

**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 Approval of its 2017 Electric  
Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts

Application 16-04-018  
(Filed April 15, 2016)

**REPLY OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)  
TO THE PROTEST OF THE OFFICE OF RATEPAYER ADVOCATES AND  
TO THE RESPONSE OF THE ALLIANCE FOR RETAIL ENERGY MARKETS  
AND DIRECT ACCESS CUSTOMER COALITION**

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June 2, 2016

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Pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) respectfully submits this reply to the: (1) Protest of the Office of Ratepayer Advocates (“ORA Protest”); and (2) Response of the Alliance for Retail Energy Markets and Direct Access Customer Coalition (“AReM and DACC Response”).

The ORA Protest raises no specific objections to SDG&E’s “Application ... for Approval of its 2017 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts” (“Application”). Rather, ORA indicates that it is “investigating the reasonableness of SDG&E’s total 2017 revenue requirement of \$1,298.475 million” and further identifies several other issues that it recommends for inclusion in this scope of this proceeding.<sup>1</sup> ORA also states it will review recorded and forecasted greenhouse gas (“GHG”) allowance revenues and costs and suggests that the schedule SDG&E proposed in the Application be adjusted to allow it additional time to review SDG&E’s traditional November Update to the Application, particularly with respect to GHG issues.<sup>2</sup> In accordance with the Administrative Law Judge’s May 24, 2016 email ruling,

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<sup>1</sup> ORA Protest at 3.

<sup>2</sup> *Id.* at 6.

SDG&E has met and conferred with ORA regarding the procedural schedule with the aim to reach an agreement on a procedural schedule. Those discussions are ongoing, and SDG&E will update the Administrative Law Judge at the Prehearing Conference.

AReM and DACC indicate that their “primary interest in this proceeding is the calculation and rate treatment of costs that are charged to Direct Access (“DA”) customers,” which they claim must be verified.<sup>3</sup> They further request party status, which SDG&E does not oppose.

Respectfully submitted,

/s/ Christopher M. Lyons

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<sup>3</sup> AReM and DACC Response at 1.