



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

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Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Adoption of its 2011 Energy  
Resource Recovery Account Revenue Requirement  
Forecast and Competitive Transition Charge Revenue  
Requirement Forecasts

Application 10-10-001  
(filed October 1, 2010)

**COMMENTS OF  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) ON PROPOSED  
DECISION**

John A. Pacheco  
Sempra Energy  
101 Ash Street, HQ12  
San Diego, California 92101-3017  
Telephone: (619) 699-5130  
Facsimile: (619) 699-5027  
Email: [jpacheco@semprautilities.com](mailto:jpacheco@semprautilities.com)

Attorney for: SAN DIEGO GAS &  
ELECTRIC COMPANY

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**I. INTRODUCTION**

Pursuant to Rule 14.3 of the California Public Utilities Commission's ("Commission's") Rules of Practice and Procedure, San Diego Gas & Electric Company ("SDG&E") respectfully submits these Comments on the Proposed Decision ("PD") of Administrative Law Judge ("ALJ") Seaneen M. Wilson regarding SDG&E's Application for approval of its Energy Resource Recovery Account ("ERRA") and Competitive Transition Charge ("CTC") revenue requirement forecasts for 2011 ("Application").

**II. SDG&E SUPPORTS THE PD, WITH LIMITED PROPOSED MODIFICATIONS**

In Section 6.3, the PD grants SDG&E's motion to seal confidential portions of its submitted testimony and exhibits. In its confidentiality motion, SDG&E made specific requests for confidentiality time periods as follows:<sup>1</sup>

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<sup>1</sup> See SDG&E's Opening Brief, Section VIII. (Motion to Seal Portions of the Evidentiary Record) at p. 24-25. It appears that the Division of Ratepayer Advocates ("DRA") marked some portions of its testimony as confidential to be consistent with SDG&E's confidentiality designations. Accordingly, DRA's designations should be granted similar treatment.

- SDGE-1C (Amended Direct Testimony of T. Choi) confidential for three years from date of decision, except for the following items which require a shorter period of confidentiality under the Matrix in D.06-06-066:

<b>Confidential Information</b>	<b>Matrix Reference</b>	<b>Length of Confidentiality</b>
TC-6 lines 26-29	IV, F	confidential until 1/1/2013
Attachment B (Encina Data)	IV, F	confidential until 1/1/2013

- SDGE-2C (Amended Direct Testimony of Y. Le Mieux): confidential for three years from date of decision
- SDGE-3C (Amended Direct Testimony of C. Fang): confidential for three years from date of decision
- SDGE-4C (Prepared Rebuttal Testimony of K. Deremer): confidential for three years from date of decision

The PD, however, in Ordering Paragraph (“OP”) 6 rules that confidentiality is granted for only 2 years for all of SDG&E’s confidential evidence. SDG&E requests that the confidentiality time periods be modified as outlined above.

With respect to implementation of the new rates incorporating the adopted ERRA and CTC revenue requirement forecasts for 2011, SDG&E requests that OP 7 be modified to clarify that implementation will be for rates effective September 1, 2011, which would coincide with the date of SDG&E’s next regularly scheduled rate change.

### **III. CONCLUSION**

Subject to the following proposed modifications (see Appendix of Specific Proposed Changes to PD, below), SDG&E supports the PD and appreciates the time and

effort spent on evaluating the merits of this Application.

Respectfully submitted,

By:     /s/ John A. Pacheco    

John A. Pacheco

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

101 Ash Street

San Diego, CA 92101

Telephone: (619) 699-5130

Facsimile: (619) 699-5027

E-mail: [jpacheco@semprautilities.com](mailto:jpacheco@semprautilities.com)

DATED at San Diego, California, this 18th day of July 2011

## APPENDIX OF SPECIFIC PROPOSED CHANGES TO PD

As set forth above, SDG&E supports adoption of the PD. However, consistent with these Comments, SDG&E would like to propose a few specific wording changes to the PD, as follows:

### Ordering Paragraph No. 6

The requests of San Diego Gas & Electric Company and the Division of Ratepayer Advocates (DRA) to seal portions of the evidentiary record, including Exhibits SDGE-1C, -2C, -3C, and -4C and Exhibit DRA-1C, are granted ~~for two years~~. The information will remain under seal for a period of ~~two~~ three years after the date of this order, except for the following portions of SDGE-1C, which shall remain under seal until January 1, 2013: TC-6 lines 26-29 and Attachment B (Encina Data). During ~~this two-year~~ these periods, this information may not be viewed by any person other than the assigned Commissioner, the assigned Administrative Law Judge, the Assistant Chief Administrative Law Judge, or the Chief Administrative Law Judge, except as agreed to in writing by San Diego Gas & Electric Company, DRA, or as ordered by a court of competent jurisdiction. If San Diego Gas & Electric Company or DRA believes that it is necessary for this information to remain under seal for longer ~~than two years periods~~, San Diego Gas & Electric Company or the DRA may file a new motion at least 30 days before the expiration of this limited protective order.

### Ordering Paragraph 7

San Diego Gas & Electric Company must file a Tier 1 Advice Letters to implement the authority granted herein within 10 days of the date of this decision. The tariffs filed in the Advice Letters shall become effective on ~~or after the date filed~~ September 1, 2011, which is the date of San Diego Gas & Electric Company's next scheduled rate change, subject to Energy Division determining they are in compliance with this decision.