

**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 Authorization to Recover Costs Related to A1509010 Application 15-09-\_\_\_\_  
the 2007 Southern California Wildfires Recorded in the (Filed September 25, 2015)  
Wildfire Expense Memorandum Account (WEMA)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR  
AUTHORIZATION TO RECOVER COSTS RELATED TO THE 2007 SOUTHERN  
CALIFORNIA WILDFIRES RECORDED IN THE WILDFIRE EXPENSE  
MEMORANDUM ACCOUNT**

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September 25, 2015

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**I. INTRODUCTION**

Pursuant to section 454 of the California Public Utilities Code, the Commission’s Rules of Practice and Procedure, and Decision (D.)12-12-029, San Diego Gas & Electric Company (“SDG&E”) hereby applies for authority to recover in rates certain costs related to the 2007 Southern California wildfires that have been recorded to its Wildfire Memorandum Expense Account (“WEMA”). Specifically, SDG&E seeks to recover approximately \$379 million (“WEMA Costs”), which represents a small portion of the total \$2.4 billion in costs and legal fees it has incurred to resolve third-party damage claims arising from three wildfires – the Witch, Guejito, and Rice Fires – that occurred in SDG&E’s service territory in late 2007 (“Wildfire Costs”). When translated into typical residential rates, the WEMA Costs would lead to an increase of \$1.67 per month when amortized over six years.

The Commission has previously indicated that recovery of the WEMA Costs will be “subject to [a] reasonableness review,”<sup>1</sup> and through this Application, SDG&E will demonstrate the reasonableness and prudence of its decisions that led to the incurrence of the WEMA Costs.

## **II. OVERVIEW**

### **A. The 2007 Wildfires**

Beginning on October 21, 2007, one of the most devastating fire storms on record broke out in Southern California, driven by intense Santa Ana winds, unseasonably hot temperatures, low humidity and dry vegetation. This fire storm was comprised of more than a dozen major fires (by some counts, 23 wildfires), which erupted across portions of Orange, San Diego, Los Angeles, San Bernardino, Ventura, Santa Barbara, and Riverside counties. The wildfires caused extensive damage to properties in the region, widespread evacuations, and fatalities.<sup>2</sup>

### **B. Post-Fire Investigations and The 2007 Wildfire Litigation**

In investigative reports issued in the aftermath of the 2007 wildfires, the California Department of Forestry and Fire Protection (“Cal Fire”) and the Commission’s Consumer Protection and Safety Division (“CPSD”) (now the Safety and Enforcement Division (“SED”)), attributed the ignition of three of these wildfires – the Witch, Guejito, and Rice Fires – to SDG&E power lines. The Witch Fire is alleged to have started when SDG&E power lines (also called “conductors”) came into contact with one another in the extreme Santa Ana winds. The Guejito Fire is alleged to have started when a Cox Communications lashing wire came into

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<sup>1</sup> D.12-12-029 at Ordering Paragraphs (“OP”) 2-3.

<sup>2</sup> See *California Fire Siege 2007: An Overview*, which is attached as Appendix 2 to the testimony of Mr. Lee Schavrien. The Commission has previously taken official notice of this report. See D.12-01-032 at 5, n.1.

contact with an SDG&E conductor. The Rice Fire is alleged to have started when a tree limb broke from a sycamore tree and knocked down an SDG&E conductor.

Following the issuance of the CPSD report, in which it alleged various violations of General Order requirements, the Commission initiated its own investigation into the operations and practices of both SDG&E and Cox Communications regarding the facilities linked to these three fires.<sup>3</sup> SDG&E and Cox Communications each ultimately entered into settlement agreements resolving those investigations, which the Commission approved.<sup>4</sup> In its settlement agreement with the CPSD, SDG&E agreed to pay \$14.75 million; it issued an apology for falling short of its obligation and duty to respond promptly to Commission requests for access to information and utility employees; it admitted that it failed to provide a required 20-day follow-up letter; it made no admissions of violations of the safety General Order provisions or related statutory requirements; it agreed with CPSD that the settlement agreement was without prejudice to any positions that a party may want to introduce in any other Commission proceeding; and it agreed to undertake certain remedial measures.<sup>5</sup>

More than 2,500 lawsuits were filed against SDG&E by property owners and governmental entities who claimed damages resulting from the Witch, Guejito and Rice Fires (“2007 Wildfire Litigation”). In the California court proceedings, the Superior Court ruled that plaintiffs could plead inverse condemnation claims, despite SDG&E’s argument that such claims should not be allowed against privately-owned utilities like SDG&E.<sup>6</sup> As explained below, this

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<sup>3</sup> I.08-11-006 (Witch and Rice Fires) and I.08-11-007 (Guejito Fire).

<sup>4</sup> See D.10-04-047.

<sup>5</sup> *Id.* at 4-7.

<sup>6</sup> *In re 2007 Wildfire Litigation*, January 29, 2009 Minute Orders Overruling SDG&E’s Demurrers to the Master Complaints. SDG&E petitioned the Court of Appeal and the California Supreme Court to overturn the trial court’s order, but those petitions were denied.

ruling meant that SDG&E could have been held strictly liable for plaintiff's wildfire damages, irrespective of fault. Mr. Lee Schavrien and Ms. Karen Sedgwick discuss SDG&E's decision, as a result of the court's ruling, to work diligently to resolve the vast number of claims asserted through settlements and mediations, for the lowest reasonable cost (to date, all but one case has been resolved in the Superior Court). Through its settlement approach, SDG&E avoided considerable litigation risk, including the risk that it would have been required to pay far greater damages through trial judgments.

### **C. Inverse Condemnation**

The applicability of inverse condemnation was the driving factor in SDG&E's handling of the 2007 Wildfire litigation, as noted by Mr. Schavrien, and justifies SDG&E's actions and decisions in relation to the WEMA Costs. Inverse condemnation is a California constitutional claim that requires the payment of just compensation when property has been taken or damaged for the public use:

The doctrine has been summarized as follows: 'Article I, section 19 (formerly art. I, § 14) of the California Constitution requires that just compensation be paid when private property is taken or damaged for public use. Therefore, a public entity may be liable in an inverse condemnation action for any physical injury to real property proximately caused by a public improvement as deliberately designed and constructed, whether or not that injury was foreseeable, and in the absence of fault by the public entity.'<sup>7</sup>

In contrast to a direct condemnation action under the laws of eminent domain, an inverse condemnation action is instituted by a property owner against the owner of a public improvement after the "taking" has occurred.<sup>8</sup>

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<sup>7</sup> *Marshall v. Dept. of Water and Power*, 219 Cal. App. 3d 1124, 1138 (1990) (citing *Souza v. Silver Development Co.*, (1985) 164 Cal.App.3d 165, 170).

<sup>8</sup> *Customer Co. v. City of Sacramento*, 10 Cal. 4th 368, 377 (1995); see also *Breidert v. So. Pac. Co.* (1964), 61 Cal. 2d 659, 663, fn. 1.

To establish a “taking” or damage for public use, the plaintiff “must demonstrate a causal relationship between the governmental activity and the property loss complained of,” and “[t]ypically, this element is referred to as ‘proximate cause.’”<sup>9</sup> The public entity “may be held strictly liable, *irrespective of fault*, where a public improvement constitutes a substantial cause of the plaintiff’s damages *even if only one of several concurrent causes*.”<sup>10</sup> California courts have repeatedly emphasized that the “fundamental policy underlying the concept of inverse condemnation is that the costs of a public improvement benefiting the community should be spread among those benefited rather than allocated to a single member of the community.”<sup>11</sup>

Originally, liability for inverse condemnation was applied to governmental entities, and in several cases, homeowners were permitted to recover in inverse condemnation for property damaged by brush fires resulting from downed power lines owned by the Los Angeles Department of Water and Power.<sup>12</sup> But a California Court of Appeal decision extended the applicability of inverse condemnation to a privately-owned public utility – Southern California Edison Company (“SCE”) – in a case involving damage to private property resulting from a wildfire ignited by the utility’s power lines.<sup>13</sup> Although SCE argued that inverse condemnation applies only to public or governmental entities, the court rejected that distinction, finding that there were not “any significant differences ... regarding the operation of publicly versus privately owned electric utilities” and that the transmission of electric power “was for the benefit

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<sup>9</sup> *Marshall v. Dept. of Water and Power*, 219 Cal. App. 3d 1124, 1139.

<sup>10</sup> *Id.* (emphasis added).

<sup>11</sup> *Pac. Bell. v. City of San Diego*, 81 Cal. App. 4th 596, 602 (citing *Belair v. Riverside County Flood Control Dist.* (1988) 47 Cal. 3d. 550, 558).

<sup>12</sup> *Marshall v. Dept. of Water and Power*, 219 Cal. App. 3d 1124; *Aetna Life & Casualty Co. v. City of Los Angeles*, 170 Cal. App. 3d 865 (1985).

<sup>13</sup> *Barham v. S. Cal. Edison Co.*, 74 Cal. App. 4<sup>th</sup> 744 (1999).

of the public” and thus a “public use.”<sup>14</sup> The court also reiterated that inverse condemnation applies to property damages caused by “a public improvement as deliberately conceived, altered and maintained.”<sup>15</sup>

In a subsequent case, SCE argued that the cost spreading rationale underlying inverse condemnation did not apply to it because it lacked taxing authority and could only raise rates with the approval of the Commission. The court, however, was unpersuaded by that argument, noting that “Edison has not pointed to any evidence to support its implication that the [C]ommission would not allow Edison adjustments to pass on damages liability during its periodic reviews.”<sup>16</sup> Thus, in applying inverse condemnation to SCE, the court presumed that SCE would be permitted to recover its costs through rates, just as a municipally owned utility would recover its costs through rates established by or taxes levied by the municipality. The court also reiterated that a strict liability standard applies in inverse condemnation proceedings involving privately-owned public utilities, without regard to issues of negligence or intentional wrong-doing.<sup>17</sup>

As a result, under current law, any utility may be held strictly liable under inverse condemnation when its power lines are involved in wildfires that lead to property damage, without regard to the reasonableness or prudence of the utility’s conduct and even when the power lines are merely one of several concurrent causes of the resulting damages. This strict liability is premised on the assumption held by California courts that damages paid by the utility

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<sup>14</sup> *Id.* at 753-54.

<sup>15</sup> *Id.* at 755.

<sup>16</sup> *Pac. Bell v. So. Cal. Edison Co.*, 208 Cal. App. 4th 1400, 1407 (2012).

<sup>17</sup> *Id.* at 1408. *See also Marshall v. Dept. of Water and Power*, 219 Cal. App. 3d 1124, 1138 (1990).

will be spread as widely as possible through rates so that the community as a whole, those who make use of electricity service provided by the utility as a public good, and not just the few ratepayers impacted or the utility, will bear the cost. Accordingly, the Commission should permit SDG&E to spread the WEMA Costs through rates.

**D. SDG&E's Efforts to Drastically Reduce the Amount of Costs for Recovery**

The WEMA Costs (approximately \$379 million) represent approximately one-sixth of the total Wildfire Costs (\$2.4 billion) SDG&E has incurred through its process of resolving claims asserted in the 2007 Wildfire Litigation. This is due to reasonable and prudent steps SDG&E undertook over the past several years to reduce the Wildfire Costs dramatically. First, SDG&E had \$1.1 billion liability insurance coverage in place at the time of the 2007 wildfires. Second, SDG&E obtained settlement payments from third parties (Cox Communications and three contractors) totaling \$824 million. Ms. Sedgwick discusses the reasonableness of SDG&E's insurance coverage and its settlements with third parties. Third, SDG&E has pursued recovery of the portion of Wildfire Costs allocated to Federal Energy Regulatory Commission ("FERC") jurisdictional rates and continues to do so, as noted by Mr. Schavrien and Mr. Craig Gentes. SDG&E also proposes in this Application to further reduce the costs it seeks to recover through a voluntary contribution of 10% of the remaining balance, or \$42 million (after the deductions referenced above) and by applying annual credits of any miscellaneous revenue it receives above the amount authorized for recovery in rates to the WEMA balance, as discussed by Mr. Schavrien. As a result of these actions on SDG&E's part, the rate impact of the WEMA Costs is far less than it might have been.

**E. Procedural Background to This Application**

As discussed by Mr. Schavrien, utilities are permitted to recover the costs of their businesses, including the cost of liabilities such as those that comprise the WEMA Costs, as part

of the regulatory compact. The costs for liabilities, including losses not covered by insurance or settlement claims, are ordinarily approved for inclusion in a utility's rates through its General Rate Case, in which the utility typically provides a forecast of such costs based on past experience of the cost history in Account 925 (Injuries & Damages).<sup>18</sup> But the Commission also permits utilities to record costs to memorandum accounts when (as here) projected costs and benefits are uncertain, subject to a later review for inclusion in rates.<sup>19</sup>

In late 2009, along with other California utilities, SDG&E filed a joint application seeking Commission approval to establish a balancing account mechanism, the Wildfire Expense Balancing Account ("WEBA"), for recovery of wildfire-related costs.<sup>20</sup> SDG&E also sought authorization to record wildfire-related costs (including costs to resolve claims and related legal fees) to a WEMA, which the Commission approved in Resolution E-4311, indicating that such costs could be recorded pending resolution of the related request to establish the WEBA mechanism.

The Commission ultimately denied the WEBA application for reasons that, as discussed by Mr. Schavrien, are not applicable to this Application. In doing so, the Commission indicated that the WEMA "authorized by Commission Resolution E-4311 shall remain open pending reasonableness review and disposition in appropriate proceedings," and that SDG&E may apply to recover "[WEMA] balances, subject to a reasonableness review at a later time."<sup>21</sup>

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<sup>18</sup> See, e.g., D.14-08-032 at 570-72 (approving Pacific Gas & Electric Company's ("PG&E") forecasts of (1) settlements and judgment costs, as part of litigation; and (2) claims payments to third parties alleging personal injury, property damage and economic loss as a result of PG&E's operations).

<sup>19</sup> See, e.g., *So. Cal. Edison Co. v. Public Utils. Comm'n.*, 85 Cal. App. 4th 1086, 1091-92 (2000).

<sup>20</sup> Application (A.) 09-08-020.

<sup>21</sup> D.12-12-029 at OP 2-3.

## F. Reasonableness Reviews

The Commission's standard in a reasonableness review<sup>22</sup> assess whether the utility's decisions were reasonable and prudent in light of what the utility knew or should have known at the time the decisions were made.<sup>23</sup> Reasonableness and prudence are not to be assessed using hindsight judgment.<sup>24</sup> It is not the consequences of the decision or action that matter but rather the soundness of the utility's decision making process that led to the decision and its consequences.<sup>25</sup> Further, a reasonable or prudent decision is not limited to the optimum decision but can include a spectrum of decisions.<sup>26</sup> The action selected should logically be expected, at the time the decision was made, to accomplish the desired result at the lowest reasonable cost consistent with good utility practices.<sup>27</sup>

Typically, the Commission conducts reasonableness reviews with respect to decisions that a utility voluntarily makes, such as procurement decisions, that give rise to costs the utility then seeks to recover in rates.<sup>28</sup> In this instance, SDG&E did not voluntarily decide to incur any wildfire-related costs. The decisions that SDG&E made with respect to the specific amount of WEMA Costs at issue, and which are thus the appropriate actions for assessment in this reasonableness review are:

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<sup>22</sup> In a reasonableness review, the applicant utility bears the burden of proof. *See, e.g.*, D.14-06-007 at 12-13. The Commission has also stated that its "standard for reasonableness issues is the preponderance [of the evidence] standard," meaning that an applicant must present more evidence that supports the requested result that would support an alternative outcome. *Id.*

<sup>23</sup> *See, e.g.*, D.05-08-037 at 10-11.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *See, e.g.*, D.09-05-025.

- (1) SDG&E's decision to pursue settlement of the claims asserted in the 2007 Wildfire Litigation, in light of the applicability of inverse condemnation and the accompanying strict liability standard that California courts have imposed on the basis that utilities can spread costs through rates;
- (2) the process SDG&E employed to settle those claims at the lowest reasonable cost; and
- (3) SDG&E's efforts to substantially reduce the amount of Wildfire Costs for which it seeks recovery through liability insurance coverage; recoveries from third parties obtained through settlements; and through voluntary contributions representing 10% of the remaining CPUC regulatory asset, and an annual credit of miscellaneous revenues collected above the amount authorized. While FERC recoveries are not subject to review by this Commission, those recoveries have also reduced the amount of costs SDG&E seeks to recover.

Mr. Schavrien and Ms. Sedgwick demonstrate the reasonableness and prudence of these decisions in their testimony. The accounting treatment of the WEMA Costs, and the rate impact associated with those costs are discussed by Mr. Gentes and Ms. Cynthia Fang.

Given the CPSD report discussed above, SDG&E expects that opponents of this Application will argue that the Commission should deny recovery of the WEMA Costs because SDG&E may have been liable under inverse condemnation due to the involvement of its facilities in the ignitions of the Witch, Guejito and Rice Fires. In the face of such arguments, the Commission should recognize, as an initial matter, that under the law of inverse condemnation, liability does not equate to fault. As discussed above, California courts apply strict liability "*irrespective of fault*," where a public improvement constitutes a substantial cause of the

plaintiff's damages *even if only one of several concurrent causes.*"<sup>29</sup> Thus, the fact that SDG&E may have been liable under inverse condemnation does not mean that it did anything wrong, or acted in a way that was not reasonable or prudent. To suggest otherwise, would be to deny the fundamental tenets of inverse condemnation claims, just as denying recovery of the WEMA Costs would contravene the entire rationale (cost or loss spreading through rates) for the application of inverse condemnation to privately-owned public utilities.

Moreover, although SDG&E's facilities may have been involved, any inquiry should recognize the importance of the myriad other "concurrent causes" of the ignition and spread of the Witch, Guejito and Rice Fires which SDG&E did not control, including the extreme Santa Ana winds and the dryness of vegetation in the vicinity and path of all three of those fires, the limited availability and effectiveness of firefighting resources, and other outside factors. As noted by Mr. Schavrien, the factors that determine whether a fire results in \$2 or \$2 billion in damages are wholly outside of SDG&E's control.

Furthermore, the alleged involvement of SDG&E facilities in the ignitions of the three fires does *not* show that SDG&E acted unreasonably or imprudently. While SDG&E submits that the Commission need not make any findings regarding the reasonableness and prudence of its operating and engineering practices, SDG&E has nevertheless undertaken to assure the Commission of the soundness of those practices prior to October 2007. Specifically, in attached testimony, SDG&E discusses the extensive efforts it undertook in the design, construction, maintenance and inspections of its facilities, including the facilities implicated in the Witch, Guejito and Rice Fires, prior to October 21, 2007. SDG&E witness Mr. David Geier, joined by Messrs. Darren Weim, Greg Walters and Don Akau, present testimony regarding those issues.

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<sup>29</sup> *Marshall v. Dept. of Water and Power*, 219 Cal. App. 3d 1124, 1139 (1990) (emphasis added).

These witnesses explain the rigorous practices and procedures that were in place to ensure the safe, reliable, and cost-effective operation of SDG&E's system, consistent with its desire to reduce risk and comply with applicable safety regulations. Importantly, that testimony also shows that despite these practices and procedures, SDG&E had no reason to believe, on October 21, 2007, that the facilities linked to the Witch, Guejito and Rice Fires would give rise to those fires. Those witnesses also discuss the "concurrent causes" of the fires, as do Mr. Steve Vanderburg and Dr. Jon Peterka, who focus on the extreme weather and wind conditions that played such a significant role in the ignition and spread of these fires.

Finally, this testimony demonstrates that the 2007 wildfires were a turning point in how SDG&E, the Commission, and fire-fighting agencies assesses and responds to wildfire risk. Mr. Geier describes the host of measures SDG&E has undertaken since 2007 to reduce that risk and to further protect the community and its facilities from future wildfires. Messrs. Geier, Weim, Walters and Akau also discuss the extensive and significant changes the Commission has made to its safety requirements since 2007. SDG&E has been heavily involved in those proceedings, which continue to this day.

### **III. RELIEF REQUESTED**

Through this Application and the supporting testimony, SDG&E requests Commission authorization to recover the WEMA Costs in rates. SDG&E has developed three scenarios for that recovery, as discussed by Ms. Cynthia Fang – amortization periods of six, eight, and ten years. As noted by Mr. Schavrien, SDG&E recommends the six-year amortization period.

### **IV. SUMMARY OF PREPARED TESTIMONY**

This Application is supported by the following testimony:

Mr. Lee Schavrien, Chief Administrative Officer of SDG&E and Southern California Gas Company, presents an overview of SDG&E's WEMA Application. Mr. Schavrien then discusses the 2007 wildfires and the prior regulatory proceedings involving those fires that have preceded this Application. Next, Mr. Schavrien explains why SDG&E believes that the WEMA Costs are appropriate for recovery, including that the WEMA Costs are costs of the utility business and, as such, are appropriate for recovery in rates under the regulatory compact. Mr. Schavrien then shows that the WEMA Costs were reasonably and prudently incurred, explaining that SDG&E's decision to settle the damage claims asserted in the 2007 Wildfire Litigation was reasonable and prudent in light of the applicability of inverse condemnation by California courts to privately-owned public utilities and the potential for the significant damages that might have resulted from trials, as was the settlement process itself. He further explains the reasonableness and prudence of SDG&E's actions to reduce the amount of costs for which it seeks recovery in this proceeding – through insurance, recoveries from contractors, and voluntary contributions. Lastly, Mr. Schavrien explains the many factors outside of SDG&E's control that impacted the ignition and spread of the Witch, Guejito and Rice Fires.

Ms. Karen Sedgwick, Sempra Energy's Vice President of Audit Services, describes the 2007 Wildfire Litigation, including the vast number of claims that were asserted against SDG&E and how SDG&E undertook to resolve those claims for the lowest reasonable amounts. Ms. Sedgwick also explains that SDG&E had a reasonable amount of liability insurance coverage in place at the time of the 2007 wildfires (\$1.1 billion), which it used to offset a significant portion of the \$2.4 billion in Wildfire Costs. Further, she discusses the settlements SDG&E negotiated with third parties and contractors, which further reduced the Wildfire Costs by an additional \$824 million.

Mr. R. Craig Gentes, SDG&E's Director of Utility Accounting, explains the accounting treatment of the WEMA, including how costs are properly recorded, and the specific deductions that have reduced the WEMA Costs to the amount for which SDG&E now seeks recovery. Those deductions include the recoveries from insurance, third parties and contractors, the amount SDG&E has recovered (or applied to recover) through FERC proceedings, and a voluntary 10% deduction of the remaining CPUC regulatory asset (\$42 million).

Ms. Cynthia Fang, SDG&E's Rate Strategy and Analysis Manager, computes the rate impacts associated with recovery of the WEMA Costs, using three amortization scenarios that Mr. Schavrien instructed her to present – six, eight, and ten years (with a recommendation to use the six year scenario). According to Ms. Fang, the monthly rate impacts for a typical residential customer associated with these amortization periods are \$1.67, \$1.25, and \$1.00, respectively.

Mr. David Geier, SDG&E's Vice President of Electric Transmission and System Engineering, is SDG&E's overview witness with respect to operations and engineering issues. Mr. Geier provides an overview of the 2007 wildfires, the devastation they caused, and the impact they have had on SDG&E and its community. Mr. Geier then describes SDG&E's service territory (including the unique challenges posed by that territory), its distribution and transmission systems, and some of the key priorities – safety, reliability, compliance, and cost-effectiveness – that drive its operational and engineering decisions. Mr. Geier also introduces some of the key standards and programs (as further discussed by Messrs. Weim, Akau and Walters) that SDG&E implemented prior to the 2007 wildfires to further those priorities, including measures specifically aimed at the risk of wildfire. Next, Mr. Geier discusses the 2003 and 2007 wildfires, and SDG&E's response. He then explains the enormous changes SDG&E has made to its operations since the 2007 wildfires to reduce the risk of future wildfire outbreaks.

In this regard, Mr. Geier conclusively disproves any argument that SDG&E will – if permitted to recover the WEMA Costs – lack incentive to minimize fire risk; SDG&E has already devoted tremendous resources towards that goal and continues to do so today. Lastly, Mr. Geier discusses fire-related regulatory proceedings since the 2007 wildfires, and how all stakeholders, including the Commission and SDG&E, have sought to implement measures to further reduce the risk of wildfires.

Mr. Darren Weim, SDG&E’s Manager of Northeast Construction & Operations, discusses the rigorous standards and procedures that were in place prior to the 2007 wildfires for the design, construction, maintenance and inspection of facilities. He explains the inspections of the facilities alleged to have been involved in the Guejito Fire and concludes that SDG&E had complied with applicable standards at the time and had no reason to believe that its facilities would be involved in that fire. Mr. Weim also testifies that SDG&E complied with the applicable design, inspection and maintenance standards prior to the Witch Fire, and similarly had no reason to believe that its facilities would be involved in that fire.

Mr. Greg Walters, a former Team Leader in SDG&E’s Compliance Management department, explains how SDG&E complies with the Commission’s General Order requirements related to the safety of electric power lines and to the inspection requirements for electric distribution and transmission facilities. He demonstrates that SDG&E had complied with such requirements at the time of the Guejito Fire and had no notice of any clearance or other safety-related issues. Mr. Walters also discusses the policies that were in place at the time for joint pole attachments by Communications Infrastructure Providers. Lastly, he explains how the Commission, along with all stakeholders, has sought to strengthen the regulatory requirements

related to a variety of facilities, including Communications Infrastructure Provider facilities in the aftermath of the 2007 wildfires.

Mr. Don Akau, SDG&E's Vegetation Program Manager, discusses SDG&E's Vegetation Management Program, pursuant to which it trims and removes trees that pose safety or other concerns. Additionally, Mr. Akau discusses how vegetation is inspected and how potential safety issues are resolved. Mr. Akau demonstrates that SDG&E was in compliance with that program, and applicable regulations, at the time of the Rice Fire.

Mr. Steve Vanderburg, a Senior Meteorologist at SDG&E, describes the weather and wind conditions in SDG&E's service territory, as well as the reasons why SDG&E's service territory is subject to such massive wildfire outbreaks. Mr. Vanderburg then explains the substantial efforts SDG&E has undertaken to improve that understanding of weather conditions and fire potential, including the addition of in-house meteorology capabilities and 170 new, localized weather stations, as well as the development of an analytical process for assessing Large Fire Potential and for categorizing that potential through the Santa Ana Wildfire Threat Index, which is now maintained by the U.S. Forest Service. Based on an historical analysis of the Large Fire Potential, Mr. Vanderburg shows that the fire potential at the time of the 2007 wildfires was unprecedented and extreme.

Dr. Jon Peterka, a wind engineering expert, supplements Mr. Vanderburg's testimony with an analysis of the significant wind conditions at the time and location of each of the Witch, Guejito and Rice Fires, showing how strong and gusty those winds were. Dr. Peterka first explains how he conducted mesoscale modeling to examine winds near the surface at the location of each fire, and how he modeled the local terrain and used an atmospheric boundary layer wind tunnel to determine wind speeds and gusts. Dr. Peterka then discusses an analysis he

undertook to corroborate his results. Finally, Dr. Peterka explains why data from Remote Automated Weather Stations that existed in San Diego County in 2007 was unrepresentative of actual wind conditions at the time and locations of each of the three wildfires.

## **V. STATUTORY AND PROCEDURAL REQUIREMENTS**

### **A. Rule 2.1(a)—(c)**

In accordance with Rule 2.1(a)—(c) of the Commission’s Rules and Practice and Procedure, SDG&E provides the following information:

#### **1. Rule 2.1(a) – Legal Name**

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. The exact legal name of the Applicant is San Diego Gas & Electric Company. SDG&E’s principal place of business is 8330 Century Park Court, San Diego, California 92123.

#### **2. Rule 2.1(b) – Correspondence**

Correspondence or communications regarding this Application should be addressed to

Shivani Ballesteros  
Regulatory Case Manager  
8330 Century Park Court, #CP31F  
San Diego, CA 92123  
Telephone: (858) 637-7914  
Email: [sballesteros@semprautilities.com](mailto:sballesteros@semprautilities.com)

With copies to:

Christopher M. Lyons  
8330 Century Park Court, #CP32D  
San Diego, CA 92123  
Telephone: (858) 654-1559  
Email: [clyons@semprautilities.com](mailto:clyons@semprautilities.com)

**3. Rule 2.1(c)**

**a. Proposed Category of Proceeding**

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting because SDG&E proposes to recover the WEMA Costs described in this Application from its ratepayers.

**b. Need for Hearings**

SDG&E anticipates that the Commission will set this matter for hearing. SDG&E has provided a proposed schedule below.

**c. Issues to be Considered**

The issues to be considered are described in this Application and the accompanying testimony and exhibits.

**d. Proposed Schedule**

SDG&E proposes the following schedule:

<b><u>ACTION</u></b>	<b><u>DATE</u></b>
Application filed	September 25, 2015
End of Response Period (including Applicant Reply)	On or around November 9, 2015
Prehearing Conference	November 2015
ORA and Intervenor Testimony	February 2016
Concurrent Rebuttal Testimony	May 2016
Evidentiary Hearings	June 2016
Concurrent Opening Briefs	August 2016
Concurrent Reply Briefs	September 2016
Proposed Decision	October 2016
Comments on Proposed Decision	November 2016

Reply Comments on Proposed  
Decision

November 2016

Commission Decision Adopted

Late 2016/1st Quarter 2017

**B. Rule 2.2 – Articles of Incorporation**

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014 in connection with SDG&E Application No. 14-09-008, and is incorporated herein by reference.

**C. Rule 3.2 – Authority to Change Rates**

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.<sup>30</sup>

**1. Rule 3.2(a)(1) – Balance Sheet**

SDG&E’s financial statement, balance sheet and income statement for the three-month period ending June 30, 2015 are included with this Application as Attachment A.

**2. Rule 3.2(a)(2) – Statement of Effective Rates**

A statement of all of SDG&E’s presently effective electric rates can be viewed electronically by accessing:

<http://www.sdge.com/rates-regulations/current-and-effective-tariffs/current-and-effective-tariffs>.

Attachment B to this Application provides the current table of contents from SDG&E’s electric tariffs on file with the Commission.

**3. Rule 3.2(a)(3) – Statement of Proposed Rate Change**

A statement of proposed rate increases is attached as Attachment C.

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<sup>30</sup> Note Rule 3.2(a) (9) is not applicable to SDG&E.

**4. Rule 3.2(a)(4) – Description of Property and Equipment**

A general description of SDG&E’s property and equipment was filed with the Commission on October 5, 2001 in connection with Application 01-10-005, and is incorporated herein by reference. Applicant’s original cost of utility plant, together with the related reserves for depreciation and amortization period ending June 30, 2015, is shown on the balance sheet included in Attachment D.

**5. Rule 3.2(a)(5) and (6) – Summary of Earnings**

A summary of SDG&E’s earnings (for the total utility operations for the company) for period ending June 30, 2015, is included as Attachment E to this Application.

**6. Rule 3.2(a)(7) – Statement Regarding Tax Depreciation**

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

**7. Rule 3.2(a)(8) – Proxy Statement**

A copy of the most recent proxy statement sent to all shareholders of SDG&E’s parent company, Sempra Energy, dated March 26, 2015, was mailed to the Commission on April 28, 2015, and is incorporated herein by reference.

**8. Rule 3.2(a)(10) – Statement re Pass Through to Customers**

This Application will seek Commission authorization to recover the WEMA Costs in rates. The rate increase does not reflect and pass through to customers only increased costs to the corporation for the services or commodities furnished by it.

**9. Rule 3.2(b) – Notice to State, Cities and Counties**

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing this Application, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in Attachment F to this Application.

**10. Rule 3.2(c) – Newspaper Publication**

In compliance with Rule 3.2 (c) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing of this Application, publish in newspapers of general circulation in each county in its service territory notice of this Application.

**11. Rule 3.2(d) – Bill Insert Notice**

In compliance with Rule 3.2 (d) of the Commission’s Rules of Practice and Procedure, SDG&E will, within 45 days after the filing of this Application, provide notice of this Application to all of its customers along with the regular bills sent to those customers that will generally describe the proposed rate changes addressed in this Application.

**VI. SERVICE**

This is a new Application. No service list has been established. Accordingly, SDG&E will serve this Application on parties to the service list for its WEBA Application (A.09-08-020).

Hard copies will be sent via FedEx to Chief ALJ Karen Clopton.

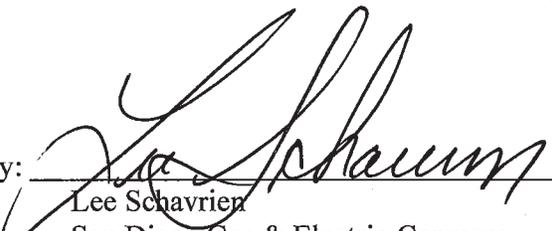
**VII. CONCLUSION**

WHEREFORE, SDG&E requests that the Commission grant SDG&E's Application, as described herein.

By: /s/ Christopher M. Lyons  
Christopher M. Lyons  
San Diego Gas & Electric Company  
8330 Century Park Court, #CP32D  
San Diego, CA 92123  
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Attorneys for  
SAN DIEGO GAS & ELECTRIC COMPANY

By:   
Lee Schavrien  
San Diego Gas & Electric Company  
Chief Administration Officer

DATED at San Diego, California, this 25th day of September 2015.

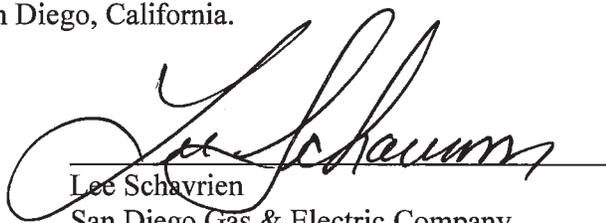
## OFFICER VERIFICATION

Lee Schavrien declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR AUTHORIZATION TO RECOVER COSTS RELATED TO THE 2007 SOUTHERN CALIFORNIA WILDFIRES RECORDED IN THE WILDFIRE EXPENSE MEMORANDUM ACCOUNT** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on September 25, 2015 at San Diego, California.

  
\_\_\_\_\_  
Lee Schavrien  
San Diego Gas & Electric Company  
Chief Administration Officer

**ATTACHMENT A**

**FINANCIAL STATEMENT, INCOME STATEMENT AND BALANCE SHEET**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
**June 30, 2015**

<b>(a) Amounts and Kinds of Stock Authorized:</b>				
Common Stock		255,000,000	shares	Without Par Value
<b>Amounts and Kinds of Stock Outstanding:</b>				
Common Stock		116,583,358	shares	291,458,395 <small>sap</small>

**(b) Brief Description of Mortgage:**  
Full information as to this item is given in Application Nos. 08-07-029, 10-10-023 and 12-03-005 to which references are hereby made.

**(c) Number and Amount of Bonds Authorized and Issued:**

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2014
6.80% Series KK, due 2013	12-01-91	14,400,000	0	0
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.85% Series RR, due 2021	06-29-93	60,000,000	0	0
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,373
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,250
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,938
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	3,000,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-15-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	2,660,460
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	15,840,000
.4677% Series OOO, due 2017	03-12-15	140,000,000	140,000,000	-
1.9140% Series PPP, due 2022	03-12-15	48,490,631	48,490,631	-
<b>Total 1st. Mortgage Bonds:</b>				<b>181,406,020</b>

**Unsecured Bonds:**

5.30% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.50% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.90% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000
<b>Total Unsecured Bonds</b>				<b>6,586,700</b>
<b>Total Bonds:</b>				<b>187,992,720</b>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
**June 30, 2015**

<u>Other Indebtedness:</u>	Date of <u>Issue</u>	Date of <u>Maturity</u>	Interest <u>Rate</u>	<u>Outstanding</u>	Interest Paid <u>2015</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	39,500,000	\$134,068

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

Preferred Stock	Shares Outstanding 3/31/15	Dividends Declared				
		2011	2012	2013	2014	2015
5.0%	\$375,000	\$375,000	\$281,250	\$0	\$0	
4.50%	270,000	270,000	202,500	0	0	
4.40%	286,000	286,000	214,500	0	0	
4.60%	343,868	343,868	257,901	0	0	
\$ 1.70	2,380,000	2,380,000	1,785,000	0	0	
\$ 1.82	1,164,800	1,164,800	873,600	0	0	
	0	\$4,819,668	\$4,819,668	\$3,614,751	\$0	\$0

Common Stock

Dividend to Parent	[1]	\$0	\$0	\$0	\$200,000,000	\$0
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**NOTE 11 PREFERRED STOCK 10K:**

On October 15, 2013, SDG&E redeemed all six series of its outstanding shares of contingently redeemable preferred stock for \$82 million, including a \$3 million early call premium (pg 9.1).

A balance sheet and a statement of income and retained earnings of applicant for the six months ended June 30, 2015 are attached hereto.

[1] San Diego Gas & Electric Company dividend to parent.

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**SIX MONTHS ENDED JUNE 30, 2015**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$2,178,220,818
401	OPERATING EXPENSES	\$1,297,860,136	
402	MAINTENANCE EXPENSES	66,974,652	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	280,855,777	
408.1	TAXES OTHER THAN INCOME TAXES	60,826,929	
409.1	INCOME TAXES	56,726,931	
410.1	PROVISION FOR DEFERRED INCOME TAXES	285,219,039	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(200,462,740)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(1,347,031)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		1,846,653,693
	NET OPERATING INCOME		331,567,125

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	4,708	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	42,090	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	32,087,992	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	17,931,303	
421	MISCELLANEOUS NONOPERATING INCOME	180,884	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	50,246,977	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	125,024	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	2,531,707	
	TOTAL OTHER INCOME DEDUCTIONS	2,656,731	
408.2	TAXES OTHER THAN INCOME TAXES	311,784	
409.2	INCOME TAXES	9,941,846	
410.2	PROVISION FOR DEFERRED INCOME TAXES	20,599,355	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(7,413,100)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	23,439,885	
	TOTAL OTHER INCOME AND DEDUCTIONS		24,150,361
	INCOME BEFORE INTEREST CHARGES		355,717,486
	EXTRAORDINARY ITEMS AFTER TAXES		12,557,074
	NET INTEREST CHARGES*		95,445,102
	NET INCOME		\$272,829,458

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$6,871,322)

**SAN DIEGO GAS & ELECTRIC COMPANY  
STATEMENT OF INCOME AND RETAINED EARNINGS  
SIX MONTHS ENDED JUNE 30, 2015**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,608,175,171
NET INCOME (FROM PRECEDING PAGE)	272,829,458
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$3,881,004,629</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**JUNE 30, 2015**

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<b>1. UTILITY PLANT</b>		<u>2015</u>
101	UTILITY PLANT IN SERVICE	\$14,053,093,436
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	11,307,728
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	798,496,264
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,414,807,978)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(483,007,396)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(875,168)
118	OTHER UTILITY PLANT	981,700,669
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(241,469,612)
120	NUCLEAR FUEL - NET	-
	<b>TOTAL NET UTILITY PLANT</b>	<u>10,793,382,664</u>

<b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	5,946,616
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(364,300)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>1,145,248,663</u>
	<b>TOTAL OTHER PROPERTY AND INVESTMENTS</b>	<u>1,150,830,979</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**JUNE 30, 2015**

<b>3. CURRENT AND ACCRUED ASSETS</b>		2015
131	CASH	11,836,301
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	259,665,563
143	OTHER ACCOUNTS RECEIVABLE	21,292,872
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(2,791,108)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,281,277
151	FUEL STOCK	2,717,414
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	99,062,149
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	188,831,739
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	363,545
165	PREPAYMENTS	220,247,439
171	INTEREST AND DIVIDENDS RECEIVABLE	30,284,349
173	ACCRUED UTILITY REVENUES	57,060,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,718,925
175	DERIVATIVE INSTRUMENT ASSETS	118,684,597
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<b>1,011,255,562</b>
<b>4. DEFERRED DEBITS</b>		
181	UNAMORTIZED DEBT EXPENSE	34,055,918
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,563,098,767
		4,954,547
184	CLEARING ACCOUNTS	(176,433)
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	44,542,513
	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	10,895,112
	ACCUMULATED DEFERRED INCOME TAXES	586,002,047
	<b>TOTAL DEFERRED DEBITS</b>	<b>4,243,372,471</b>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>17,198,841,676</b>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**JUNE 30, 2015**

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**5. PROPRIETARY CAPITAL**

	<u>2015</u>
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	-
207 PREMIUM ON CAPITAL STOCK	(591,282,978)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(479,665,368)
214 CAPITAL STOCK EXPENSE	24,605,640
216 UNAPPROPRIATED RETAINED EARNINGS	(3,881,004,629)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>11,753,527</u>
TOTAL PROPRIETARY CAPITAL	<u>(5,207,052,203)</u>

**6. LONG-TERM DEBT**

221 BONDS	(4,302,505,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(123,900,000)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>10,015,759</u>
TOTAL LONG-TERM DEBT	<u>(4,416,389,241)</u>

**7. OTHER NONCURRENT LIABILITIES**

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(635,976,563)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(27,156,159)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(236,568,303)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
	<u>(842,916,641)</u>
TOTAL OTHER NONCURRENT LIABILITIES	<u>(1,742,617,666)</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**JUNE 30, 2015**

**8. CURRENT AND ACCRUED LIABILITES**

	<u>2015</u>
231 NOTES PAYABLE	(39,500,000)
232 ACCOUNTS PAYABLE	(394,053,669)
233 NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234 ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(6,848,847)
235 CUSTOMER DEPOSITS	(70,146,065)
236 TAXES ACCRUED	(165,562,754)
237 INTEREST ACCRUED	(46,126,130)
238 DIVIDENDS DECLARED	-
241 TAX COLLECTIONS PAYABLE	(4,153,401)
242 MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(216,607,507)
243 OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(39,310,608)
244 DERIVATIVE INSTRUMENT LIABILITIES	(179,598,464)
245 DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	<hr/>
TOTAL CURRENT AND ACCRUED LIABILITIES	<u>(1,161,907,445)</u>

**9. DEFERRED CREDITS**

252 CUSTOMER ADVANCES FOR CONSTRUCTION	(47,642,061)
253 OTHER DEFERRED CREDITS	(318,892,313)
254 OTHER REGULATORY LIABILITIES	(1,417,547,983)
255 ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(20,268,134)
257 UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281 ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282 ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,975,988,171)
283 ACCUMULATED DEFERRED INCOME TAXES - OTHER	(890,536,459)
	<hr/>
TOTAL DEFERRED CREDITS	<u>(4,670,875,121)</u>

TOTAL LIABILITIES AND OTHER CREDITS (\$17,198,841,676)

**ATTACHMENT B**

**STATEMENT OF PRESENT RATES**



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Sheet 1

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

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**ATTACHMENT C**

**STATEMENT OF PROPOSED RATES**

## ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

Through this Wildfire Expense Memorandum Account Application, SDG&E seeks authorization to recover in rates approximately \$379 million. If the CPUC approves SDG&E's request and its recommended six-year repayment schedule, a typical residential customer with basic service living in the inland climate zone and using 500 kWh per month could see a monthly summer bill increase of \$1.67, or 1.6%, from a current monthly bill of \$106.72 to \$108.39 in the first year of implementation.

Table 1 below shows a comparison of current class average rates to proposed rates for a repayment period of six-years.

**Table 1: Class Average Rate Increase under Six-Year Period**

<b>Customer Class</b>	<b>Class Average Rates Reflecting Current Effective <sup>1</sup> (¢/kWh)</b>	<b>Class Average Rates Reflecting Proposed Six-Year Amortization (¢/kWh)</b>	<b>Total Rate Increase (¢/kWh)</b>	<b>Percentage Rate Increase (%)</b>
<i><b>Residential</b></i>	22.651	23.048	0.397	1.75%
<i><b>Small Commercial</b></i>	24.653	25.075	0.422	1.71%
<i><b>Medium and Large C&amp;I<sup>2</sup></b></i>	19.529	19.756	0.227	1.16%
<i><b>Agricultural</b></i>	17.642	17.911	0.269	1.52%
<i><b>Lighting</b></i>	18.062	18.271	0.209	1.16%
<i><b>System Total</b></i>	21.154	21.464	0.310	1.47%

<sup>1</sup> Rates effective 9/1/15 per Advice Letter 2783-E.

<sup>2</sup> C&I is the abbreviation for Commercial & Industrial.

Under an eight-year repayment schedule, a typical residential customer with basic service living in the inland climate zone and using 500 kWh per month could see a monthly summer bill increase of \$1.25, or 1.2%, from a current monthly bill of \$106.72 to \$107.97 in the first year of implementation.

Table 2 below shows a comparison of current class average rates to proposed rates for a repayment period of eight-years.

**Table 2: Class Average Rate Increase under Eight-Year Period**

<b>Customer Class</b>	<b>Class Average Rates Reflecting Current Effective <sup>1</sup> (¢/kWh)</b>	<b>Class Average Rates Reflecting Proposed Eight-Year Amortization (¢/kWh)</b>	<b>Total Rate Increase (¢/kWh)</b>	<b>Percentage Rate Increase (%)</b>
<i>Residential</i>	22.651	22.948	0.297	1.31%
<i>Small Commercial</i>	24.653	24.970	0.317	1.29%
<i>Medium and Large C&amp;I<sup>2</sup></i>	19.529	19.699	0.170	0.87%
<i>Agricultural</i>	17.642	17.844	0.202	1.14%
<i>Lighting</i>	18.062	18.219	0.157	0.87%
<i>System Total</i>	21.154	21.387	0.233	1.10%

<sup>1</sup> Rates effective 9/1/15 per Advice Letter 2783-E.

<sup>2</sup> C&I is the abbreviation for Commercial & Industrial.

Under a ten-year repayment schedule, a typical residential customer with basic service living in the inland climate zone and using 500 kWh per month could see a monthly summer bill increase of \$1.00, or 0.9%, from a current monthly bill of \$106.72 to \$107.72 in the first year of implementation.

Table 3 below shows a comparison of current class average rates to proposed rates for a repayment period of ten-years.

**Table 3: Class Average Rate Increase under Ten-Year Period**

<b>Customer Class</b>	<b>Class Average Rates Reflecting Current Effective <sup>1</sup> (¢/kWh)</b>	<b>Class Average Rates Reflecting Proposed Ten-Year Amortization (¢/kWh)</b>	<b>Total Rate Increase (¢/kWh)</b>	<b>Percentage Rate Increase (%)</b>
<i>Residential</i>	22.651	22.889	0.238	1.05%
<i>Small Commercial</i>	24.653	24.907	0.254	1.03%
<i>Medium and Large C&amp;I<sup>2</sup></i>	19.529	19.665	0.136	0.70%
<i>Agricultural</i>	17.642	17.803	0.161	0.91%
<i>Lighting</i>	18.062	18.188	0.126	0.70%
<i>System Total</i>	21.154	21.340	0.186	0.88%

<sup>1</sup> Rates effective 9/1/15 per Advice Letter 2783-E.

<sup>2</sup> C&I is the abbreviation for Commercial & Industrial.

**ATTACHMENT D**

**COST OF PROPERTY AND DEPRECIATION RESERVE**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**COST OF PROPERTY AND**  
**DEPRECIATION RESERVE APPLICABLE THERETO**  
**AS OF JUNE 30, 2015**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>ELECTRIC DEPARTMENT</b>			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	<u>140,108,997.59</u>	<u>49,601,967.25</u>
	<b>TOTAL INTANGIBLE PLANT</b>	<u>140,331,838.95</u>	<u>49,804,867.55</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	95,050,664.39	37,445,619.89
312	Boiler Plant Equipment	166,496,015.17	63,890,422.28
314	Turbogenerator Units	131,184,022.25	42,598,809.14
315	Accessory Electric Equipment	85,626,487.97	30,730,447.10
316	Miscellaneous Power Plant Equipment	43,080,970.18	8,275,622.51
	Steam Production Decommissioning	<u>0.00</u>	<u>0.00</u>
	<b>TOTAL STEAM PRODUCTION</b>	<u>535,964,678.25</u>	<u>182,987,439.21</u>
320.1	Land	0.00	0.00
320.2	Land Rights	283,677.11	283,677.11
321	Structures and Improvements	277,056,869.05	271,035,015.47
322	Boiler Plant Equipment	593,074,221.34	414,490,839.33
323	Turbogenerator Units	144,904,264.99	137,460,463.10
324	Accessory Electric Equipment	173,367,620.53	168,082,213.69
325	Miscellaneous Power Plant Equipment	317,035,090.29	243,619,477.31
101	SONGS PLANT CLOSURE GROSS PLANT-C	<u>(341,763,687.91)</u>	<u>(71,013,630.75)</u>
	<b>TOTAL NUCLEAR PRODUCTION</b>	<u>1,163,958,055.40</u>	<u>1,163,958,055.26</u>
340.1	Land	143,475.87	0.00
340.2	Land Rights	56,032.61	5,917.33
341	Structures and Improvements	22,703,423.92	5,761,529.28
342	Fuel Holders, Producers & Accessories	20,348,101.38	6,292,618.88
343	Prime Movers	85,663,135.71	28,504,786.87
344	Generators	341,381,604.65	114,175,583.81
345	Accessory Electric Equipment	32,506,374.56	10,549,090.47
346	Miscellaneous Power Plant Equipment	<u>26,173,720.53</u>	<u>11,606,341.38</u>
	<b>TOTAL OTHER PRODUCTION</b>	<u>528,975,869.23</u>	<u>176,895,868.02</u>
	<b>TOTAL ELECTRIC PRODUCTION</b>	<u>2,228,898,602.88</u>	<u>1,523,841,362.49</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	68,252,868.81	0.00
350.2	Land Rights	155,793,504.52	17,517,383.94
352	Structures and Improvements	383,864,055.00	52,905,190.43
353	Station Equipment	1,182,186,441.64	224,518,427.55
354	Towers and Fixtures	895,570,732.55	136,956,939.65
355	Poles and Fixtures	395,226,526.03	73,861,856.16
356	Overhead Conductors and Devices	529,034,412.96	204,330,807.56
357	Underground Conduit	334,395,279.09	41,813,042.52
358	Underground Conductors and Devices	354,242,771.00	42,274,270.34
359	Roads and Trails	306,224,135.72	20,438,201.65
101	SONGS PLANT CLOSURE GROSS PLANT-C	(5,943,752.68)	(5,943,752.68)
	TOTAL TRANSMISSION	4,598,846,974.64	808,672,367.12
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	82,737,782.32	37,892,926.25
361	Structures and Improvements	3,995,243.29	1,821,106.00
362	Station Equipment	472,004,865.84	135,410,477.08
363	Storage Battery Equipment	12,078,716.40	1,308,212.69
364	Poles, Towers and Fixtures	611,714,985.46	253,912,397.64
365	Overhead Conductors and Devices	494,804,544.44	186,493,434.84
366	Underground Conduit	1,083,178,155.24	429,284,425.61
367	Underground Conductors and Devices	1,397,602,106.52	837,102,929.57
368.1	Line Transformers	553,122,952.04	114,101,231.03
368.2	Protective Devices and Capacitors	23,693,408.69	(3,140,894.70)
369.1	Services Overhead	132,123,430.57	121,062,200.87
369.2	Services Underground	328,019,297.70	232,048,096.35
370.1	Meters	192,090,738.99	60,081,340.46
370.2	Meter Installations	55,799,101.46	15,075,480.61
371	Installations on Customers' Premises	7,932,837.82	10,817,331.56
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	26,687,350.91	19,432,482.72
	TOTAL DISTRIBUTION PLANT	5,493,761,745.49	2,452,703,178.58
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	32,161,023.60	23,415,740.30
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	9,678.13
393	Stores Equipment	15,720.46	15,325.38
394.1	Portable Tools	23,220,505.68	7,551,022.20
394.2	Shop Equipment	341,135.67	235,329.28
395	Laboratory Equipment	2,145,336.65	161,528.03
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	241,465,414.06	86,778,483.01
398	Miscellaneous Equipment	4,453,757.03	508,674.71
	TOTAL GENERAL PLANT	311,233,710.29	118,843,166.92
101	TOTAL ELECTRIC PLANT	12,773,072,872.25	4,953,864,942.66

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>GAS PLANT</b>			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	<b>TOTAL INTANGIBLE PLANT</b>	<b>86,104.20</b>	<b>86,104.20</b>
360.1	Land	0.00	0.00
361	Structures and Improvements	43,992.02	43,992.02
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,052,614.24	944,766.27
	<b>TOTAL STORAGE PLANT</b>	<b>2,096,606.26</b>	<b>988,758.29</b>
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,327,555.27
366	Structures and Improvements	12,210,179.55	9,688,638.06
367	Mains	183,491,355.72	67,065,777.24
368	Compressor Station Equipment	83,677,785.18	66,582,662.20
369	Measuring and Regulating Equipment	20,877,901.42	16,073,781.67
371	Other Equipment	254,683.04	0.00
	<b>TOTAL TRANSMISSION PLANT</b>	<b>307,393,340.46</b>	<b>160,738,414.44</b>
374.1	Land	102,187.24	0.00
374.2	Land Rights	8,234,848.18	6,610,902.32
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	650,161,825.97	349,668,202.59
378	Measuring & Regulating Station Equipment	17,833,916.59	7,444,186.29
380	Distribution Services	251,965,768.18	291,986,447.65
381	Meters and Regulators	156,881,896.75	51,014,709.89
382	Meter and Regulator Installations	92,110,710.40	33,897,011.89
385	Ind. Measuring & Regulating Station Equipme	1,516,810.70	1,146,353.81
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	5,223,271.51	4,877,690.11
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>1,184,074,682.43</b>	<b>746,706,757.65</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	74,500.55	74,500.68
394.1	Portable Tools	7,962,640.18	3,770,267.21
394.2	Shop Equipment	76,864.06	46,173.25
395	Laboratory Equipment	283,093.66	271,243.70
396	Power Operated Equipment	162,284.40	147,534.05
397	Communication Equipment	2,491,260.51	808,408.05
398	Miscellaneous Equipment	157,056.49	54,591.93
	TOTAL GENERAL PLANT	11,207,699.85	5,198,221.87
101	TOTAL GAS PLANT	1,504,858,433.20	913,718,256.45
<b>COMMON PLANT</b>			
303	Miscellaneous Intangible Plant	287,585,924.72	187,530,573.81
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,168,914.56	0.00
389.2	Land Rights	1,080,961.15	27,776.34
390	Structures and Improvements	313,005,081.69	132,039,894.61
391.1	Office Furniture and Equipment - Other	26,346,354.88	12,951,689.12
391.2	Office Furniture and Equipment - Computer Ec	51,158,948.39	29,459,449.43
392.1	Transportation Equipment - Autos	33,942.29	(338,930.17)
392.2	Transportation Equipment - Trailers	12,195.98	3,581.40
393	Stores Equipment	63,971.09	46,056.12
394.1	Portable Tools	1,232,026.51	286,281.50
394.2	Shop Equipment	213,047.56	134,818.16
394.3	Garage Equipment	1,096,434.79	137,576.22
395	Laboratory Equipment	1,997,981.54	877,735.27
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	182,772,166.50	64,001,487.86
398	Miscellaneous Equipment	2,287,818.69	1,364,706.14
118.1	TOTAL COMMON PLANT	876,055,770.34	428,329,716.71
	TOTAL ELECTRIC PLANT	12,773,072,872.25	4,953,864,942.66
	TOTAL GAS PLANT	1,504,858,433.20	913,718,256.45
	TOTAL COMMON PLANT	876,055,770.34	428,329,716.71
101 & 118.1	TOTAL	15,153,987,075.79	6,295,912,915.82
101	PLANT IN SERV-SONGS FULLY RECOVERE	(1,163,958,055.43)	(1,163,958,055.43)
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	(2,540,241.64)	0.00

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-ASSETS HELD FOR SALE		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-SUNRISE FIRE MITIGATION		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,633,319.82)	(1,633,319.82)
		<u>(1,633,319.82)</u>	<u>(1,633,319.82)</u>
101	Accrual for Retirements		
	Electric	(5,941,130.16)	(5,941,130.16)
	Gas	(240,135.20)	(240,135.20)
		<u>(6,181,265.36)</u>	<u>(6,181,265.36)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE		
		<u>(6,181,265.36)</u>	<u>(6,181,265.36)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
104	Electric	85,194,000.02	10,101,887.58
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>10,101,887.58</u>
	TOTAL PLANT LEASED TO OTHERS	85,194,000.02	10,101,887.58
		<u>85,194,000.02</u>	<u>10,101,887.58</u>
105	Plant Held for Future Use		
	Electric	11,307,727.50	0.00
	Gas	0.00	0.00
		<u>11,307,727.50</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	11,307,727.50	0.00
		<u>11,307,727.50</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	645,274,162.13	
	Gas	153,222,101.66	
	Common	104,556,633.95	
		<u>903,052,897.74</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	903,052,897.74	0.00
		<u>903,052,897.74</u>	<u>0.00</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	990,168,246.79
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	990,168,246.79
101.1	ELECTRIC CAPITAL LEASES	837,939,281.00	163,665,572.00
118.1	COMMON CAPITAL LEASE	19,504,760.01	18,491,298.52
		857,444,041.01	182,156,870.52
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL-	(62,963,775.37)	(40,861,208.00)
143	FAS 143 ASSETS - Legal Obligation	271,718,404.13	(925,955,078.13)
	SONGS Plant Closure - FAS 143 contra	(270,338,553.03)	(61,166,058.00)
	FIN 47 ASSETS - Non-Legal Obligation	69,819,775.07	28,850,342.37
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,356,607,664.35)
	TOTAL FAS 143	71,199,626.17	(2,314,878,458.11)
	UTILITY PLANT TOTAL	15,907,872,485.98	3,991,688,821.99

**ATTACHMENT E**

**SUMMARY OF EARNINGS**

**SAN DIEGO GAS & ELECTRIC COMPANY  
SUMMARY OF EARNINGS  
SIX MONTHS ENDED JUNE 30, 2015  
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$2,178
2	Operating Expenses	<u>1,847</u>
3	Net Operating Income	<u><u>\$332</u></u>
4	Weighted Average Rate Base	\$4,410
5	Rate of Return*	7.79%

\*Authorized Cost of Capital

**ATTACHMENT F**

**GOVERNMENTAL ENTITIES RECEIVING NOTICE**

State of California  
Attorney General's Office  
P.O. Box 944255  
Sacramento, CA 94244-2550

Naval Facilities Engineering  
Command  
Navy Rate Intervention  
1314 Harwood Street SE  
Washing Navy Yard, DC 20374

City of Carlsbad  
Attn. City Attorney  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Chula Vista  
Attn. City Attorney  
276 Fourth Ave  
Chula Vista, Ca 91910-2631

City of Dana Point  
Attn. City Attorney  
33282 Golden Lantern  
Dana Point, CA 92629

City of Del Mar  
Attn. City Clerk  
1050 Camino Del Mar  
Del Mar, CA 92014

City of Encinitas  
Attn. City Attorney  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Escondido  
Attn. City Attorney  
201 N. Broadway  
Escondido, CA 92025

City of Imperial Beach  
Attn. City Clerk  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Laguna Beach  
Attn. City Clerk  
505 Forest Ave  
Laguna Beach, CA 92651

State of California  
Attn. Director Dept of General  
Services  
PO Box 989052  
West Sacramento, CA 95798-9052

Alpine County  
Attn. County Clerk  
99 Water Street, P.O. Box 158  
Markleeville, CA 96120

City of Carlsbad  
Attn. Office of the County Clerk  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Coronado  
Attn. Office of the City Clerk  
1825 Strand Way  
Coronado, CA 92118

City of Dana Point  
Attn. City Clerk  
33282 Golden Lantern  
Dana Point, CA 92629

City of El Cajon  
Attn. City Clerk  
200 Civic Way  
El Cajon, CA 92020

City of Encinitas  
Attn. City Clerk  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Fallbrook  
Chamber of Commerce  
Attn. City Clerk  
111 S. Main Avenue  
Fallbrook, CA 92028

City of Imperial Beach  
Attn. City Attorney  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Laguna Beach  
Attn. City Attorney  
505 Forest Ave  
Laguna Beach, CA 92651

United States Government  
General Services Administration  
300 N. Los Angeles  
Los Angeles, CA 90012

Borrego Springs Chamber of  
Commerce Attn. City Clerk  
786 Palm Canyon Dr  
PO Box 420  
Borrego Springs CA 92004-0420

City of Chula Vista  
Attn: Office of the City Clerk  
276 Fourth Avenue  
Chula Vista, California 91910-2631

City of Coronado  
Attn. City Attorney  
1825 Strand Way  
Coronado, CA 92118

City of Del Mar  
Attn. City Attorney  
1050 Camino Del Mar  
Del Mar, CA 92014

City of El Cajon  
Attn. City Attorney  
200 Civic Way  
El Cajon, CA 92020

City of Escondido  
Attn. City Clerk  
201 N. Broadway  
Escondido, CA 92025

City of Fallbrook  
Chamber of Commerce  
Attn. City Attorney  
111 S. Main Avenue  
Fallbrook, CA 92028

Julian Chamber of Commerce  
P.O. Box 1866  
2129 Main Street  
Julian, CA

City of Laguna Niguel  
Attn. City Attorney  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Laguna Niguel  
Attn. City Clerk  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Lakeside  
Attn. City Clerk  
9924 Vine Street  
Lakeside CA 92040

City of La Mesa  
Attn. City Attorney  
8130 Allison Avenue  
La Mesa, CA 91941

City of La Mesa  
Attn. City Clerk  
8130 Allison Avenue  
La Mesa, CA 91941

City of Lemon Grove  
Attn. City Clerk  
3232 Main St.  
Lemon Grove, CA 92045

City of Lemon Grove  
Attn. City Attorney  
3232 Main St.  
Lemon Grove, CA 92045

City of Mission Viejo  
Attn: City Clerk  
200 Civic Center  
Mission Viejo, CA 92691

City of Mission Viejo  
Attn: City Attorney  
200 Civic Center  
Mission Viejo, CA 92691

City of National City  
Attn. City Clerk  
1243 National City Blvd  
National City, CA 92050

City of National City  
Attn. City Attorney  
1243 National City Blvd  
National City, CA 92050

City of Oceanside  
Attn. City Clerk  
300 N. Coast Highway  
Oceanside, CA 92054-2885

City of Oceanside  
Attn. City Attorney  
300 N. Coast Highway  
Oceanside, CA 92054-2885

County of Orange  
Attn. County Counsel  
P.O. Box 1379  
Santa Ana, CA 92702

County of Orange  
Attn. County Clerk  
12 Civic Center Plaza, Room 101  
Santa Ana, CA 92701

City of Poway  
Attn. City Clerk  
P.O. Box 789  
Poway, CA 92064

City of Poway  
Attn. City Attorney  
P.O. Box 789  
Poway, CA 92064

City of Ramona  
Attn. City Clerk  
960 Main Street  
Ramona, CA 92065

City of Ramona  
Attn. City Attorney  
960 Main Street  
Ramona, CA 92065

City of Rancho San Diego - Jamul  
Attn. City Clerk  
3855 Avocado Blvd.  
Suite 230  
La Mesa, CA 91941

City of San Clemente  
Attn. City Clerk  
100 Avenida Presidio  
San Clemente, CA 92672

City of San Clemente  
Attn. City Attorney  
100 Avenida Presidio  
San Clemente, CA 92672

City of San Diego  
Attn. Mayor  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

County of San Diego  
Attn. County Clerk  
P.O. Box 121750  
San Diego, CA 92101

City of San Diego  
Attn. City Attorney  
1200 Third Ave.  
Suite 1620  
San Diego, CA 92101

County of San Diego  
Attn. County Counsel  
1600 Pacific Hwy  
San Diego, CA 92101

City of San Diego  
Attn. City Clerk  
202 C Street, 2<sup>nd</sup> Floor  
San Diego, CA 92101

City of San Marcos  
Attn. City Clerk  
1 Civic Center Dr.  
San Marcos, CA 92069

City of San Marcos  
Attn. City Attorney  
1 Civic Center Dr.  
San Marcos, CA 92069

City of Santee  
Attn. City Clerk  
10601 Magnolia Avenue  
Santee, CA 92071

City of Santee  
Attn. City Attorney  
10601 Magnolia Avenue  
Santee, CA 92071

City of Solana Beach  
Attn. City Attorney  
635 S. Highway 101  
Solana Beach, CA 92075

Spring Valley Chamber of  
Commerce  
Attn. City Clerk  
3322 Sweetwater Springs Blvd,  
Ste. 202  
Spring Valley, CA 91977-3142

Valley Center Chamber of  
Commerce  
Attn. City Clerk  
P.O. Box 8  
Valley Center, CA 92082

City of Vista  
Attn. City Attorney  
200 Civic Center Drive, Bldg. K  
Vista, CA 92084

City of Vista  
Attn. City Clerk  
200 Civic Center Drive  
Vista, CA 92084

City of Aliso Viejo  
12 Journey  
Aliso Viejo, CA 92656

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

Application of San Diego Gas & Electric Company  
(U 902 E) for Authorization to Recover Costs Related to  
the 2007 Southern California Wildfires Recorded in the  
Wildfire Expense Memorandum Account (WEMA)

Application 15-09-\_\_\_\_  
(Filed September 25, 2015)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E)  
NOTICE OF AVAILABILITY OF ITS APPLICATION FOR AUTHORIZATION TO  
RECOVER COSTS RELATED TO THE 2007 SOUTHERN CALIFORNIA WILDFIRES  
RECORDED IN THE WILDFIRE EXPENSE MEMORANDUM ACCOUNT**

Christopher M. Lyons  
San Diego Gas & Electric Company  
8330 Century Park Court, #CP32D  
San Diego, CA 92123  
Telephone: (858) 654-1559  
Fax: (619) 699-5027  
Email: clyons@semprautilities.com

Attorney for  
SAN DIEGO GAS & ELECTRIC COMPANY

September 25, 2015

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

Application of San Diego Gas & Electric Company  
(U 902 E) for Authorization to Recover Costs Related to  
the 2007 Southern California Wildfires Recorded in the  
Wildfire Expense Memorandum Account (WEMA)

Application 15-09-\_\_\_\_  
(Filed September 25, 2015)

**SAN DIEGO GAS & ELECTRIC COMPANY’S (U 902 E)  
NOTICE OF AVAILABILITY OF ITS APPLICATION FOR AUTHORIZATION TO  
RECOVER COSTS RELATED TO THE 2007 SOUTHERN CALIFORNIA WILDFIRES  
RECORDED IN THE WILDFIRE EXPENSE MEMORANDUM ACCOUNT**

Pursuant to Rule 1.9(d) of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company hereby provides notice that it has electronically filed with the Commission’s docket office its Application for Authorization to Recover Costs Related to the 2007 Southern California Wildfires Recorded in the Wildfire Expense Memorandum Account (“Application”). The Application and testimony are available on SDG&E’s website at the following url:

<http://www.sdge.com/regulatory-filing/15691/sdge-wildfire-expense-memorandum-account-wema-proceeding>

The Application and testimony may also be obtained by contacting:

Shivani Ballesteros  
Regulatory Case Manager  
8330 Century Park Court, #CP31F  
San Diego, CA 92123  
Telephone: (858) 637-7914  
Email: [sballesteros@semprautilities.com](mailto:sballesteros@semprautilities.com)

DATED at San Diego, California, this 25th day of September, 2015.

Respectfully submitted,

By: /s/ Christopher M. Lyons

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Christopher M. Lyons  
San Diego Gas & Electric Company  
8330 Century Park Court, #CP32D  
San Diego, CA 92123  
Telephone: (858) 654-1559  
Email: [clyons@semprautilities.com](mailto:clyons@semprautilities.com)

Attorney for  
SAN DIEGO GAS & ELECTRIC COMPANY