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

Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2016.

Application No. 14-11-003
(Filed November 14, 2014)

Application of Southern California Gas Company (U 904 G) for Authority to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2016.

Application No. 14-11-004
(Filed November 14, 2014)

**REPLY BY SAN DIEGO UTILITY CONSUMERS' ACTION NETWORK TO THE JOINT
MOTION FOR OTHER RELIEF REGARDING
SAN DIEGO GAS & ELECTRIC COMPANY'S
TEST YEAR 2016 GENERAL RATE CASE AND SOUTHERN CALIFORNIA GAS
COMPANY'S TEST YEAR 2016 GENERAL RATE CASE**

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July 22, 2016

San Diego Consumers' Action Network (SDCAN) hereby responds to a July 21st motion by the Joint Parties. That motion seeks Commission approval of a modification to In D.16-06-054. The Settling Parties¹ indicate that they have agreed to accept the Commission's adjustments to the original settlements, with one additional change. Specifically, the Joint Parties request that the Commission accept the SDG&E and SoCalGas TY 2016 Settlement Agreements as modified by the attached modification documents.

Prior to the issuance of D.16-06-054, the Settling Parties, which included SDCAN, urged the Commission to adopt the SDG&E and SoCalGas TY 2016 Settlement Agreements in their entirety. The Decision found otherwise. The Joint Parties have indicated that they accept the Commission's modified revenue requirements to allow the Commission and all interested parties to reach finality on nearly all of the numerous issues in this proceeding.

However, SDCAN does not agree with the Joint Parties "agreement" that SDG&E and SoCalGas shall retain the right to seek further review and modification of the bonus depreciation adjustment in D.16-06-054, so that SDG&E and/or SoCalGas can pursue relief in the form of full or partial restoration of the total revenue requirement reflected in the SDG&E and SoCalGas TY 2016 Settlement Agreements.

SDCAN submits that D.16-06-054 resolves all issues in the GRC. The Commission need not accept a non-unanimous "settlement" that excepts SDG&E and/or SoCalGas from Commission rules. If the utilities wish to either appeal and/or file a Petition for Modification, the Commission's rules give them that right. The Joint Parties motion seems to seek an additional extra-legal right to pursue future pleadings, such as petitions for modification, applications for rehearing, motions, or other available relief. SDCAN urges the Commission to reject the Motion to the extent that it seeks any rights above and beyond what currently exists in Commission rules.

Respectfully submitted,

Dated: July 22, 2016

/s/

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¹ With the exception of SDCAN