Program (ESCMP): Internal Environmental and Safety compliance certification program.							
2019	RAMP Base	439	0	0	439	3.0	1-Sided Adj	TP5MXD20170310222829380
Explanation:	RAMP - Environmental Self-Assessment: Environmental self-assessments are internal compliance reviews conducted by company personnel who are knowledgeable in environmental laws, rules and regulations and company policies and procedures. The environmental self-assessment process supports the day-to-day compliance of company operations which are subject to applicable federal, state and local environmental laws, regulations, rules and company policies, standards and procedures.							
2019	RAMP Base	444	0	0	444	3.0	1-Sided Adj	TP5MXD20170310223600713
Explanation:	RAMP - Environmental Inspections and Environmental Incident Evaluations: Tracking and reporting of agency inspections and addressing environmental incidents.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	18	0	18	0.0	1-Sided Adj	TP5MXD20170510151220427
Explanation:	CC2200-2403 Triennial Gasoline Fueling Dispensing/Underground Storage Tank Testing regulations require performance of triennial tests on secondary containment USTs to ensure performance integrity of the systems. These costs were calculated using a three-year average of vendor ratesheets, as well as anticipating the failure and repair of sites tested based upon test reports on similar UST tests conducted in the past.							
2019	FOF-Ongoing	0	-12	0	-12	0.0	1-Sided Adj	BCELLIS20170831114253827
Explanation:	CC2200-0733 - Fuel the Future: Digitize and automate Transfer Storage & Disposal Facility (TSDF) shipments through bar coding and electronic documentation. (#1730)							
2019	RAMP Base	721	0	0	721	8.7	1-Sided Adj	TP5MXD20170310232504520
Explanation:	RAMP - Asbestos Safety Program: Provide guidance for identifying and managing asbestos-containing material by SoCalGas employees.							
2019	RAMP Base	695	0	0	695	0.0	1-Sided Adj	TP5MXD20170310233503480
Explanation:	RAMP - SoCalGas Environmental Training: Development and implementation of environmental training of all SCG non-represented, non-management, and management employees.							
2019	Other	0	992	0	992	0.0	1-Sided Adj	BCELLIS20170901010136310
Explanation:	CC2200-2403-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the SCG Underground Storage Tanks cost for SoCalGas.							
2019	Other	0	115	0	115	0.0	1-Sided Adj	BCELLIS20170901010610510
Explanation:	CC2200-2558-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Greenhouse Gas cost for SoCalGas.							
2019 Total		**4,564**	**2,498**	**-89**	**6,973**	**43.7**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	1,108	1,691	1,619	2,481	3,607
Non-Labor	1,159	1,316	1,707	2,547	2,077
NSE	0	0	0	0	0
Total	**2,267**	**3,007**	**3,326**	**5,028**	**5,683**
FTE	12.3	18.9	16.7	27.5	38.9
Adjustments (Nominal $) **					
Labor	632	1,058	632	16	-317
Non-Labor	0	0	0	-128	82
NSE	0	0	0	0	0
Total	**632**	**1,058**	**632**	**-111**	**-235**
FTE	9.2	13.2	7.5	0.2	-3.9
Recorded-Adjusted (Nominal $)					
Labor	1,739	2,750	2,251	2,497	3,289
Non-Labor	1,159	1,316	1,707	2,419	2,159
NSE	0	0	0	0	0
Total	**2,899**	**4,065**	**3,958**	**4,917**	**5,448**
FTE	21.5	32.1	24.2	27.7	35.0
Vacation & Sick (Nominal $)					
Labor	278	457	367	404	542
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**278**	**457**	**367**	**404**	**542**
FTE	3.6	5.4	4.1	4.7	5.9
Escalation to 2016$					
Labor	198	232	127	71	0
Non-Labor	34	16	-6	6	0
NSE	0	0	0	0	0
Total	**232**	**248**	**122**	**77**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	2,216	3,439	2,745	2,973	3,831
Non-Labor	1,193	1,332	1,701	2,425	2,159
NSE	0	0	0	0	0
Total	**3,409**	**4,771**	**4,447**	**5,398**	**5,990**
FTE	25.1	37.5	28.3	32.4	40.9

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs					
Years	2012	2013	2014	2015	2016
Labor	632	1,058	632	16	-317
Non-Labor	0	0	0	-128	82
NSE	0	0	0	0	0
Total	**632**	**1,058**	**632**	**-111**	**-235**
FTE	9.2	13.2	7.5	0.2	-3.9

Detail of Adjustments to Recorded:

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2012	Other	91	0	0	0.1	CCTR Transf From 2200-2012.000	TP1DEW20170224222721267
Explanation:	trf						
2012	Other	-91	0	0	-0.1	CCTR Transf From 2200-2012.000	TP5MXD20170224224512907
Explanation:	Correction to off set entered in error						
2012	Other	9	0	0	0.1	CCTR Transf From 2200-2012.000	TP5MXD20170224224614330
Explanation:	Transfer of .09 FTEs to new cost center in order to track Major Env Projects activities						
2012	Other	162	0	0	2.4	CCTR Transf From 2200-2176.000	TP5MXD20170224201444337
Explanation:	Transfer of 2.35 FTEs to new cost center in order to track Project Support activities						
2012	Other	107	0	0	3.1	CCTR Transf From 2200-2176.000	TP5MXD20170224201642783
Explanation:	Transfer of 3.05 FTEs to new cost center in order to track Cultrl/Ntrl Res Mgmt activities						
2012	Other	70	0	0	0.7	CCTR Transf From 2200-0289.000	TP1LFH20161203105748290
Explanation:	Transfer environmental personnel labor to 2200-2588 to be consistent with 2016 base year						
2012	Other	60	0	0	0.6	CCTR Transf From 2200-0298.000	TP1LFH20161203110124050
Explanation:	Transfer environmental personnel to 2200-2588 to be consistent with 2016 base year.						
2012	Other	62	0	0	0.7	CCTR Transf From 2200-2176.000	TP5MXD20170224202220623
Explanation:	Transfer of .65 FTEs to new cost center in order to track Cultrl & Ntrl Res Mgmt activities						
2012	Other	161	0	0	1.6	CCTR Transf From 2200-2176.000	TP5MXD20170224202308607
Explanation:	Transfer of .65 FTEs to new cost center in order to track GHG activities						
2012 Total		**632**	**0**	**0**	**9.2**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2013	Other	65	0	0	0.6	CCTR Transf From 2200-2012.000	TP5MXD20170224224903013
Explanation:	Transfer of .61 FTEs to new cost center in order to track Major Env Projects activities						
2013	Other	74	0	0	0.8	CCTR Transf From 2200-0289.000	TP1LFH20161203111139153
Explanation:	Transfer environmental personnel to 2200-2588 to be consistent with 2016 base year						
2013	Other	48	0	0	0.5	CCTR Transf From 2200-0298.000	TP1LFH20161203111327347
Explanation:	Transfer environmental personnel to 2200-2588 to be consistent with 2016 base year						
2013	Other	441	0	0	6.0	CCTR Transf From 2200-2176.000	TP5MXD20170224193224753
Explanation:	Transfer of 5.93 FTEs to new cost center in order to track Project Support activities						
2013	Other	245	0	0	3.1	CCTR Transf From 2200-2176.000	TP5MXD20170224193339780
Explanation:	Transfer of 3.05 FTEs to new cost center in order to track Air Quality activities						
2013	Other	186	0	0	2.2	CCTR Transf From 2200-2176.000	TP5MXD20170224193449050
Explanation:	Transfer of 2.18 FTEs to new cost center in order to track Air Quality activities						
2013 Total		**1,058**	**0**	**0**	**13.2**		
2014	Other	32	0	0	0.3	CCTR Transf From 2200-2012.000	TP5MXD20170224224954530
Explanation:	Transfer of ..26 FTEs to new cost center in order to track Major Env Projects activities						
2014	Other	70	0	0	0.7	CCTR Transf From 2200-0289.000	TP1LFH20161203111538660
Explanation:	Transfer environmental personnel from 2200-0289 to 2200-2588 to be consistent with 2016 base year						
2014	Other	17	0	0	0.2	CCTR Transf From 2200-0298.000	TP1LFH20161203111818427
Explanation:	Transfer environmental personnel from 2200-0298 to 2200-2588 to be consistent with 2016 base year						
2014	Other	248	0	0	3.2	CCTR Transf From 2200-2176.000	TP5MXD20170224074953367
Explanation:	Transfer of 3.24 FTEs to new cost center in order to track Project Support activities						
2014	Other	144	0	0	1.8	CCTR Transf From 2200-2176.000	TP5MXD20170224075821260
Explanation:	Transfer of 1.80 FTEs to new cost center in order to track Cltr & Ntrl Res activities						
2014	Other	95	0	0	1.1	CCTR Transf From 2200-2176.000	TP5MXD20170224075901810
Explanation:	Transfer of 1.11 FTEs to new cost center in order to track Water Quality activities						
2014	Other	26	0	0	0.2	CCTR Transf From 2200-2176.000	TP5MXD20170224075942933
Explanation:	Transfer of .22 FTEs to new cost center in order to track Green House Gas (GHG) activities						

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2014 Total		**632**	**0**	**0**	**7.5**		
2015	Other	13	0	0	0.1	CCTR Transf From 2200-2012.000	TP5MXD20170224225027593
Explanation:	Transfer of .10 FTEs to new cost center in order to track Major Env Projects activities						
2015	Other	15	0	0	0.2	CCTR Transf From 2200-2176.000	TP5MXD20170224095129777
Explanation:	Transfer of .18 FTEs to new cost center in order to track Cltr & Ntrl Res Mgmt activities						
2015	Other	5	0	0	0.1	CCTR Transf From 2200-2176.000	TP5MXD20170224094940980
Explanation:	Transfer of .07 FTEs to new cost center in order to track Water Quality activities						
2015	Aliso	0	-128	0	0.0	1-Sided Adj	TP5MXD20170315170813343
Explanation:	Adjustment to remove Aliso Canyon incident in 2015 for CC 2200-2475, 2200-2555 and 2200-2557.						
2015	Aliso	-13	0	0	-0.2	1-Sided Adj	TP5MXD20170511121553870
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2015 for 2200-0733, 2200-2443, 2200-2475, 2200-2555, 2200-2556, and 2200-2557.						
2015	Other	-4	0	0	0.0	CCTR Transf From 2200-0289.000	TP1LFH20161203112315270
Explanation:	Transfer environmental personnel from 2200-0289 to 2200-2588 to be consistent with 2016 base year (2015 costs have a credit balance)						
2015 Total		**16**	**-128**	**0**	**0.2**		
2016	Aliso	0	-44	0	0.0	1-Sided Adj	TP5MXD20170315173116077
Explanation:	Nonlabor adjustment to remove Aliso Canyon incident in 2016 for CC 2200-0733, 2200-2443, 2200-2475, 2200-2556, 2200-2557, 2200-2440, 2200-2579, 2200-2581, and 2200-2587.						
2016	Aliso	-52	0	0	-0.6	1-Sided Adj	TP5MXD20170315181049393
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2440.						
2016	Aliso	-53	0	0	-0.7	1-Sided Adj	TP5MXD20170315181322250
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2579.						
2016	Aliso	-36	0	0	-0.4	1-Sided Adj	TP5MXD20170315181559683
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2581.						
2016	Aliso	-1	0	0	0.0	1-Sided Adj	TP5MXD20170511122017433
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-0733.						

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2016	Aliso	0	-1	0	0.0	1-Sided Adj	TP5MXD20170511122159640
Explanation:	Non-labor adjustment to remove Aliso Canyon incident in 2016 for 2200-1181						
2016	Aliso	-85	0	0	-1.2	1-Sided Adj	TP5MXD20170511122316287
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2443						
2016	Aliso	-10	0	0	-0.1	1-Sided Adj	TP5MXD20170511122454743
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2475.						
2016	Aliso	-9	0	0	-0.1	1-Sided Adj	TP5MXD20170511122553967
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2555.						
2016	Aliso	0	127	0	0.0	1-Sided Adj	TP5MXD20170511122732540
Explanation:	Non-labor adjustment to remove accrual reversal of Aliso Canyon incident in 2016.						
2016	Aliso	-8	0	0	-0.1	1-Sided Adj	TP5MXD20170511122832147
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2556.						
2016	Aliso	-16	0	0	-0.2	1-Sided Adj	TP5MXD20170511123002323
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2557.						
2016	Aliso	-1	0	0	0.0	1-Sided Adj	TP5MXD20170511123116670
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2558.						
2016	Aliso	-45	0	0	-0.5	1-Sided Adj	TP5MXD20170511123204023
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2587.						
2016	Aliso	-2	0	0	0.0	1-Sided Adj	TP5MXD20170511123501697
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2588.						
2016 Total		**-317**	**82**	**0**	**-3.9**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 1 Ref ID: TP5MXD20161205212420847

RAMP Chapter: SCG-2

Program Name: Environmental Services and Safety Compliance Management Program (ESCMP)

Program Description: Internal Environmental and Safety compliance certification program

Risk/Mitigation:

Risk: Employee, Contracts & Public Safety

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	101	101	101
High	124	124	124

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Non-Mandated

Work Type Citation: N/A

Historical Embedded Cost Estimates ($000)

Embedded Costs: 101

Explanation: Internal Environmental and Safety compliance certification program.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 2 Ref ID: TP5MXD20170310222118203

RAMP Chapter: SCG-2

Program Name: Environmental Self-Assessment

Program Description: Environmental self-assessments are internal compliance reviews conducted by company personnel who are knowledgeable in environmental laws, rules and regulations and company policies and procedures. The environmental self-assessment process supports the day-to-day compliance of company operations which are subject to applicable federal, state and local environmental laws, regulations, rules and company policies, standards and procedures.

Risk/Mitigation:

Risk: Employee, Contractor & Public Safety
"

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	439	439	439
High	536	536	536

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Non-Mandated

Work Type Citation: n/a

Historical Embedded Cost Estimates ($000)

Embedded Costs: 439

Explanation: Environmental Self-Assessment are internal compliance reviews conducted by company personnel who are knowledgeable in environmental laws, rules and regulations and company policies and procedures. The environmental self-assessment process supports the day-to-day compliance of company operations which are subject to applicable federal, state and local environmental laws, regulations, rules and company policies, standards and procedures.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 3 Ref ID: TP5MXD20170310223122473

RAMP Chapter: SCG-2

Program Name: Investigation of envrionmental exposure incidents

Program Description: Tracking and reporting of agency inspections and addressing environmental incidents.

Risk/Mitigation:

Risk: Employee, Contractor & Public Safety

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	444	444	444
High	543	543	543

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Non-Mandated

Work Type Citation: N/A

Historical Embedded Cost Estimates ($000)

Embedded Costs: 444

Explanation: Investigation of envrionmental exposure incidents for tracking and reporting of agency inspections and addressing environmental incidents.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 4 Ref ID: TP5MXD20170310223826323

RAMP Chapter: SCG-2

Program Name: Prop 65

Program Description: Compliance program to comply with the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Risk/Mitigation:

Risk: Employee, Contractor & Public Safety

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	17	17	17
High	21	21	21

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Mandated

Work Type Citation: N/A

Historical Embedded Cost Estimates ($000)

Embedded Costs: 17

Explanation: Prop 65 compliance program to comply with the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 5 Ref ID: TP5MXD20170310225318320

RAMP Chapter: SCG-2

Program Name: Service Contracting

Program Description: supply management.

Risk/Mitigation:

Risk: Employee, Contractor & Public Safety

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	165	165	165
High	201	201	201

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Non-Mandated

Work Type Citation: N/A

Historical Embedded Cost Estimates ($000)

Embedded Costs: 165

Explanation: Service Contracting deals with creating and maintaining environmental contracts with help of Supply Management.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 6 Ref ID: TP5MXD20170310231848220

RAMP Chapter: SCG-2

Program Name: Asbestos Safety Program

Program Description: Provide guidance for identifying and managing asbestos-containing material by SoCalGas employees.

Risk/Mitigation:

Risk: Employee, Contractor & Public Safety

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	721	721	721
High	882	882	882

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Non-Mandated

Work Type Citation: N/A

Historical Embedded Cost Estimates ($000)

Embedded Costs: 721

Explanation: Asbestos Safety Program provides guidance for identifying and managing asbestos-containing material by SoCalGas employees.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Environmental Programs
Category-Sub: 1. Environmental Programs
Workpaper: 2EV000.000 - ENVIRONMENTAL

RAMP Item # 7 Ref ID: TP5MXD20170310232945077

RAMP Chapter: SCG-2

Program Name: SoCalGas Environmental Training

Program Description: Development and implementation of environmental training.of all SCG non-represented, non-management and management employees.

Risk/Mitigation:

Risk: Employee, Contractor & Public Safety

Mitigation: 0

Forecast CPUC Cost Estimates ($000)

	2017	2018	2019
Low	695	695	695
High	849	849	849

Funding Source: CPUC-GRC

Forecast Method: Zero-Based

Work Type: Mandated

Work Type Citation: N/A

Historical Embedded Cost Estimates ($000)

Embedded Costs: 695

Explanation: SoCalGas Environmental Training the development and implementation of environmental training of all SCG non-represented, non-management, and management employees.

Supplemental Workpapers for Workpaper 2EV000.000

SUPPLEMENTAL WORKPAPER

ANNUAL FEE SUMMARY

HAZARDOUS WASTE AND MATERIALS ACTIVITY FEES

FOR CALENDAR YEAR 2017

DEPARTMENT OF TOXIC SUBSTANCES

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara A. Lee, Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806

Edmund G. Brown Jr.
Governor

Annual Fee Summary

Fee Rates for Calendar Year January 1, 2017 through December 31, 2017 (Revised 12/27/2016)

The Department of Toxic Substances Control (DTSC) is the lead agency in California for hazardous waste management. DTSC enforces the state's Hazardous Waste Control laws, issues permits to hazardous waste facilities, and mitigates contaminated hazardous waste sites. This document summarizes the fees charged by DTSC. The State Board of Equalization (BOE) partners with DTSC to administer and collect many of the fees described in this summary.

The purpose of this document is to conveniently summarize state law as it relates to fees charged and collected by DTSC or collected by BOE for DTSC. Additional information about hazardous waste fees can be found on DTSC or BOE's websites[1]. The DTSC Fees Unit can be contacted directly at Fees@dtsc.ca.gov. Information can also be obtained by contacting DTSC's Regulatory Assistance Officers at (800) 728-6942 or (916) 324-2439 (out-of-state) or by email at RAO@dtsc.ca.gov.

In the event of a conflict between state law, regulations or policy and this document, state law, regulations or policy prevail. The following provides detail for each fee charged by DTSC as well as a section for hazardous-waste legislation and a glossary of all acronyms used.

[1] Department of Toxic Substances website: http://www.dtsc.ca.gov/
BOE Special Taxes and Fees Program website: http://www.boe.ca.gov/sptaxprog/tax_and_fee_programs.htm

Summary of Fees

- **Activity Fee for Hazardous Waste Permit Applications and Permit Modifications** (Health and Safety Code (H&SC) Sections 25189.3, 25205.7, 25206.1 through 25206.4 and 25247(d) (3))

  Senate Bill (SB) 839 (Chapter 340, Statutes of 2016) eliminated the option for a flat-rate Activity Fee for hazardous waste facility permit requests submitted after April 1, 2016. SB 839 requires anyone applying for a new permit, renewal of a permit, standardized permit or post closure permit or requesting certain permit modifications to enter into a written agreement to reimburse DTSC for its costs incurred in processing the application or request. This requirement also applies to requests for variances and waste classification determinations.

  DTSC recognizes that this change in law is significant. DTSC is developing a process to implement the new law. DTSC will post additional information on its website as it is developed. For any upcoming application or request, DTSC will contact applicants about entering into a cost reimbursement agreement, and will meet with applicants to discuss the scope and schedule of the permitting project, DTSC's cost estimate, the required partial advance payment, and billing frequency.

  Activity Fees for Permitting do not apply to the following: (H&SC Section 25205.7)

  1. Any variance granted pursuant to Article 4 (commencing with 66263.40) of Chapter 13 of Division 4.5 of Title 22 of the California Code of Regulations (CCR) (certain transportation operations).
  2. Any variance issued to a public agency to transport wastes for purposes of operating a household hazardous waste collection facility, or to transport waste from a household hazardous waste collection facility, which receives household hazardous waste or hazardous waste from conditionally exempted small quantity generators pursuant to Article 10.8 (H&SC Section 25218).
  3. A permanent household hazardous waste collection facility.
  4. Any variance issued to a public agency to conduct a collection program for agricultural wastes.

- **Consultative Services** (H&SC Sections 25201.9 and 25206.1 through 25206.4)

  DTSC may, upon written request of any person, enter into an agreement to provide certain voluntary consultative services to businesses who request the advice and oversight of the state in complying with H&SC Chapter 6.5 (Hazardous Waste Control) or Chapter 6.8 (Hazardous Substance Account). The agreement will require the person to reimburse DTSC for its costs pursuant to Article 9.2 (commencing with H&SC Section 25206.1)

- **Disposal Fee** (H&SC Sections 25174.1 through 25174.7 and 25205.5.1 and Section 66269.2 of the CCR Title 22)

  Persons who dispose of hazardous waste to land at an authorized hazardous waste disposal facility in California will pay a fee directly to the disposal facility, and the disposal facility will transmit the fee to BOE for deposit into the Hazardous Waste Control Account (HWCA). The fees specified in Table 1, established in H&SC Section 25174.6(a), are the rates for Calendar Year (CY) 2017 and are adjusted annually, except for the non-Resource Conservation and Recovery Act (RCRA) Cleanup Waste rate, to reflect changes in the Consumer Price Index (CPI) as determined by the Department of Industrial Relations. Disposal fees are calculated using the total wet weight measured in tons, or fractions thereof, of the hazardous waste in the form in which the hazardous waste existed at the time of disposal, submission for disposal, or application to land using a land disposal method as defined in Section 66260.10 of Title 22 CCR.

Summary of Fees

Table 1: Land Disposal Fees for CY 2017

Due Date: Upon disposal at the disposal facility
Base Rate $139.19

Waste Category	Rate
Non-RCRA cleanup wastes* (excluding asbestos).....	$ 5.72/ton
Other non-RCRA wastes* (including asbestos).....	$ 22.70/ton
Ores and Minerals*, Mining Waste.....	$ 18.09/ton
Extremely Hazardous Waste.....	$278.38/ton
Restricted Hazardous Waste.....	$278.38/ton
RCRA hazardous waste, not elsewhere classified.....	$ 56.23/ton
RCRA hazardous waste treated at the facility to be non-RCRA or nonhazardous.....	$ 22.70/ton
RCRA hazardous waste generated in a cleanup action and treated to non-RCRA standards.....	$ 5.72/ton
Incineration or dechlorination residues disposed in-state.....	$ 6.96/ton
Waste disposed out-of-state.....	$ -0-

* Fees are paid on the first 5,000 tons per month disposed of or submitted for disposal of non-RCRA and mining waste at each onsite or offsite facility by each generator.

Land Disposal Fees do not apply to any of the following: (H&SC 25174.1)

1. Hazardous waste that result when a government agency, or its contractor, removes or remedies a release of hazardous waste in the state caused by another person.

2. Hazardous waste generated or disposed of by a public agency operating a household hazardous waste collection facility in the state pursuant to H&SC, Division 20, Chapter 6.5, Article 10.8, commencing with Section 25218, including, hazardous waste received from conditionally exempt small quantity commercial generators.

3. Hazardous waste generated or disposed of by local vector control agencies that have entered into a cooperative agreement pursuant to H&SC Section 116180 or by county agricultural commissioners, if the hazardous waste resulted from their control or regulatory activities and if they comply with the requirements of this chapter and regulations adopted.

4. Hazardous waste disposed of, or submitted for disposal or treatment, which is discovered and separated from solid waste as part of a load checking program.

5. Hazardous waste disposed of by any person who acquires land for the sole purpose of owner-occupied single-family residential use, and who acquires that land without actual or constructive notice or knowledge that there is a tank containing hazardous waste on or under that property, if the waste is disposed in connection with the removal of the tank.

Summary of Fees

- **Environmental Fee** (H&SC Section 25205.6 and Section 66269.1 of Title 22 CCR)

On or before November 1 of each year, DTSC provides BOE with a schedule of codes from either the Standard Industrial Classification system maintained by the U.S. Department of Labor, or the North American Industry Classification system adopted by the U.S. Census Bureau, whichever it deems suitable, designating the classes of organizations that use, generate, store, or conduct activities in the state related to hazardous materials (Activities related to hazardous materials include the use of products such as paper, ink, plastics, paint, etc., which were manufactured using hazardous materials). BOE assesses and collects this fee from organizations using the codes provided by DTSC. Organizations subject to the fee are required to report annually on an Environmental Fee Return provided by BOE. The rates specified in Table 2 are for CY 2017. The fees will be collected in early CY 2018, and are adjusted annually based on changes in the CPI as determined by the Department of Industrial Relations.

Table 2: Environmental Fee CY 2017

Due Date: On the last day of February 2018 on a return provided by BOE

Business Size	Fee
Less than 50 employees.....	$ 0
50 but less than 75 employees.....	$ 320
75 but less than 100 employees.....	$ 562
100 but less than 250 employees.....	$ 1,117
250 but less than 500 employees.....	$ 2,396
500 but less than 1,000 employees.....	$ 4,474
1,000 or more employees.....	$15,181

Counting Employees in Calculating the Fee: The number of employees employed by a business organization is the number of persons employed in California for more than 500 hours during the previous calendar year for which the fee is due.

The following businesses are exempt from the Environmental Fee: (H&SC 25205.6)

1. Nonprofit residential care facilities.
2. Insurance companies that pay tax on gross premiums in lieu of all other California taxes and licenses.
3. Banks that pay a tax on net income in lieu of all other California taxes and licenses. Banks and insurance companies must pay the Environmental Fee for wholly owned corporations not engaged in banking or insurance.

Summary of Fees

- **EPA ID Verification Fee** (H&SC Section 25205.16)

DTSC is authorized to assess an annual verification fee on businesses with 50 or more employees that require an identification number issued by DTSC or by the U.S. EPA. There is an annual cap of $5,000 for each generator, hauler, or facility that may have multiple ID numbers. The fee is due within 30 days from the date of receipt of notice by DTSC. See the Related Links section found on DTSC's Hazardous Waste ID Number website[2] for more information. Table 3 reflects the fee collected for each identification number based on the number of employees within an organization.

Table 3: EPA ID Verification Fee for Fiscal Year (FY) 2016-17

Due Date: 30 days from the date of receiving a notice from the DTSC

Number of Employees	Fee*
Less than 50 employees.....	$ 0
50 but less than 75 employees.....	$150
75 but less than 100 employees.....	$175
100 but less than 250 employees.....	$200
250 but less than 500 employees.....	$225
500 or more employees.....	$250

* Not subject to CPI adjustment.

- **Facility Fees** Generally: H&SC sections 25205.1 through 25205.4 and 25205.12 through 25205.14 and 25205.17 through 25205.21)

Any facility treating, storing or disposing of hazardous waste in California must have a hazardous waste facility permit. Currently, facility permits are classified into four tiers; full facility permit, standardized permit, permit-by-rule, and conditional exemption. The facility fee due is determined by the type or types of permits held by a facility operator.

The following is a brief summary of each of the four tiers. A more detailed description of each tier and the associated fees follow the summary.

1. Full Permit - RCRA equivalent permit required for all RCRA regulated facilities, and for any state regulated incinerators and land disposal facilities.

2. Standardized Permit - offsite, non-RCRA treatment or storage.

3. Permit-By-Rule - onsite, non-RCRA treatment.

4. Conditional Exemption - onsite, non-RCRA treatment of small quantities or low-risk wastes.

[2] http://www.dtsc.ca.gov/IDManifest/index.cfm

Summary of Fees

Reducing or Terminating Facility Fees

Operating Full and Standardized permitted facilities are subject to Facility Fees and may be entitled to a reduction in fees when:

- **Size**: The facility notifies DTSC in writing and pledges to operate at a reduced capacity, below the amount the permit allows (H&SC Section 25205.18).
- **Type**: A facility that changes the type of authorization must do so using a Permit Modification, for example from treatment to storage. A reduction in the type of authorization may result in lower facility fees H&SC Section 25205.19).
- **Timing**: Facility fees for facilities reducing their capacity or type would be reduced in the next calendar year following the year the change occurs (H&SC Section 25205.19(b)).

Facilities that are closing must notify DTSC in writing of their intent to close and when operations actually ceased (H&SC Section 25205.2 and 22 CCR Division 4.5, Chapter 14, Article 7 or Chapter 15, Article 7).

Non-operating Facilities - Non-operating facilities owe the Facility Fee for one calendar year after they have ceased operations and notified DTSC of their intent to close. The Facility Fee rate for this additional year after final closure shall be either (1) the largest facility size rate at which the facility has ever been subject to the fee; or (2) where prior approval was obtained from, and granted by DTSC for a variance, closure, or permit-by-rule, the largest facility size rate since the department last granted approval for such variance, closure or permit-by-rule.

➢ Full Permit Facility Fee (H&SC Sections 25205.1 (b), 25205.2 and 25205.2 through 25205.7)

Each operator of a facility will pay an annual Facility Fee for each reporting period, or any portion thereof, to BOE based on the size and type of the facility. Facility means any units or other structures, and all contiguous land, used for the treatment, storage, disposal, or recycling of hazardous waste for which a permit or a grant of interim status has been issued by DTSC for that activity.

Facility Fees are due and payable to BOE annually in two installments each at 50% of the annual Facility Fee. BOE will mail prepayment forms to registered fee payers approximately 30 days prior to the due dates. The rates specified in Table 4 are for CY 2017 and are adjusted annually to reflect changed in the CPI as determined by the Department of Industrial Relations.

Summary of Fees

Table 4: Full Permit Facility Fee for CY 2017

Due Dates:		
Two Prepayments	February 27, 2017 (during the reporting period) August 31, 2017 (during the reporting period)	
Reconciliation	February 29, 2018 (any remaining balance)	
Base Rate $32,264		
Facility Type	Rate	Fee
Mini storage facility.....	25% base rate.....	$ 8,066
Small storage facility.....	100% base rate.....	$ 32,264
Large storage facility.....	2 x base rate.....	$ 64,528
Mini treatment facility.....	50% base rate.....	$ 16,132
Small treatment facility.....	2 x base rate.....	$ 64,528
Large treatment facility (onsite/offsite).....	3 x base rate.....	$ 96,792
Disposal facility.....	10 x base rate.....	$322,640

Land Treatment Units - Land treatment units pay an annual fee equivalent to two percent of the land disposal fee in addition to the annual Facility Fee, which is due at the same time as the Facility Fee (H&SC 25209.7).

Ceasing Operations - A treatment or storage facility that has stopped treating or storing waste is required to pay the applicable full permit Facility Fee for only one additional reporting period. For the additional reporting period, the fee will be based on the highest category in which the facility has operated in any previous year. Disposal facilities pay twice the applicable full permit Facility Fee for one additional reporting period after operations have ceased. A facility is not considered to have stopped treatment, storage or disposal of waste unless these activities have actually ceased and the facility has notified DTSC of its intent to close.

Full Permit Fees do not apply to the following:

1. Facilities operating under a standardized permit, permit-by-rule, or conditional exemption.

2. Facilities authorized by DTSC to clean and recycle excavated underground storage tanks until an effective date of a regulation, adopted by DTSC, governing the statewide requirements for the issuance of a permit for tank cleaning and recycling facilities.

3. A facility that DTSC has issued a variance from the requirement of obtaining a hazardous waste facility permit or grant of the Interim Status Documents (ISD) is not subject to the fee for any fiscal year following the reporting period in which the variance was granted.

4. Facilities that treat, store or dispose, if that activity took place before July 1, 1986, and if the fee for the activity was not paid prior to January 1, 1994.

5. Treatment facilities engaging in treatment exclusively to accomplish a removal, or remedial action or a corrective action, in accordance with an order issued by the U.S. EPA.

6. Any household hazardous waste collection facility operated pursuant to H&SC, Division 20, Chapter 6.5; Article 10.8.

Summary of Fees

7. Any facility operated by a local government agency, or by any person operating a hazardous waste collection program under an agreement with a public agency.

8. That portion of a permitted solid waste facility which is used for the segregation, handling, and storage of hazardous waste separated from solid waste loads received by the facility, pursuant to a load checking program.

9. A facility used solely for the treatment, storage, disposal, or recycling of hazardous waste that results when a public agency or its contractor investigates, removes, or remedies a release of hazardous waste caused by another person.

10. A facility that has been issued a permit for storing hazardous waste onsite, and whose permit has expired, if all the following has occurred:

    a. The facility has received no waste from offsite since the permit expired;

    b. The owner or operator gave DTSC timely notification of intent to close the facility; pursuant to regulations adopted by DTSC;

    c. At least 90 days have elapsed since the owner or operator gave DTSC that notification and;

    d. DTSC did not complete its review of the closure plan within 90 days of receiving the notification.

11. An operator who is operating in such a manner that a permit or a grant of interim status is required, but who does not hold a permit or a grant of interim status, is not required to pay facility fees. However, the operator could be subject to fines and penalties for operating without a permit or a grant of interim status. If the facility is allowed to operate pursuant to an order requiring the facility to obtain a permit within a specified amount of time, the order may also require fees to be paid while the permit issuance is pending as a condition of operation.

Definitions for Full Permit Facilities:

Note: The term "capacity" referred to in the definitions below is the capacity provided in a permit, interim status document or Federal Part A application.

- Mini-storage facility — A storage facility that stores or has the capacity to store 0.5 ton (1,000 pounds) or less of hazardous waste during any one month of the current reporting period commencing on or after July 1, 1991.

- Mini-treatment facility — A treatment facility that treats, land treats, or recycles, or has the capacity to treat, land treat, or recycle 0.5 ton (1,000 pounds) or less of hazardous waste during any one month of the current reporting period commencing on or after July 1, 1991.

- Small storage facility — A storage facility that stores more than or has the capacity to store more than 0.5 ton (1,000 pounds), but less than 1,000 tons, of hazardous waste during any one month of the current reporting period commencing on or after July 1, 1991.

Summary of Fees

- Small treatment facility — A treatment facility that treats, land treats, or recycles, or has the capacity to treat, land treat, or recycle more than 0.5 ton (1,000 pounds), but less than 1,000 tons, of hazardous waste during any month of the current reporting period commencing on or after July 1, 1991.
- Large storage facility — A storage facility that stores or has the capacity to store 1,000 or more tons of hazardous waste during any one month of the current reporting period commencing on or after July 1, 1991.
- Large treatment facility — A treatment facility that treats, land treats, or recycles, or has the capacity to treat, land treat, or recycle 1,000 or more tons of hazardous waste during any one month of the current reporting period commencing on or after July 1, 1991.

➢ Postclosure Permit Facility Fee (H&SC Sections 25205.4(c9) and 25247(d)(3))

Postclosure Fee applies to facilities with postclosure permits. Facilities are required to report their facility size on a Hazardous Waste Facility Fee Return provided by BOE. Table 5 are CY 2017 postclosure permit facility fees. These fees are not subject to annual CPI adjustment.

Table 5: Postclosure Permit Facility Fee for CY 2017 - Annually

Due Dates:		
Two Prepayments	February 27, 2017 (during the reporting period) August 31, 2017 (during the reporting period)	
Reconciliation	February 28, 2018 (any remaining balance)	
DTSC-Lead Sites		
	During first five years of postclosure period	During remaining years of postclosure period
Small Facility	$ 5,725	$ 3,050
Medium Facility	$11,450	$ 6,100
Large Facility	$17,175	$10,300

Regional Water Quality Control Board-Lead Sites - These fees will be reduced by 50 percent for any facility for which an agency other than DTSC is the lead agency pursuant to paragraph (1) of subdivision (b) of H&SC Section 25204.6.

➢ Standardized Permit Facility Fee (H&SC Sections 25201.6 and 25205.4(e))

California SB 27 (Chapter 410, Statutes of 1993) created the standardized permit tier. Standardized permits are only for non-RCRA facilities. Each facility will pay an annual facility fee in addition to the Activity Fee (see Activity Fees H&SC Section 25205.7) assessed upon application for a permit or renewal. The amount of the fee is determined by the size and series designation of the facility. All fees will be billed to facilities directly by BOE. Table 6 lists the Activity Fees for a Standardized Permit in CY 2017. Standardized permit facility fees are not subject to annual CPI adjustment.

Summary of Fees

Table 6: Standardized Permit for CY 2017

Due Dates:	
Two Prepayments	February 27, 2017 (during the reporting period) August 31, 2017 (during the reporting period)
Reconciliation	February 28, 2018 (any remaining balance)
Series A.....	$11,730
Series B.....	$ 5,497
Series C.....	$ 4,617
Small Quantity Series C	$ 2,308

Standardized Permit Fee Definitions

"SERIES A" Standardized Permit means a permit issued to a facility that meets one or more of the following conditions:

1. The total influent volume of liquid hazardous waste treated is greater than 50,000 gallons per calendar month.
2. The total volume of solid hazardous waste treated is greater than 100,000 pounds per calendar month.
3. Where both liquid and solid hazardous wastes are being treated, either the total volume of liquid waste treated exceeds the volume specified in number one (1) above, or the total weight of solid hazardous waste treated exceeds the weight specified in number two (2) above.
4. The total facility storage design capacity is greater than 500,000 gallons for liquid hazardous waste.
5. The total facility storage design capacity is greater than 500 tons for solid hazardous waste.
6. Where both liquid and solid hazardous waste are being stored, the total volume of liquid waste stored exceeds the volume specified in number four (4) above, or the total volume of solid hazardous waste stored exceeds the volume specified in number five (5) above.
7. A volume of liquid or solid hazardous waste is stored at the facility for more than one calendar year.

"**SERIES B"** Standardized Permit means a permit issued to a facility that does not store liquid or solid hazardous waste for a period of more than one calendar year, and that meets one or more of the following conditions:

1. The total influent volume of liquid hazardous waste treated is greater than 5,000 gallons but less than 50,000 gallons per calendar month.
2. The total volume of solid hazardous waste treated is greater than 10,000 pounds but less than 100,000 pounds per calendar month.
3. Where both liquid and solid hazardous wastes are being treated, the total volume of liquid hazardous waste treated does not exceed the volume specified in number one (1) above, and the volume of solid hazardous waste treated does not exceed the volume specified in number two (2) above.
4. The total facility storage design capacity is greater than 50,000 gallons but less than 500,000 gallons for liquid hazardous waste.
5. The total facility storage design capacity is greater than 100,000 pounds but less than 500 tons for solid hazardous waste.

Summary of Fees

6. Where both liquid and solid hazardous wastes are being stored, the total volume of liquid hazardous waste stored does not exceed the volume specified in number four (4) above, and the total volume of solid hazardous waste stored does not exceed the volume specified in number five (5) above.

"SERIES C" Standardized Permit means a permit issued to a facility that does not store liquid or solid hazardous waste for a period of more than one calendar year, that does not conduct thermal treatment of hazardous waste, with the exception of evaporation, and meets one of the following conditions:

1. The total influent volume of liquid hazardous waste treated does not exceed 5,000 gallons per calendar month.
2. The total volume of solid hazardous waste treated does not exceed 10,000 pounds per calendar month.
3. Where both liquid and solid hazardous wastes are being treated, the total volume of liquid hazardous waste treated does not exceed the volume specified in number one (1) above, and the total volume of solid hazardous wastes treated does not exceed the volume specified in number two (2) above.
4. The total facility storage design capacity does not exceed 50,000 gallons for liquid hazardous waste.
5. The total facility storage design capacity does not exceed 100,000 pounds for solid hazardous waste.
6. Where both liquid and solid hazardous waste are being stored, the total volume of liquid hazardous waste stored does not exceed the volume specified in number four (4) above, and the total weight of solid hazardous waste stored does not exceed the weight specified in number five (5) above.

"SMALL QUANTITY SERIES C" Standardized Permit Facility is a facility that treats less than 1,500 gallons or 3,000 pounds of waste in a month, or can store less than 15,000 gallons or 30,000 pounds of waste.

- Transportable Treatment Unit (H&SC Section 25205.14)

California Assembly Bill (AB) 1772 (Chapter 1325, Statutes of 1992) created permit levels that allow facilities that pose a lesser threat to public health and the environment to handle hazardous waste under certain conditions without being required to secure a full permit (H&SC Section 25205.7) or pay facility fees (H&SC Section 25205.2). Those who qualify for the lower level of permit and notify DTSC may fall under the tiers described in Table 7. The Transportable Treatment Unit fees are authorized per treatment unit and not per facility.

Table 7: Transportable Treatment Unit Fee CY 2017

Due Date: 30 Days after billing by BOE
Reporting period begins January 1 each year

Type of Permit	Fee
Permit-by-Rule.....	$1,565 per unit
Conditional Authorization.....	$1,565 per unit
Conditional Exemption, initial and subsequent years.....	$ 38 per unit*

* Not subject to CPI adjustment.

Summary of Fees

- **Generator Fee** (H&SC Sections 25174.7, 25205.1, 25205.5, 25205.5.1 and 25205.22; Section 3000 of Title 18 CCR; and Section 66269.2 of Title 22 CCR)

Every generator that produces five tons or more of hazardous waste will pay BOE a Generator Fee for each generator site for each calendar year, or portion thereof. Facilities permitted under a full or standardized permit who pay annual Facility Fees for a specific site do not owe a generator fee for that site. Generators are required to report the amount of waste generated on a hazardous waste generator fee return provided by BOE. The rates specified in Table 8 are for CY 2017 and are adjusted annually to reflect changes in the CPI as determined by the Department of Industrial Relations.

Table 8: Generator Fee CY 2017

Due Dates:		
Two Prepayments	February 27, 2017 (during the reporting period) August 31, 2017 (during reporting period)	
Final Payment	February 28, 2018 (after the reporting period)	
Base Rate: $4,488		
Generator Size	Rate	Fee
Less than 5 tons/year.....	0% base rate.....	$ -0-
5 but less than 25 tons/year.....	5% base rate.....	$ 224
25 but less than 50 tons/year...	40% base rate.....	$ 1,795
50 but less than 250 tons/year.....	100% base rate.....	$ 4,488
250 but less than 500 tons/year.....	5 x base rate.....	$ 22,440
500 but less than 1,000 tons/year.....	10 x base rate.....	$ 44,880
1,000 but less than 2,000 tons/year.....	15 x base rate.....	$ 67,320
2,000 or more tons/year.....	20 x base rate.....	$ 89,760

Land Disposal Fee for Generators - In addition, generators who dispose of waste to land may be subject to Land Disposal Fees imposed pursuant to H&SC Section 25174.1.

Generator Fee Exemptions - Generators who have paid a Facility Fee or received a credit under H&SC Section 25205.2 (i) are exempt from the generator fee.

Generator Fee Refunds - SB 2014 (Chapter 737, Statutes of 1998) provides for two potential refunds for hazardous waste generators:

a. Generators who paid Generator Fees to BOE and in the same year also paid Generator Inspection Fees to a Certified Unified Program Agency (CUPA). In addition, the generator must also have received a state Generator Fee credit for local fees paid for in 1996.

b. Generators who submitted hazardous waste to a permitted offsite facility for recycling. For this purpose recycling does not include hazardous waste that is burned in a boiler; industrial furnace; or incinerator, disposed of, or used to produce products applied to land.

Summary of Fees

Other specific requirements apply to each of the two potential types of refunds. In addition, no refunds will be made unless DTSC certifies that funds are available for the refunds. Because of budgetary shortfalls, refunds have not been available in prior years, and may not be available in CY 2017. Separate applications for each type of refund must be submitted to BOE by September 30th of each year for the prior calendar year. For information regarding the application process please contact BOE at (916) 322-9534.

Standard Conversion Factors - All quantities in the Hazardous Waste Tracking System (HWTS) are reported in tons for standard reports and calculations. Volumes of hazardous waste reported in cubic yards on the manifest are converted to tons using a conversion factor that is specific to the state waste code. DTSC takes every precaution to ensure the accuracy of data in the HWTS; however conversion factors may underestimate or overestimate the actual weight of waste, especially with waste types that are highly variable in composition. Consequently, conversions of wastes such as asbestos and contaminated soils, reported in volume and other measurements (e.g. bags) to tons, may not reflect the true tonnage generated or transported. Therefore, retention of weight tickets for each manifest is strongly recommended for accurate measurements. The weight tickets can be referenced by the generator to later file their generator fee return with BOE and/or the weight tickets can later be produced to respond to an audit initiated by BOE.

Effective January 1, 2016, the following standard conversion factors were implemented by DTSC in calculating generator fees.

- Asbestos (State Waste Code # 151) – Conversion Factor = 0.23
- Contaminated Soils (State Waste Code # 611) – Conversion Factor = 1.41

The following materials are not hazardous wastes for purposes of fee assessments:

1. Hazardous materials that are recycled and used onsite, and are not transferred offsite.

2. Aqueous waste treated in a treatment unit operating, or that subsequently operates, pursuant to a permit by rule, or pursuant to H&SC Section 25200.3 or 25201.5. However, hazardous waste generated by a treatment unit treating waste pursuant to a permit-by-rule, by a unit that subsequently obtains a permit-by-rule or other authorization pursuant to H&SC Section 25200.3 or 25201.5 is hazardous waste.

Generator Fees do not apply to:

1. Hazardous waste that results when a government agency, or its contractor, removes or remedies a release of hazardous waste in the state caused by another person.

2. Hazardous waste generated or disposed of by a public agency operating a household hazardous waste collection facility in the state pursuant to Article 10.8, including hazardous waste received from conditionally exempt small quantity commercial generators.

3. Hazardous waste generated or disposed of by local vector control agencies that have entered into a cooperative agreement pursuant to H&SC Section 116180 or by county agricultural commissioners, if the hazardous wastes result from their control or regulatory activities and if they comply with the requirements of this chapter and regulations adopted.

4. Hazardous waste disposed of, or submitted for disposal or treatment, which is discovered and separated from solid waste as part of a load checking program.

Summary of Fees

5. Any person, who acquires land for the sole purpose of owner-occupied single-family residential use, and who acquires that land without actual or constructive notice or knowledge that there is a tank containing hazardous waste on or under that property, is exempt from the fees imposed pursuant to H&SC Sections 25174.1, 25205.5, and 25345, in connection with the removal of the tank.

- **Lead-Acid Battery Recycling Act of 2016 (AB 2153, Chapter 666, Statutes of 2016)** (Article 10.5 (commencing with Section 25215) of Chapter 6.5 of Division 20 of the H&S C)

  1. **California Battery Fee** (H&SC 25215.25). On and after April 1, 2017, until March 31, 2022, this law requires a California battery fee in the amount of $1 to be imposed on a "person," as specified in statute, for each qualifying lead-acid battery purchased from a dealer. The bill authorizes the dealer to retain one and one-half percent of the fee as reimbursement for any costs associated with the collection of the fee and requires the dealer to remit the remainder to BOE. On and after April 1, 2022, the law increases the California Battery Fee to $2.

  2. **Manufacturer Battery Fee** (H&SC 25215.35). On and after April 1, 2017, until March 31, 2022, this law requires a fee of $1 to be imposed on a "manufacturer," as specified in statute, of lead-acid batteries for each lead-acid battery it sells at retail to a person in California, or that it sells to a dealer, wholesaler, distributor, or other person for retail sale in California.

- **Manifest Forms** (Section 66262.20 of Title 22 CCR.)

  A generator who transports, or offers for transportation, hazardous waste for offsite transfer, treatment, storage, or disposal will prepare a Manifest before the waste is transported offsite. The national Uniform Hazardous Waste Manifest Form is available only from registered printers approved by the U.S. EPA. Registered printers are available via the U.S. EPA website[3].

- **Manifest Reprocessing Fee** (H&SC Section 25160.5)

  DTSC has authority to assess a $20 reprocessing fee for each improperly completed Manifest Form that is returned to the person who completed the manifest.

- **Manifest User Fee** (H&SC Section 25205.15)

  DTSC is authorized to assess a fee of $7.50 for each manifest used, except that manifests used solely for recycled waste are exempt. The first four non-recycled manifests used in a calendar year by a business with less than 100 employees are free. The fee is due within 30 days from the date of receipt of notice by DTSC. The fee for a manifest that is used solely for hazardous waste derived from air compliance solvents is $3.50. Persons, who erroneously report this type of waste, or recycled waste, on a manifest that is actually used for transportation of other types of waste, will pay the $7.50 manifest fee plus the error correction fee of $20.00 per manifest. The Manifest User Fee is not subject to annual CPI adjustment. More information about Hazardous Waste Manifests can be found on DTSC's website[4].

[3] http://www.epa.gov/epawaste/hazard/transportation/manifest/registry/printers.htm

[4] http://www.dtsc.ca.gov/IDManifest/Manifests.cfm

Summary of Fees

- **Other Miscellaneous Fees** (State Administrative Manual Section 8740)

  In accordance with the requirements of the State Administrative Manual, DTSC may charge a fee for any requests to retrieve and copy Departmental records.

- **Sale of Materials** (H&SC Section 25201.11)

  DTSC may sell, lease, or license materials including, but not limited to, videotapes, audiotapes, books, pamphlets and computer software.

Fees Related Legislative History

The Hazardous Substance Account (HSA) was created by Chapter 756, Statutes of 1981. In 1989, SB 475 (Torres, c. 269, stats. 1989) moved the Land Disposal Fee from the HWCA to the HSA, established the Environmental Fee for corporations with 50 or more employees, set the base rate for the Disposal Fee at $52.50, added a new category for waste transported out of state, and established fees for oversight activities provided by the DTSC Site Mitigation Program.

In FY 1990/91, SB 1857 (Torres, c. 1268, stats. 1990) eliminated the Superfund tax and the discount for disposal to double-lined surface impoundments, and reduced the base rate for mining waste from 25 percent to 13 percent. In addition, the legislation doubled the disposal fee base rate from $52.50 to $105.00 per ton, and made several technical and corrective changes to the hazardous waste funding program. These rates became effective on January 1, 1991.

In FY 1991/92, SB 48 (Thompson, c. 766, stats. 1991) created the Railroad Accident and Prevention Fund and mandated DTSC to establish a fee to be paid by surface transporters of hazardous materials to fund the Railroad Accident Prevention and Immediate Deployment Force.

In FY 1992/93, SB 1469 (Calderon, c. 852, stats. 1992) created the Federal Receipts Account for fees collected from Federal Agencies, combined the HWCA and the HSA accounts into the HWCA, and created the Site Remediation Account, which was funded from the HWCA to pay for direct site cleanup. Land disposal fees for waste going out of state were eliminated, and the disposal fee for the Resource Conversation and Recovery Act (Federal), 42 USC Section 6901, 40 Code of Federal Regulation (RCRA) waste dropped from $105 to $42.42 per ton. This bill also created two new fees, the Manifest User Fee and the EPA ID number verification fee. AB 1772 (Polanco, c. 1325, stats. 1992) established a new Tiered Permitting fee, exempted certain onsite treatments from past and future facility fees, and established new annual fees for companies that operate in the lower permitting tiers.

In FY 1993/94, SB 27 (Wright, c. 410, stats. 1993) set new fees for the Standardized Permits for hazardous waste treatment and storage facilities that accept hazardous waste from other locations and that are not required to obtain a permit under federal law (RCRA). Also, SB 922 (Calderon, c. 1145, stats. 1993) made substantial changes to the California Hazardous Substances Tax Law, effective January 1, 1994. Some of these changes included reducing the Disposal Fee on cleanup waste, eliminating most Site Mitigation Activity Fees, reducing the Manifest Fee on recycled wastes, increasing the Generator Fee, and limiting the liability for Facility Fees after closure. SB 1123 (Calderon, c. 65, stats. 1994) exempted facilities and operators from any Permit Modification Fee liability resulting from a revision of the facility's or operator's closure plan.

In FY 1994/95, AB 3582 (Richter, c. 1154, stats. 1994) established effective January 1, 1995, that oil-contaminated bilge water that requires a National Pollutant Discharge Elimination System Permit from a regional water quality control board was no longer considered to be "used oil." Such oil-contaminated bilge water was now subject to the Hazardous Waste Generator Fee if shipped off-site for treatment. Bilge water treated in an onsite treatment unit authorized to operate under Permit-by-Rule (PBR), under Conditional Authorization , or under Conditional Exemption remained exempt from the Generator Fee under H&SC Section 25205.5(e)(2). The effluent or residue from the treatment process is subject to the fee unless another exemption applies. Also, SB 1815 (Wright, c. 548, stats. 1994) provided that the base rate for a Standardized Permit would be the rate for the 1993-94 fiscal year. SB 1082 (Calderon, c. 418, stats. 1993) created the Certified Unified Program Agency (CUPA) and instituted a single fee system specifically for the support of the local CUPAs. Each CUPA collects a state surcharge, determined by the California Environmental Protection Agency, to fund the state's costs of overseeing the program. DTSC is one of the agencies that receive a portion of the state surcharge.

In FY 1995/96, SB 1222 (Calderon, c. 638, stats. 1995) lowered the rate for non-RCRA cleanup waste to $7.50 per ton, lowered the rate for other non-RCRA waste to $17.94 per ton, and added a reduced fee for designated treatment residues disposed in-state. In addition, this bill required hazardous waste disposal facilities to collect the Disposal Fee and transmit the fee to BOE and eliminated the requirement for facilities receiving non-RCRA waste imported for treatment, recycling or disposal to pay the Generator Fee. AB 1906 (Sher, c. 637, stats. 1995) consolidated fee return filing and provided for prepayment for the facility, generator and generator surcharge fees. SB 1964 (Figueroa, c. 630, stats. 1995) required annual adjustments to the Hazardous Waste Fees to be based on the CPI for California rather than the United States Index. SB 1291 (Wright, c. 640, stats. 1995) created procedures for a facility to convert from a full permit or ISD to an onsite tier, either PBR, Conditional Authorization or Conditional Exemption, and established a fee of $500 for the permit modification to make the conversion. Fees are paid only on the highest tier.

In FY 1996/97, AB 2776 (Miller, c. 999, stats. 1996) allowed DTSC to, until January 1, 2002, grant temporary relief from certain requirements by issuing a single variance to all affected businesses and allowing a variance applicant to enter into an optional cost reimbursement agreement as an alternative to the flat rate variance fee. SB 1532 (Wright, c. 259, stats. 1996) changed existing law to require that certain facilities operating under a standardized permit or grant of interim status receive a credit for the annual Facility Fee . SB 1532 also exempted a generator from the annual Generator Fee if the generator's facility received a credit under the Facility Fee Provision for a specific site. SB 1839 specified that, effective July 20, 1996; a Generator Fee prepayment was not required for a fee payer whose prepayment due was less than $500.

Fees Related Legislative History

In FY 1997/98, SB 660 (Sher, c. 870, stats. 1997) enacted the Environmental Cleanup and Fee Reform Act of 1997 and implemented many of the recommendations made by the Fee Reform Task Force mandated by SB 1222. Effective January 1, 1998, SB 660 eliminated the Generator Fee surcharge and restructured the Generator Fee, Disposal Fee, Facility Fee and the Environmental Fee. Effective July 1, 1998, the fees for a preliminary endangerment assessment for site mitigation, extremely hazardous waste, border zone property assessment, waste classification, variance, and class I modifications were eliminated. Variances (except variances for transporters), waste classifications, and preliminary endangerment assessments became cost reimbursement activities. In addition, permitted facilities may submit a self-certification letter ("pledge letter") which allows the permitted facility to pay a reduced Facility Fee corresponding to the reduced amount of hazardous waste being generated at those respective facilities. SB 660 also established the Toxic Substances Control Account (TSCA) to receive the Environmental Fee, cost reimbursements and other revenues not listed in this summary. TSCA funds are to be expended for site remediation, technology programs, and administration and implementation of cleanup programs.

In FY 1998/99, SB 2240 (Committee on Environmental Quality, c. 882, stats. 1998) allowed DTSC to choose either the Standard Industrial Classification system or the North American Industry Classification system, whichever it deemed suitable, when providing BOE with a list of codes for the Environmental Fee. While SB 660 eliminated the Manifest Fee for manifests used solely for recycled waste, this bill added a fee for manifests used to transport hazardous wastes derived from air compliance solvents.

In FY 1999/00, SB 606 (O'Connell, c. 745, stats.1999) added a penalty to the Disposal Fee of five (5) times the normal Disposal Fee rate for recyclable wastes that have been disposed on land. This penalty is in addition to any other penalties that DTSC may assess through an enforcement action.

In FY 2000/01, AB 2309, which would have extended the sunset date for the reduction of fees for disposal and facility fees set by SB 660 (Sher, c. 870, stats. 1997), was vetoed.

In FY 2001/02, AB 1259 (Wiggins, c. 461, stats. 2001) required DTSC to suspend or deny the permit of a hazardous waste facility if the owner or operator is delinquent in paying fees or penalties owed to DTSC provided all appeal rights have been exhausted or have expired.

In FY 2002/03, there were no changes to the fee structure.

In FY 2003/04, AB 1247 (Aghazarian, c. 286, stats. 2003) authorized DTSC to use enforcement orders and enforceable agreements to impose the requirements of postclosure plans at hazardous waste facilities in lieu of issuing postclosure permits. If DTSC imposes postclosure plan requirements through an enforcement order or enforceable agreement, the facility owner or operator is required to pay DTSC's Activity Fee and annual Postclosure Facility Fee. DTSC may only impose postclosure plan requirements through enforcement orders and enforceable agreements from January 1, 2004, to January 1, 2007.

In FY 2004/05 there were no changes to the fee structure.

In FY 2005/06, AB 1803 (Committee on Budget, c.77, stats.2006) authorized DTSC to expand the applicability of the Environmental Fee beyond corporations. Under AB 1803, the language of H&SC Section 25205.6(a) was amended to include the definition of "organization," which means a corporation, limited liability company, limited partnership, limited liability partnership, general partnership, and sole proprietorship. In addition, AB 1803 exempted the fees of the first four non-recycled manifests for organizations with less than 100 California employees. AB 1813 (Committee on Budget, c.344, stats. 2006) stipulated that the amended Environmental Fee will go into effect for CY 2007, and was due by February 29, 2008.

In FY 2006/07 there were no changes to the fee structure.

In FY 2007/08 there were no changes to the fee structure.

In FY 2008/09 there were no changes to the fee structure.

In FY 2009/10, SB 855 (Committee on Budget, c. 718, stats. 2010) clarified that all penalties collected associated with lead in jewelry, lead wheel weights, and toxics in consumer product packaging will be deposited into TSCA.

In FY 2010/11 there were no changes to the fee structure.

In FY 2012/13 there were no changes to the fee structure.

In FY 2014/15, SB 1249 (Hill, c. 756, stats. 2014) authorizes DTSC to collect an annual fee from metal shredding facilities at a rate sufficient to cover its costs in establishing and implementing alternative hazardous waste management standards within those facilities.

Fees Related Legislative History

In FY 2016/17, SB 839 (Senate Committee on Budget, c. 340, stats. 2016) alters how the costs of processing a hazardous waste facility permit application or a class 2 or class 3 permit modification are assessed. SB 839 requires anyone applying for a new permit, renewal of a permit, standardized permit or post closure permit or requesting certain permit modifications to enter into a written agreement to reimburse DTSC for its costs incurred in processing the application or request. This requirement also applies to requests for variances and waste classification determinations. SB 839 eliminated the option of paying a flat-rate Activity Fee for these applications and requests submitted on or after April 1, 2016.

In FY 2016/17, AB 2153 (Garcia, c. 666, stats. 2016) The Lead-Acid Battery Recycling Act of 2016 establishes in part a Manufacturers Battery Fee and a California Battery Fee. A Manufacturer Battery Fee of one dollar ($1), shall be imposed on a manufacturer of lead-acid batteries for each lead-acid battery it sells at retail to a person in California or that it sells to a dealer, wholesaler, distributor, or other person for retail sale in California. The fee become inoperative on April 1, 2022, and as of January 1, 2023 is repealed, unless a later enacted statute becomes operative on or before January 1, 2023. A California Battery Fee shall be imposed on a person for each replacement lead-acid battery purchased from a dealer of the type specified in statute. The California Battery Fee is set at one dollar ($1) on and after April 1, 2017, until March 31, 2022, and after April 1, 2022, the amount of the fee shall be two dollars ($2). Revenues collected pursuant to the Act will be deposited into a newly established Lead-Acid Battery Cleanup Fund and be used in part, and on appropriation by the Legislature, to fund response actions at any area of the state that is reasonably suspected to have been contaminated by the operation a lead-acid battery recycling facility.

Glossary of Acronyms/Abbreviations

AB = Assembly Bill

BOE = California State Board of Equalization

c. = Chapter

CCR = California Code of Regulations

CUPA = Certified Unified Program Agency

CPI = Consumer Price Index

CY = Calendar Year

DTSC = Department of Toxic Substances Control

EPA = Environmental Protection Agency

FY = Fiscal Year

H&SC = California Health and Safety Code

HWCA = Hazardous Waste Control Account

ID = Identification

ISD = Interim Status Documents

PBR = Permit-by-Rule

RCRA = Federal Resource Conservation Recovery Act

SB = California Senate Bill

Stats. = Statutes

TSCA = Toxic Substances Control Account

SUPPLEMENTAL WORKPAPER

CALIFORNIA ENDANGERED SPECIES ACT
MEMORANDUM OF UNDERSTANDING
AND MANAGEMENT AUTHORIZATION
CALIFORNIA DEPARTMENT OF FISH AND GAME

CALIFORNIA ENDANGERED SPECIES ACT MEMORANDUM OF UNDERSTANDING AND MANAGEMENT AUTHORIZATION

by and between

SOUTHERN CALIFORNIA GAS COMPANY

and

THE CALIFORNIA DEPARTMENT OF FISH AND GAME

regarding

ON-GOING MAINTENANCE ACTIVITIES

No. 2081-1996-049-5

This California Endangered Species Act Memorandum of Understanding ("CESA MOU") is made and entered into by and between Southern California Gas Company ("SCG") and the California Department of Fish and Game (the "Department"), collectively "the Parties."

SCG proposes to undertake a project that may cause the take of species of wildlife protected by the California Endangered Species Act, California Fish and Game Code §2050, *et seq.* ("CESA"). The project is the subject of a federal Biological Opinion issued pursuant to a Federal Endangered species Act, Section 7 consultation between the United States Fish and Wildlife Service ("USFWS") and the United States Bureau of Land Management ("BLM"). In conjunction with the federal Biological Opinion, this CESA MOU prescribes management measures for the species that are to be incorporated into the proposed project. The management measures are designed to avoid, minimize, and mitigate adverse impacts to the species and to ensure that the project will not destroy or adversely modify habitat essential to the species' continued existence. If the management measures are duly implemented, the proposed project can be completed in compliance with CESA.

AGREEMENT

The Parties agree to the following recitals of fact, definitions, terms, conditions, and other provisions:

1.0 DEFINITIONS

The following definitions shall govern interpretation of this CESA MOU:

1.1 *"Wildlife"* means all wild animals, birds, plants, fish, amphibians, and related ecological communities, including the habitat upon which the wildlife depends for its continued viability, as provided in Fish and Game Code §711.2.

1.2 *"Take"* means to hunt, pursue, catch, capture, or kill an individual of a listed species, or to attempt any such act. *"Take"* includes any act that is the proximate cause of the death of an individual of a listed species, or any act a natural and probable consequence of which is the death of any individual of a listed species.

1.3 *"Management measure"* means any action deemed necessary by the Department to sustain a species within a natural ecological system. *"Management measures"* include legal, biological and administrative measures.

2.0 RECITALS

2.1 The State-listed endangered least Bell's vireo (*Vireo pusillus bellii*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), willow flycatcher (*Empidonax traillii extimus*), gila woodpecker (*Melanerper aropygialis*), Coachella Valley fringe-toed lizard (*Uma inornata*), and the State-listed threatened desert tortoise (*Gopherus agassizii*), Mohave ground squirrel (*Spermophilus mohavensis*), black rail (*Rallus jamaicensis*), Yuma clapper rail (*Rallus longirostris yumanensis*), and barefoot banded gecko (*Coleonyx switaki*), (the "Listed Species") are known to exist at or in the vicinity of SCG's proposed on-going maintenance activities. A summary life history of the Listed Species is attached as Exhibit 1. SCG proposes to avoid, minimize and mitigate adverse impacts to the Listed Species that may result from the Maintenance Activities, and has requested Authorization for Management of the Listed Species from the Department, pursuant to Fish and Game Code §2081.

2.2 The Department is trustee for the fish and wildlife resources of the State of California and has jurisdiction over the conservation, protection, and management of fish, wildlife and native plants, and the habitat necessary for biologically sustainable populations thereof, pursuant to Fish and Game Code §1802. Under the objectives and policies of CESA, it is the Department's goal to conserve, protect, restore, and enhance the Listed Species and the Listed Species' habitat.

2.3 This CESA MOU is the result of a cooperative effort by the Parties to ensure that the Project may proceed as proposed to the extent it is consistent with CESA.

3.0 PROJECT DESCRIPTION

This CESA MOU covers those SCG activities described in Exhibit 2, including normal and emergency activities involving operation and maintenance of SCG's pipelines and associated facilities located in the California Desert Conservation Area ("CDCA"), which is managed by the BLM, and lands east of CDCA but west of Colorado River, including the desert portions of Imperial, Kern, Los Angeles, Riverside and San Bernardino counties (collectively referred to as the Southern California Gas Desert Region, or "SCGDR"). Covered activities are hereafter referred to as "Maintenance Activities" or "Project".

Maintenance Activities may include, but are not necessarily limited to: 1) inspection of pipeline corridors for pipe exposure due to washouts, signs of leaks or evaluation of valve stations, deep well or horizontal anode bed condition, or evaluation of above-ground support equipment, including centerline markers, cathodic protection units (CPUs), valve stations and compressor stations; 2) excavation and repair or replacement of pipeline segments experiencing unacceptably high levels of pipeline corrosion; 3) repair and maintenance of valve stations, anode beds, and CPUs; 4) selective placement of additional CPUs in order to reduce pipe corrosion rates; 5) blading to clear vegetation from existing maintenance road and repairs of maintenance road segments due to washouts, erosion, or other damage; and 6) emergency repairs or replacement on pipe segments experiencing leaks caused by corrosion or from exterior damage. Specific actions that may be undertaken pursuant to this CESA MOU are described in detail in Exhibit 2. The categories of actions are as follows: Class I: normal activities that do not result in new surface disturbance; Class II: activities that result in minimal amounts of surface disturbance with medium duty equipment; Class III: activities that result in moderate surface disturbance; Class IV: activities that may extend outside of pipeline right of way corridors.

Most of the SCGDR is within the Mojave Desert region, but the southern area is in the Sonoran Desert. Some common plant species for the Mojave Desert include Joshua tree (*Yucca brevifolia*), Mojave Yucca (*Yucca schidigera*), Creosote Bush (*Larrea tridentata*), Mohave Sage (*Salvia mohavensis*), *Opuntia spp.*, *Ambrosia spp.*, and *Atriplex spp.* Some of the species common to the Sonoran Desert include Mojave Yucca, Creosote Bush, California Washingtonia (*Washingtonia filifera*), Desert Ironwood (*Olneya tesota*), *Opuntia spp.* and *Ambrosia spp.*

4.0 IMPACTS TO LISTED SPECIES

Desert tortoise, Mohave ground squirrel, barefoot banded gecko and the Coachella Valley fringe-toed lizard may be subject to direct and indirect adverse impacts and potential take associated with the Maintenance Activities. The total number of acres of listed species' habitat that will be affected by activities under this CESA MOU cannot reasonably be determined. The precise number and scope of activities will be determined by SCG through ongoing field monitoring and inspections.

In general, effects on wildlife may include direct injury or mortality, displacement of animals into offsite areas, interference with seasonal activities such as nesting, and collapse of burrows. Animals which are displaced by the Maintenance Activities may escape direct injury but would have to compete for food and living space with animals in adjacent areas. This would increase these animals' vulnerability to disease, predation, and accidental death.

Vegetation impacts will include removal of surface vegetation, crushing of plants, damage to root systems, and surface scarification that may accelerate topsoil erosion. In desert areas, revegetation rates are protracted due to low rainfall patterns. Site restoration for Maintenance Activities that remove surface shrubs may require several decades. The Department, in consultation with SCG and federal agencies, will determine whether impacts are short-term or long-term.

5.0 MANAGEMENT AUTHORIZATION

Subject to the terms and conditions of this CESA MOU, specifically including this provision of the CESA MOU and pursuant to Section 2081 of the Fish and Game Code, the Department authorizes any take of Listed Species that is incidental to the Maintenance Activities as described in Section 3.0. Take of the Listed Species that is deliberate or that otherwise results from an act outside the scope of the Maintenance Activities, as defined in Section 3.0, is not authorized.

5.1 Project Representative.

At least thirty (30) days before initiating ground-disturbing activities, SCG shall designate a representative responsible for communications with the Department and for overseeing compliance with this CESA MOU. The Department shall be notified in writing of the representative's name, business address and telephone number, and shall be notified in writing if a substitute representative is designated.

5.2 Exclusion Zones and Other Pre-Construction Measures.

5.2.1 A qualified biologist shall conduct surveys for the presence of desert tortoise, Mohave ground squirrel, barefoot banded lizard, Coachella Valley fringe-toed lizard and other biological sensitivities, including sensitive plants, before ground-disturbing work is initiated for any Class II, Class III or Class IV activity. Survey methodology will consist of walking the entire length of the activity area. The surveys will concentrate on detecting live tortoise and other evidence of tortoise occurrence, including the presence of tortoise burrows, scat, shell fragments, tracks, and cover sites. At a minimum, the survey shall include all areas that will be subjected to disturbance or overland travel and a 50-foot buffer around those areas. Tortoise survey reports will indicate whether or not the Project is also within Mohave ground squirrel, barefoot banded

gecko or Coachella Valley fringe-toed lizard habitat. The survey reports will be submitted to the Department.

5.2.2 If desert tortoises must be moved from harm's way during any Maintenance Activities, the following procedures shall be implemented by persons authorized by the Service and the Department to handle desert tortoises:

a. Desert tortoises shall be handled only by the authorized personnel and only when necessary. New latex gloves shall be used when handling each desert tortoise to avoid the transfer of infectious diseases between animals. Desert tortoises shall be moved the minimum distance possible within appropriate habitat to ensure their safety. In general, desert tortoises shall not be moved in excess of 1,000 feet for adults and 300 feet for hatchlings. The authorized biologist shall follow the general handling methods contained in the "Protocols for Handling Live Tortoises" (Arizona Game and Fish et al. 1991).

b. Desert tortoises that are found above ground and need to be moved from harm's way shall be placed in the shade of a shrub.

c. A Memorandum of Understanding with the Department for handling desert tortoises shall be obtained. The current contact person at the Department is Frank Hoover (909) 597-8235.

5.3 Biological Monitor.

5.3.1 A knowledgeable, experienced biologist or another SCG representative with adequate training in the biology of the desert tortoise shall be present during all construction activities in areas of Listed Species habitat to help avoid the take of individual animals and to minimize disturbance to the habitat. The biological monitor shall conduct daily inspections of the Maintenance Activities site and shall ensure compliance with the management measures provided in this CESA MOU. All trenches and holes shall be inspected daily for entrapped animals. A qualified biologist shall be supplied with equipment necessary to facilitate removal of any entrapped wildlife. The equipment should minimally include a catch pole, net, heavy gloves, and materials (e.g. plywood) to be used to block animal access to holes and trenches.

5.3.2 The biological monitor shall have authority to stop immediately any activity that is not in compliance with this CESA MOU, and to order any reasonable measure to avoid the take of an individual of a Listed Species.

5.3.3 Neither the biological monitor, nor the Department shall be liable for any costs incurred in complying with the management measures, including cease-work orders.

5.4 Delineation of Project Area.

5.4.1 SCG shall clearly delineate the boundaries of Class II, III or IV Maintenance Activities sites by posting stakes, flags, and/or rope or cord, as directed by the Department or a qualified biologist, and shall post signs and place fencing as necessary to exclude vehicle traffic unrelated to Maintenance Activities construction.

5.4.2 All Maintenance Activities-related parking and equipment storage shall be confined to the construction site or to previously disturbed off-site areas. Undisturbed areas and off-site Listed Species habitat shall not be used for parking or equipment storage. Maintenance Activities- related vehicle traffic shall be restricted to established roads, construction areas, storage areas, and staging and parking areas. SCG shall post signs and shall erect traffic restraints to minimize the disturbance of the Listed Species habitat and shall enforce a twenty (20) m.p.h. speed limit on the Maintenance Activities site.

5.5 Employee Orientation.

SCG shall conduct an orientation program for all persons who will work on-site during Maintenance Activities. The program shall consist of a brief presentation from a person knowledgeable about the biology of the Listed Species, the terms of the CESA MOU and CESA. The orientation program shall include a discussion of the biology of the Listed Species, the habitat needs of these species, their status under CESA, and the management measures provided in this CESA MOU. A fact sheet containing this information shall also be prepared and distributed. Upon completion of the orientation, employees shall sign a form stating that they attended the program and understand all protection measures. These forms shall be filed at SCG's offices and shall be made available to the Department upon request.

5.6 Management Measures During and After Construction.

5.6.1 All proposed work shall be limited to existing disturbed areas (maintenance roads, etc.) whenever possible. The area of new disturbance shall be confined to the smallest practical area, considering topography, placement of facilities, location of burrows or vegetation, public health and safety, and other limiting factors. Special habitat features (e.g., tortoise and squirrel burrows, sensitive plants, etc.) identified by the qualified biologist shall be flagged with blue flagging and avoided so that surface disturbance, particularly that which is associated with vehicle and equipment straying, is minimized.

5.6.2 To prevent entrapment of endangered species or other animals during construction activities, all excavated, steep-walled holes or trenches in excess of two feet in depth shall be provided with one or more escape ramps constructed of earth fill. The ramps shall be less than 45 degrees. Steep-walled holes shall be covered with plywood at the end of each working day. Trenches and holes shall be inspected for entrapped wildlife each morning prior to onset of

construction and at the end of each working day or, for holes, immediately prior to being covered with plywood. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped animals. Any animals so discovered shall be allowed to escape voluntarily, without harassment, before construction activities resume, or removed from the trench or hole by a qualified biologist and allowed to escape unimpeded.

5.6.3 All food-related trash items such as wrappers, cans, bottles, and food scraps generated during Project activities shall be disposed of in closed containers, which shall be regularly removed from the site. No feeding of wildlife shall be allowed.

5.6.4 To prevent harassment or mortality of desert tortoises, Mohave ground squirrels or Coachella Valley fringe-toed lizards by domestic dogs and cats, or the destruction of burrows or predation on these species by dogs or cats, no pets shall be permitted on site.

5.6.5 Workers shall inspect underneath each vehicle parked on-site prior to moving it. If a desert tortoise is found underneath, the authorized biologist shall remove the animal to a safe place or wait until the tortoise moves to safety on its own before the vehicle is moved.

5.7 Notification Regarding Dead, Injured or Entrapped Animals.

If SCG, its employees, contractors or agents kills or injures an individual of a Listed Species, or finds any such animal dead, injured, or entrapped, SCG shall immediately notify the Department. All reasonable efforts shall be made to allow any entrapped animals to escape. Any animal that may have been killed as a result of Maintenance Activities shall be turned over to the Department and a written report detailing the date, time, location and general circumstances under which it was found must be submitted to the Department no later than three (3) business days following the incident. The Department contact for these notifications shall be: Frank Hoover, (909) 597-8235, for desert tortoise; Sharon Keeney, (619) 347-3145, for barefoot banded gecko and Coachella Valley fringe-toed lizard; and Becky Jones, (805)285-5867, for Mohave ground squirrels. Any animals injured during Maintenance Activities shall be transported to a qualified veterinarian for treatment at the expense of SCG.

5.8 Annual Reporting to the Department.

5.8.1 SCG shall provide the Department with an annual written report detailing Category II , III and IV Maintenance Activities (as defined in the federal Biological Opinion, Exhibit 2) that were carried out during the preceding calendar year and any such activities planned during the current year. SCG shall provide the report by March 31 of each year, unless the Department consents in writing to a later date for its submittal.

5.8.2 Each report shall document the effectiveness and practicality of the mitigation measures and shall include, at a minimum, the following information:

A. Information about activities during the preceding year, including:

1. The location and nature of Maintenance Activities;
2. The amount of habitat disturbed by Maintenance Activities, and whether such impacts were temporary or long-term;
3. Any take of animals in the form of death and injury, as well as information about burrow excavation and relocation of animals, including specific information for each tortoise excavated or relocated;
4. The effectiveness and practicality of mitigation measures during the preceding year.

B. Information about activities planned for the current year, including:

1. The specific location and nature of each activity planned for the year, including the duration of each activity and the equipment that will be used;
2. The anticipated acreage to be disturbed by Project activities, the amounts of currently vegetated lands that will be disturbed, and whether impacts will be temporary or long-term;
3. Whether the affected lands are within a special management area for State-listed species or their habitats;
4. Results of any prior locality information identifying the occurrence of any listed species within or proximate to the site;

C. Cumulative data for all Project activities carried out to date, including:

1. The number of activities undertaken;
2. The number of acres temporarily disturbed;
3. The number of acres permanently disturbed;
4. The number of State-listed animals that have been killed, injured, relocated, and turned over to the Department.

5.8.3 The annual reports shall be provided to the Department of Fish and Game, Environmental Services Specialist III-San Bernardino County, 330 Golden Shore, Suite 50, Long Beach, CA 90802. Copies shall also be mailed to the following Department offices: (1) Department of Fish and Game, Environmental Services, Region 4, 1234 Shaw Avenue, Fresno, CA 93710, Attn: Endangered Species Coordinator, and (2) Department of Fish and Game, Environmental Services Division, Endangered Species Coordinator, 1416 Ninth Street,

Sacramento, CA 95814. SCG is responsible for ensuring that all Maintenance Activities carried out pursuant to this CESA MOU are consistent with the project descriptions in Section 3.0 and Exhibit 2. If CDFG believes that any of the Maintenance Activities proposed in the annual report are not within the scope of this CESA MOU, CDFG will notify SCG and work with SCG in an attempt to resolve any differences.

5.9 Unscheduled Maintenance Activities

For unscheduled Class II, III or IV activities, SCG will provide the Department with a description and mitigation plan for each activity. The Department will have 45 days to review, reject or modify unscheduled maintenance activities. Unscheduled activities must fall within the project description of this CESA MOU and Exhibit 2. SCG may proceed with the unscheduled activity if the Department fails to comment within 45 days after receiving the description and mitigation plan. All unscheduled activities shall be included in the next annual report provided to the Department.

5.10 Access to Project Site.

SCG shall allow the Department representatives access to the Maintenance Activities site to monitor compliance with the terms and conditions of this CESA MOU, subject to such reasonable restrictions as SCG requests.

5.11 Habitat Management Lands.

5.11.1 Acquisition and Transfer of Habitat Management Lands

5.11.1.1 The SCG, acting in its own capacity, or through a designated agent approved by the Department, shall: (1) acquire, preserve and enhance offsite habitat management lands ("HM lands") of State-listed species, the habitats of which are subject to temporary or permanent disturbance as a consequence of Maintenance Activities, or (2) shall provide sufficient funding to BLM, USFWS or the Department for the acquisition, preservation and enhancement of such lands. The location and amounts of such acreage or funds shall be determined annually, based on SCG's annual report of the locations and areas to be affected by proposed Maintenance Activities. The required HM lands or funding contributed by SCG to mitigate the impacts of Maintenance Activities on listed species outside of the boundary of the Mojave National Preserve shall be conveyed to the BLM for protective management within one year of the completion of the Maintenance Activities being mitigated. HM lands so acquired or funding contributed by SCG to mitigate impacts within of the boundary of the Mojave National Preserve shall be conveyed to the U.S. National Park Service for protective management within one year of the completion of the Maintenance Activities being mitigated. Associated management funds for any HM lands shall be provided to the agency that acquired or received the lands to be managed. The acreage and associated management funds shall be of amounts typically

secured for similar activities affecting such species and their habitats within the same general area as the proposed SCG activity. These amounts shall be determined by existing mitigation ratios previously applied by the Department in cooperation with other agencies, or as a result of regional conservation plans that portions of the SCG pipeline system may cross. The required amounts of compensation and disbursement of compensation will vary with area and between species.

The Department, in discussions with SCG staff, the USFWS, U.S. National Park Service, and the BLM, shall determine the amounts of HM lands to be provided, or the amount of funding to be provided to agencies in lieu of such lands, and the amounts of associated attending funds for habitat improvements and long-term management for areas outside HCP boundaries. In the event SCG's projections result in the transfer of more HM lands or funds to the BLM (for offsetting Projects affecting listed species located outside of the Mojave National Preserve) or to the National Park Service (for Projects affecting listed species located within the boundaries of the Mojave National Preserve) than is required to mitigate impacts that actually occurred during the year, the Department shall "credit" SCG for such surplus HM lands and funds against projections for the following year's Maintenance Activities. In the event that actual impacts, including impacts from unscheduled activities, exceed the projections upon which the HM lands and funding requirements were based, SCG shall provide additional HM lands or funding to fully mitigate such unanticipated impacts.

5.11.1.2 For those portions of the pipeline system that lie within a Habitat Conservation Area boundary, where a specific compensation plan has been developed and is being implemented, SCG shall provide compensation for Maintenance Activities in a manner and at an amount as prescribed in the appropriate Habitat Conservation Plan. Pertinent planning areas crossed by one or more pipelines in this system include: Mojave National Preserve; West Mojave Coordinated Management Area (under development); Northern and Eastern Colorado Desert Coordinated Management Area (under development); Coachella Valley Habitat Conservation Plan Area. Listed species included in one or more plans currently in preparation or completed are: Coachella Valley fringe-toed lizard, desert tortoise, and Mohave ground squirrel. Locations of planning area boundaries along the pipeline system are provided in Rado (1994).

The agencies will work with SCG on a compensation amount and will mutually agree in writing to the terms for areas outside of HCP boundaries. Listed species addressed in this fashion are: Least Bell's vireo, willow flycatcher, and California yellow-billed cuckoo (scattered willow riparian habitats); California black rail and Yuma clapper rail (scattered aqueducts) and the gila woodpecker (large washes in the lower Colorado Desert).

6.0 SECURITY

Each year, SCG shall provide the Department with an irrevocable Letter of Credit or other form of security acceptable to the Department ("Security") as described below covering

the projected costs of securing and enhancing these lands, and endowment for long-term management of secured lands. The Security shall be provided to the Department from SCG prior to initiating any actions that will result in the disturbance to State listed species' habitats from proposed Project activities.

The amount within the Security will vary year-to-year, and shall be determined on the basis of annual projections of activities within the SCG system in the SCGDR that will temporarily or permanently disturb habitats for one or more State listed threatened or endangered species. Such Security shall be delivered to the General Counsel to approve as to form. The General Counsel shall then transfer the letter to the Accounting Officer for safe keeping.

7.0 DEPARTMENT FINDINGS

The Department finds that the Maintenance Activities will not result in jeopardy to the continued existence of the Listed Species if the terms and conditions of this CESA MOU are fully implemented and adhered to. In addition, through the acquisition and protection of habitat lands pursuant to this CESA MOU, the Listed Species may be afforded protection from further degradation. The Department further finds, determines and certifies that:

- This CESA MOU authorizes only take that is incidental to an otherwise lawful activity, and impacts of the authorized take will be minimized and fully mitigated if this CESA MOU is fully implemented;

- The measures identified in this CESA MOU to minimize and mitigate project impacts are roughly proportional in extent to those impacts, will maintain the Applicant's objectives to the greatest extent possible, and are capable of successful implementation; and

- The Applicant, by agreeing to undertake specific measures and to provide a Letter of Credit as security, has ensured adequate funding to implement the mitigation requirements and to monitor compliance with and effectiveness of those measures.

8.0 DEFAULT

Actual or threatened breach of this CESA MOU may be prohibited or restrained by a court of competent jurisdiction. In the event SCG defaults on any of its material obligations under this CESA MOU, the Department shall notify SCG, pursuant to Section 10 below, of the default and allow SCG 30 days to remove the default or otherwise reach an agreement with the Department for removal of the default. If SCG does not remove the default or reach agreement with the Department for removal of the default, then the Department shall have all rights with respect to any security provided pursuant to this CESA MOU. The Department shall also have all remedies available at law or equity, including specific performance, injunction and without

limitation, all rights of a secured party pursuant to the California Uniform Commercial Code. The following non-exclusive list of actions shall constitute an event of default under this CESA MOU:

1. SCG has failed to provide the Department with required reports;

2. SCG has not complied with other terms and conditions of this CESA MOU, including failing to implement the measures to avoid or minimize take that are set forth in this CESA MOU.

9.0 NOTICES

All notices and other communications required or permitted by this CESA MOU shall be in writing. Such writing shall be delivered personally, by courier, by telecopy providing confirmation of delivery, or by first-class or certified mail, return receipt requested. All default notices shall be sent certified mail, return receipt requested. Notices or transmittals shall be deemed delivered upon the earlier of actual receipt or three days after posting by certified mail, if delivered to the following addresses:

SCG
Southern California Gas Company
17071 Gas Line Road
Victorville, CA 92392-1007
Attn: Tim Mefford

DEPARTMENT
General Counsel
Legal Affairs Division
California Department of Fish and Game
1416 Ninth Street, Twelfth Floor
Sacramento, California 95814

AND REGION
Rebecca Jones
Regional Representative
330 Golden Shore, Suite 50
Long Beach, CA 90802

10.0 ASSIGNMENT

Any sale or assignment of this CESA MOU or any of the rights or obligations hereunder is void absent the written consent of the Parties; provided, however, that no consent shall be required for assignment or pledge made by SCG (a) to any company that shall succeed by purchase, merger or consolidation to the properties of SCG; or (b) as security for a debt under the provision of any mortgage, deed of trust, indenture, bank credit agreement, or similar instrument.

11.0 ENTIRE AGREEMENT

This CESA MOU comprises the entire agreement and understanding between the Parties concerning the Maintenance Activities. This CESA MOU supersedes all prior and contemporaneous agreements, representations, or understandings, whether oral or written.

12.0 GOVERNING LAW

This CESA MOU shall be governed by the laws of the State of California.

13.0 BENEFIT OF CESA MOU

This CESA MOU is solely for the benefit of the People of the State of California by and through the Department.

14.0 FURTHER ACTIONS

From time to time, the Parties shall by mutual agreement execute such instruments and other documents, and take such other actions, as may be reasonably necessary to carry out the terms of this CESA MOU. This CESA MOU cannot be amended or modified in any way except by a written instrument duly executed by the Parties.

15.0 TERMINATION

This CESA MOU shall terminate 25 years from the date of execution, but may be extended for an additional 15 years upon mutual agreement of SCG and the Department. In the event this CESA MOU terminates by law or judicial action prior to the full performance of the management duties and obligations, title to any security provided by SCG shall inure to the Department by operation of law on the date of termination.

16.0 DISCLAIMER

This CESA MOU contains the Department's requirements for the Maintenance Activities pursuant to CESA; barring material unforeseeable circumstances, the Department shall not request additional mitigation or avoidance measures for the Maintenance Activities for the Listed Species. SCG understands and recognizes that this CESA MOU does not constitute or imply compliance with other applicable state or federal laws and regulations and does not create an entitlement to proceed with the Maintenance Activities.

17.0 EFFECTIVE DATE

This CESA MOU shall be immediately effective upon execution by the Parties.

18.0 EXHIBITS

This CESA MOU includes and incorporates the following:

EXHIBIT 1: LIFE HISTORY OF LISTED SPECIES

EXHIBIT 2: FEDERAL BIOLOGICAL OPINION

IN WITNESS WHEREOF, THE PARTIES HERETO HAVE EXECUTED THIS MOU TO BE IN EFFECT AS OF THE DATE LAST WRITTEN BELOW.

SOUTHERN CALIFORNIA GAS COMPANY:

By: _____ Date: 12/31/97
Tim Mefford, Desert Region Manager

CALIFORNIA DEPARTMENT OF FISH AND GAME

By: _____ Date: 12/29/97
Curt Taucher, Acting Regional Manager

Approved as to
legal form and sufficiency

_____
CRAIG MANSON, General Counsel

EXHIBIT I

LISTED SPECIES

Based on biological studies of the California Desert Conservation Area, the desert tortoise, Mohave ground squirrel, barefoot banded gecko and the Coachella Valley fringe-toed lizard, all State-listed endangered or threatened species, may use the SCGDR area. A summary of the life history information for each species follows:

Desert Tortoise

The desert tortoise (*Gopherus agassizii*) is a medium-sized tortoise with an adult carapace length of about 200-380 mm. Males average larger than females and are distinguished by having a concave plastron, longer gular horns, larger chin glands on each side of the lower jaw and longer tail. Carapace color varies from light yellow-brown (horn color) to dark grey-brown. A composite of characteristics is often necessary to distinguish the desert tortoise from other species of gopher tortoises, but its most unique feature is its very large hind feet.

The desert tortoise ranges from southern Nevada and extreme southwestern Utah south through southeastern California and southwestern Arizona into northern Mexico. In California, the species occurs in northeastern Los Angeles, eastern Kern and southeastern Inyo counties, and over most of San Bernardino, Riverside and Imperial counties except for the Coachella Valley. The species inhabits washes, rocky hillsides, and flat desert having sandy or gravelly soil. Vegetation comprising their habitat includes creosote bush, burrobush, saltbush, Joshua tree, Mojave yucca and cacti, along with other shrubs, annual grasses and forbs.

Habitat of the species in California has been reduced 50 to 60 percent since the 1920's and is now highly fragmented. Habitat loss and degradation has occurred as a result of a combination of human-related activities, including residential and commercial development, livestock grazing, energy and mineral development, ORV use, vandalism (illegal shooting), road and trail construction, and collecting. Major population losses have occurred in recent years, particularly in the western Mojave desert, due to the rapid spread of Upper Respiratory Syndrome.

The desert tortoise was listed as threatened by the Fish and Game Commission in June, 1989. The species has also been listed as threatened by the U.S. Fish and Wildlife Service ("USFWS"). Further acquisition of preserve areas will be needed to ensure continued existence of the species.

Mohave Ground Squirrel

The Mohave ground squirrel (*Spermophilus mohavensis*) has one of the smallest geographical ranges of the 28 species of ground squirrels found in North America. The species

is resident in the western Mohave desert, occurring in southwestern Inyo County (from the vicinity of Olancha southward), eastern Kern County (from the vicinity of the town of Mojave eastward) and northwestern San Bernardino County (from Victorville northward and northeastward). The species occupies several vegetative communities within this range, including creosote bush scrub, shadscale scrub, alkali sink scrub, and Joshua tree woodland. The diet consists primarily of annual grasses and forbs. The species estivates in underground burrows about seven months out of the year (usually from August to February) when forage is limited and above-ground temperatures are extreme.

The state listed the Mohave ground squirrel as threatened in 1985, but the California Fish and Game Commission recently voted to delist this species. A court order has blocked final action to delist the Mohave ground squirrel, making the longer-term status of the species unclear at the present time. The Department currently treats this species as having threatened status. Reasons for initial State listing center around habitat loss and fragmentation as a result of agricultural development, urban development, mineral development, livestock grazing, and recreational vehicle use (Department, no date). Compared to the desert tortoise, little recent work has been conducted on this species. Regional population trends are currently unknown. In September 1985, the USFWS designated the species as a Category 2 candidate species for listing.

Since its state listing in 1971, significant loss of the species habitat has occurred primarily on private lands due to urban development and agricultural conversion, especially along the Mojave River between Barstow and Victorville, and in several basins and valleys, including the Antelope Valley, western Fremont Valley, Harper Lake Basin and Rose Valley. Habitat loss due to urbanization has accelerated in recent years. On federal lands within its range, the species is affected by off-road vehicles, livestock grazing, mining activities and other uses.

Population trends are unknown, but are suspected to be downward due to the continuing loss and degradation of habitat. The species is not currently protected on preserve areas in public ownership, except at the Desert Tortoise Preserve near California City, which was established with the habitat requirements of the tortoise in mind.

Least Bell's Vireo

Least Bell's vireo (*Vireo bellii pusillus*), a state- and federally-listed endangered species is a small bird which is drab-gray above and whitish below, with sides faintly washed with grayish olive-yellow, and has indistinct white spectacles and faint wing bars with the lower bar being more prominent. The vireo is insectivorous. It is a summer resident of the following riparian habitats: willow (*Salix* sp.) - cottonwood (*Populus fremontii*) forest, oak (usually *Quercus agrifolia*) woodland, shrubby thickets (often composed solely of willow species, usually narrowleaf willow or black willow) and dry washes (with willow thickets at the edges to provide vireo foraging habitat and nest sites). The willow-cottonwood habitat is the more commonly used habitat by the vireo. The bird was formerly known as a breeder from interior northern California near Red Bluff (Tehama County) south through the Sacramento and San Joaquin valleys and Sierra Nevada

foothills, and in the coast ranges from Santa Clara County south to the approximate vicinity of San Fernando in Baja California. Populations also were found in the Owens Valley, Death Valley and at scattered oases and canyons throughout the Mojave Desert. Its known breeding range is restricted to Monterey and San Benito counties, along the Amargosa River (Inyo County) and numerous small populations from southern California (primarily Santa Barbara, Riverside, Ventura and San Diego counties) into northwest Baja California.

The vireo is threatened by habitat loss and degradation and by nest parasitism by the brown-headed cowbird (*Molothrus ater*). The population seems to fluctuate around 300 pairs but should not be considered stable. Nest parasitism by brown-headed cowbirds continues to be a problem, but is under control in some vireo nesting areas due to intensive cowbird control programs. Adverse impact categories include water projects, development, introduced predators and competitors, agriculture, livestock grazing, human disturbance, exotic plants, flood control and off-road vehicles.

Management activities include establishment, in the 1980's, by the USFWS of a working group comprised of state, federal, local and private biologists to develop standard census methods, encourage research and make timely recommendations on ways to avoid impacts to vireo habitat in development projects.

Management needs include an expanded, efficient cowbird removal program; protection and restoration of riparian habitat; annual surveys to determine distribution, numbers, quality and extent of habitat at each site and threats to the site; acceptance and implementation of conservation programs by the appropriate local governments; designation of Critical Habitat by the USFWS; and completion of the recovery plan.

Western Yellow-billed Cuckoo

The western yellow-billed Cuckoo (*Coccyzus americanus occidentalis*) is a state-listed endangered species. This slender bird is brown with white underparts. In flight its wings show rufous or cinnamon color, and its tail shows black with white spots. The nest typically is on the horizontal branch of a tree willow, in a location hidden from view from the ground or from surrounding trees. Food items brought to the nest include katydids, green caterpillars, tree frogs and grasshoppers. The cuckoo historically was known as a breeder in all regions of California except the central and northern Sierra Nevada, the Great Basin and the Colorado Desert. Recent surveys conducted for the Department found cuckoos in the following areas: Sacramento Valley, Kern River, Owens Valley, Amargosa River, Santa Ana River and Lower Colorado River. Its natural nesting habitat is in deciduous riparian forest and woodland of a cottonwood-tree willow composition.

The major threat to the cuckoo is the loss and degradation of its riparian habitat. The Statewide survey in 1986 and 1987 resulted in an estimated 31-42 pairs which breed in California. This represents a decline of 66-81% from the 122-163 pairs estimated in the previous survey.

Adverse impact include water projects; development; agriculture; pesticides, poisons and contaminants; livestock grazing; and off-road vehicles.

Willow Flycatcher

The willow flycatcher *(Empidonax traillii)* , a state-listed endangered and federal candidate 1 species was formerly a common summer resident throughout California. Its breeding range extended wherever extensive willow thickets occurred. The species has now been eliminated as a breeding bird from most of its former range in California. Only five populations of significance remain in isolated meadows of the Sierra Nevada and along the Kern, Santa Margarita, San Luis Rey and Santa Ynez rivers in southern California. The smallest of these consists of about six pairs and the largest about 44 pairs. The total population estimate for California is about 200 pairs of willow flycatchers. A survey conducted in late summer 1991 on Department-owned willow riparian habitat at Red Lake, Alpine County indicated a significant breeding population exists there.

The loss of riparian habitat is the principal reason for the decline of California's willow flycatcher population and contraction of the species range. Impacts to habitat and breeding birds associated with livestock grazing have also been implicated in the decline of the species. Nest parasitism by brown-headed cowbirds (*Molothrus*) may have contributed significantly to population reductions.

More than a decade ago the Department designated the willow flycatcher a "Bird Species of Special Concern" of highest priority. This finding prompted several years of Department studies to further assess the status of willow flycatchers in California. Reports from the Pacific Coast and Southwest resulted in addition of the willow flycatcher to the National Audubon Society's Blue List of declined bird species in 1980 and 1986. In 1984 the willow flycatcher was added to the U.S. Forest Service, Region 5, (mostly comprised of the State of California) Sensitive Species list. The USFWS has also designated the willow flycatcher as a sensitive species for Region 1 (Washington, Idaho, Oregon, California and Nevada) based on significant declines in this region. The South-western willow flycatcher (*E.t. extimus*), with small populations in southern California, was proposed for listing by the USFWS in July 1993.

Gila Woodpecker

The Gila woodpecker (*Melanerpes uropygialis*) is state-listed endangered. It is a large woodpecker with a grayish-brown head, neck and underparts, and has a back which is narrowly barred with black and white. the male has a red crown patch which is visible only at a short distance. Food items include insects, mistletoe berries, cactus pulp, bird eggs, corn in fields and peaches and pears from fruit trees. This woodpecker is a primary cavity nester. It is a permanent resident of mature cottonwood - willow riparian woodland. The bird was formerly found along the entire California portion of the lower Colorado River and adjacent Arizona in the extensive riparian forests and also was in the cotton wood groves of the Imperial Valley south of the Salton

Sea. Now the Gila woodpecker is found only at scattered locations along the California side of the river between Needles and Yuma.

The species is threatened by habitat loss and degradation and by competition with the exotic European Starling for nest cavities. Adverse impacts include water projects, development, introduced predators and competitors, agriculture, livestock grazing, exotic plants, flood control, and off-road vehicles.

Black Rail

The California black rail (*Laterallus jamaicensis coturniculus*) is a state-listed threatened species. This rail is tiny, about the size of a sparrow, and is blackish in color, with a small black bill, a back speckled with white and a nape of deep chestnut. Little is known about food habits, but apparently the rail eats arthropods. The species is known to inhabit saltwater, brackish and freshwater marshes. Vegetation in marshes utilized by this species varies from almost pure pickleweed to sedges and saltgrass to bulrushes and cattails. This species historically was known or thought to occur as a breeder from the San Francisco Bay area south along the coast to norther Baja California, in the San Bernardino/Riverside area, at the Salton Sea and along the lower Colorado River north of Yuma in California and Arizona. The rail now is probably absent as a breeder from coastal southern California. Its status as a breeder in the Riverside area is unknown.

The species is threatened by loss and degradation of its habitat.
Adverse impacts include water projects, development, agriculture, and flood control.

Yuma Clapper Rail

The Yuma clapper rail (*Rallus longirostris yumanensis*) is state-listed threatened and federally-listed endangered. This rail is the most slender and pale of the three clapper rail subspecies in California. The clapper rails generally are grey-brown above and buffy-cinnamon below. The cheeks are brownish-gray, and the flanks are barred with black and white. The bill is long and slightly downcurved. The Yuma clapper rail eats mostly crayfish but also small fish, isopods, insects, clams and seeds. The rail generally is a resident of shallow, freshwater marshes containing dense stands of cattails and bulrushes along the lower Colorado River from California and Arizona into Mexico. It is also found at the Salton sea in Imperial County.

This rail is threatened by loss of habitat due to human-caused river flooding, so-called reclamation projects and mosquito abatement activities. Adverse impacts include water projects, development, agriculture, exotic plants, and flood control.

Barefoot Banded Gecko

The barefoot banded gecko (*Coleonyx switaki*) is a lizard 2 to 3 inches long with soft skin and fine, granular scales. Its large eyes with vertical pupils and grey-brown body with various black and white spots and bands give it a striking appearance. This species is known only from several localities in eastern San Diego and western Imperial and Riverside Counties. These limited distribution records indicate that the gecko inhabits rock cracks and crevices in boulder-strewn desert foothills. This gecko is insectivorous, but little more is known about its diet. It is a nocturnal species which is active during spring and summer, possibly during milder fall and winter weather as well. Little else is know about its biology.

The rarity of this species makes it vulnerable to illegal collection by reptile hobbyists and commercial collectors. Anza-Borrego Desert State Park affords protection for some gecko habitat, and the Department is involved with a Habitat Management Plan for BLM land where the gecko is found. The species is listed by the state as threatened, and as a Category 2 candidate by USFWS.

Coachella Valley Fringe-toed Lizard

The Coachella Valley fringe-toed lizard (*Uma inornata*) is medium-sized (70 mm to 120 mm), and has a flattened body with very fine scales. Its dorsal ground color and spotting patterns provide excellent camouflage. Its counter-sunk lower jaw, well-developed ear flaps, and toes fringed with long, pointed scales are all adaptations to the sandy habitat of this lizard. This species is restricted to areas of fine, windblown sand deposits in the sandy plains, sand hummocks and mesquite dunes of the Coachella Valley, Riverside County.

Approximately 75 percent of this species' habitat has been lost to human activities such as agriculture and construction of golf courses, subdivisions, condominiums and shopping centers. A recovery plan was approved in 1983. Three reserves have been established in the Coachella Valley to set aside approximately 783 acres of remaining lizard habitat (five percent of the lizard's historical habitat) and blowsand sources. Five years of studies obtained biological information critical to the management and preservation of the lizard. The impact of continuing drought conditions on survivorship, reproduction, and recruitment, however, is unknown. Recent research found wind-induced changes in the sandy habitat at two of the reserves that may be detrimental to the long-term survival of the species. The species is listed as endangered by the state and as threatened by USFWS.

SUPPLEMENTAL WORKPAPER

WASTE DISCHARGE FEES

CALIFORNIA CODE OF REGULATIONS

TITLE 23. DIVISION 3. CHAPTER 9. ARTICLE 1. FEES

2016-17 Fee Schedules

CALIFORNIA CODE OF REGULATIONS
TITLE 23. Division 3. Chapter 9. Waste Discharge Reports and Requirements
Article 1. Fees

Section 2200. Annual Fee Schedules.

Each person for whom waste discharge requirements have been prescribed pursuant to Section 13263 of the Water Code shall submit, to the state board, an annual fee in accordance with the following schedules. The fee shall be submitted for each waste discharge requirement order issued to that person.[1]

(a) The annual fees for persons issued waste discharge requirements (WDRs), except as provided in subdivisions (a)(3), (a)(4), (b), and (c), shall be based on the discharge's threat to water quality (TTWQ) and complexity (CPLX) rating according to the following fee schedule, plus applicable surcharge(s).

ANNUAL FEE SCHEDULE FOR WASTE DISCHARGE REQUIREMENTS				
Threat to Water Quality (TTWQ)	Complexity (CPLX)	Type of Discharge		
		Discharge to Land or Surface Waters[2]	Land Disposal[3]	
			Not Paying a Tipping Fee[4]	Paying a Tipping Fee[5]
1	A	$109,095	$70,781[6]	$59,252[6]
1	B	$68,901	$57,168	$47,856
1	C	$37,178	$36,751	$30,766
2	A	$24,833	$30,625	$25,638
2	B	$14,929	$24,502	$20,510
2	C	$11,195	$18,376	$15,383
3	A	$8,823	$12,250	$10,256
3	B	$4,699	$9,188	$7,690
3	C	$2,088	$4,082	$3,419

[1] Federal facilities will generally not be invoiced for the portion of the annual fee that is attributable to the state board's ambient water monitoring programs. See *Massachusetts v. United States* (1978) 435 U.S. 444.

[2] For this table, discharges to land or surface waters are those discharges of waste to land or surface waters not covered by NPDES permits that are regulated pursuant to Water Code Section 13263 that do not implement the requirements of Title 27 of the California Code of Regulations (CCR). Examples include, but are not limited to, wastewater treatment plants, erosion control projects, and septic tank systems. It does not include discharge of dredge or fill material, discharges from agricultural lands, including irrigated lands, or discharge from animal feeding operations.
Dischargers covered by a WDR for municipal and domestic discharges with permitted flows of less than 50,000 gallons per day in categories 2-B, 2-C, 3-B and 3-C will receive a 50 percent fee discount. The design flow shall be used where no permitted flow is present. Municipal and domestic discharges receiving the discount are defined as discharges from facilities that treat domestic wastewater or a mixture of wastewater that is predominately domestic wastewater. Domestic wastewater consists of wastes from bathroom toilets, showers, and sinks from residential kitchens and residential clothes washing. It does not include discharges from food preparation and dish washing in restaurants or from commercial laundromats. Dischargers covered by a Landscape Irrigation General Permit issued by the state board will be assessed a fee associated with TTWQ/CPLX rating of 3B.

[3] For this table, land disposal discharges are those discharges of waste to land that are regulated pursuant to Water Code Section 13263 that implement the requirements of CCR Title 27, Division 2, except Chapter 7, Subchapter 2, §22560-22565 (confined animal facilities). Examples include, but are not limited to, discharges associated with active and closed landfills, waste piles, surface impoundments, and mines.

[4] For this table, Not Paying a Tipping Fee are those land disposal dischargers not subject to Public Resources Code (PRC) § 48000 et seq.

[5] For this table, Paying a Tipping Fee are those land disposal dischargers subject to PRC § 48000 et seq.

[6] A surcharge of $12,000 will be added for Class I landfills. Class I landfills are those that, during the time they are, or were, in operation, are so classified by the regional board under 23 CCR Chapter 15, have WDRs that allow (or, for closed units, allowed) them to receive hazardous waste, and have a permit issued by the Department of Toxic Substances Control under 22 CCR Chapter 10, § 66270.1 et seq.

2016-17 Fee Schedules

Oil and gas produced water storage and disposal facilities regulated by waste discharge requirements are subject to a surcharge according to the following formula:

Surcharge equals $0.00083 multiplied by the number of barrels of waste water discharged in the prior 12 months. The minimum annual surcharge amount is $500.

(1) Threat to water quality (TTWQ)[7] and complexity (CPLX) of the discharge is assigned by the regional board in accordance with the following definitions:

THREAT TO WATER QUALITY

Category "1" – Those discharges of waste that could cause the long-term loss of a designated beneficial use of the receiving water. Examples of long-term loss of a beneficial use include the loss of drinking water supply, the closure of an area used for water contact recreation, or the posting of an area used for spawning or growth of aquatic resources, including shellfish and migratory fish.

Category "2" – Those discharges of waste that could impair the designated beneficial uses of the receiving water, cause short-term violations of water quality objectives, cause secondary drinking water standards to be violated, or cause a nuisance.

Category "3" – Those discharges of waste that could degrade water quality without violating water quality objectives, or could cause a minor impairment of designated beneficial uses as compared with Category 1 and Category 2.

COMPLEXITY

Category "A" – Any discharge of toxic wastes; any small volume discharge containing toxic waste; any facility having numerous discharge points and groundwater monitoring; or any Class 1 waste management unit.

Category "B" – Any discharger not included in Category A that has physical, chemical, or biological treatment systems (except for septic systems with subsurface disposal), or any Class 2 or Class 3 waste management units.

Category "C" – Any discharger for which waste discharge requirements have been prescribed pursuant to Section 13263 of the Water Code not included in Category A or Category B as described above. Included are dischargers having no waste treatment systems or that must comply with best management practices, dischargers having passive treatment and disposal systems, or dischargers having waste storage systems with land disposal.

(2) For dischargers covered under Statewide General WDRs for Sanitary Sewer Systems, the TTWQ and CPLX designations are assigned based on the population served by the sanitary sewer system. The table below describes the correlation between population served and TTWQ and CPLX designations to determine the appropriate annual fee:

[7] In assigning a category for TTWQ, a regional board should consider duration, frequency, seasonality, and other factors that might limit the impact of the discharge.

2016-17 Fee Schedules

Population Served[8]	Threat and Complexity Designation
Less than 50,000	3C
50,000 or more	2C

(3) The fees for discharges of dredge and fill material shall be as follows.[9]

STANDARD FEE			
Discharge Category	**Application Fee[10]**	**Annual Active Discharge Fee[11]**	**Annual Post-Discharge Monitoring Fee[12]**
(A) Fill and Excavation[13] Discharges Discharges will be assessed as the higher fee of "discharge length in feet" and "discharge area in acres." The size of the discharge area shall be rounded to two decimal places (0.01 acre = 436 square feet).	Discharge length in feet x $8.10 -or- Discharge area in acres x $10,206 Whichever is higher, up to a maximum of $120,000. The minimum application fee is $720	$720	$360

[8] Assumes 2.5 persons per equivalent dwelling unit (EDU).

[9] i. For "excavation" the area of the discharge is the area of excavation; if the excavated material is then discharged to waters, an additional "fill" fee will be assessed.

ii. When a single project includes multiple discharges within a single dredge and fill fee category, the fee for that category shall be assessed based on the total area, volume, or length of discharge (as applicable) of the multiple discharges. When a single project includes discharges that are assessed under multiple standard fee categories, the total application fee shall be the sum of the application fees assessed under each applicable fee category; however only a single annual active discharge fee or annual post-discharge monitoring fee, if required, shall be assessed for the project. The single annual active discharge fee and the single annual post-discharge monitoring fee for the project shall be based on the higher of the applicable fee categories. Single projects qualifying for a special/flat fee or amended order fee shall only be assessed the applicable special/flat fee or amended order fee.

iii. Fees shall be based on the largest discharge size specified in the original or revised report of waste discharge or Clean Water Act (CWA) Section 401 water quality certification application, or as reduced by the applicant without any state board or regional board intervention.

iv. If water quality certification is issued in conjunction with dredge or fill WDRs or is issued for a discharge regulated under such preexisting WDRs, the current annual WDR fee as derived from this dredge and fill fee schedule shall be paid in advance during the application for water quality certification, and shall comprise the fee for water quality certification.

v. Discharges requiring water quality certification and regulated under a federal permit or license other than a US Army Corps of Engineers CWA Section 404 permit or a Federal Energy Regulatory Commission License shall be assessed a fee determined from CCR 23, Section 2200(a).

[10] Dischargers shall pay a one-time application fee for each project at the time that the application or report of waste discharge is submitted. Notwithstanding section 2200.2, if discharges commence in a fiscal year other than the fiscal year in which the application or report of waste discharge is submitted, the application fee is in addition to the first annual active discharge fee for the project. If discharges commence in the same fiscal year as the application or report of waste discharge is submitted, the discharger shall pay only the greater of the application fee or the first annual active discharge fee. The application fee for category (A) fill and excavation discharges will be based on the discharger's estimate of project length and area. If, upon completion, the actual length or area is larger than the estimate, the discharger may receive an additional application fee invoice that is based on the actual project length and area, minus the application fee that was previously paid.

[11] Dischargers shall pay an annual active discharge fee each fiscal year or portion of a fiscal year during which discharges occur until the regional board or state board issues a Notice of Completion of Discharges Letter to the discharger. The annual active discharge fee for category (B) dredging discharges will be invoiced after the annual dredge volume has been determined.

[12] Dischargers shall pay an annual post-discharge monitoring fee each fiscal year or portion of a fiscal year commencing with the first fiscal year following the fiscal year in which the regional board or state board issued a Notice of Completion of Discharges Letter to the discharger, but continued water quality monitoring or compensatory mitigation monitoring is required. Dischargers shall pay the annual post-discharge monitoring fee each fiscal year until the regional board or state board issues a Notice of Project Complete Letter to the discharger.

[13] "Excavation" refers to removing sediment or soil in shallow waters or under no-flow conditions where impacts to beneficial uses are best described by the area of the discharge. It typically is done for purposes other than navigation. Examples include trenching for utility lines, other earthwork preliminary to discharge, removing sediment to increase channel capacity, and other flood control and drainage maintenance activities (e.g. debris removal, vegetation management and removal, detention basin maintenance and erosion control of slopes along open channels and other drainage facilities).

2016-17 Fee Schedules

(B) Dredging[14] Discharges (except Sand Mining-see (C) below) Dredge volume expressed in cubic yards.	$720	Annual dredge volume in cubic yards x $0.252, up to a project maximum of $120,000. The minimum annual active discharge fee is $720.	$360
SPECIAL/FLAT FEE			
Discharge Category	**Application Fee[10]**	**Annual Active Discharge Fee[11]**	**Annual Post-Discharge Monitoring Fee[12]**
(C) Sand Mining Dredging Discharges Aggregate extraction in marine waters where source material is free of pollutants and the dredging operation will not violate any basin plan provisions.	$720	$720	$360
(D) Ecological Restoration and Enhancement Projects Projects undertaken for the sole purpose of restoring or enhancing the beneficial uses of water. This schedule does not apply to projects required under a regulatory mandate or to projects that are not primarily intended for ecological restoration or enhancement, e.g., land development. This category does not include mitigation banking or in-lieu fee programs.	$200	$200	$100
(E) Low Impact Discharges Projects may be classified as low impact discharges if they meet all of the following criteria: 1. The discharge size is less than all of the following: (a) for fill, 0.1 acre, and 200 linear feet, and (b) for dredging, 25 cubic yards. 2. The discharger demonstrates that: (a) all practicable measures will be taken to avoid impacts; (b) where unavoidable temporary impacts take place, waters and vegetation will be restored to pre-project conditions as quickly as practicable; and (c) where unavoidable permanent impacts take place, there will be no net loss of wetland, riparian area, or headwater functions, including onsite habitat, habitat connectivity, floodwater retention, and pollutant removal. 3. The discharge will not do any of the following: (a) directly or indirectly destabilize a bed of a receiving water; (b) contribute to significant cumulative effects; (c) cause pollution, contamination, or nuisance; (d) adversely affect candidate, threatened, or endangered species; (e) degrade water quality or beneficial uses; (f) be toxic; or (g) include "hazardous" or "designated" material.	$720	$200	$100
(F) General Orders for CEQA Exempt Projects Projects which are CEQA exempt and which are required to submit notification of a proposed discharge to the state and/or regional board pursuant to: (1) a general order authorizing impacts for the qualifying project CEQA exemption (e.g. Small Habitat Restoration General Permit); or (2) a general water quality certification permitting discharges authorized by a U.S. Army Corps of Engineers general permit (e.g., nationwide permit). Applies ONLY if a general order or general water quality certification was previously granted.	$200	N/A	N/A

[14] "Dredging" generally refers to removing sediment in deeper water to increase depth. The impacts to beneficial uses are best described by the volume of the discharge and typically occur to facilitate navigation. For fee purposes it also includes aggregate extraction within stream channels where the substrate is composed of course sediment (e.g., gravel) and is reshaped by normal winter flows (e.g., point bars), where natural flood disturbance precludes establishment of significant riparian vegetation, and where extraction timing, location and volume will not cause changes in channel structure (except as required by regulatory agencies for habitat improvement) or impair the ability of the channel to support beneficial uses.

2016-17 Fee Schedules

(G) Emergency Projects Authorized by a Water Board General Order	$720	$200	$100
(H) Amended Orders Amendments of WDRs or water quality certifications previously issued. (a) Minor project changes, not requiring technical analysis and involving only minimal processing time. (b) Changes to projects eligible for flat fees (fee categories C and D) where technical analysis is needed to assure continuing eligibility for flat fee and that beneficial uses are still protected. (c) Project changes not involving an increased discharge amount, but requiring some technical analysis to assure that beneficial sues are still protected and that original conditions are still valid, or need to be modified. (d) Project changes involving an increased discharge amount and requiring some technical analysis to assure that beneficial uses are still protected and that original conditions are still valid, or need to be modified. (e) Major project changes requiring an essentially new analysis and re-issuance of WDRs or water quality certification.	(a) No fee required (b) $300 flat fee (c) $200 flat fee (d) Additional standard fee assessed per increased amount of discharge(s) (e) New standard fee assessed		

(b) The annual fees for persons issued NPDES permits shall be based on the following schedules, plus any applicable surcharge(s).

(1)(A) Each public entity that owns and/or operates a storm water conveyance system, or part of such a system, that is subject to a NPDES permit for storm water discharges from a municipal separate storm sewer system (MS4) shall pay an annual fee according to the following schedule. The fee shall be based on the population of the public entity according to the most recently published United States Census. For public entities other than cities or counties (Non-Traditional Small MS4s[15]), shall pay an annual fee according to the following schedule, based on the average daily population[16] using the entities' facilities, unless otherwise provided in the schedule. Flood control districts or other special districts named as co-permittees to MS4 permits and school districts, serving students between kindergarten and fourteenth grade, shall not pay an annual fee if the city or county within whose jurisdiction the district lies, pays an annual fee. For Fiscal Year 2016-17, dischargers paying this fee will receive a 6.4 percent reduction of the total fee.

[15] Non-Traditional Small MS4s are facilities that have systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. (40 C.F.R. § 122.26(b)(16)(iii)).

[16] Total daily population must include resident and commuter populations. For community services districts, total daily population must include resident population and non-residents regularly employed in the areas served by the district.

2016-17 Fee Schedules

ANNUAL FEE SCHEDULE FOR AREAWIDE MUNICIPAL STORM WATER SEWER SYSTEM PERMITS AND CO-PERMITEES	
Population equal to or greater than 250,000	$63,956
Population between 200,000 and 249,999	$55,961
Population between 150,000 and 199,999	$48,285
Population between 100,000 and 149,999	$39,974
Population between 75,000 and 99,999	$31,979
Population between 50,000 and 74,999	$23,982
Population between 25,000 and 49,999	$15,989
Population between 10,000 and 24,999	$9,594
Population between 1,000 and 9,999	$6,395
Less than 1,000 population	$3,199
Statewide Permit Holders	$255,822
High Speed Rail Authority	$150,000

(B) Dischargers applying for the Small MS4 Waiver of a General Permit to Discharge Storm Water Associated with Small Municipal Activity issued by the state board shall pay an application fee of $200.

(2) Any entity or entities submitting a watershed improvement plan to the regional board for review pursuant to Section 16102 of the Water Code shall reimburse the regional board for its costs[17] to review and oversee the implementation of the plan, which shall be calculated using a rate of $150.00 per hour.

(3) Facilities that discharge storm water associated with industrial activities that are regulated by a state board or regional board general NPDES storm water permit shall pay an annual fee of $1,791. An amount equal to the fee prescribed shall be submitted with the discharger's Notice of Intent (NOI) to be regulated under a general NPDES permit and will serve as the first annual fee. For the purposes of this section, an NOI is considered to be a report of waste discharge. For Fiscal Year 2016-17, dischargers paying this fee will receive a 6.4 percent reduction of the total fee.

(4)(A) Storm water discharges associated with construction activities that are regulated by a general NPDES storm water permit other than those covered under (b)(5), including those issued by a regional board, shall pay an annual fee of $512 plus $51 per acre (rounded to the nearest whole acre and dollar amount), to a maximum fee of $5,612, based on the total acreage to be disturbed during the life of the project as listed on the NOI. An amount equal to the fee prescribed shall be submitted with the discharger's NOI to be regulated under a general NPDES permit and will serve as the first annual fee. For the purposes of this section, an NOI is considered to be a report of waste discharge. For Fiscal Year 2016-17, dischargers paying this fee will receive a 6.4 percent reduction of the total fee.

(B) Dischargers applying for the Small Construction Rainfall Erosivity Waiver of a General Permit to Discharge Storm Water Associated with Construction Activity issued by the state board shall pay an application fee of $200.

[17] These costs include labor, state board and regional board administrative costs, and overhead costs.

2016-17 Fee Schedules

(5) Discharges associated with mosquito and vector control activities[18] that are regulated by an individual or general NPDES permit adopted specifically for these purposes, including those issued by a regional board, shall pay a fee of $241. Dischargers filing an application for a mosquito and vector control permit shall pay a fee of $241. The fee shall be paid each time an application for initial certification or renewal of certification is submitted. Mosquito and vector control fees are not subject to ambient water monitoring surcharges.

(6) Planned and emergency discharges from community water systems that are regulated by a general NPDES permit adopted specifically for this purpose shall pay an application fee and subsequent annual fees (if applicable) based on the number of service connections for the public water system in accordance with the following schedule. The application fee shall be submitted with the discharger's NOI to be regulated by the general NPDES permit. For purposes of this section, an NOI is considered to be a report of waste discharge.

Dischargers with a Single System		
Service Connections	**Application Fee**	**Annual Fee**
15 – 999	$100	No Annual Fee
1,000 – 9,999	$500	$500
10,000+	$2,062	$2,062
Transmission System or Water Wholesaler	$2,062	$2,062

Dischargers with Multiple Systems		
Total Number of Service Connections	**Application Fee**	**Annual Fee[19]**
15 – 999	$100	No Annual Fee
1,000 – 9,999	$500	$500 per Primary System fee plus $100 per Secondary System
10,000+	$2,062	$2,062 per Primary System fee plus $100 per Secondary System
Transmission System or Water Wholesaler System	$2,062	$2,062 per Primary System fee plus $100 per Secondary System

(7) All other NPDES permitted discharges, except as provided in (b)(8), (b)(9), and (c), shall pay a fee according to the following formula:

Fee equals $2,062 plus 3,646 multiplied by the permitted flow, in mgd, with a maximum fee of $515,537 plus any applicable surcharge(s).

If there is no permitted effluent flow specified, the fee shall be based on the design flow of the facility.

[18] A mosquito and vector control activity involves discharge of pesticides into a designated area for the maintenance and control of mosquito larva for the protection of public health from the outbreak of lethal diseases. A mosquito and vector control agency discharges pesticides into surface waters for the control of mosquito larva.

[19] All Transmission Systems and Water Wholesaler Systems are Primary Systems. If the Discharger does not have a Transmission System or a Water Wholesaler System, the Discharger's individual water system with the highest number of service connections will be designated as the Primary System. All systems that are not Primary Systems are designated as Secondary Systems.

2016-17 Fee Schedules

NPDES permitted industrial discharges[20] with a threat/complexity[21] rating of 1A, 1B, or 1C are subject to a surcharge as follows:

Threat/Complexity Rating 1A - $15,000
Threat/Complexity Rating 1B - $10,000
Threat/Complexity Rating 1C - $5,000

Public wastewater treatment facilities with approved pretreatment programs are subject to a surcharge of $10,000. Agencies with multiple facilities under one approved pretreatment program shall pay a $10,000 surcharge per program.

(8)(A) Flow for wet weather municipal facilities[22] will be based on the previous five years' actual monthly average flow[23], as of the date the permit is issued.

(B) Notwithstanding (8)(A), the minimum annual fee for wet weather municipal facilities shall be $20,000.

(9) All other general NPDES permits and de minimis discharges[24] that are regulated by an individual or general NPDES permit, including those issued by a regional board, shall pay a fee as follows:

Category 1 – Discharges that require treatment systems to meet priority toxic pollutant limits and that could impair beneficial uses if limits are violated: $11,877
Category 2 – Discharges that require treatment systems to meet non-priority pollutant limits, but are not expected to impair beneficial uses if limits are violated. Examples of non-priority pollutants include, but are not limited to, nutrients, inorganic compounds, pH, and temperature: $7,177
Category 3 – Discharges that require minimal or no treatment systems to meet limits and pose no significant threat to water quality: $2,062

[20] NPDES permitted industrial discharger(s) means those industries identified in the Standard Industrial Classification Manual, Bureau of Budget, 1967, as amended and supplemented, under the category "Division D-Manufacturing" and such other classes of significant waste producers as, by regulation, the U.S. EPA Administrator deems appropriate. (33 USC Sec. 1362).
[21] Threat/complexity categories are listed under (a)(1) of this document.
[22] Wet weather municipal facilities are intermittently operated facilities that are designated specifically to handle flows during wet weather conditions.
[23] The actual monthly average flow is defined as the average of the flows during each of the months that the discharge occurred during the previous five-year period.
[24] De minimis discharge activities include, but are not limited to, the following: aquaculture activities (as defined in Chapter 40, Section 122.25(b) of the Code of Federal Regulations) defined as managed water areas that use discharges of pollutants into that designated area for maintenance or reproduction of harvestable freshwater, estuarine, or marine plants or animals including fish hatcheries; geothermal facilities that utilize, extract, or produce energy from geothermal fluids for heating, generating power, or other beneficial uses, and discharge geothermal fluids to surface waters; aquatic pesticide applications; evaporative condensate; swimming and landscape pool drainage; discharges from fire hydrant testing or flushing; discharges resulting from construction dewatering; discharges associated with supply well installation, development, test pumping, and purging; discharges resulting from the maintenance of uncontaminated water supply wells, pipelines, tanks, etc.; discharges resulting from hydrostatic testing of water supply vessels, pipelines, tanks, etc.; discharges resulting from the disinfection of water supply pipelines, tanks, reservoirs, etc.; discharges from water supply systems resulting from system failures, pressure releases, etc.; discharges of non-contact cooling water, not including steam/electric power plants; discharges resulting from diverted stream flows; water treatment plant discharges; and other similar types of wastes that have low pollutant concentrations and are not likely to cause or have a reasonable potential to cause or contribute to an adverse impact on the beneficial uses of receiving waters yet technically must be regulated under an NPDES permit.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Workpaper: VARIOUS

Summary for Category: B. New Environmental Reg Balancing Acct (NERBA)

	In 2016$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2016	2017	2018	2019
Labor	126	77	205	205
Non-Labor	4,911	5,299	9,429	9,429
NSE	0	0	0	0
Total	**5,037**	**5,376**	**9,634**	**9,634**
FTE	1.2	0.8	0.8	0.8

Workpapers belonging to this Category:

2EV001.002 RNERBA-AB32 Fees

Labor	0	0	0	0
Non-Labor	4,834	5,023	5,023	5,023
NSE	0	0	0	0
Total	**4,834**	**5,023**	**5,023**	**5,023**
FTE	0.0	0.0	0.0	0.0

2EV001.004 RNERBA-MS4

Labor	0	0	0	0
Non-Labor	0	130	130	130
NSE	0	0	0	0
Total	**0**	**130**	**130**	**130**
FTE	0.0	0.0	0.0	0.0

2EV001.001 RNERBA-Subpart W

Labor	126	77	77	77
Non-Labor	77	146	146	146
NSE	0	0	0	0
Total	**203**	**223**	**223**	**223**
FTE	1.2	0.8	0.8	0.8

2EV001.003 RNERBA-LDAR

Labor	0	0	128	128
Non-Labor	0	0	4,130	4,130
NSE	0	0	0	0
Total	**0**	**0**	**4,258**	**4,258**
FTE	0.0	0.0	0.0	0.0

Note: Totals may include rounding differences.

Beginning of Workpaper
2EV001.002 - RNERBA-AB32 Fees

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub 1. Assembly Bill (AB) 32 Administrative Fees
Workpaper: 2EV001.002 - RNERBA-AB32 Fees

Activity Description:

Since 2010, SoCalGas has paid administrative fees as required by the California's Global Warming Solutions Act of 2006 (colloquially referred to as "AB32") which are intended for CARB to recover its costs to implement AB32. AB32 requires public utility gas corporations, such as SoCalGas, to pay annual administrative fees for each therm of natural gas they deliver to any end user in California, excluding natural gas delivered to electric generating facilities and to wholesale providers. SoCalGas cannot determine either the fuel delivered to customers or the exact common carbon cost to provide very detailed projections.

Forecast Explanations:

Labor - Zero-Based

N/A

Non-Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

NSE - Zero-Based

N/A

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	0	0	0	0	0	0	0	0
Non-Labor	6,167	5,028	4,079	5,243	4,834	5,023	5,023	5,023
NSE	0	0	0	0	0	0	0	0
Total	**6,167**	**5,028**	**4,079**	**5,243**	**4,834**	**5,023**	**5,023**	**5,023**
FTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 1. Assembly Bill (AB) 32 Administrative Fees
Workpaper: 2EV001.002 - RNERBA-AB32 Fees

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2017	2018	2019	2017	2018	2019	2017	2018	2019
Labor	Zero-Based	0	0	0	0	0	0	0	0	0
Non-Labor	Zero-Based	0	0	0	5,023	5,023	5,023	5,023	5,023	5,023
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**5,023**	**5,023**	**5,023**	**5,023**	**5,023**	**5,023**
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	0	5,023	0	5,023	0.0	1-Sided Adj	TP5MXD20161205223131520

Explanation: CC2200-2558-All associated AB32 administrative fee (non-labor) costs may be charged to the NERBA work orders. This includes only invoiced costs for the administrative fees which are O&M costs. Any internal labor costs associated with AB32 program administration should not be charged to the NERBA.
Based on 4-year average.

2017 Total	**0**	**5,023**	**0**	**5,023**	**0.0**		

2018	Other	0	5,023	0	5,023	0.0	1-Sided Adj	TP5MXD20161205223329190

Explanation: CC2200-2558-All associated AB32 administrative fee (non-labor) costs may be charged to the NERBA work orders. This includes only invoiced costs for the administrative fees which are O&M costs. Any internal labor costs associated with AB32 program administration should not be charged to the NERBA.
Based on 4-year average.

2018 Total	**0**	**5,023**	**0**	**5,023**	**0.0**		

2019	Other	0	5,023	0	5,023	0.0	1-Sided Adj	TP5MXD20161205223951150

Explanation: CC2200-2558-All associated AB32 administrative fee (non-labor) costs may be charged to the NERBA work orders. This includes only invoiced costs for the administrative fees which are O&M costs. Any internal labor costs associated with AB32 program administration should not be charged to the NERBA.
Based on 4-year average.

2019 Total	**0**	**5,023**	**0**	**5,023**	**0.0**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 1. Assembly Bill (AB) 32 Administrative Fees
Workpaper: 2EV001.002 - RNERBA-AB32 Fees

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	0	0	0	0	0
Non-Labor	5,994	4,966	4,093	5,229	4,834
NSE	0	0	0	0	0
Total	**5,994**	**4,966**	**4,093**	**5,229**	**4,834**
FTE	0.0	0.0	0.0	0.0	0.0
Adjustments (Nominal $) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal $)					
Labor	0	0	0	0	0
Non-Labor	5,994	4,966	4,093	5,229	4,834
NSE	0	0	0	0	0
Total	**5,994**	**4,966**	**4,093**	**5,229**	**4,834**
FTE	0.0	0.0	0.0	0.0	0.0
Vacation & Sick (Nominal $)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Escalation to 2016$					
Labor	0	0	0	0	0
Non-Labor	173	62	-13	14	0
NSE	0	0	0	0	0
Total	**173**	**62**	**-13**	**14**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	0	0	0	0	0
Non-Labor	6,167	5,028	4,079	5,243	4,834
NSE	0	0	0	0	0
Total	**6,167**	**5,028**	**4,079**	**5,243**	**4,834**
FTE	0.0	0.0	0.0	0.0	0.0

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 1. Assembly Bill (AB) 32 Administrative Fees
Workpaper: 2EV001.002 - RNERBA-AB32 Fees

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs						
Years	**2012**	**2013**	**2014**	**2015**	**2016**
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0

Year	Adj_Group	Labor	NLbr	NSE	FTE	Adj_Type	RefID

Note: Totals may include rounding differences.

Beginning of Workpaper
2EV001.004 - RNERBA-MS4

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub 2. Municipal Separate Storm Sewer System (MS4)
Workpaper: 2EV001.004 - RNERBA-MS4

Activity Description:

The RWQCBs issue National Pollutant Discharge Elimination System (NPDES) permits to MS4 owners/operators that include counties, cities, and flood control districts. Municipalities and MS4 owners/operators, in turn, must regulate dischargers located within their jurisdiction, including commercial facilities. This includes requiring commercial facilities to minimize discharge of pollutants to the MS4 through the implementation of Best Management Practices (BMPs). Since NPDES permits are renewed on a five-year cycle and are generally becoming more stringent, municipalities may become more rigorous in enforcing BMP implementation on commercial facilities. MS4 owners/operators are required to inspect and regulators can enforce BMP implementation at these facilities and can impose further compliance requirements if the facility is located in a watershed of an impaired waterbody that has a Total Maximum Daily Loading (TMDL). One of the most cost effective BMPs is good housekeeping and sweeping. Currently, most SoCalGas facilities are swept on a monthly basis. To lower potential pollutant discharge from commercial activities and vehicular traffic at SoCalGas facilities, it may be necessary to increase sweeping to a frequency of twice a month for approximately 52 facilities.

Forecast Explanations:

Labor - Zero-Based

N/A

Non-Labor - Zero-Based

N/A

NSE - Zero-Based

MS4 had no recorded costs in base year 2016 and was thus forecasted using a zero-based methodology.

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	0	0	0	0	0	0	0	0
Non-Labor	0	0	0	0	0	130	130	130
NSE	0	0	0	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**	**130**	**130**	**130**
FTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 2. Municipal Separate Storm Sewer System (MS4)
Workpaper: 2EV001.004 - RNERBA-MS4

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2017	2018	2019	2017	2018	2019	2017	2018	2019
Labor	Zero-Based	0	0	0	0	0	0	0	0	0
Non-Labor	Zero-Based	0	0	0	130	130	130	130	130	130
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**130**	**130**	**130**	**130**	**130**	**130**
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	0	130	0	130	0.0	1-Sided Adj	TP5MXD20170214123549937
Explanation:	CC2200-2558-Incremental non-labor cost associated with MS4 related to implementation of Best Management Practices (e.g., increased frequency of sweeping at SCG facilities)							
2017 Total		**0**	**130**	**0**	**130**	**0.0**		
2018	Other	0	130	0	130	0.0	1-Sided Adj	TP5MXD20170214123609270
Explanation:	CC2200-2558-Incremental non-labor cost associated with MS4 related to implementation of Best Management Practices (e.g., increased frequency of sweeping at SCG facilities)							
2018 Total		**0**	**130**	**0**	**130**	**0.0**		
2019	Other	0	130	0	130	0.0	1-Sided Adj	TP5MXD20170214123625453
Explanation:	CC2200-2558-Incremental non-labor cost associated with MS4 related to implementation of Best Management Practices (e.g., increased frequency of sweeping at SCG facilities)							
2019 Total		**0**	**130**	**0**	**130**	**0.0**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 2. Municipal Separate Storm Sewer System (MS4)
Workpaper: 2EV001.004 - RNERBA-MS4

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Adjustments (Nominal $) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal $)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Vacation & Sick (Nominal $)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Escalation to 2016$					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 2. Municipal Separate Storm Sewer System (MS4)
Workpaper: 2EV001.004 - RNERBA-MS4

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs						
Years	**2012**	**2013**	**2014**	**2015**	**2016**
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0

Year	Adj_Group	Labor	NLbr	NSE	FTE	Adj_Type	RefID

Note: Totals may include rounding differences.

Beginning of Workpaper
2EV001.001 - RNERBA-Subpart W

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 3. Subpart W
Workpaper: 2EV001.001 - RNERBA-Subpart W

Activity Description:

Both the federal and state mandatory GHG Reporting Rules require Petroleum and Natural Gas Systems to report GHG emissions annually. The federal requirement is embodied in Title 40, CFR, Part 98, Subpart W. The state requirement is contained in Title 17, California Code of Regulations (CCR), Sub-Article 5, beginning with section 95150.

Forecast Explanations:

Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

Non-Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

NSE - Zero-Based

N/A

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	0	118	154	96	126	77	77	77
Non-Labor	0	100	113	257	77	146	146	146
NSE	0	0	0	0	0	0	0	0
Total	**0**	**218**	**266**	**354**	**204**	**223**	**223**	**223**
FTE	0.0	1.3	1.4	0.9	1.2	0.8	0.8	0.8

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 3. Subpart W
Workpaper: 2EV001.001 - RNERBA-Subpart W

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2017	2018	2019	2017	2018	2019	2017	2018	2019
Labor	Zero-Based	0	0	0	77	77	77	77	77	77
Non-Labor	Zero-Based	0	0	0	146	146	146	146	146	146
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**223**	**223**	**223**	**223**	**223**	**223**
FTE	Zero-Based	0.0	0.0	0.0	0.8	0.8	0.8	0.8	0.8	0.8

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	0	39	0	39	0.0	1-Sided Adj	TP5MXD20170214115903520
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2017	Other	0	70	0	70	0.0	1-Sided Adj	TP5MXD20170214120151997
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2017	Other	0	37	0	37	0.0	1-Sided Adj	TP5MXD20170214120252157
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2017	Other	77	0	0	77	0.8	1-Sided Adj	TP5MXD20170214120351077
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W of 98 ot Title 40 of CFR may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA. Methodology: Based on 4-year average. Does not include escalation.							
2017 Total		**77**	**146**	**0**	**223**	**0.8**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 3. Subpart W
Workpaper: 2EV001.001 - RNERBA-Subpart W

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	0	39	0	39	0.0	1-Sided Adj	TP5MXD20170214120634767
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2018	Other	0	70	0	70	0.0	1-Sided Adj	TP5MXD20170214120713170
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2018	Other	0	37	0	37	0.0	1-Sided Adj	TP5MXD20170214120804110
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2018	Other	77	0	0	77	0.8	1-Sided Adj	TP5MXD20170214120846830
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W of 98 ot Title 40 of CFR may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA. Methodology: Based on 4-year average. Does not include escalation.							
2018 Total		**77**	**146**	**0**	**223**	**0.8**		
2019	Other	0	39	0	39	0.0	1-Sided Adj	TP5MXD20170214120923180
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							
2019	Other	0	70	0	70	0.0	1-Sided Adj	TP5MXD20170214121005847
Explanation:	CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 3. Subpart W
Workpaper: 2EV001.001 - RNERBA-Subpart W

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	37	0	37	0.0	1-Sided Adj	TP5MXD20170214121036403

Explanation: CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA.

2019	Other	77	0	0	77	0.8	1-Sided Adj	TP5MXD20170214121109963

Explanation: CC2200-2558-All internal labor and non-labor costs associated with compliance of Subpart W of 98 ot Title 40 of CFR may be charged to the NERBA work orders. This includes both O&M and capital costs. Costs associated with other greenhouse gas monitoring and reporting activities, such as Subpart C, should not be charged to the NERBA. Methodology: Based on 4-year average. Does not include escalation.

2019	**Total**	**77**	**146**	**0**	**223**	**0.8**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 3. Subpart W
Workpaper: 2EV001.001 - RNERBA-Subpart W

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	0	94	126	81	109
Non-Labor	0	99	113	257	77
NSE	0	0	0	0	0
Total	**0**	**193**	**239**	**338**	**186**
FTE	0.0	1.1	1.2	0.8	1.0
Adjustments (Nominal $) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal $)					
Labor	0	94	126	81	109
Non-Labor	0	99	113	257	77
NSE	0	0	0	0	0
Total	**0**	**193**	**239**	**338**	**186**
FTE	0.0	1.1	1.2	0.8	1.0
Vacation & Sick (Nominal $)					
Labor	0	16	21	13	18
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**16**	**21**	**13**	**18**
FTE	0.0	0.2	0.2	0.1	0.2
Escalation to 2016$					
Labor	0	8	7	2	0
Non-Labor	0	1	0	1	0
NSE	0	0	0	0	0
Total	**0**	**9**	**7**	**3**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	0	118	154	96	126
Non-Labor	0	100	113	257	77
NSE	0	0	0	0	0
Total	**0**	**218**	**266**	**354**	**204**
FTE	0.0	1.3	1.4	0.9	1.2

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 3. Subpart W
Workpaper: 2EV001.001 - RNERBA-Subpart W

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs					
Years	**2012**	**2013**	**2014**	**2015**	**2016**
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0

Year	Adj_Group	Labor	NLbr	NSE	FTE	Adj_Type	RefID

Note: Totals may include rounding differences.

Beginning of Workpaper
2EV001.003 - RNERBA-LDAR

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Activity Description:

Extracted from NERBA and moved into its own Balancing Account per the recent OIR.

Forecast Explanations:

Labor - Zero-Based

N/A

Non-Labor - Zero-Based

N/A

NSE - Zero-Based

N/A

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	0	0	0	0	0	0	128	128
Non-Labor	0	0	0	0	0	0	4,130	4,130
NSE	0	0	0	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**	**0**	**4,258**	**4,258**
FTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		**Base Forecast**			**Forecast Adjustments**			**Adjusted-Forecast**		
Years		**2017**	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
Labor	Zero-Based	0	0	0	0	128	128	0	128	128
Non-Labor	Zero-Based	0	0	0	0	4,130	4,130	0	4,130	4,130
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**0**	**4,258**	**4,258**	**0**	**4,258**	**4,258**
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	-85	0	0	-85	-1.0	1-Sided Adj	TP5MXD20170620160111757
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2017	Other	64	1,000	0	1,064	0.6	1-Sided Adj	TP5MXD20170214121935350
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Gas Engineering).							
2017	Other	85	0	0	85	1.0	1-Sided Adj	TP5MXD20170214122001420
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Environmental Services).							
2017	Other	-64	-1,000	0	-1,064	-0.6	1-Sided Adj	TP5MXD20170620160155893
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2017	Other	0	0	0	0	0.0	1-Sided Adj	BCELLIS20170831165424493
Explanation:	Development and implementation of proposed activities and practices as proposed by SB887 and/or CARB Oil & Gas Rules.							
2017 Total		**0**	**0**	**0**	**0**	**0.0**		
2018	Other	963	32	0	995	9.0	1-Sided Adj	TP5MXD20170214122429823
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371 (Customer Services).							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	10,696	13,149	0	23,845	107.0	1-Sided Adj	TP5MXD20170214122622460
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Distribution).							
2018	Other	85	0	0	85	1.0	1-Sided Adj	TP5MXD20170214122658983
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Environmental Services).							
2018	Other	2,425	1,647	0	4,072	23.0	1-Sided Adj	TP5MXD20170214122731370
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Gas Engineering).							
2018	Other	0	4,090	0	4,090	0.0	1-Sided Adj	TP5MXD20170214122811480
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Storage).							
2018	Other	202	3,442	0	3,644	2.0	1-Sided Adj	TP5MXD20170214122843387
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Transmission).							
2018	Other	-85	0	0	-85	-1.0	1-Sided Adj	TP5MXD20170620160447443
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2018	Other	-202	-3,442	0	-3,644	-2.0	1-Sided Adj	TP5MXD20170620160514367
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2018	Other	-2,425	-1,647	0	-4,072	-23.0	1-Sided Adj	TP5MXD20170620160537540
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2018	Other	0	-4,090	0	-4,090	0.0	1-Sided Adj	TP5MXD20170620160607193
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2018	Other	-963	-32	0	-995	-9.0	1-Sided Adj	TP5MXD20170620160638523
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2018	Other	-10,696	-13,149	0	-23,845	-107.0	1-Sided Adj	TP5MXD20170620160701510
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2018	Other	128	4,130	0	4,258	0.0	1-Sided Adj	BCELLIS20170831165721557
Explanation:	Development and implementation of proposed activities and practices as proposed by SB887 and/or CARB Oil & Gas Rules.							
2018 Total		**128**	**4,130**	**0**	**4,258**	**0.0**		
2019	Other	4,663	158	0	4,821	45.0	1-Sided Adj	TP5MXD20170511143417690
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Customer Services).							
2019	Other	12,477	1,365	0	13,842	108.0	1-Sided Adj	TP5MXD20170214123237763
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Distribution).							
2019	Other	85	0	0	85	1.0	1-Sided Adj	TP5MXD20170214123305580
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Environmental Services).							
2019	Other	632	442	0	1,074	6.0	1-Sided Adj	TP5MXD20170214123345743
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Gas Engineering).							
2019	Other	0	340	0	340	1.2	1-Sided Adj	TP5MXD20170214123411687
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Storage).							
2019	Other	200	722	0	922	2.0	1-Sided Adj	TP5MXD20170214123440673
Explanation:	CC2200-2558-Development and implementation of proposed Best Management Practices described by SB1371. (Transmission). .							
2019	Other	-85	0	0	-85	-1.0	1-Sided Adj	TP5MXD20170620161042887
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	-340	0	-340	-1.2	1-Sided Adj	TP5MXD20170620161105360
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2019	Other	-200	-722	0	-922	-2.0	1-Sided Adj	TP5MXD20170620161134717
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2019	Other	-632	-442	0	-1,074	-6.0	1-Sided Adj	TP5MXD20170620161155537
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2019	Other	-12,477	-1,365	0	-13,842	-108.0	1-Sided Adj	TP5MXD20170620161216470
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2019	Other	-4,663	-158	0	-4,821	-45.0	1-Sided Adj	TP5MXD20170620161241743
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR.							
2019	Other	128	4,130	0	4,258	0.0	1-Sided Adj	BCELLIS20170831165648970
Explanation:	Development and implementation of proposed activities and practices as proposed by SB887 and/or CARB Oil & Gas Rules.							
2019 Total		**128**	**4,130**	**0**	**4,258**	**0.0**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	0	0	0	0	59
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**59**
FTE	0.0	0.0	0.0	0.0	0.6
Adjustments (Nominal $) **					
Labor	0	0	0	0	-59
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**-59**
FTE	0.0	0.0	0.0	0.0	-0.6
Recorded-Adjusted (Nominal $)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Vacation & Sick (Nominal $)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Escalation to 2016$					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**
FTE	0.0	0.0	0.0	0.0	0.0

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. New Environmental Reg Balancing Acct (NERBA)
Category-Sub: 4. LDAR Impact Program
Workpaper: 2EV001.003 - RNERBA-LDAR

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs					
Years	**2012**	**2013**	**2014**	**2015**	**2016**
Labor	0	0	0	0	-59
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**-59**
FTE	0.0	0.0	0.0	0.0	-0.6

Detail of Adjustments to Recorded:

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2012 Total		**0**	**0**	**0**	**0.0**		
2013 Total		**0**	**0**	**0**	**0.0**		
2014 Total		**0**	**0**	**0**	**0.0**		
2015 Total		**0**	**0**	**0**	**0.0**		
2016	Other	-59	0	0	-0.6	1-Sided Adj	TP5MXD20170620155520357
Explanation:	Adjustment to remove LDAR in order to track/recover in memo/balancing accounts set up under the SB1371 OIR						
2016 Total		**-59**	**0**	**0**	**-0.6**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson

Summary of Shared Services Workpapers:

	In 2016 $ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
Description	**2016**	**2017**	**2018**	**2019**
A. Director of Environmental Services	69	75	75	75
B. Environmental Programs	656	488	525	561
Total	**725**	**563**	**600**	**636**

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Cost Center: 2200-2012.000

Summary for Category: A. Director of Environmental Services

	In 2016$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2016	2017	2018	2019
Labor	26	75	75	75
Non-Labor	43	0	0	0
NSE	0	0	0	0
Total	**69**	**75**	**75**	**75**
FTE	0.3	0.4	0.4	0.4

Cost Centers belonging to this Category:

2200-2012.000 SCG ENVIRONMENTAL SERVICE DIRECTOR

Labor	26	75	75	75
Non-Labor	43	0	0	0
NSE	0	0	0	0
Total	**69**	**75**	**75**	**75**
FTE	0.3	0.4	0.4	0.4

Note: Totals may include rounding differences.

Beginning of Workpaper
2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Activity Description:

The Director of Environmental Services provides overall leadership, strategy and direction to the Environmental Services organization and is supported by one Director, one financial planning project manager and one administrative assistant. The activity is a shared service with SDG&E and SoCalGas.

Forecast Explanations:

Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

Non-Labor - Zero-Based

N/A

NSE - Zero-Based

N/A

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	318	168	310	216	26	75	75	75
Non-Labor	55	48	94	75	43	0	0	0
NSE	0	0	0	0	0	0	0	0
Total	**372**	**216**	**404**	**291**	**69**	**75**	**75**	**75**
FTE	3.0	1.4	3.0	1.4	0.3	0.4	0.4	0.4

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub: 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Cost Center Allocations (Incurred Costs):

	2016 Adjusted-Recorded					2017 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.0	0	0	0	0	0.0
Directly Allocated	0	0	0	0	0.0	0	0	0	0	0.0
Subj. To % Alloc.	26	42	0	68	0.3	75	0	0	75	0.4
Total Incurred	**26**	**42**	**0**	**68**	**0.3**	**75**	**0**	**0**	**75**	**0.4**
% Allocation										
Retained	93.47%	93.47%				93.47%	93.47%			
SEU	6.53%	6.53%				6.53%	6.53%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			

	2018 Adjusted-Forecast					2019 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.0	0	0	0	0	0.0
Directly Allocated	0	0	0	0	0.0	0	0	0	0	0.0
Subj. To % Alloc.	75	0	0	75	0.4	75	0	0	75	0.4
Total Incurred	**75**	**0**	**0**	**75**	**0.4**	**75**	**0**	**0**	**75**	**0.4**
% Allocation										
Retained	93.47%	93.47%				93.47%	93.47%			
SEU	6.53%	6.53%				6.53%	6.53%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub: 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2016

This is the Environmental Services Director cost center that administrates over the SDG&E and SoCalGas Environmental Services organizations. This cost center is shared on the basis of a collective roll-up of forecasted labor and non-labor spend and shared service allocations from the other operational cost centers in Environmental Services subject to the leadership and administration of the Director. This cost center includes one Financial Planning Project Manager and one Administrative Assistant in addition to the Director.

Cost Center Allocation Percentage for 2017

This is the Environmental Services Director cost center that administrates over the SDG&E and SoCalGas Environmental Services organizations. This cost center is shared on the basis of a collective roll-up of forecasted labor and non-labor spend and shared service allocations from the other operational cost centers in Environmental Services subject to the leadership and administration of the Director. This cost center includes one Financial Planning Project Manager and one Administrative Assistant in addition to the Director.

Cost Center Allocation Percentage for 2018

This is the Environmental Services Director cost center that administrates over the SDG&E and SoCalGas Environmental Services organizations. This cost center is shared on the basis of a collective roll-up of forecasted labor and non-labor spend and shared service allocations from the other operational cost centers in Environmental Services subject to the leadership and administration of the Director. This cost center includes one Financial Planning Project Manager and one Administrative Assistant in addition to the Director.

Cost Center Allocation Percentage for 2019

This is the Environmental Services Director cost center that administrates over the SDG&E and SoCalGas Environmental Services organizations. This cost center is shared on the basis of a collective roll-up of forecasted labor and non-labor spend and shared service allocations from the other operational cost centers in Environmental Services subject to the leadership and administration of the Director. This cost center includes one Financial Planning Project Manager and one Administrative Assistant in addition to the Director.

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub: 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		**Base Forecast**			**Forecast Adjustments**			**Adjusted-Forecast**		
Years		**2017**	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
Labor	Zero-Based	0	0	0	75	75	75	75	75	75
Non-Labor	Zero-Based	0	0	0	0	0	0	0	0	0
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**75**	**75**	**75**	**75**	**75**	**75**
FTE	Zero-Based	0.0	0.0	0.0	0.4	0.4	0.4	0.4	0.4	0.4

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	75	0	0	75	0.4	1-Sided Adj	TP5MXD20161205232614503
Explanation:	CC2200-2012-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Services Director cost for SoCalGas							
2017 Total		**75**	**0**	**0**	**75**	**0.4**		
2018	Other	75	0	0	75	0.4	1-Sided Adj	TP5MXD20161205232659123
Explanation:	CC2200-2012-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Services Director cost for SoCalGas							
2018 Total		**75**	**0**	**0**	**75**	**0.4**		
2019	Other	75	0	0	75	0.4	1-Sided Adj	TP5MXD20161205232718983
Explanation:	CC2200-2012-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Services Director cost for SoCalGas							
2019 Total		**75**	**0**	**0**	**75**	**0.4**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub: 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	267	220	292	219	243
Non-Labor	52	46	92	292	7,963
NSE	0	0	0	0	0
Total	**319**	**266**	**385**	**510**	**8,206**
FTE	2.7	2.0	2.9	1.4	1.4
Adjustments (Nominal $) **					
Labor	-9	-82	-32	-35	-221
Non-Labor	0	0	0	-218	-7,920
NSE	0	0	0	0	0
Total	**-9**	**-82**	**-32**	**-253**	**-8,141**
FTE	-0.1	-0.8	-0.3	-0.2	-1.1
Recorded-Adjusted (Nominal $)					
Labor	258	139	260	184	23
Non-Labor	52	46	92	74	43
NSE	0	0	0	0	0
Total	**310**	**184**	**353**	**257**	**65**
FTE	2.6	1.2	2.6	1.2	0.3
Vacation & Sick (Nominal $)					
Labor	41	23	42	30	4
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**41**	**23**	**42**	**30**	**4**
FTE	0.4	0.2	0.4	0.2	0.0
Escalation to 2016$					
Labor	18	6	7	3	0
Non-Labor	3	2	2	1	0
NSE	0	0	0	0	0
Total	**21**	**8**	**9**	**4**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	318	168	310	216	26
Non-Labor	55	48	94	75	43
NSE	0	0	0	0	0
Total	**372**	**216**	**404**	**291**	**69**
FTE	3.0	1.4	3.0	1.4	0.3

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub: 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs					
Years	**2012**	**2013**	**2014**	**2015**	**2016**
Labor	-9	-82	-32	-35	-221
Non-Labor	0	0	0	-218	-7,920
NSE	0	0	0	0	0
Total	**-9**	**-82**	**-32**	**-253**	**-8,141**
FTE	-0.1	-0.8	-0.3	-0.2	-1.1

Detail of Adjustments to Recorded:

Year	Adj_Group	Labor	NLbr	NSE	FTE	Adj_Type	RefID
2012	Other	-91	0	0	-0.1	CCTR Transf To 2200-2581.000	TP1DEW20170224222721267
Explanation:	trf						
2012	Other	91	0	0	0.1	CCTR Transf To 2200-2581.000	TP5MXD20170224224512907
Explanation:	Correction to off set entered in error						
2012	Other	-9	0	0	-0.1	CCTR Transf To 2200-2581.000	TP5MXD20170224224614330
Explanation:	Transfer of .09 FTEs to new cost center in order to track Major Env Projects activities						
2012 Total		**-9**	**0**	**0**	**-0.1**		
2013	Other	-65	0	0	-0.6	CCTR Transf To 2200-2581.000	TP5MXD20170224224903013
Explanation:	Transfer of .61 FTEs to new cost center in order to track Major Env Projects activities						
2013	Other	-17	0	0	-0.2	CCTR Transf From 2200-0331.000	JKCHHUOR20161205101005397
Explanation:	Transfer operational planner to financial planning.						
2013 Total		**-82**	**0**	**0**	**-0.8**		
2014	Other	-32	0	0	-0.3	CCTR Transf To 2200-2581.000	TP5MXD20170224224954530
Explanation:	Transfer of ..26 FTEs to new cost center in order to track Major Env Projects activities						
2014 Total		**-32**	**0**	**0**	**-0.3**		
2015	Other	-13	0	0	-0.1	CCTR Transf To 2200-2581.000	TP5MXD20170224225027593
Explanation:	Transfer of .10 FTEs to new cost center in order to track Major Env Projects activities						

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: A. Director of Environmental Services
Category-Sub: 1. Policy, Oversight & Compliance Management
Cost Center: 2200-2012.000 - SCG ENVIRONMENTAL SERVICE DIRECTOR

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2015	Aliso	0	-218	0	0.0	1-Sided Adj	TP5MXD20170315165732580
Explanation:	Adjustment to remove Aliso Canyon incident in 2015.						
2015	Aliso	-22	0	0	-0.1	1-Sided Adj	TP5MXD20170511120859143
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2015 for 2200-2012.						
2015 Total		**-35**	**-218**	**0**	**-0.2**		
2016	Aliso	0	-7,659	0	0.0	1-Sided Adj	TP5MXD20170315165349090
Explanation:	Adjustment to remove Aliso Canyon incident in 2016.						
2016	Aliso	0	-261	0	0.0	1-Sided Adj	TP5MXD20170315170440203
Explanation:	Adjustment to remove Root Cause Analysis for Aliso Canyon incident in 2016.						
2016	Aliso	-221	0	0	-1.1	1-Sided Adj	TP5MXD20170315182539870
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2012.						
2016	Aliso	0	0	0	0.0	1-Sided Adj	TP5MXD20170511123709573
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2012.						
2016 Total		**-221**	**-7,920**	**0**	**-1.1**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Cost Center: VARIOUS

Summary for Category: B. Environmental Programs

	In 2016$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2016	2017	2018	2019
Labor	283	296	333	369
Non-Labor	373	192	192	192
NSE	0	0	0	0
Total	**656**	**488**	**525**	**561**
FTE	2.8	2.7	3.0	3.3

Cost Centers belonging to this Category:

2200-2176.000 SCG ENVIRONMENTAL PROGRAMS

Labor	84	37	74	110
Non-Labor	174	174	174	174
NSE	0	0	0	0
Total	**258**	**211**	**248**	**284**
FTE	0.7	0.3	0.6	0.9

2200-2554.000 TECH SUPP-AIR QUAL

Labor	199	259	259	259
Non-Labor	199	18	18	18
NSE	0	0	0	0
Total	**398**	**277**	**277**	**277**
FTE	2.1	2.4	2.4	2.4

Note: Totals may include rounding differences.

Beginning of Workpaper
2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Activity Description:

The compliance activities in this shared service O&M cost category include the Environmental Programs Manager function and services required to support program management for the department.

Forecast Explanations:

Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

Non-Labor - Zero-Based

N/A

NSE - Zero-Based

N/A

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	1,016	469	782	282	84	37	74	110
Non-Labor	885	1,128	701	-38	174	174	174	174
NSE	0	0	0	0	0	0	0	0
Total	**1,901**	**1,597**	**1,483**	**244**	**258**	**211**	**248**	**284**
FTE	8.4	3.2	7.7	2.6	0.7	0.3	0.6	0.9

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Cost Center Allocations (Incurred Costs):

	2016 Adjusted-Recorded					2017 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	2	0	2	0.0	0	0	0	0	0.0
Directly Allocated	0	0	0	0	0.0	0	0	0	0	0.0
Subj. To % Alloc.	84	172	0	256	0.7	37	174	0	211	0.3
Total Incurred	**84**	**174**	**0**	**258**	**0.8**	**37**	**174**	**0**	**211**	**0.3**
% Allocation										
Retained	98.00%	98.00%				98.00%	98.00%			
SEU	2.00%	2.00%				2.00%	2.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			

	2018 Adjusted-Forecast					2019 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.0	0	0	0	0	0.0
Directly Allocated	0	0	0	0	0.0	0	0	0	0	0.0
Subj. To % Alloc.	74	174	0	248	0.6	110	174	0	284	0.9
Total Incurred	**74**	**174**	**0**	**248**	**0.6**	**110**	**174**	**0**	**284**	**0.9**
% Allocation										
Retained	98.00%	98.00%				98.00%	98.00%			
SEU	2.00%	2.00%				2.00%	2.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2016

Non Shared Service Cost Center. All costs retained by SCG Environmental Services.

Cost Center Allocation Percentage for 2017

Non Shared Service Cost Center. All costs retained by SCG Environmental Services.

Cost Center Allocation Percentage for 2018

Non Shared Service Cost Center. All costs retained by SCG Environmental Services.

Cost Center Allocation Percentage for 2019

Non Shared Service Cost Center. All costs retained by SCG Environmental Services.

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		**Base Forecast**			**Forecast Adjustments**			**Adjusted-Forecast**		
Years		**2017**	**2018**	**2019**	**2017**	**2018**	**2019**	**2017**	**2018**	**2019**
Labor	Zero-Based	0	0	0	37	74	110	37	74	110
Non-Labor	Zero-Based	0	0	0	174	174	174	174	174	174
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**211**	**248**	**284**	**211**	**248**	**284**
FTE	Zero-Based	0.0	0.0	0.0	0.3	0.6	0.9	0.3	0.6	0.9

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	37	0	0	37	0.3	1-Sided Adj	TP5MXD20161205232949307
Explanation:	CC2200-2176-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Program Manager cost for SoCalGas.							
2017	Other	0	174	0	174	0.0	1-Sided Adj	BCELLIS20170831145931140
Explanation:	CC2200-2176 Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Program Manager cost for SoCalGas.							
2017 Total		**37**	**174**	**0**	**211**	**0.3**		
2018	Other	74	0	0	74	0.6	1-Sided Adj	TP5MXD20161205233007947
Explanation:	CC2200-2176-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Program Manager cost for SoCalGas.							
2018	Other	0	174	0	174	0.0	1-Sided Adj	BCELLIS20170831145949343
Explanation:	CC2200-2176 Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Program Manager cost for SoCalGas.							
2018 Total		**74**	**174**	**0**	**248**	**0.6**		
2019	Other	110	0	0	110	0.9	1-Sided Adj	TP5MXD20161205233028573
Explanation:	CC2200-2176-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Environmental Program Manager cost for SoCalGas.							

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
2019	Other	0	174	0	174	0.0	1-Sided Adj	BCELLIS20170831150007390

Explanation: CC2200-2176 Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Environmental Program Manager cost for SoCalGas.

2019 Total		**110**	**174**	**0**	**284**	**0.9**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	1,188	1,241	1,114	125	102
Non-Labor	832	1,082	682	-40	174
NSE	0	0	0	0	0
Total	**2,020**	**2,322**	**1,796**	**85**	**276**
FTE	13.6	14.0	12.4	1.1	0.8
Adjustments (Nominal $) **					
Labor	-362	-854	-456	115	-29
Non-Labor	3	3	3	3	0
NSE	0	0	0	0	0
Total	**-359**	**-851**	**-453**	**118**	**-29**
FTE	-6.4	-11.3	-5.8	1.1	-0.2
Recorded-Adjusted (Nominal $)					
Labor	826	386	658	240	72
Non-Labor	835	1,085	686	-38	174
NSE	0	0	0	0	0
Total	**1,661**	**1,471**	**1,343**	**202**	**246**
FTE	7.2	2.7	6.6	2.2	0.6
Vacation & Sick (Nominal $)					
Labor	132	64	107	39	12
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**132**	**64**	**107**	**39**	**12**
FTE	1.2	0.5	1.1	0.4	0.1
Escalation to 2016$					
Labor	57	18	17	4	0
Non-Labor	50	44	15	0	0
NSE	0	0	0	0	0
Total	**108**	**62**	**32**	**3**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	1,016	469	782	282	84
Non-Labor	885	1,128	701	-38	174
NSE	0	0	0	0	0
Total	**1,901**	**1,597**	**1,483**	**244**	**258**
FTE	8.4	3.2	7.7	2.6	0.7

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs					
Years	2012	2013	2014	2015	2016
Labor	-362	-854	-456	115	-29
Non-Labor	3	3	3	3	0
NSE	0	0	0	0	0
Total	**-359**	**-851**	**-453**	**118**	**-29**
FTE	-6.4	-11.3	-5.8	1.1	-0.2

Detail of Adjustments to Recorded:

Year	Adj_Group	Labor	NLbr	NSE	FTE	Adj_Type	RefID
2012	Other	155	3	0	1.7	CCTR Transf From 2200-2172.000	TP2RXL20161127205108557
Explanation:	Accounting adjustment: Transfer of Env Advisor positions expense.						
2012	Other	0	0	0	0.0	CCTR Transf From 2200-0255.000	TP2RXL20161127210307697
Explanation:	Accounting adjustment: Transfer of Env Advisor position expense.						
2012	Other	-25	0	0	-0.3	CCTR Transf To 2200-2554.000	TP5MXD20170224201334570
Explanation:	Transfer of .32 FTEs to new cost center in order to track Air Quality activities						
2012	Other	-162	0	0	-2.4	CCTR Transf To 2200-2555.000	TP5MXD20170224201444337
Explanation:	Transfer of 2.35 FTEs to new cost center in order to track Project Support activities						
2012	Other	-107	0	0	-3.1	CCTR Transf To 2200-2556.000	TP5MXD20170224201642783
Explanation:	Transfer of 3.05 FTEs to new cost center in order to track Cultrl/Ntrl Res Mgmt activities						
2012	Other	-62	0	0	-0.7	CCTR Transf To 2200-2557.000	TP5MXD20170224202220623
Explanation:	Transfer of .65 FTEs to new cost center in order to track Cultrl & Ntrl Res Mgmt activities						
2012	Other	-161	0	0	-1.6	CCTR Transf To 2200-2558.000	TP5MXD20170224202308607
Explanation:	Transfer of .65 FTEs to new cost center in order to track GHG activities						
2012 Total		**-362**	**3**	**0**	**-6.4**		
2013	Other	-134	0	0	-1.6	CCTR Transf To 2200-2554.000	TP5MXD20170224193111703
Explanation:	Transfer of 1.55 FTEs to new cost center in order to track Air Quality activities						
2013	Other	151	3	0	1.6	CCTR Transf From 2200-2172.000	TP2RXL20161127205322383
Explanation:	Accounting adjustment: Transfer of Env Advisor positions expense.						

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2013	Other	-441	0	0	-6.0	CCTR Transf To 2200-2555.000	TP5MXD20170224193224753
Explanation:	Transfer of 5.93 FTEs to new cost center in order to track Project Support activities						
2013	Other	-245	0	0	-3.1	CCTR Transf To 2200-2556.000	TP5MXD20170224193339780
Explanation:	Transfer of 3.05 FTEs to new cost center in order to track Air Quality activities						
2013	Other	-186	0	0	-2.2	CCTR Transf To 2200-2557.000	TP5MXD20170224193449050
Explanation:	Transfer of 2.18 FTEs to new cost center in order to track Air Quality activities						
2013 Total		**-854**	**3**	**0**	**-11.3**		
2014	Other	165	3	0	1.7	CCTR Transf From 2200-2172.000	TP2RXL20161127205515353
Explanation:	Accounting adjustment: Transfer of Env Advisor positions expense.						
2014	Other	0	0	0	0.0	CCTR Transf From 2200-0255.000	TP2RXL20161127204712570
Explanation:	Accounting adjustment: Transfer of Env Advisor position expense.						
2014	Other	-109	0	0	-1.2	CCTR Transf To 2200-2554.000	TP5MXD20170224075651917
Explanation:	Transfer of 1.23 FTEs to new cost center in order to track Air Quality activities						
2014	Other	-248	0	0	-3.2	CCTR Transf To 2200-2555.000	TP5MXD20170224074953367
Explanation:	Transfer of 3.24 FTEs to new cost center in order to track Project Support activities						
2014	Other	-144	0	0	-1.8	CCTR Transf To 2200-2556.000	TP5MXD20170224075821260
Explanation:	Transfer of 1.80 FTEs to new cost center in order to track Cltr & Ntrl Res activities						
2014	Other	-95	0	0	-1.1	CCTR Transf To 2200-2557.000	TP5MXD20170224075901810
Explanation:	Transfer of 1.11 FTEs to new cost center in order to track Water Quality activities						
2014	Other	-26	0	0	-0.2	CCTR Transf To 2200-2558.000	TP5MXD20170224075942933
Explanation:	Transfer of .22 FTEs to new cost center in order to track Green House Gas (GHG) activities						
2014 Total		**-456**	**3**	**0**	**-5.8**		
2015	Other	37	0	0	0.4	CCTR Transf From 2200-0255.000	TP2RXL20161127204508177
Explanation:	Accounting adjustment: Transfer of Env Advisor positions expense.						
2015	Other	119	3	0	1.2	CCTR Transf From 2200-2172.000	TP2RXL20161127205659573
Explanation:	Accounting adjustment: Transfer of Env Advisor positions expense.						

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2176.000 - SCG ENVIRONMENTAL PROGRAMS

Year	Adj Group	Labor	NLbr	NSE	FTE	Adj Type	RefID
2015	Other	-15	0	0	-0.2	CCTR Transf To 2200-2558.000	TP5MXD20170224095129777
Explanation:	Transfer of .18 FTEs to new cost center in order to track Cltr & Ntrl Res Mgmt activities						
2015	Other	-5	0	0	-0.1	CCTR Transf To 2200-2558.000	TP5MXD20170224094940980
Explanation:	Transfer of .07 FTEs to new cost center in order to track Water Quality activities						
2015	Aliso	0	-1	0	0.0	1-Sided Adj	TP5MXD20170315165846923
Explanation:	Adjustment to remove Aliso Canyon incident in 2015.						
2015	Aliso	-20	0	0	-0.2	1-Sided Adj	TP5MXD20170511121122260
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2015 for 2200-2176.						
2015 Total		**115**	**3**	**0**	**1.1**		
2016	Aliso	-29	0	0	-0.2	1-Sided Adj	TP5MXD20170511123752033
Explanation:	Labor adjustment to remove incremental Aliso Canyon dollars in 2016 for 2200-2176.						
2016 Total		**-29**	**0**	**0**	**-0.2**		

Note: Totals may include rounding differences.

Beginning of Workpaper
2200-2554.000 - TECH SUPP-AIR QUAL

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub 1. SCG Environmental Programs
Cost Center: 2200-2554.000 - TECH SUPP-AIR QUAL

Activity Description:

The compliance activities in this shared service O&M cost category include air quality compliance and permitting support.

Forecast Explanations:

Labor - Zero-Based

A zero-based forecasting methodology was used to forecast this cost category. Utilizing a zero-based forecasting methodology allows Environmental Services to fully convey atypical cost changes due to the Environmental Services' response to the Aliso Incident, as well as a complete reorganization of the department due to the combining of the environmental departments of SCG and SDG&E.

Non-Labor - Zero-Based

N/A

NSE - Zero-Based

N/A

Summary of Results:

	In 2016$ (000) Incurred Costs							
	Adjusted-Recorded					Adjusted-Forecast		
Years	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Labor	30	162	130	241	199	259	259	259
Non-Labor	0	0	0	156	199	18	18	18
NSE	0	0	0	0	0	0	0	0
Total	**30**	**162**	**130**	**397**	**398**	**277**	**277**	**277**
FTE	0.4	1.9	1.4	2.6	2.1	2.4	2.4	2.4

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2554.000 - TECH SUPP-AIR QUAL

Cost Center Allocations (Incurred Costs):

	2016 Adjusted-Recorded					2017 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	7	0	7	0.0	0	0	0	0	0.0
Directly Allocated	0	0	0	0	0.0	0	0	0	0	0.0
Subj. To % Alloc.	199	192	0	391	2.1	259	18	0	277	2.4
Total Incurred	**199**	**199**	**0**	**398**	**2.1**	**259**	**18**	**0**	**277**	**2.4**
% Allocation										
Retained	91.67%	91.67%				91.67%	91.67%			
SEU	8.33%	8.33%				8.33%	8.33%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			

	2018 Adjusted-Forecast					2019 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.0	0	0	0	0	0.0
Directly Allocated	0	0	0	0	0.0	0	0	0	0	0.0
Subj. To % Alloc.	259	18	0	277	2.4	259	18	0	277	2.4
Total Incurred	**259**	**18**	**0**	**277**	**2.4**	**259**	**18**	**0**	**277**	**2.4**
% Allocation										
Retained	91.67%	91.67%				91.67%	91.67%			
SEU	8.33%	8.33%				8.33%	8.33%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2016

Non Shared Service Cost Center. All costs retained by SDG&E Environmental Services.

Cost Center Allocation Percentage for 2017

Non Shared Service Cost Center. All costs retained by SDG&E Environmental Services.

Cost Center Allocation Percentage for 2018

Non Shared Service Cost Center. All costs retained by SDG&E Environmental Services.

Cost Center Allocation Percentage for 2019

Non Shared Service Cost Center. All costs retained by SDG&E Environmental Services.

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2554.000 - TECH SUPP-AIR QUAL

Summary of Adjustments to Forecast:

In 2016 $(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2017	2018	2019	2017	2018	2019	2017	2018	2019
Labor	Zero-Based	0	0	0	259	259	259	259	259	259
Non-Labor	Zero-Based	0	0	0	18	18	18	18	18	18
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**277**	**277**	**277**	**277**	**277**	**277**
FTE	Zero-Based	0.0	0.0	0.0	2.4	2.4	2.4	2.4	2.4	2.4

Forecast Adjustment Details:

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj Type	RefID
2017	Other	259	0	0	259	2.4	1-Sided Adj	TP5MXD20161205233212583
Explanation:	CC2200-2554-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Air Quality cost for SoCalGas.							
2017	Other	0	18	0	18	0.0	1-Sided Adj	BCELLIS20170831160643183
Explanation:	CC2200-2554-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Air Quality cost for SoCalGas.							
2017 Total		**259**	**18**	**0**	**277**	**2.4**		
2018	Other	259	0	0	259	2.4	1-Sided Adj	TP5MXD20161205233231793
Explanation:	CC2200-2554-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Air Quality cost for SoCalGas.							
2018	Other	0	18	0	18	0.0	1-Sided Adj	BCELLIS20170831160718560
Explanation:	CC2200-2554-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Air Quality cost for SoCalGas.							
2018 Total		**259**	**18**	**0**	**277**	**2.4**		
2019	Other	259	0	0	259	2.4	1-Sided Adj	TP5MXD20161205233250153
Explanation:	CC2200-2554-Labor adjustment to annualize existing labor cost as well as to capture incremental labor cost required to support the Air Quality cost for SoCalGas.							
2019	Other	0	18	0	18	0.0	1-Sided Adj	BCELLIS20170831160759573

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2554.000 - TECH SUPP-AIR QUAL

Year	Adj Group	Labor	NLbr	NSE	Total	FTE	Adj_Type	RefID
Explanation:	CC2200-2554-Non-Labor adjustment to annualize existing non-labor administrative cost as well as capture incremental non-labor cost required to support the Air Quality cost for SoCalGas.							
2019 Total		**259**	**18**	**0**	**277**	**2.4**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2554.000 - TECH SUPP-AIR QUAL

Determination of Adjusted-Recorded (Incurred Costs):

	2012 ($000)	2013 ($000)	2014 ($000)	2015 ($000)	2016 ($000)
Recorded (Nominal $)*					
Labor	0	0	0	205	171
Non-Labor	0	0	0	154	199
NSE	0	0	0	0	0
Total	**0**	**0**	**0**	**359**	**370**
FTE	0.0	0.0	0.0	2.2	1.8
Adjustments (Nominal $) **					
Labor	25	134	109	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**25**	**134**	**109**	**0**	**0**
FTE	0.3	1.6	1.2	0.0	0.0
Recorded-Adjusted (Nominal $)					
Labor	25	134	109	205	171
Non-Labor	0	0	0	154	199
NSE	0	0	0	0	0
Total	**25**	**134**	**109**	**359**	**370**
FTE	0.3	1.6	1.2	2.2	1.8
Vacation & Sick (Nominal $)					
Labor	4	22	18	33	28
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**4**	**22**	**18**	**33**	**28**
FTE	0.1	0.3	0.2	0.4	0.3
Escalation to 2016$					
Labor	2	6	3	3	0
Non-Labor	0	0	0	2	0
NSE	0	0	0	0	0
Total	**2**	**6**	**3**	**5**	**0**
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2016$)					
Labor	30	162	130	241	199
Non-Labor	0	0	0	156	199
NSE	0	0	0	0	0
Total	**30**	**162**	**130**	**397**	**398**
FTE	0.4	1.9	1.4	2.6	2.1

* After company-wide exclusions of Non-GRC costs
** Refer to "Detail of Adjustments to Recorded" page for line item adjustments
Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson
Category: B. Environmental Programs
Category-Sub: 1. SCG Environmental Programs
Cost Center: 2200-2554.000 - TECH SUPP-AIR QUAL

Summary of Adjustments to Recorded:

In Nominal $ (000) Incurred Costs					
Years	**2012**	**2013**	**2014**	**2015**	**2016**
Labor	25	134	109	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	**25**	**134**	**109**	**0**	**0**
FTE	0.3	1.6	1.2	0.0	0.0

Detail of Adjustments to Recorded:

Year	Adj_Group	Labor	NLbr	NSE	FTE	Adj_Type	RefID
2012	Other	25	0	0	0.3	CCTR Transf From 2200-2176.000	TP5MXD20170224201334570
Explanation:	Transfer of .32 FTEs to new cost center in order to track Air Quality activities						
2012 Total		**25**	**0**	**0**	**0.3**		
2013	Other	134	0	0	1.6	CCTR Transf From 2200-2176.000	TP5MXD20170224193111703
Explanation:	Transfer of 1.55 FTEs to new cost center in order to track Air Quality activities						
2013 Total		**134**	**0**	**0**	**1.6**		
2014	Other	109	0	0	1.2	CCTR Transf From 2200-2176.000	TP5MXD20170224075651917
Explanation:	Transfer of 1.23 FTEs to new cost center in order to track Air Quality activities						
2014 Total		**109**	**0**	**0**	**1.2**		
2015 Total		**0**	**0**	**0**	**0.0**		
2016 Total		**0**	**0**	**0**	**0.0**		

Note: Totals may include rounding differences.

Area: ENVIRONMENTAL
Witness: Darrell R. Johnson

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2200-0733	000	SCG HAZMAT OPERATIONS
2200-1181	000	SCG SITE ASSESSMENT & MITIGATION
2200-2013	000	SCG ENVIRONMENTAL FEES
2200-2370	000	SCG ENVIRONMENTAL SERVICES RESEARCH
2200-2403	000	SCG ENVIRONMENTAL UST COMPLIANCE
2200-2440	000	SCG ENV MJR PRJ-PSEP&PIP
2200-2443	000	SCG ENVIRONMENTAL STRATEGY & SUSA
2200-2475	000	FIELD ENVIRONMENTAL SERVICES
2200-2555	000	PROJECT SUPPORT
2200-2556	000	CULTRL AND NTRL RES
2200-2557	000	TECH SUPP-WATER QUAL
2200-2558	000	GHG PROGRAM
2200-2579	000	MAJOR PROJECTS ENVIRONMENTAL - SUPPORT
2200-2581	000	MAJOR PROJECTS ENVIRONMENTAL - RESOURCES
2200-2586	000	FIELD ENVIRONMENTAL SERVICES - DISTRIBUT
2200-2587	000	FIELD ENVIRONMENTAL SERVICES - STORAGE
2200-2588	000	FIELD ENVIRONMENTAL SERVICES - TRANSMISS