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A. 14-11-009

November 11, 2015

Mr. Robert Castaneda
Chair – Low Income Oversight Board
Proteus, Inc.
1830 N. Dinuba Blvd
Visalia, CA 93291

Dear Mr. Castaneda:

During SDG&E's presentation at the October 29, Low Income Oversight Board (LIOB) meeting, SDG&E was asked by Commissioner Sandoval to send a letter to Board Members describing its recommendation to simplify the Commission-adopted requirements when Investor-Owned Utilities submit a request to shift funds between budget categories and/or between its gas and electric departments for the California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs. Following is an excerpt from the Prepared Direct Testimony of SDG&E witness Alex Kim in Application (A.) 14-11-009 which describes SDG&E's request for Commission reconsideration of its fund shifting rules:

The Commission formalized its rules for shifting program funds between program cost categories, sub-categories, and across program years and program budget cycles in D.08-11-051 and modified in D.10-10-008 for the CARE and ESA Programs. The Commission's adopted fund shifting rules also established requirements for requesting and reporting any such fund shifting. D.12-08-044, at OP 135 (b) reaffirmed and continued the Commission's adopted fund shifting rules in the 2012-2014 program cycle. OP 135 also requires IOUs to seek prior Administrative Law Judge written approval to shift carryover funds between their gas and electric departments by filing a motion pursuant to Article 11 of the Commission's Rules of Practice and Procedure.

SDG&E seeks Commission reconsideration of its policy requiring utilities to file a motion to request a fund shift of carryover funds between its gas and electric departments. SDG&E recommends that utilities be permitted to use an Advice Letter process consistent with the Fund Shifting Rules adopted for the current Energy Efficiency Programs. Utilizing the Advice Letter would permit a more efficient administrative review process and would result in a more timely decision on the fund shifting request.¹

If you have any questions, please contact Joy Yamagata at: jyamagata@semprautilities.com.

Sincerely,

Lisa Davidson
Director – Customer Programs



cc: LIOB Members:
Commissioner Catherine J.K. Sandoval
Ms. Patricia Watts
Mr. Jose Atilio Hernandez
Ms. Ortensia Lopez
Mr. Jason Wimbley
Mr. Dave Stephenson
Mr. Benito Delgado-Olson
Ms. Charlie Toledo
Mr. Daniel Rendler
Mr. Larry Gross
Ms. Zaida Amaya, Energy Division
Ms. Joy Yamagata, SDG&E
Service List A. 14-11-007 et al and A. 15-02-001 et al
Central Files

¹ A. 14-11-009, Prepared Direct Testimony of Alex Kim at p. AYK-19