



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

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In the Matter of the Application of San Diego Gas & Electric Company (U 902 E) for Authorization to Recover Unforeseen Liability Insurance Premium and Deductible Expense Increases as a Z-Factor Event.	)	
	)	
	)	A.09-08-019
	)	(Filed August 31, 2009)
	)	
	)	

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**SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E)  
AMENDMENT TO PROOF OF RULE 3.2 COMPLIANCE**

On September 17, 2009, San Diego Gas and Electric Company (SDG&E) submitted the following documentation pursuant to Rule 3.2 of the Commission’s Rules of Practice and Procedure:

- (i) proof of mailing of a *Notice of Application made by San Diego Gas and Electric Company (U 902 E) for Authorization to Recover Unforeseen Liability Insurance Premium and Deductible Expense Increases as a Z-Factor Event in Application No. 09-08-019* to the applicable state, county and municipal governmental agencies in accordance with Rule 3.2(b);
- (ii) proof of posting of a *Notice of Application made by San Diego Gas and Electric Company (U 902 E) for Authorization to Recover Unforeseen Liability Insurance Premium and Deductible Expense Increases as a Z-Factor Event in Application No. 09-08-019* in all the applicable division offices in accordance with Rule 3.2(b); and

- (iii) proof of publishing of a *Notice of Application made by San Diego Gas and Electric Company (U 902 E) for Authorization to Recover Unforeseen Liability Insurance Premium and Deductible Expense Increases as a Z-Factor Event in Application No. 09-08-019* in all the applicable newspapers in accordance with Rule 3.2(c).

At that time, SDG&E indicated that proof of compliance of the remaining notice requirements as set forth in Rules 3.2(d) would be filed separately and in accordance with said Rules, as the documentation needed to prove compliance became available.

As described in the attached Declaration SDG&E's bill inserts commenced on September 9, 2009 and were completed on October 9, 2009. SDG&E hereby submits the following in this Amendment to Proof of Rule 3.2 Compliance:

Attachment A, which contains SDG&E's proof of mailings of a *Notice of Application made by San Diego Gas and Electric Company (U 902 E) for Authorization to Recover Unforeseen Liability Insurance Premium and Deductible Expense Increases as a Z-Factor Event in Application No. 09-08-019* ("the bill insert") to SDG&E's customers in accordance with Rule 3.2(d).

Respectfully submitted,

By: /s/ KEITH W. MELVILLE

KEITH W. MELVILLE

*Attorney for:*

**SAN DIEGO GAS AND ELECTRIC COMPANY**

101 Ash Street, HQ-12

San Diego, CA 92101

Telephone: (619) 699-5039

Facsimile: (213) 699-5027

E-mail: *kmelville@sempra.com*

Dated: October 29, 2009

# ATTACHMENT A

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**PROOF OF MAILINGS TO CUSTOMERS  
(VIA THE "THE BILL INSERT")**

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## DECLARATION

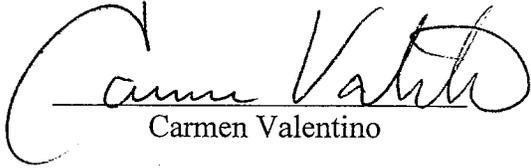
I, Carmen Valentino, am a citizen of the United States residing in Los Angeles County, California, and am over the age of 18.

I am now, and at all times referred to below, have been employed by the San Diego Gas & Electric Company as Communications Advisor in Los Angeles, California.

With regard to San Diego Gas & Electric Company's Application No. 09-08-019 before the California Public Utilities Commission, I was instructed to, and did supervise, the insertion and mailing of the Notices, attached hereto, to all known customers of the San Diego Gas & Electric Company.

The insertion and mailing of the Notice to Customers of Proposed Changes in Rates commenced on Friday, September 11, 2009 with September Billing Cycle No. 7, and was completed on Friday, October 9, 2009 with October Billing Cycle No. 6.

I declare under penalty of perjury that the foregoing is true and correct.

  
Carmen Valentino

10-21-09  
(Date)

Copies of this application are available at the SDG&E Web site at: [www.sdge.com/regulatory/cpuc.shtml](http://www.sdge.com/regulatory/cpuc.shtml).

Copies of this insert will be available for viewing and printing at the SDG&E Web site at [www.sdge.com/billinserts/regulatory.shtml](http://www.sdge.com/billinserts/regulatory.shtml).

**SAN DIEGO GAS & ELECTRIC COMPANY  
NOTICE OF PROPOSED INCREASE IN ELECTRIC RATES  
APPLICATION NO. 09-08-019**

On August 31, 2009, San Diego Gas & Electric Company (SDG&E®) filed an application with the California Public Utilities Commission (CPUC) requesting authority to increase its base rates, effective June 1, 2010. SDG&E's application covers its costs for 2009 liability insurance coverage that exceeds the amount authorized by the CPUC in SDG&E's last General Rate Case (GRC). SDG&E also proposes a formula for adjusting its base rates annually after 2009 (until its next GRC) to reflect continuing incremental liability insurance in excess of the amount authorized in SDG&E's last GRC. SDG&E's application includes a detailed explanation of the incremental cost being requested and a description of why this increase is necessary and reasonable under the revenue adjustment mechanism authorized by the CPUC in SDG&E's last GRC. SDG&E believes its request is necessary as the liability insurance cost increase is outside the control of utility management and liability insurance is a necessary part of providing safe and reliable service to customers.

**EFFECT ON ELECTRIC RATES AND BILLS**

If the CPUC approves SDG&E's request, a typical non-CARE coastal residential customer's summer electric bill using 500 kilowatt-hours of electricity will increase from \$84.75 per month to \$85.43 per month, or \$0.68. The impact on each customer and customer class could vary depending on the CPUC's final decision. SDG&E estimates that the requested \$29 million increase in electric revenues associated with the application would be allocated in a manner shown in the table that follows.

*(Continued inside)*



**San Diego Gas & Electric Company  
Electric Department  
Proposed Change In Class Average Rates**

	5/01/09 Class Average Rates	Class Average Rates Reflecting Proposed Revenue Changes	Total Rate Change	Percentage Rate Change
	(¢/kWh)	(¢/kWh)	(¢/kWh)	%
Residential *	18.147	18.352	0.205	1.13%
Small Commercial	18.484	18.642	0.158	0.85%
Med. & Large C&I	15.414	15.498	0.084	0.54%
Agriculture	17.933	18.090	0.157	0.88%
Lighting	15.868	15.976	0.108	0.68%
System Total	16.686	16.823	0.137	0.82%

\* Pursuant to California Assembly Bill 1X, electric rates for residential usage up to 130% of baseline allowances will not exceed rate levels in effect February 1, 2001, with the exception that rates for usage up to 130% of baseline shall be increased to recover costs associated with the California Solar Initiative.

**THE CPUC MAY HOLD EVIDENTIARY HEARINGS**

The CPUC may hold Evidentiary Hearings (EHs) whereby parties of record present their proposals in testimony and are subject to cross-examination before an Administrative Law Judge (ALJ). The EHs are open to the public, but only those who are formal parties of record can present evidence or cross-examine witnesses during the EHs. Members of the public are welcome to attend the EHs, but they are only allowed to listen. After considering all evidence presented during this process, the ALJ will issue a draft decision. The CPUC may approve the draft decision; it may adopt all or part of the draft; or the assigned Commissioner may issue an alternate decision. The final decision adopted may be different from what SDG&E proposes in the application filing.

**FOR FURTHER INFORMATION**

You may request additional information or obtain a copy of the application and related exhibits by writing to: Ronald van der Leeden, Director-Rates, Revenues & Tariffs, 8330 Century Park Court, San Diego, CA 92123. SDG&E will provide a copy of the application, including the public testimony, upon request. SDG&E's application and attachments may be inspected at the CPUC's Central Files Office, 505 Van Ness Ave., San Francisco, CA 94102. A copy of the application and any amendments may be inspected at the SDG&E business offices listed below:

- |  |   |
|--|---|
| 436 H St.<br>Chula Vista, CA 91910           | 336 Euclid Ave., Suite 502<br>San Diego, CA 92102 |
| 104 North Johnson Ave.<br>El Cajon, CA 92020 | 440 Beech St.<br>San Diego, CA 92101              |
| 320 W. Mission Ave.<br>Escondido, CA 92025   | 2604 El Camino Real, Ste B<br>Carlsbad, CA 92008  |
| 2405 Plaza Blvd.<br>National City, CA 91950  |   |

**CPUC PROCESS**

If you would like additional information on the CPUC process, or would like to attend these hearings and need assistance, you can contact the Public Advisor's Office (PAO). You may also send your comments to the PAO at the address: Public Advisors Office, 320 West Fourth St., Ste. 500, Los Angeles, CA 90013, or send an e-mail to: public.advisor.la@cpuc.ca.gov. Any letters received from you will be circulated to each Commissioner and ALJ and will become part of the formal correspondence file in this application. In your letter, state that your comments are regarding Application No.09-08-019.

*(Continued on back)*





California Public  
Utilities Commission

CPUC Home

## CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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**PROCEEDING: A0908019 - SDG&E - TO RECOVER U  
FILER: SAN DIEGO GAS & ELECTRIC COMPANY  
LIST NAME: LIST  
LAST CHANGED: OCTOBER 27, 2009**

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### Parties

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MICHAEL J. AGUIRRE  
AGUIRRE MORRIS & SEVERSON LLP  
444 WEST C STREET, SUITE 210  
SAN DIEGO, CA 92101  
FOR: RUTH HENDRICKS

MICHAEL SHAMES  
UTILITY CONSUMERS ACTION NETWORK  
3100 FIFTH AVENUE, SUITE B  
SAN DIEGO, CA 92103  
FOR: UCAN

CHUCK MANZUK  
CASE MANAGER  
SEMPRA UTILITIES  
8306 CENTURY PARK COURT  
SAN DIEGO, CA 92123  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

ED MOLDAVSKY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5037  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

### Information Only

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RONALD VAN DER LEEDEN  
SOCAL GAS AND SAN DIEGO GAS & ELECTRIC  
555 W. FIFTH STREET, GCT14D6  
LOS ANGELES, CA 90013

MICHAEL R. THORPE  
SAN DIEGO GAS & ELECTRIC CO.  
555 WEST FIFTH STREET, GT-14E7  
LOS ANGELES, CA 90013-1011

KEITH W. MELVILLE  
ATTORNEY  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, PO BOX 1831  
SAN DIEGO, CA 92101

AGUIRRE MORRIS & SEVERSON  
444 W. C STREET SUITE 210  
SAN DIEGO, CA 92101

BONNIE KANE  
THE KANE LAW FIRM  
402 W. BROADWAY, SUITE 860  
SAN DIEGO, CA 92101-3554

WENDY LEI  
RATE CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS  
ATTORNEY AT LAW  
TOBIAS LAW OFFICE  
460 PENNSYLVANIA AVE  
SAN FRANCISCO, CA 94107

CALIFORNIA ENERGY MARKETS  
425 DIVISADERO ST., SUITE 303  
SAN FRANCISCO, CA 94117-2242

CASE ADMINISTRATION  
PACIFIC GAS & ELECTRIC COMPANY  
77 BEALE STREET, MCB9A  
SAN FRANCISCO, CA 94177

## State Service

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MARIBETH A. BUSHEY  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5018  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5306  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SCOTT LOGAN  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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