

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



**FILED**

04/13/18  
04:59 PM

**A1804004**

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Approval of its 2019 Electric  
Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts

Application 18-04-\_\_\_\_  
(Filed April 13, 2018)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)  
FOR APPROVAL OF ITS 2019 ELECTRIC PROCUREMENT REVENUE  
REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS**

**PUBLIC VERSION**

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April 13, 2018

**TABLE OF CONTENTS**

**I. INTRODUCTION..... 1**

**II. BACKGROUND..... 5**

**A. ERRA ..... 5**

**B. CTC ..... 7**

**C. LG..... 7**

**D. PCIA..... 8**

**E. SONGS Unit 1 Offsite Spent Fuel Storage Costs ..... 9**

**F. GHG Costs and Allowance Revenues ..... 10**

**G. Proposed Rate Components for the Green Tariff and Enhanced  
Community Renewables Program..... 11**

**III. SUMMARY OF APPLICATION AND PREPARED TESTIMONY ..... 12**

**A. Ms. Jennifer Montanez..... 13**

**B. Ms. Khoang Ngo..... 13**

**C. Ms. Jenell McKay..... 14**

**D. Mr. Roland Mollen..... 14**

**E. Ms. Ana Garza-Beutz ..... 15**

**F. Ms. Monica Chihwaro ..... 15**

**IV. STATUTORY AND PROCEDURAL REQUIREMENTS..... 15**

**A. Rule 2.1 (a) – (c) ..... 15**

**1. Rule 2.1 (a) - Legal Name..... 15**

**2. Rule 2.1 (b) Correspondence..... 15**

**3. Rule 2.1 (c)..... 16**

**B. Rule 2.2 – Articles of Incorporation ..... 17**

**C. Rule 3.2 – Authority to Change Rates..... 18**

1.	Rule 3.2 (a) (1) – Balance Sheet .....	18
2.	Rule 3.2 (a) (2) – Statement of Effective Rates.....	18
3.	Rule 3.2 (a) (3) – Statement of Proposed Rate Change .....	18
4.	Rule 3.2 (a) (4) – Description of Property and Equipment .....	18
5.	Rule 3.2 (a) (5) and (6) – Summary of Earnings .....	19
6.	Rule 3.2 (a) (7) – Statement Regarding Tax Depreciation .....	19
7.	Rule 3.2 (a) (8) – Proxy Statement.....	20
8.	Rule 3.2 (a) (10) – Statement re Pass Through to Customers.....	20
9.	Rule 3.2 (b) – Notice to State, Cities and Counties .....	20
10.	Rule 3.2 (c) – Newspaper Publication .....	20
11.	Rule 3.2 (d) – Bill Insert Notice.....	20
V.	CONFIDENTIAL INFORMATION.....	21
VI.	SERVICE.....	21
VII.	CONCLUSION AND SUMMARY OF RELIEF REQUESTED .....	21
<b>OFFICER VERIFICATION</b>		
<b>ATTACHMENT A BALANCE SHEET AND INCOME STATEMENT AND FINANCIAL STATEMENT</b>		
<b>ATTACHMENT B STATEMENT OF PRESENT RATES</b>		
<b>ATTACHMENT C STATEMENT OF PROPOSED RATES</b>		
<b>ATTACHMENT D COST OF PROPERTY AND DEPRECIATION RESERVE</b>		
<b>ATTACHMENT E SUMMARY OF EARNINGS</b>		
<b>ATTACHMENT F GOVERNMENTAL ENTITIES RECEIVING NOTICE</b>		
<b>ATTACHMENT G GHG REVENUE AND RECONCILIATION FORM</b>		

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**I. INTRODUCTION**

In compliance with California Public Utilities Commission (“Commission”) Decisions (“D.”) 02-10-062, D.02-12-074, D.04-01-050, D.13-09-003, and D.14-10-033, as well as the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby submits this Application for Approval of its 2019 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Competition Transition Charge (“CTC”) revenue requirement; (3) the Local Generation (“LG”) revenue requirement; (4) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement; and (5) the GHG allowance revenues and return allocations (“Application”). In this Application, SDG&E also requests approval to recover undercollected balances recorded to the Local Generating Balancing Account (“LGBA”). Lastly, SDG&E requests approval for its proposed 2019 (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables Program. SDG&E respectfully

requests that the Commission approve the forecasts and proposals in this Application for recovery in rates beginning January 1, 2019.

As discussed in greater detail below and in the testimony accompanying this Application, SDG&E hereby requests approval of a total 2019 forecasted revenue requirement of \$1,248.529 million.<sup>1</sup> This total forecast is comprised of 2019 forecasts of the following:

- (1) the ERRA revenue requirement: \$1,127.908 million (includes 2019 forecast GHG costs of \$50.420 million);
- (2) the CTC revenue requirement: \$13.391 million;
- (3) the LG revenue requirement: \$196.545 million (includes LGBA undercollection of \$0.524 million);
- (4) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement: \$1.068 million; and
- (5) the following GHG allowance revenue return allocations:
  - (a) (\$0.465) million for energy-intensive trade-exposed (“EITE”) customers;
  - (b) (\$3.877) million for small businesses; and
  - (c) (\$86.564) million for residential California Climate Credit (“CCC”).<sup>2</sup>

Those GHG allowance revenue return allocations are based on the following 2019 forecasts of GHG revenues and expenses, for which SDG&E also requests approval:

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<sup>1</sup> This forecasted revenue requirement includes Franchise Fees and Uncollectibles (“FF&U”). The EITE return allocation is also included in this amount because it is part of the 2019 forecast revenue requirement, although it is not returned to customers in rates.

<sup>2</sup> The residential California Climate Credit is the semi-annual line item credit that goes to residential customers. It was previously referred to as the “climate dividend.” Pursuant to D.14-01-012, the Energy Division issued a letter on January 27, 2014 notifying the electric utilities that “California Climate Credit” will be used as the name for all on-bill credits of GHG allowance revenues that small businesses and residential customers receive.

- (1) the GHG allowance revenues: \$98.565 million;
- (2) the GHG allowance revenue set aside for clean energy/energy efficiency programs of \$9.857 million;
- (3) the GHG administration, customer education and outreach plan costs of \$0.048 million.

The 2019 revenue requirement forecasts for ERRRA, CTC, LG, SONGS Unit 1 Offsite Spent Fuel Storage Costs, the GHG allowance revenue return, and the sum of the 2016 LGBA activity result in a total revenue requirement decrease of \$201.190 million compared to the amounts currently effective in rates.<sup>3</sup> These components are shown in detail in Table 1, below.

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<sup>3</sup> On December 18, 2017, the Commission approved SDG&E's "Application of San Diego Gas & Electric Company (U 902-E) for Approval of its 2018 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts" (A.17-04-016) ("2018 Application"), as updated on November 9, 2017 in "San Diego Gas & Electric Company's (U 902-E) November Update to Application." See D.17-12-014. SDG&E implemented its approved forecasts in rates in Advice Letter 3176-E. The rate impacts resulting from the revenue requirements requested in this application are calculated using current effective rates as of January 1, 2018 (Advice Letter 3167-E) and current authorized sales, which includes the 2018 test year. SDG&E has filed A.18-03-003 to update its authorized sales to include the 2019 test year, which is currently pending at the Commission. Upon approval and implementation of SDG&E's 2019 test year sales update, all rate values will updated to reflect the changes in sales with the exclusion of the Residential California Climate Credit and the Green Tariff Shared Renewables rate components.

**TABLE 1**  
**ERRA, CTC, LG, SONGS, and GHG Revenue Requirements (Includes FF&U)**  
**(\$000)**

Line	Description	Currently Effective Revenue Requirement	2019 Revenue Requirement	Change from Current
1	ERRA	\$1,356,818	\$1,127,908	\$(228,910)
2	CTC	\$24,307	\$13,391	\$(10,916)
3	LG	\$160,218	\$196,545	\$36,327
4	SONGS Unit 1 Spent Fuel	\$1,088	\$1,068	\$(20)
5	GHG EITE	\$(669)	\$(465)	\$205
6	GHG Small Business	\$(3,750)	\$(3,877)	\$(127)
7	GHG CCC	\$(88,789)	\$(86,564)	\$2,225
8	Subtotal	\$1,449,222	\$1,248,006	\$(201,217)
9	LGBA Undercollection	\$497	\$524	\$27
10	Total <sup>4</sup>	\$1,449,719	\$1,248,529	\$(201,190)

In total, this would decrease the current system average rates by 1.31 cents per kilowatt hours, or 5.5%. A typical non-California Alternative Rates for Energy (“CARE”) residential customer in the inland climate zone using 500 kilowatt-hours could see a monthly summer bill decrease of 4.3%, or \$6.60 (from \$155.09 to \$148.49). A typical non-CARE residential customer in the inland climate zone using 500 kilowatt-hours could see a monthly winter bill decrease of 5.0%, or \$6.87 (from \$137.38 to \$130.51).<sup>5</sup> As indicated in footnote 3 above, the rates that SDG&E will implement on January 1, 2019 in connection with the revenue requirements for which SDG&E seeks approval in this application could change if the Commission approves SDG&E’s request to update its authorized sales.

<sup>4</sup> The sums in Table 1 may not equal due to rounding.

<sup>5</sup> Customers’ actual bill impacts will vary with usage per month, by season and by climate zone.

The key drivers underlying the changes in the forecasted 2019 ERRA revenue requirement (as compared to the 2018 revenue requirement) are lower load and market prices, accompanied with contract changes.

Section VII below summarizes the relief SDG&E requests from the Commission in this Application.

## **II. BACKGROUND**

SDG&E's 2019 forecasts and proposals in this Application contain several categories of electric procurement activities, each of which is discussed below. Prior to 2016, SDG&E had filed an annual application seeking approval of its forecasted revenue requirements for ERRA, CTC and LG and a separate application regarding GHG-related forecasts. In accordance with D.14-10-033, in which the Commission directed the utilities to incorporate GHG-related forecasts and proposals into their annual ERRA forecast applications, SDG&E began including its GHG-related forecasts in its 2016 Application and has continued that approach ever since then. Likewise, as in prior Applications, SDG&E is again proposing to incorporate its 2019 forecast of its SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – formerly an element of its General Rate Cases (“GRC”) – in this Application. Similarly, as it did in its 2017 and 2018 Applications, SDG&E seeks to recover its outstanding LGBA balance, as further described in Section II.C below. As in its 2017 and 2018 Applications, SDG&E has also included 2019 proposed rate components for the Green Tariff Shared Renewables Program, as further described in Section II.G below.

### **A. ERRA**

In D.02-10-062, the Commission established the ERRA balancing account – the power procurement balancing account required by Public Utilities (“P.U.”) Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities



(“IOUs”) with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator-related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers.<sup>6</sup>

The ERRA regulatory process consists of (1) an annual forecast proceeding to adopt a forecast of the utility’s electric procurement cost revenue requirement and electricity sales for the upcoming year; and (2) an annual compliance proceeding to review the utility’s compliance in the preceding year regarding energy resource contract administration, least cost dispatch, fuel procurement, and the ERRA balancing account. There is also an update process for new information – primarily fuel and purchased power forecasts, GHG verified volumes and associated costs, additional GHG estimates for current year and the ERRA mechanism – which takes place in November of each year (“November Update”).

P.U. Code Section 454.5(d)(3) also specified that the balance of the ERRA was not to exceed 5% of the IOUs actual recorded generation revenues for the prior calendar year, excluding revenues collected for the California Department of Water Resources (“DWR”).<sup>7</sup> Accordingly, in D.02-10-062, the Commission established a trigger mechanism designed to avoid the 5% threshold point, pursuant to which IOUs must file an expedited application for approval to adjust rates in 60 days from the filing date when their ERRA balance reaches an undercollection or overcollection of 4% and is projected to exceed the 5% trigger.<sup>8</sup> As currently implemented, the trigger process exists independently of, but in conjunction with, the forecast

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<sup>6</sup> See D.02-10-062 at 60.

<sup>7</sup> See D.02-10-062 at 62; *see also* D.11-05-005.

<sup>8</sup> In D.07-05-008, the Commission modified D.02-10-062 by adding a new rule to the trigger procedures, pursuant to which SDG&E is permitted to file an advice letter seeking to maintain rates when it expects an undercollection or overcollection above the 4% trigger will self-correct within 120 days.

process used for this Application. Thus, SDG&E does not currently include the prior year-end ERRA balance in its forecast applications as it is addressed via an ERRA trigger application or year-end consolidated advice letter filing.

## **B. CTC**

The Transition Cost Balancing Account (“TCBA”), which is also reviewed in ERRA forecast proceedings, is designed to accrue all ongoing Competition Transition Charge (“CTC”) revenues and recover all ongoing CTC-eligible generation-related costs.<sup>9</sup> In accordance with D.02-12-074 and D.02-11-022, payments to Qualifying Facilities (“QFs”) that are above the market benchmark proxy price (*i.e.*, above-market QF power costs) are charged to the TCBA. Eligible ongoing CTC expenses reflect the difference between the market benchmark proxy price and the costs associated with QF contracts.

## **C. LG**

The Local Generation Balancing Account (“LGBA”) is designed to record the costs and revenues of Local Generation where the Commission has determined that the generation resource is subject to the Cost Allocation Mechanism (“CAM”).<sup>10</sup> Such generation may take the form of power purchase agreements, company-owned generation units associated with new generation resources, or any other resources approved by the Commission for CAM treatment. The costs recorded in the LGBA are recovered via the Local Generation Charge (“LGC”), a rate component.

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<sup>9</sup> Assembly Bill 1890 established the expenses that are eligible for CTC recovery.

<sup>10</sup> The Commission adopted its CAM policy in D.06-07-029, which it later modified in D.11-05-005. The basic purpose of the CAM is to allow the advantages and costs of new generation to be shared by all benefiting customers in an IOU’s service territory.

SDG&E is requesting recovery for costs related to peaker generators that have been previously approved for CAM treatment, including Carlsbad, Pio Pico, and Escondido. These plants are mentioned in Ms. Montanez’s testimony, along with the CAM-eligible combined heat & power plants. SDG&E is also requesting recovery for costs related to four energy storage facilities in SDG&E’s service territory.

As noted above, SDG&E is also seeking recovery of LGBA activity in the amount of \$0.524 million. This represents the uncollected LGBA activity during 2016. SDG&E previously requested review of these costs in its June 1, 2017 “Application of SDG&E (U-902-E) for Approval of ERRR Compliance for 2016” (A.17-06-006) (“2016 ERRR Compliance Application).” In this application SDG&E is requesting recovery of this amount pending approval of A.17-06-006.

#### **D. PCIA**

The Power Charge Indifference Amount is another rate component of this Application. In D.06-07-030, as modified by D.07-01-030, the Commission resolved various issues relating to the cost responsibility surcharge applicable to Direct Access (“DA”) and Municipal Departing Load customers within the service territories of the IOUs. The PCIA component of the cost responsibility surcharge is intended to preserve bundled customer indifference to customers that migrate from bundled to DA load by ensuring that departing load customers pay their share of the cost responsibility associated with the above-market-costs of the utilities’ total procurement portfolio. Under the methodology adopted by the Commission in D.08-09-012, the Commission refined the indifference amount methodology by introducing the requirement to vintage departing load customers, based on their departure date, when assigning responsibility for the total portfolio of resources.

The PCIA rates will be based on applicable costs from SDG&E's total portfolio of resources, including its forecasted ERRA and CTC revenue requirements, as well as its authorized 2019 Non-Fuel Generation Balancing Account ("NGBA") revenue requirement and authorized 2019 DWR costs allocated to SDG&E. Although SDG&E proposes to update the currently effective PCIA rates in this Application, it will not be able to provide final PCIA rates until the 2019 NGBA and DWR revenue requirements (and certain market price information) become available, which is anticipated to be in the second half of 2018. Once the necessary information becomes available, SDG&E will update its proposed PCIA rates in the November Update to this Application.

In the proceeding involving SDG&E's 2017 Application (A.16-04-018), the Alliance for Retail Energy Markets ("AREM") and the Direct Access Customer Coalition ("DACC") took issue with SDG&E's calculation of the PCIA charge for so-called pre-2009 vintage DA customers. SDG&E maintained that it appropriately calculated a PCIA charge for pre-2009 vintage DA customers. SDG&E and AREM/DACC briefed this issue. On November 1, 2016, Commissioner Florio issued an Amended Scoping Memo to create Phase 2 of A.16-04-018 to resolve that issue. In approving SDG&E's 2017 Application, the Commission permitted SDG&E to implement the pre-2009 vintage PCIA rates, pending resolution of the second phase of that proceeding.<sup>11</sup> In this Application, as in SDG&E's 2018 Application, SDG&E proposes to follow that same approach.

#### **E. SONGS Unit 1 Offsite Spent Fuel Storage Costs**

SDG&E tracks the authorized revenue requirement in its Nuclear Decommissioning Adjustment Mechanism ("NDAM") account. SDG&E is seeking authorization to recover these

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<sup>11</sup> D.16-12-053 at Ordering Paragraphs 3-5.

costs through the ERRA forecast application process, and it is thus seeking authorization of the forecast 2019 revenue requirement for SONGS Unit 1 Offsite Spent Fuel Costs in this Application, as it did in its 2017 and 2018 Applications.

#### **F. GHG Costs and Allowance Revenues**

Pursuant to the California Global Warming Solutions Act of 2006, Assembly Bill (“AB”) 32, the California Air Resources Board (“ARB”) designed a statewide GHG cap-and-trade program in which certain utilities are required to participate. The cap-and-trade program creates a cap on major sources of GHG emissions – including power plants, fuel suppliers and industrial facilities – to achieve GHG reduction goals.

Utilities incur costs both by purchasing allowances for their own compliance obligation under the cap-and-trade program and, indirectly, through GHG costs embedded in the wholesale price of electricity. These GHG costs are incorporated into the generation component of electricity rates through the ERRA process in the same manner as other procurement-related costs, and they result in a carbon price signal intended to incent an overall reduction in GHG emission. The state allocates GHG allowances to ratepayers with the utilities acting as an intermediary to hold and then sell the allowances for ratepayer benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that result from GHG compliance.

In D.14-10-033, the Commission adopted methodologies for calculating forecast GHG allowance revenue and GHG costs, as well as recorded GHG allowance revenue and GHG costs. In so doing, the Commission required that utilities use Attachments C and D to D.14-10-033, as corrected by D.14-10-055 and D.15-01-024, to provide the required information in its GHG Forecast Revenue and Reconciliation Applications as a separate chapter or as part of its ERRA

forecast application.<sup>12</sup> As required, to make this procedure work efficiently and fairly, and to allow sufficient review of the forecast and recorded amounts, our application includes: completed Weighted Average Cost (“WAC”) calculation forms (Attachment C of the Decisions listed above) in Attachment A of Ana Garza-Beutz’s testimony and SDG&E’s GHG Revenue and Reconciliation Application Form (Attachment D of the Decisions listed above) in Attachment G of this main application. The decision further adopted Confidentiality Protocols for cap-and-trade related data and required the utilities to use a proxy price in their forecasts. Lastly, the decision required the utilities to file GHG Forecast Revenue and Reconciliation Applications annually as part of their ERRA forecast applications. In accordance with that decision, SDG&E is again incorporating its 2019 GHG-related forecasts and proposals in this Application, and it will further update the information in its forthcoming November Update. Attachment G to this Application contains the information that the Commission directed the utilities to use in D.14-10-033.

**G. Proposed Rate Components for the Green Tariff and Enhanced Community Renewables Program**

In 2013, California enacted the Green Tariff Shared Renewables Program, established in Senate Bill 43. That legislation intended to promote renewable energy by expanding access to renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation (*e.g.*, residential customers who could not install onsite solar panels). In D.15-01-051 – implementing Senate Bill 43 – the Commission required the three large California IOUs to establish the Green Tariff Shared Renewables Program. This program has two features administered by the utilities: (1) a Green Tariff component, which allows customers to purchase

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<sup>12</sup> As directed in D.14-10-033, SDG&E is including its WAC and GHG Revenue and Reconciliation Application Form in its ERRA Forecast Applications for review. If requested by the Commission, SDG&E may provide these forms under other proceedings as informational only.

energy with a greater share of renewables; and (2) an Enhanced Community Renewables component, which allows customers to purchase renewable energy from community-based projects. In its decision, the Commission directed the utilities to procure renewable energy resources, subject to certain limitations. The Commission also made numerous determinations regarding rate design. SDG&E customers who elect into the Green Tariff Renewables program will pay a subset of SDG&E's renewable energy procurement costs (which costs are in turn a subset of the total ERRRA costs), and SDG&E has thus developed 2019 forecasts of procurement expenses under this program, as well as 2019 rate proposals for the various rate components of the Green Tariff Shared Renewables Program.

### **III. SUMMARY OF APPLICATION AND PREPARED TESTIMONY**

In this Application, SDG&E identifies the forecast of its load, the resources available to meet the load, fuel costs, GHG costs, and costs for SDG&E's various energy resources for 2019. SDG&E used these forecasts to develop its 2019 forecast of its ERRRA revenue requirement, CTC revenue requirement, and LG revenue requirement forecasts. SDG&E also forecasts the SONGS Unit 1 Offsite Spent Fuel Storage Costs revenue requirement. SDG&E seeks approval of each of these 2019 forecast revenue requirements.

In addition, SDG&E requests approval of its 2019 forecast of allowance revenues resulting from the consignment and sale of allowances in ARB's quarterly auctions. SDG&E has allocated the allowance revenues to various customer classes, and it seeks approval of these allocations. SDG&E further requests approval to recover the undercollection recorded to its LGBA.

Lastly, SDG&E requests approval of its proposed 2019 GHG Allowance Return rates; its proposal to update the currently-effective PCIA rates and to provide vintage 2019 PCIA rates; and its proposed 2019 Green Tariff Shared Renewables Program rate components.

In support of this Application, SDG&E provides the testimony of six witnesses. That testimony is summarized below and incorporated herein by reference:

**A. Ms. Jennifer Montanez**

Ms. Montanez's testimony describes the resources that SDG&E expects to use in 2019 to meet its forecast bundled customer load. Ms. Montanez then forecasts the procurement costs that SDG&E expects to record charges to the ERRA, TCBA, LGBA, as well as procurement costs related to the Green Tariff Shared Renewables program in 2019. In addition, Ms. Montanez provides a forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Ms. Montanez also presents SDG&E's forecast of 2019 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which (as noted below) Ms. Ngo uses in her 2019 forecast of the ERRA revenue requirement. Lastly, Ms. Montanez provides a 2019 forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2019.

**B. Ms. Khoang Ngo**

Ms. Ngo's testimony describes the purpose of the ERRA, TCBA, and LGBA. Using cost information provided by Ms. Montanez, Ms. Ngo then presents SDG&E's 2019 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; and (3) the LG revenue requirement. Ms. Ngo also presents the sum of 2016 activity recorded to the LGBA that SDG&E seeks to recover in this Application. Additionally, Ms. Ngo compares the 2017 year-end recorded balances with the 2017 year-end actual balances in the GHG balancing accounts used for GHG expenses (GHG Customer Outreach and Education



Memorandum Account and GHG Administrative Costs Memorandum Account) and GHG allowance revenues (GHG Revenue Balancing Account). Ms. Ngo's testimony also discusses the activity in the Green Tariff Shared Renewables balancing account. Finally, Ms. Ngo presents SDG&E's 2019 forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement.

**C. Ms. Jenell McKay**

Ms. McKay's testimony presents the rate and bill impacts associated with the cost recovery of SDG&E's 2019 forecast of its (1) ERRR revenue requirement; (2) CTC revenue requirement; (3) LG revenue requirement; (4) SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement; (5) GHG allowance revenue return, and (6) the sum of the activity in the LGBA. Ms. McKay also proposes the 2019 PCIA component of the cost responsibility surcharge applicable to departing load customers. Further, Ms. McKay presents the methodology for the GHG allowance revenue returns, which involves identifying and supporting the 2019 forecast GHG allowance revenue return allocation amounts (including the California Climate Credit) in Templates D-1 and D-4 of Attachment G to this Application. Lastly, Ms. McKay proposes the 2019 rate components associated with the Green Tariff Shared Renewables program.

**D. Mr. Roland Mollen**

Mr. Mollen's testimony describes the overall approach that SDG&E proposes to employ to support ongoing customer awareness about the purpose and value of the GHG allowance revenues that will be credited to the bills of residential, small business and EITE customers. In addition, the testimony forecasts the costs of ongoing customer education and outreach as well as the ongoing administrative and billing costs associated with the return of allowance revenue to customers.

**E. Ms. Ana Garza-Beutz**

Ms. Garza-Beutz's testimony presents SDG&E's 2017 costs for GHG compliance instruments used to satisfy obligations under the ARB's cap-and-trade program. Additionally, Ms. Garza-Beutz provides the 2017 revenues. Ms. Garza-Beutz's testimony also describes the cap-and-trade program and details the methodology behind SDG&E's calculation of its unadjusted 2017 actual revenues and estimated costs including the WAC form in Attachment A. These costs and revenues are adjusted to recorded numbers by Ms. Chihwaro for the purposes of the reconciliation performed by Ms. McKay.

**F. Ms. Monica Chihwaro**

Ms. Chihwaro's testimony presents the accounting procedures that are used to record the GHG costs described in Ms. Garza-Beutz's testimony.

**IV. STATUTORY AND PROCEDURAL REQUIREMENTS**

**A. Rule 2.1 (a) – (c)**

In accordance with Rule 2.1 (a) – (c) of the Commission's Rules of 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. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E's attorney in this matter is Christopher M. Lyons.

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

Correspondence or communications regarding this Application should be addressed to:

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**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 forecasted revenue requirements described in this Application from its ratepayers, and the costs will thus influence SDG&E's rates.

**b. Need for Hearings**

SDG&E does not believe that approval of this Application will require hearings. SDG&E has provided ample supporting testimony, analysis and documentation that provide the Commission with a sufficient record upon which to grant the relief requested.

**c. Issues to be Considered**

The issues to be considered are described in this Application and the accompanying testimony and exhibits. SDG&E does not believe there are any issues related to safety considerations that need to be considered in this Application.

**d. Proposed Schedule**

SDG&E proposes the following schedule:

<b><u>ACTION</u></b>	<b><u>DATE</u></b>
Application filed	April 13, 2018
Approx. End of Response Period (including Applicant Reply)	May 30, 2018
Prehearing Conference	June 12, 2018
ORA and Intervener Testimony	July 17, 2018
Rebuttal Testimony	August 7, 2018
Evidentiary Hearings (if needed)	August 8-10, 2018
Concurrent Opening Briefs	September 14, 2018
Concurrent Reply Briefs	October 5, 2018
SDG&E November Update	November 7, 2018
ORA/Intervenor Comments on November Update	November 9, 2018
SDG&E Reply Comments on November Update	November 12, 2018
Proposed Decision	November 27, 2018
Comments on Proposed Decision	December 3, 2018
Reply Comments on Proposed Decision	December 6, 2018
Commission Decision	December 13, 2018

**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 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>13</sup>

**1. Rule 3.2 (a) (1) – Balance Sheet**

SDG&E’s financial statement, balance sheet and income statement for the nine-month period ending September 30, 2017 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 on SDG&E’s website. 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.

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

SDG&E is in the business of generating, transmitting and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange and Imperial Counties. This includes a composite 92% ownership in the 500 kV Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500 kV Sunrise Powerlink including substations and

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<sup>13</sup> Note Rule 3.2(a) (9) is not applicable to SDG&E.

transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of the Moreno gas compressor station in Riverside County and the Rainbow compressor station located in San Diego County. The gas is transmitted through high and low-pressure distribution mains and service lines.

Applicant's original cost of utility plant, together with the related reserves for depreciation and amortization nine-month period ending September 30, 2017, is shown on the Statement of Original Cost and Depreciation Reserves 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 nine-month period ending September 30, 2017, 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 24, 2017, was mailed to the Commission on April 10, 2017, and is incorporated herein by reference.

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

The rate increase reflected in this Application passes through to customers only increased costs to SDG&E 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.

## **V. CONFIDENTIAL INFORMATION**

SDG&E is submitting the testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E's declarations of confidential treatment attached to each of the witnesses' testimonies and submitted in conformance with D.06-06-066, D.08-04-023 and other applicable orders and statutory provisions. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E's electric procurement resources and strategies) that SDG&E witnesses must identify to support SDG&E's revenue requirements forecasts for 2019. Additionally, SDG&E is contemporaneously filing a motion for leave to file confidential information in Attachment G to this Application under seal.

## **VI. SERVICE**

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, testimony and related exhibits on parties to the service list for its 2018 Application (A.17-04-016). Hard copies will be sent via FedEx to Chief ALJ Anne Simon and ALJ Gerald F. Kelly.

## **VII. CONCLUSION AND SUMMARY OF RELIEF REQUESTED**

WHEREFORE, San Diego Gas & Electric Company requests that the Commission:

(1) grant authority to change rates by approving as reasonable SDG&E's 2019 forecast of its ERRA revenue requirement pertaining to SDG&E's load, the resources available to meet SDG&E's load, and various input assumptions regarding fuel costs, GHG costs, and costs for SDG&E's various electric resources;



(2) grant authority to decrease rates by approving as reasonable SDG&E's 2019 forecast of its CTC revenue requirement;

(3) grant authority to increase rates by approving as reasonable SDG&E's 2019 forecast of its LG revenue requirement;

(4) grant authority to decrease rates by approving as reasonable SDG&E's 2019 forecast of its SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement;

(5) approve SDG&E's 2019 forecast of its GHG allowance revenues;

(6) approve SDG&E's 2019 forecast for its GHG administration, customer education and outreach activities;

(7) adopt SDG&E's 2019 forecast of its GHG allowance revenue return allocations, including reconciliation adjustments, for EITE, small businesses, and residential California Climate Credit; and

(8) grant authority to increase rates by approving the collection in rates of the outstanding balances in SDG&E's LGBA;

(9) adopt SDG&E's proposed vintage PCIA rates, as will be provided in SDG&E's forthcoming November Update to this Application;

(10) adopt SDG&E's proposed 2019 rate components for the Green Tariff Shared Renewables Program; and

(11) grant such additional relief as the Commission believes is just and reasonable. SDG&E is ready to proceed with its showing in this Application.

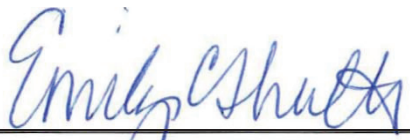
Respectfully submitted,

By: /s/ Christopher M. Lyons

Christopher M. Lyons  
San Diego Gas & Electric Company  
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Attorney for:  
SAN DIEGO GAS & ELECTRIC COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

By:   
Emily C. Shults  
San Diego Gas & Electric Company  
Vice President –Energy Supply

DATED at San Diego, California, this 13th day of April 2018

# **OFFICER VERIFICATION**

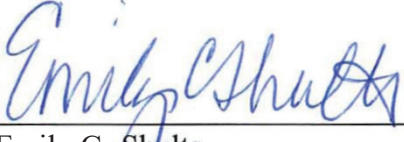
## OFFICER VERIFICATION

Emily C. Shults 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 APPROVAL OF ITS 2019 ELECTRIC PROCUREMENT REVENUE REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS** 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 April 13, 2018 at San Diego, California.

By:   
\_\_\_\_\_  
Emily C. Shults  
Vice President – Energy Supply

**ATTACHMENT A**

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

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**September 30, 2017**

	2017
<b>1. UTILITY PLANT</b>	
101 UTILITY PLANT IN SERVICE	\$ 16,828,093,926
102 UTILITY PLANT PURCHASED OR SOLD	-
104 UTILITY PLANT LEASED TO OTHERS	85,194,000
105 PLANT HELD FOR FUTURE USE	4,941,794
106 COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107 CONSTRUCTION WORK IN PROGRESS	1,173,575,364
108 ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,171,878,313)
111 ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(738,450,819)
114 ELEC PLANT ACQUISITION ADJ	3,750,722
115 ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,437,776)
118 OTHER UTILITY PLANT	1,231,240,369
119 ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(249,625,189)
120 NUCLEAR FUEL - NET	-
	<b>\$ 13,165,404,078</b>
<b>2. OTHER PROPERTY AND INVESTMENTS</b>	
121 NONUTILITY PROPERTY	\$ 5,790,994
122 ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(364,300)
158 NON-CURRENT PORTION OF ALLOWANCES	189,865,937
123 INVESTMENTS IN SUBSIDIARY COMPANIES	-
124 OTHER INVESTMENTS	-
125 SINKING FUNDS	-
128 OTHER SPECIAL FUNDS	1,041,465,326
175 LONG-TERM PORTION OF DERIVATIVE ASSETS	119,848,247
	<b>\$ 1,356,606,204</b>

Data from SPL as of December 5, 2017

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**September 30, 2017**

<b>3. CURRENT AND ACCRUED ASSETS</b>		2017
131	CASH	\$ 2,472,456
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	379,184,675
143	OTHER ACCOUNTS RECEIVABLE	36,703,520
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(4,395,233)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	527,917
151	FUEL STOCK	1,456,137
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	129,744,226
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	206,127,894
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(189,865,937)
163	STORES EXPENSE UNDISTRIBUTED	458,063
164	GAS STORED	305,183
165	PREPAYMENTS	153,415,257
171	INTEREST AND DIVIDENDS RECEIVABLE	716,525
173	ACCRUED UTILITY REVENUES	73,203,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,294,000
175	DERIVATIVE INSTRUMENT ASSETS	140,320,296
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(119,848,247)
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<b>\$ 812,820,232</b>
<b>4. DEFERRED DEBITS</b>		
181	UNAMORTIZED DEBT EXPENSE	\$ 34,154,399
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,551,442,725
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	303,020
184	CLEARING ACCOUNTS	(766,800)
185	TEMPORARY FACILITIES	1,715
186	MISCELLANEOUS DEFERRED DEBITS	22,200,130
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	9,664,292
190	ACCUMULATED DEFERRED INCOME TAXES	320,390,192
	<b>TOTAL DEFERRED DEBITS</b>	<b>\$ 2,937,389,673</b>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>\$ 18,272,220,187</b>

Data from SPL as of December 5, 2017

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**September 30, 2017**

**5. PROPRIETARY CAPITAL**

		2017
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	4,135,912,729
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(7,161,311)
	TOTAL PROPRIETARY CAPITAL	\$ 5,466,552,519

**6. LONG-TERM DEBT**

221	BONDS	\$ 4,573,220,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(11,873,565)
	TOTAL LONG-TERM DEBT	\$ 4,561,346,435

**7. OTHER NONCURRENT LIABILITIES**

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,046,355,148
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	23,784,340
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	253,519,158
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	156,477,877
230	ASSET RETIREMENT OBLIGATIONS	831,834,042
	TOTAL OTHER NONCURRENT LIABILITIES	\$ 2,311,970,565

Data from SPL as of December 5, 2017



**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**September 30, 2017**

**8. CURRENT AND ACCRUED LIABILITES**

		2017
231	NOTES PAYABLE	\$ 185,290,094
232	ACCOUNTS PAYABLE	468,175,363
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	42,132,430
235	CUSTOMER DEPOSITS	80,068,246
236	TAXES ACCRUED	34,427,622
237	INTEREST ACCRUED	56,829,675
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	5,052,983
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	151,865,954
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	52,250,217
244	DERIVATIVE INSTRUMENT LIABILITIES	205,595,657
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(156,477,877)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
		-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 1,125,210,364

**9. DEFERRED CREDITS**

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 58,105,858
253	OTHER DEFERRED CREDITS	396,920,638
254	OTHER REGULATORY LIABILITIES	1,142,321,486
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	17,232,953
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	2,417,284,462
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	775,274,907
		-
	TOTAL DEFERRED CREDITS	\$ 4,807,140,304

TOTAL LIABILITIES AND OTHER CREDITS \$ 18,272,220,187

\$4,807,140,304

Data from SPL as of December 5, 2017

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**Nine Months Ended September 30, 2017**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$ 3,387,220,735
401	OPERATING EXPENSES	\$ 2,270,223,155	
402	MAINTENANCE EXPENSES	106,479,051	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	476,449,119	
408.1	TAXES OTHER THAN INCOME TAXES	98,294,258	
409.1	INCOME TAXES	76,751,932	
410.1	PROVISION FOR DEFERRED INCOME TAXES	200,171,849	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(211,596,204)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	1,197,681	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>\$ 3,017,970,841</u>
	NET OPERATING INCOME		\$ 369,249,894

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	\$ -	
417	REVENUES OF NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	35,323	
418	NONOPERATING RENTAL INCOME	24,673	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	5,196,861	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	46,541,709	
421	MISCELLANEOUS NONOPERATING INCOME	158,262	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>\$ 51,956,828</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	\$ -	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	2,340,814	
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 2,528,350</u>	
408.2	TAXES OTHER THAN INCOME TAXES	\$ 489,141	
409.2	INCOME TAXES	(66,427)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	38,985,370	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(33,741,297)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 5,666,787</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>\$ 43,761,691</u>
	INCOME BEFORE INTEREST CHARGES		413,011,585
	EXTRAORDINARY ITEMS AFTER TAXES		233,112
	NET INTEREST CHARGES*		<u>137,469,585</u>
	NET INCOME		<u><u>\$ 275,775,112</u></u>

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$9,638,447)

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**Nine Months Ended September 30, 2017**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 4,310,137,617
NET INCOME (FROM PRECEDING PAGE)	275,775,112
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	0
DIVIDENDS DECLARED - COMMON STOCK	(450,000,000)
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 4,135,912,729</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
**Sep 30, 2017**

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

**(b) Brief Description of Mortgage:**  
Full information as to this item is given in Application Nos. 93-09-069, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, and 15-08-011 to which references are hereby made.

<b>(c)</b>	<b><u>Number and Amount of Bonds Authorized and Issued:</u></b>			
	<b>Nominal</b>	<b>Par Value</b>		<b>Interest Paid</b>
		<b>Authorized and Issued</b>	<b>Outstanding</b>	<b>(updated in Q4' 20xx) as of Q4' 2016</b>
	<b>Date of Issue</b>			
	<b>First Mortgage Bonds:</b>			
	5.875% Series VV, due 2034	43,615,000	43,615,000	2,562,346
	5.875% Series WW, due 2034	40,000,000	40,000,000	2,350,000
	5.875% Series XX, due 2034	35,000,000	35,000,000	2,056,250
	5.875% Series YY, due 2034	24,000,000	24,000,000	1,410,000
	5.875% Series ZZ, due 2034	33,650,000	33,650,000	1,976,938
	4.00% Series AAA, due 2039	75,000,000	75,000,000	3,000,000
	5.35% Series BBB, due 2035	250,000,000	250,000,000	13,375,000
	6.00% Series DDD, due 2026	250,000,000	250,000,000	15,000,000
	1.65% Series EEE, due 2018	161,240,000	161,240,000	2,660,460
	6.125% Series FFF, due 2037	250,000,000	250,000,000	15,312,500
	6.00% Series GGG, due 2039	300,000,000	300,000,000	18,000,000
	5.35% Series HHH, due 2040	250,000,000	250,000,000	13,375,000
	4.50% Series III, due 2040	500,000,000	500,000,000	22,500,000
	3.00% Series JJJ, due 2021	350,000,000	350,000,000	10,500,000
	3.95% Series LLL, due 2041	250,000,000	250,000,000	9,875,000
	4.30% Series MMM, due 2042	250,000,000	250,000,000	10,750,000
	3.60% Series NNN, due 2023	450,000,000	450,000,000	16,200,000
	Variable Series OOO, due 2017	0	0	1,210,959
	1.9140% Series PPP, due 2022	54,088,941	54,088,941	4,272,326
	2.50% Series QQQ, due 2026	500,000,000	500,000,000	6,111,111
	3.75% Series RRR, due 2047	400,000,000	400,000,000	-
	<b>Total 1st. Mortgage Bonds:</b>		<b>4,466,593,941</b>	<b>175,122,889</b>
	<b>Unsecured Bonds:</b>			
	<b>Total Bonds:</b>			<b>175,122,889</b>
	1.050% Commercial Paper - Long	0	0	0
	<b>TOTAL LONG-TERM DEBT</b>		<b>4,466,593,941</b>	
	<b>TOTAL LONG-TERM DEBT</b>		<b>0</b>	

**SAN DIEGO GAS & ELECTRIC COMPANY  
FINANCIAL STATEMENT**

Sep 30, 2017

<b>Other Indebtedness:</b>	<b>Date of Issue</b>	<b>Date of Maturity</b>	<b>Interest Rate</b>	<b>Outstanding</b>	<b>Interest Paid 2017</b>
Commercial Paper & ST Bank	Various	Various	Various	185,290,094	\$1,754,558

Amounts and Rates of Dividends Declared:

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

<b>Preferred Stock</b>	<b>Shares Outstanding</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
5.00%	-	\$281,250	-	-	-	-
4.50%	-	202,500	-	-	-	-
4.40%	-	214,500	-	-	-	-
4.60%	-	257,901	-	-	-	-
1.70%	-	1,785,000	-	-	-	-
1.82%	-	873,600	-	-	-	-
<b>Total</b>	-	<b>\$3,614,751</b>	-	-	-	-

<b>Common Stock</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
[1]	-	\$200,000,000	300,000,000	175,000,000	450,000,000

**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.

A balance sheet and a statement of income and retained earnings of applicant for the nine months ended Sep 30, 2017 are attached hereto.

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

# **ATTACHMENT B**

## **STATEMENT OF PRESENT RATES**



**TABLE OF CONTENTS**

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.

	<u>Cal. P.U.C. Sheet No</u>
TITLE PAGE.....	16015-E
TABLE OF CONTENTS.....	30274, 30093, 27839, 30054, 30082, 30083, 29902-E 27993, 28372, 30084, 30085, 30275, 26298-E
<b>PRELIMINARY STATEMENT:</b>	
I. General Information.....	8274, 26126, 22140-E
II. <u>Balancing Accounts</u>	
Description/Listing of Accounts	19402, 28122-E
California Alternate Rates for Energy (CARE) Balancing Account.....	26553, 26554-E
Rewards and Penalties Balancing Account (RPBA).....	21643, 22802-E
Transition Cost Balancing Account (TCBA).....	22803, 19411, 22804, 22805, 19414-E
Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA).....	19415, 19416-E
Research, Development and Demonstration (RD&D) Balancing Account.....	19417, 19418-E
Renewables Balancing Account (RBA).....	19419, 19420-E
Tree Trimming Balancing Account (TTBA).....	19421, 19422-E
Baseline Balancing Account (BBA).....	21377, 19424-E
El Paso Turned-Back Capacity Balancing Account (EPTCBA).....	19425-E
Energy Resource Recovery Account (ERRA).....	26358, 26359, 26360, 26361, 25570, 25571-E
Low-Income Energy Efficiency Balancing Account (LIEEBA).....	19431, 19432-E
Non-Fuel Generation Balancing Account (NGBA).....	25572-75-E
Electric Procurement Energy Efficiency Balancing Account (EPEEBA).....	19438-E
Common Area Balancing Account (CABA).....	19439-E
Nuclear Decommissioning Adjustment Mechanism (NDAM).....	22811-E
Pension Balancing Account (PBA).....	19441, 19442-E
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA).....	19443, 19444-E
Community Choice Aggregation Implementation Balancing Account (CCAIBA).....	19445-E

T  
T

(Continued)

1C5

Advice Ltr. No. 3198-E

Decision No. \_\_\_\_\_

Issued by  
**Dan Skopec**  
Vice President  
Regulatory Affairs

Date Filed Mar 7, 2018

Effective Apr 6, 2018

Resolution No. \_\_\_\_\_



**TABLE OF CONTENTS**

**II. Balancing Accounts (Continued)**

Solar Energy Project Balancing Account (SEPBA).....	22078-E
Electric Program Investment Charge Balancing Acct (EPICBA)...	22991, 22992-E
Tax Equity Investment Balancing Account (TEIBA)	22797-E
California Energy Systems 21 <sup>st</sup> Century Balancing Acct (CES-21BA)	23337-E
Dynamic Pricing Balancing Account (DPBA).....	23410-E
Greenhouse Gas Revenue Balancing Account (GHGRBA).	23426-E
Local Generation Balancing Account (LGBA).....	28765-E
Cost of Financing Balancing Account (CFBA).....	26180-E
Street Lighting Conversion Balancing Account (SLCBA).....	26396-E
Smart Meter Opt-Out Balancing Account (SMOBA).....	26898, 26899-E
Vehicle Grid Integration Balancing Account (VGIBA).....	27390-E
Green Tariff Shared Renewables Balancing Account (GTSRBA).....	27432, 27433-E
New Environmental Regulatory Balancing Account (NERBA).....	27955, 27956-E
Demand Response Generation Balancing Account (DRGMA)	28123-E
Master Meter Balancing Account (MMBA).....	29470-E
Distribution Resources Plan Demonstration Balancing Account	28885-E

**III. Memorandum Accounts**

Description/Listing of Accounts	19451, 29895, 28970-E
Catastrophic Event Memorandum Account (CEMA).....	19453, 19454, 22814-E
Generation Divestiture Transaction Costs Memo Acct (GDTCSMA)...	19458-E
Streamlining Residual Account (SRA).....	20137, 20138-E
Nuclear Claims Memorandum Account (NCMA).....	19465-E
Real-Time Energy Metering Memorandum Account (RTEMMA).....	19472-E
Net Energy Metering Memorandum Account (NEMMA).....	19473-E
Interval Metering Program Memorandum Account (IMPMA)....	19474-E
Self-Generation Program Memorandum Acct (SGPMA).....	19530, 19531-E
Bond Payment Memorandum Account (BPMA).....	19481-E
Direct Access Cost Responsibility Surcharge Memo Acct (DACRSMA)	19576, 19577, 19578-E
Advanced Metering & Demand Response Memo Acct (AMDRMA)	28124, 28125, 28126, 28127, 28128-E
Procurement Transaction Auditing Memo Account (PTAMA).....	19492-E
Reliability Costs Memorandum Account (RCMA).....	19493-E
Litigation Cost Memorandum Account (LCMA).....	20893-E
Community Choice Aggregation Surcharge Memo Account (CCASMA)	19988-E
Independent Evaluator Memorandum Account (IEMA)	22548-E
Community Choice Aggregation Procurement Memo Acct (CCAPMA)	19703-E
CSI Performance-Based Incentive Memorandum Account (CSIPMA)	19681-E
Renewables Portfolio Standard Cost Memorandum Account (RPSCMA)	24939-E
Market Redesign Technology Upgrade Memo Account (MRTUMA)...	22549-E
Gain/Loss On Sale Memorandum Account (GLOSMA).....	20157-E
Non-Residential Sub-metering Memo Account (NRSMA)...	20474-E
Long Term Procurement Plan Technical Assistance Memo Acct (LTAMA)	20640-E
BioMASS Memorandum Account (BIOMASSMA).....	28248-E
BioRAM Memorandum Account (BIORAMMA).....	28249-E
Wheeler North Reef Memorandum Account (WNRMA).....	28843, 28846-E

(Continued)





**TABLE OF CONTENTS**

Sheet 3

**II. Memorandum Accounts (Continued)**

Energy Efficiency 2009-2011 Memorandum Acct (EEMA)	20910-E
Fire Hazard Prevention Memorandum Account (FHPMA)...	23771, 23772-E
Dynamic Pricing Memorandum Account (DPMA).....	22248-E
Smart Grid Memorandum Account (SGMA).....	21476-E
Disconnect Memorandum Account (DMA).....	22210-E
El Dorado Transition Cost Memorandum Account (EDTCMA)	22408-E
Environmental Fee Memorandum Account (EFMA)...	22098-E
General Rate Case Memorandum Account (GRCMA)	22511-E
Energy Savings Assistance Programs Memo Acct (ESAPMA)	23032-E
Greenhouse Gas Admin Costs Memo Account (GHGACMA)	26134-E
Greenhouse Gas Customer Outreach and Education Memorandum Account (GHGCOEMA).....	23428-E
Alternative Fuel Vehicle Memorandum Account (AFVMA).....	28160-E
Residential Disconnect Memorandum Account (RDMA).....	25227-E
Mitsubishi Net Litigation Memorandum Account (MNLMA)....	25578, 25579-E
Nuclear Fuel Cancellation Incentive Memo Account (NFCMA).	25580-E
NEIL Net Litigation Memorandum Account (NNLMA).....	25581, 25582-E
SONGS 2&3 Permanent Closure Non-Investment Relates Expense (SPCEMA).....	25583-E
Deductible Tax Repairs Benefits Memo Account (DTRBMA)....	27753-E
Marine Mitigation Memorandum Account (MMMA).....	27751, 27752-E
Green Tariff Shared Renewables Administrative Costs Memorandum Account (GTSRACMA).....	27434-E
Green Tariff Marketing, Edu & Outreach Memo Acct (GTME&OMA).	27435-E
Enhanced Community Renewables Marketing, Education & Outreach Memorandum Account (ECRME&OMA).....	27436-E
Direct Participation Demand Response Memorandum Account	26335-E
General Rate Case Memorandum Account 2016 (GRCMA2016)	27754-E
Rate Reform Memorandum Account (RRMA)	26407-E
Distribution Interconnection Memorandum Account (DIMA).....	28001-E
Integration Capacity Analysis and Location Net Benefit Analysis.... Memorandum Account (ICLNBA).....	29639, 29640-E

**IV. Electric Distribution and Gas Performance** 27755, 20737, 20738, 20739, 20868, 20869-E

**V. SONGS 2&3 Procedures** 17006, 17007-E

**VI. Miscellaneous**

Listing of Accounts	20158-E
Income Tax Component of Contributions and Advances Provision (ITCCAP).....	27069, 19501, 19502-E
Hazardous Substance Cleanup Cost Account (HSCCA)	19503, 19504, 25384, 19506-19513-E
Competition Transition Charge Responsibility (CTCR)	19514-E
Public Purpose Programs Adjustment Mechanism (PPPAM)	20610, 19516-E
Gain/Loss On Sale Mechanism (GLOSM)	20159, 20160, 20161, 20162, 20163-E

**VII. Cost of Capital Mechanism (CCM)**..... 23463-E

**INDEX OF RATE AREA MAPS**

Map 1 - Territory Served.....	15228-E
Map 1-A - Territory Served.....	4916-E
Map 1-B - Territory Served.....	7295-E
Map 1-C - Territory Served.....	9135-E
Map 1-D - Territory Served.....	9136-E

(Continued)

D



**TABLE OF CONTENTS**

SCHEDULE OF RATES

<u>SCHEDULE NUMBER</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>	
	<u>Residential Rates</u>		
DR	Domestic Service .....	29903, 29904, 29905, 29906, 27653, 24223-E	T
DR-TOU	Domestic Time-of-Use Service .....	29907, 29908, 29909, 29910, 29911, 27659-E 25535, 26565-E	T
TOU-DR	Residential – Time of Use Service	29912, 29913, 29914, 29915, 26057, 25542-E 29916, 29917, 29918, 29919-E	T T
DR-SES	Domestic Households with a Solar Energy System	29920, 26571, 26572, 24335, 29921-E	T
E-CARE	California Alternate Rates for Energy .....	26573, 29922, 26575, 26576, 26577, 26578-E 26579-E	T
DM	Multi-Family Service .....	29923, 29924, 29925, 22926, 27668, 24242-E	T
DS	Submetered Multi-Family Service .....	22927, 22928, 22929, 22930, 24247, 27672-E 24249, 24250-E	T
DT	Submetered Multi-Family Service Mobilehome Park	22931, 22932, 22933, 22934, 24455, 27676-E 24257, 24258, 24259-E	T
DT-RV	Submetered Service – Recreational Vehicle Parks and Residential Marinas	22935, 22936, 22937, 22938, 24455, 27680-E 24266, 24267-E	T
EV-TOU	Domestic Time-of-Use for Electric Vehicle Charging	22939, 22940, 24270, 24271, 22941-E	T
EV-TOU-2	Domestic Time-of-Use for Households With Electric Vehicles	29942, 29943, 24272, 24274, 24275, 29944-E	T
DE	Domestic Service to Utility Employee.....	20017-E	
FERA	Family Electric Rate Assistance.....	29945, 26601-E	T
PEVSP	Plug-In Electric Vehicle Submetering Pilot .....	25237, 26183, 26184, 26185, 26186-E	
E-SMOP	Electric Smart Meter Opt-Out Program .....	26151, 26152-E	
			D
			D
			D
TOU-DR1	Residential Time-of-Use DR1 (Experimental)	29952, 29953, 29954, 29955, 29787, 29788-E	T
TOU-DR2	Residential Time-of-Use DR2 (Experimental)	29956, 29957, 29958, 29959, 29793, 29794-E	T
	<u>Commercial/Industrial Rates</u>		
A	General Service .....	29946, 29947, 24280-E	T
TOU-A	General Service – Time of Use Service.....	29948, 29949, 24373, 25256, 25257, 29950-E	T
A-TC	Traffic Control Service.....	29951, 24282, 24283-E	T
AD	General Service - Demand Metered.....	29960, 29961, 21772-E	T
A-TOU	General Service - Small - Time Metered .....	29962, 29963, 20503, 21773, 29964 -E	T
AL-TOU	General Service - Time Metered .....	29965, 29556, 29966, 29967, 29353, 29354-E 29355, 29356, 29357, 29559, 29560, 29969-E	T T
AY-TOU	General Service – Time Metered – Optional .....	29970, 29971, 25433, 21776-E	T
A6-TOU	General Service - Time Metered .....	29972, 29973, 25435, 20521, 29974-7, 29975-E	T
DG-R	Distributed Generation Renewable –Time Metered	29976, 27887, 29977, 29978, 21059, 21060-E, 29979-10, 29980-11-E	T T
OL-TOU	Outdoor Lighting – Time Metered .....	29981, 24302, 21448, 21449. 29982-E	T

(Continued)



TABLE OF CONTENTS

SCHEDULE NO.	SERVICE	CAL. P.U.C. SHEET NO.
	<u>Lighting Rates</u>	
LS-1	Lighting - Street and Highway – Utility-Owned Installations .....	29983, 29984, 29985, 12626, 12627, 12628-E 21439-E
LS-2	Lighting - Street and Highway – Customer-Owned Installations .....	29986, 29987, 29988, 29989, 29990, 22362-E 22363, 22364-E
LS-3	Lighting - Street and Highway - Customer-Owned Installations .....	29991 14943, 21441-E
OL-1	Outdoor Area Lighting Service .....	29992, 20280, 21442-E
OL-2	Outdoor Area Lighting Service Metered – Customer-Owned Installation .....	29993, 21444, 21445-E
DWL	Residential Walkway Lighting.....	29994, 21450-E
	<u>Miscellaneous</u>	
PA	Power – Agricultural .....	29995, 29996, 26508-E
TOU-PA	Power - Agricultural Time of Use Service .....	29997, 29998, 29999, 26512-E
PA-T-1	Power – Agricultural – Optional Time-of-Use .....	30000, 30001, 30002, 26516, 26517, 29593,29667-E 30003, 30004-E
S	Standby Service .....	30005, 18256, 21453-E
S-I	Standby Service – Interruptible .....	17678, 6085, 6317-E
SE	Service Establishment Charge .....	27816, 27817-E
DA	Transportation of Electric Power for Direct Access Customers .....	17679, 14953, 14954, 21894, 15111, 16976-E 21454, 21895-E
NDA	UDC Meter Services for Non-Direct Access Customers .....	17892, 11850, 11851, 21455, 16427-E
E-Depart	Departing Load Nonbypassable ND & PPP Charges .....	18385-E, 18386-E
BIP	Base Interruptible Program .....	30066, 29485, 30067, 29487, 29488, 29489-E 14625, 15198, 14627, 21948-21951-E
OBMC	Optional Binding Mandatory Curtailment Plan.....	25237, 25378, 25239, 25379, 25241-E
PEVSP	Plug-in Electric Vehicle Submetering Pilot (Phase I) .....	14584, 22957, 22958, 14587, 18367-E
SLRP	Scheduled Load Reduction Program .....	18259, 18260, 20546, 18262-E
RBRP	Rolling Blackout Reduction Program.....	25218, 23478, 23479, 25219-E
DBP	Demand Bidding Program .....	25220, 25221, 23630, 23631-E
DBP-DA	Demand Bidding - Day Ahead (US Navy).....	28166, 25273, 25274-75, 28167-68, 25278-79-E 28169, 25281-89, 28170-71, 28847-E
NEM	Net Energy Metering .....	28173, 27171-72, 27696-97, 28174-76, 27701-E 27179-95, 28177-78, 28848-E
NEM ST	Net Energy Metering Successor Tariff.....	24910, 23437, 23438, 23439, 23440, 23441-E 23442, 23442-E
NEM-FC	Net Energy Metering for Fuel Cell Customer Generators.....	29841-E
E-PUC	Surcharge to Fund PUC Reimbursement Fee .....	27021-E
DWR-BC	Department of Water Resources Bond Charge.....	21812, 30006, 30007, 27047, 27048-E
DA-CRS	Direct Access Cost Responsibility Surcharge.....	30008, 19582, 27196, 18584, 18391-E
CGDL-CRS	Customer Generation Departing Load Cost Responsibility Surcharge.....	17894, 17895, 17896, 17897-E
CCA	Transportation of Electric Power, For Community Choice Aggregation Customers.....	27049, 21817-E
CCA-CRS	Community Choice Aggregation Cost Responsibility Surcharge.....	22783, 17858, 22784, 17860-E
CCA-INFO	Information Release to Community Choice Providers.....	30196, 30197, 30198, 30199, 30200, 30201-E 30202, 30203, 30204, 30205, 30206, 30207-E
CBP	Capacity Bidding Program .....	30009,19337,19338-E
UM	Unmetered Electric Service .....	

T  
T

(Continued)



**TABLE OF CONTENTS**

SCHEDULE OF RATES

<u>SCHEDULE NUMBER</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO</u>
	<u>Miscellaneous</u>	
WATER	Water Agency Tariff for Eligible Renewables.....	20287,19337,19338, 20429,20430-E
PTR	Peak Time Rebate .....	24102, 22926, 23475, 28069-E
TCRE	Customer Renewable Energy.....	20882, 20883-E
NEM-V	Virtual Net Metering for Multi-Tenant and Meter Properties.....	23222, 22934, 23333, 23334, 23965-E 23966, 23967, 29409-E
NEM-V-ST	Virtual Net Metering for Multi-Tenant and Meter Properties Successor Tariff.....	27197-229410-E
VNM-A	Virtual Net Metering Multi-Family Affordable Housing	22385, 22402, 22403, 22404, 29411-E
VNM-A-ST	Virtual Net Metering for Multi-Family Affordable Housing Successor Tariff.....	27209-27216, 29412-E
RES-BCT	Renewable Energy Self-Generation Bill Credit Transfer.....	29722, 29724, 22584, 22585, 222586-E
ECO	Energy Credit Option.....	21280, 21281, 21282, 21283-E
SPSS	Station Power Self Supply.....	21625, 21626, 21627, 21628-E
CHP	Combined Heat and Power.....	22625, 22626-E
GHG-ARR	Greenhouse Gas Allowance Rate Return.....	30010, 30011, 27052-E
BIOMAT	Bioenergy Market Adjusting Tariff.....	29234-37, 28286-88, 26834, 29238-E 26836-38, 29239-40,28290-93,29241-E
ECR	Enhanced Community Renewables.....	30012, 30013, 29888, 28269, 28270-E 28271, 28788, 29889-E
GT	Green Tariff.....	30014, 30015, 28290, 28291, 28277-E 28992-E
ECR-PDT	Enhanced Community Renewables Project Development Tariff.....	26860, 26861, 26862, 26863, 26864-E 26865, 26866, 26867, 26868, 26869-E 26870, 26871, 26872, 26873-E
AC SAVER	Air Conditioner (AC) Saver	30068, 30069, 30070-E
VGI	Vehicle Grid Integration.....	28860, 30016, 30017, 28863, 28871 -E
AFP	Armed Forces Pilot	30071, 30072, 30073, 30074, 30075-E 30076-E
	<u>Commodity Rates</u>	
EECC	Electric Energy Commodity Cost .....	30018-30030 & 30031-30037-E (17-23)
EECC-TOU-DR-P	Electric Commodity Cost - Time of Use Plus	30038, 29436, 29437, 30039-7, 29618-9, -E
EECC-TOU-A-P	Electric Commodity Cost – Time of Use Plus	29672, 30040, 29443, 26536-7, 29444-E 29746, 30041-E
EECC-TOU-PA-P	Electric Commodity Cost – Time of Use Plus	30042, 30043, 26540, 26617, 29448-E
EECC-TBS	EECC – Transitional Bundled Service.....	22903, 22904, 16432, 19750-E
EECC-CPP-D	EECC Critical Peak Pricing Default.....	30044, 30045, 29451, 25514, 29452-E 29453, 25517, 29675, 30046, 30047-E
EECC-CPP-D-AG	EECC, Critical Peak Pricing Default Agricultural	30048, 30049, 30050, 25518, 25519-E 30051, 29462, 29463, 30052, 29465-E
LIST OF CONTRACTS AND DEVIATIONS.....		14296, 5488, 5489, 6205, 6206, 5492-E 16311, 22320, 5495, 6208, 6209, 8845-E 6109, 5902, 5750, 8808, 8809, 6011-E 8001, 8891, 24064, 22533, 28163-E

(Continued)

T, C  
T  
T



**TABLE OF CONTENTS**

Sheet 7

<u>RULE NO.</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>
1	Definitions .....	20584, 20585, 23310, 23700, 20588, 17687, 22066, 18413-E 14854, 24475, 19394, 24671, 24476, 22068-E
2	Description of Service .....	15591-15600, 15601, 15602, 15603, 20415-E
3	Applications for Service .....	15484, 15485-E
4	Contracts .....	15488, 15489, 15490-E
5	Special Information Available for Customers ..	20644, 20645-E
6	Establishment & Re-establishment of Credit...	20223, 25228-E
7	Deposits .....	25229, 20228-E
8	Notices .....	17405-E
9	Rendering and Payment of Bills .....	25230, 29075, 20142, 20143-E
10	Disputed Bills .....	19756-E
11	Discontinuance of Service .....	25231, 25232, 25233, 19693, 25248, 19695 –19697, 22793-E
12	Rates and Optional Rates .....	19399-E
13	Temporary Service .....	19757-E
14	Shortage of Elec Supply/Interruption Divry	4794-E
15	Distribution Line Extensions .....	19758, 11221, 11222, 22237, 13202, 13203, 20417, 12777-E 17074, 17075, 17076, 22238, 22239, 20420-E
16	Service Extensions .....	11233, 22794, 10501, 11235, 11236, 13238-E 11238, 11239, 11240, 19759, 11242, 11243, 11244, 11245-E
17	Meter Reading .....	26153, 20343-E
18	Meter Tests and Adjustment of Bills .....	16585, 22130, 22131-E
19	Supply to Separate Premises and Resale .....	18704, 20591, 26879, 22515-E
20	Replace of OH w/ UG Elec Facilities	25251, 15505, 15506, 15507, 15508-E
21	Interconnection Standards for Non-Utility Owned Generation	27716, 28005-6, 25991, 27718-19, 24948, 28007-10, 24953, 27218-22-E 27720, 27724-29, 28011, 27231, 28012, 27721-27, 28013, 27729-34, 28014-E 28014, 27736-38, 28015-22, 27259-60, 28023-27, 27266-88, 28028-31-E 28975-76, 28095, 28050, 27312, 27319, 28096, 28097, 27322-363-E 28804-809-E
21.1	Final Standard Offer 4 Qualifying Facilities .....	7966-7976, 7977-7986, 7989-E
22	Special Service Charges .....	8713, 8714-E
23	Competition Transition Charge Responsibility .....	19760, 15189, 15190, 15191, 15192, 15123, 10623, 10624-E 10625, 12720, 12721, 12722, 12723, 12724-E
25	Direct Access Rules .....	22714, 23311, 21669-21671, 23312, 21673, 23313, 22715-16-E 23775- 23780, 21683-21691, 23316, 21693, 11915, 20294, 20295-E 11918-11920, 20296, 11922-11924, 20297, 11926, 20298-E 11928-11930-E
25.1	Switching Exemptions .....	23413, 22644, 22727, 22646, 21889, 21699, 21700, 22728-E 23317, 23318, 21704, 28297, 28298, 23416-E 19818-E
25.2	DA Qualified Nonprofit Charitable Org	
27	Community Choice Aggregation .....	19763-19770, 20299, 21898, 19773-76, 21899, 21900, 21901-E 19780, 19781, 26377, 22825, 19784-91, 20300, 22826, 19794-98-E 19799, 19800, 20466, 20467-E
27.2	CCA Open Season	
28	Provision of Utility Right-of-Way Information	14167, 14168, 14169, 14170, 14171-E
29	Third-Party Marketers for BIP	22966, 22967, 22968, 22969, 22970, 22971, 22972, 22973-E
30	Capacity Bidding Program	19658, 19659, 19660, 19661, 19662, 19663-E
31	Participating Load Pilot	21265, 21266, 21267, 21268, 21269, 21270-E
31.1	Demand Response Wholesale Market Pilot	22041, 22042, 22043, 22044, 22045, 22046-E
32	Direct Participation Demand Response	24708, 27076, 27104, 27078, 27079, 27080, 27081, 27105, 27083-E 27084, 27085, 27086, 27087-27090, 27091, 27092, 27093, 27094-E 27095, 24729, 26386, 24731, 27096, 24733-E
33	Privacy & Security – Energy Use Data	23298, 23299, 23300, 23301, 23302, 23303, 23304, 23305-E
40	On-Bill Financing Program	20937-E
41	DR Multiple Program Participation	21501, 21502, 21503, 21504, 21505, 21506-E
43	On-Bill Repayment Pilots	26465, 23976, 26466, 26467, 26468, 26469, 26470-E
44	Mobilehome Park Utility Upgrade Program	29471, 29472, 29473, 29474, 25471- 25474-E

(Continued)





**TABLE OF CONTENTS**

Sheet 8

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements &amp; Contracts</u>	<u>Cal. P.U.C. Sheet No.</u>
101-663A	10-68	Agreement - Bills/Deposits.....	2497-E
101-4152G	6-69	Sign Up Notice for Service.....	1768-E
106-1202	6-96	Contract for Special Facilities.....	9118-E
106-1502C	5-71	Contract for Agricultural Power Service.....	1919-E
106-1959A	5-71	Absolving Service Agreement, _____ Service from Temporary Facilities.....	1921-E
106-2759L	4-91	Agreement for Replacement of Overhead with Underground Facilities.....	7063-E
106-3559	- - -	Assessment District Agreement.....	6162-E
106-3559/1	- - -	Assessment District Agreement.....	6202-E
106-3859	01-01	Request for Service at Secondary/Primary Substation Level Rates.....	14102-E
106-3959	6-96	Contract for Special Facilities Refund.....	9120-E
106-4059	6-96	Contract for Buyout Special Facilities.....	9121-E
106-5140A	10-72	Agreement for _____ Service.....	2573-E
106-15140	5-71	Agreement for Temporary Service.....	1920-E
106-21600	11-14	Agreement for the Purchase of Electrical Energy.....	25563-E
106-36140	11-73	Agreement for Street Lighting - Schedule LS-1.....	2575-E
106-37140	11-73	Agreement for Street Lighting - Schedule LS2-A.....	2576-E
106-38140	11-73	Agreement for Street Lighting - Schedule LS2-B.....	2577-E
106-13140	6-95	General Street Lighting Contract.....	8785-E
106-14140A	1-79	Street Lighting Contract, Supplement.....	3593-E
106-2059A	6-69	Contract for Outdoor Area Lighting Service.....	1773-E
106-23140	9-72	Contract for Residential Walkway Lighting Service.....	2581-E
106-35140E	11-85	Underground Electric General Conditions.....	5547-E
106-39140	9/14	Contract for Unmetered Service Agreement for Energy Use Adjustments for network Controlled Dimmable Streetlights.....	25464-E
106-43140	11-85	Overhead Line Extension General Conditions.....	5548-E
106-44140	1-08	Agreement for Extension and Construction of _____ .....	20421-E
65502	5-04	Statement Of Applicant's Contract Anticipated Cost For Applicant Installation Project.....	17139-E
107-00559	3-98	Proposal to Purchase and Agreement for Transfer of Ownership of Distribution Systems.....	11076-E
116-2001	12-11	Combined Heat & Power System Contract less than 20 MW	22627-E
116-0501	12-11	Combined Heat & Power System Contract less than 5 MW	22628-E
116-0502	06-12	Combined Heat & Power System Contract less than 500kW	22997-E
117-2159B	- - -	Standard Offer for Power Purchase and Interconnection - Qualifying Facilities Under 100 Kw.....	5113-E
117-2160	06-17	Generating Facility Interconnection Agreement (NEM/Non- NEM Generating Facility Export).....	29046-E
117-2160-A	06-17	Generating Facility Interconnection Agreement (NEM/Non- NEM Generating Facility Export) Federal Government Only..	29047-E
117-2259	8-95	Electronic Data Interchange (EDI) and Funds Transfer Agreement.....	8802-E
118-159	7-91	Group Load Curtailment Demonstration Program - Curtailment Agreement .....	7153-E
118-00228	7-98	Agreement for Illuminated Transit Shelters.....	11455-E

(Continued)



**TABLE OF CONTENTS**

Sheet 9

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements &amp; Contracts</u>	<u>Sheet No.</u>
118-459	07-91	Group Load Curtailment Demonstration Program - Peak Capacity Agreement.....	7154-E
118-228	01-11	Operating Entity Agreement for Illuminated Transit Shelters.....	22224-E
118-1228	01-11	Agreement for Illuminated Transit Shelters	22225-E
124-363	- - -	Declaration of Eligibility for Lifeline Rates.....	2857-E
124-463	07-07	Continuity of Service Agreement.....	20126-E
124-463/1	07-07	Continuity of Service Agreement Change Request.....	20127-E
124-1000	09-07	Community Choice Aggregator (CCA) Service Agreement.....	20301-E
124-1010	10-12	Community Choice Aggregator Non-Disclosure Agreement.....	23228-E
124-1020	03-12	Declaration by Mayor or Chief County Administrator Regarding Investigation, Pursuit or Implementation of Community Choice Aggregation.....	22786-E
124-5152F	08-73	Application for Gas/Electric Service.....	2496-E
132-150	05-16	Medical Baseline Allowance Application.....	27490-E
132-150/1	07-02	Medical Baseline Allowance Self-Certification.....	23637-E
132-01199	02-99	Historical Energy Usage Information Release (English).....	11886-E
132-01199/1	02-99	Historical Energy Usage Information Release (Spanish).....	11887-E
132-1259C	06-74	Contract for Special Electric Facilities.....	2580-E
-----		Contract for Electric Service - Agua Caliente – Canebrake.....	1233-E
132-2059C		Resident's Air Conditioner Cycling Agreement.....	4677-E
132-6263	06-07	On-Bill Financing Loan Agreement.....	21100-E
132-6263/1	06-07	On-Bill Financing Loan Agreement for Self Installers.....	21101-E
132-6263/2	11-12	On-Bill Financing Loan Agreement for CA State Government Customers	23268-E
132-6264	08-15	Authorization to Add Charges to Utility Bill.....	26471-E
132-20101	12-10	Affidavit for Small Business Customer.....	22132-E
135-00061	12-00	Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up.....	14001-E
135-559	07-87	Power Line Analysis and/or Engineering Study Agreement.....	5978-E
135-659	10-92	Annual Certification Form - Master Metered Accounts.....	7542-E
139-0001	02-07	Energy Payment Deferral Plan for Citrus & Agricultural Growers...	19981-E
142-00012	02-03	Scheduled Load Reduction Program Contract.....	16102-E
142-140	08-93	Request for Service on Schedule LR.....	7912-E
142-259	07-87	Contract for Service, Schedule S-I (Standby Service - Interruptible).....	5975-E
142-359A	07-87	Contract for Service, Schedule S (Standby Service).....	5974-E
142-459		Agreement for Standby Service.....	6507-E
142-732	04-15	Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program.....	28891-E
142-732/1	04-15	Residential Rate Assistance Application (IVR/System-Gen).....	28892-E
142-732/2	04-15	Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program.....	28893-E
142-732/3	12-15	CARE Program Recertification Application & Statement of Eligibility	28894-E
142-732/4	12-15	CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers.....	28895-E
142-732/5	12-15	CARE Post Enrollment Verification.....	28896-E
142-732/6	04-15	Residential Rate Assistance Application (Vietnamese).....	28897-E
142-732/8	04-15	Residential Rate Assistance Application (Direct Mail).....	28898-E
142-732/10	04-15	Residential Rate Assistance Application (Mandarin Chinese).....	28899-E
142-732/11	04-15	Residential Rate Assistance Application (Arabic).....	28900-E
142-732/12	04-15	Residential Rate Assistance Application (Armenian).....	28901-E
142-732/13	04-15	Residential Rate Assistance Application (Farsi).....	28902-E
142-732/14	04-15	Residential Rate Assistance Application (Hmong).....	28903-E
142-732/15	04-15	Residential Rate Assistance Application (Khmer).....	28904-E
142-00832	04-15	Application for CARE for Qualified Nonprofit Group Living Facilities	28910-E

T  
T  
  
T  
T  
  
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T  
T  
T  
T  
T  
T  
T  
T  
T

(Continued)



**TABLE OF CONTENTS**

Sheet 10

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements &amp; Contracts</u>	<u>Sheet No.</u>
142-732/16	05-16	Residential Rate Assistance Application (Korean).....	27476-E
142-732/17	05-16	Residential Rate Assistance Application (Russian).....	27477-E
142-732/18	05-16	Residential Rate Assistance Application (Tagalog).....	27478-E
142-732/19	05-16	Residential Rate Assistance Application (Thai).....	27479-E
142-740	05-16	Residential Rate Assistance Application (Easy/App)	27596-E
142-959	06-96	Standard Form Contract for Service New Job Incentive Rate Service.....	9129-E
142-1059	06-96	Standard Form Contract for Service New Job Connection Credit.....	9130-E
142-1159	03-94	Standard Form Contract - Use of Rule 20A Conversion Funds to Fund New Job Connection Credit.....	8103-E
142-1359	05-95	Request for Contract Minimum Demand.....	8716-E
142-1459	05-95	Agreement for Contact Closure Service.....	8717-E
142-1559	05-95	Request for Conjunctive Billing.....	8718-E
142-1659	05-95	Standard Form Contract - Credits for Reductions in Overhead to Underground Conversion Funding Levels.....	8719-E
142-01959	01-01	Consent Agreement.....	14172-E
142-02559	01-98	Contract to Permit Billing of Customer on Schedule AV-1 Prior to Installation of all Metering and Equipment Required to Provide a Contract Closure in Compliance With Special Condition 12 of Schedule AV-1.....	11023-E
142-02760	12-12	Interconnection Agreement for Net Energy Metering Solar or Wind Electric Generating Facilities for Other than Residential or Small Commercial of 10 Kilowatts or Less.....	26167-E
142-02760.5	07-14	Interconnection Agreement for Virtual Net Metering (VNM) Photovoltaic Electric Generating Facilities.....	16697-E
142-02762	01-13	Fuel Cell Generating Facility NEM and Interconnection Agreement.....	23444-E
142-02763	10-12	NEM/VNM-A Inspection Report.....	23234-E
142-02765	01-15	NEM Application & Interconnection Agreement for Customers with Solar and/or Wind Electric Generating Facilities of 30 kW or Less.....	26168-E
142-02766	01-15	NEM Application & Interconnection Agreement for Solar and/or Wind Electric Generating Facilities Greater than 30 kW or up to 1000 kW.....	26169-E
142-02768	02-09	Photovoltaic Generation Allocation Request Form.....	21148-E
142-02769	07-14	NEM Aggregation Form.....	25293-E
142-02770	12-12	Generation Credit Allocation Request Form.....	23288-E
142-02771	08-16	Rule 21 Generator Interconnection Agreement (GIA).....	28051-E
142-02772	06-14	Rule 21 Detailed Study Agreement.....	25065-E
142-02773	08-16	Interconnection App for Solar and/or Wind ONLY >30 Kw	29492-E
142-02774	08-16	Interconnection App for Solar and/or Wind ONLY <30 Kw	29493-E
142-3201	- - -	Residential Hotel Application for Residential Rates.....	5380-E
142-3242		Agreement for Exemption from Income Tax Component on Contributions and Refundable Advances.....	6041-E
142-4032	05-14	Application for California Alternate Rates for Energy (CARE) Program for Qualified Agricultural Employee Housing Facilities.....	27482-E
142-4035	06-05	Application for California Alternate Rates for Energy (CARE) Program for Migrant Farm Worker Housing Centers.....	18415-E
142-05200	08-16	Generator Interconnection Agreement for Fast Track Process.....	28054-E
142-05201	08-16	Exporting Generating Facility Interconnection Request.....	28055-E
142-05202	01-01	Generating Facility Interconnection Application Agreement....	14152-E
142-05203	08-16	Generating Facility Interconnection Application.....	28056-E
142-05204	07-16	Rule 21 Pre-Application Report Request.....	27744-E
142-05205	07-02	Optional Binding Mandatory Curtailment Plan Contract.....	17729-E
142-05207	04-06	Base Interruptible Program Contract.....	23043-E
142-05209	04-01	No Insurance Declaration.....	15476-E
142-05210	06-04	Rolling Blackout Reduction Program Contract.....	18273-E
142-05211	06-04	Bill Protection Application.....	18273-E
142-05212	07-03	Demand Bidding Program Non-Disclosure Agreement.....	17152-E
142-05215	04-06	Third Party Marketer Agreement for BIP.....	22975-E

T  
T

(Continued)





**TABLE OF CONTENTS**

Sheet 11

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements and Contracts</u>	<u>Cal. P.U.C. Sheet No.</u>
142-05216	04-06	Notice to Add, Change or Terminate Third Party Marketer for BIP	22976-E
142-05218	07-14	Demand Bidding Program Contract.....	25222-E
142-05218-N	07-14	Demand Bidding Program Day Ahead (Navy Only) Contract.....	26373-E
142-05300	10-06	Capacity Bidding Program Customer Contract.....	19664-E
142-05301	10-06	Aggregator Agreement for Capacity Bidding Program (CBP).....	26161-E
142-05302	10-06	Notice to Add, Change, or Terminate Aggregator for Capacity Bidding Program.....	26162-E
142-05303	10-06	Notice by Aggregator to Add or Delete Customer.....	26163-E
142-05213	07-03	Technical Assistance Incentive Application.....	16568-E
142-05219	02-17	Technical Incentive Program Application.....	28856-E
142-05219/1	02-17	Technical Incentive Program Agreement.....	28857-E
142-0541	06-02	Customer Generation Agreement.....	15384-E
142-0542	06-17	Generating Facility Interconnection Agreement..... (3 <sup>rd</sup> Party Inadvertent Export)	29058-E
142-0543	06-17	Generating Facility Interconnection Agreement..... (3 <sup>rd</sup> Party Non-Exporting)	29059-E
142-0544	06-17	Generating Facility Interconnection Agreement..... (Inadvertent Export)	29060-E
142-0545	06-06	Generating Facility Interconnection Agreement (Continuous Export)...	19323-E
142-0546	05-10	Generation Bill Credit Transfer Allocation Request Form.....	21852-E
142-0600	06-13	Joint IOU Standard Form Re-Mat Power Purchase Agreement.....	23603-E
142-0610	06-13	SDG&E's Final Standard Form Re-Mat PPA	23604-E
143-359		Resident's Agreement for Water Heater Switch Credit.....	3542-E
143-00212		Service Agreement between the Customer and SDG&E for Optional UDC Meter Services.....	11854-E
143-359		Resident's Agreement for Water Heater Switch Credit.....	3542-E
143-459		Resident's Agreement for Air Conditioner or Water Heater Switch.....	3543-E
143-559		Owner's Agreement for Air Conditioner or Water Heater Switch Payment.....	3544-E
143-659		Owner's Agreement for Air Conditioner or Water Heater Switch.....	3545-E
143-759	12-97	Owner's Agreement for Air Conditioner Switch Payment.....	3699-E
143-859	1-99	Occupant's Agreement for Air Conditioner Switch Payment....	3700-E
143-01212		Letter of Understanding between the Customer's Authorized Meter Supplier and SDG&E for Optional UDC Meter Services.....	11855-E
143-1459B	12-97	Thermal Energy Storage Agreement.....	5505-E
143-01759	12-97	Meter Data and Communications Request.....	11004-E
143-01859	2-99	Energy Service Provider Service Agreement.....	10572-E
143-01959	8-98	Request for the Hourly PX Rate Option Service Agreement....	11005-E
143-01959/1	2-99	Request for the Hourly PX Rate Option (Spanish).....	11888-E
143-02059	12-99	Direct Access Service Request (DASR).....	13196-E
143-02159	12-97	Termination of Direct Access (English).....	11889-E
143-02159/1	12-97	Termination of Direct Access (Spanish).....	11890-E
143-2259	12-97	Departing Load Competition Transition Charge Agreement.....	10629-E
143-02359	12-97	Customer Request for SDG&E to Perform Telecommunication Service.....	11007-E
143-02459	12-97	ESP Request for SDG&E to Perform ESP Meter Services.....	11008-E
143-02659	3-98	ESP Request to Receive Meter Installation/Maintenance Charges	11175-E
143-02759	12-17	Direct Access Customer Relocation Declaration.....	29838-E
143-02760	12-12	Six Month Notice to Return to Direct Access Service.....	23319-E
143-02761	01-12	Six Month Notice to Return to Bundled Portfolio Service....	22730-E
143-02762	02-13	Direct Access Customer Assignment Affidavit.....	23432-E
143-02763	04-10	Notice of Intent to Transfer to DA During OEW.....	21709-E

(Continued)

11C5

Advice Ltr. No.	<u>3162-E</u>	Issued by	<b>Dan Skopec</b>	Date Filed	<u>Dec 15, 2017</u>
Decision No.	<u>12-12-026</u>	Vice President	Regulatory Affairs	Effective	<u>Jan 14, 2018</u>
				Resolution No.	_____

T



**TABLE OF CONTENTS**

Sheet 12

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements and Contracts</u>	<u>Cal. P.U.C. Sheet No.</u>
143-02764	02-13	Direct Access Customer Replacement Declaration.....	23701-E
144-0810	03-08	Critical Peak Pricing (CPP) Opt-Out Form.....	20594-E
144-0811	03-09	Capacity Reservation Election.....	21133-E
144-0812	08-13	Event Notification Form.....	23703-E
144-0813	08-13	Future Communications Contact Information Form.....	23704-E
144-0820	01-16	CISR-DRP.....	27106-E
144-0821	01-16	DRP Service Agreement.....	27107-E
165-1000	06-09	Participating Load Pilot Customer Contract.....	21271-E
165-1000/1	06-10	Demand Response Wholesale Market Pilot Customer Contract.....	22047-E
165-1001	06-09	Aggregator Agreement for Participating Load Pilot.....	21272-E
165-1001/1	06-10	Aggregator Agreement for Demand Response Wholesale Market Pilot....	22048-E
165-1002	06-09	Notice to Add, Change or Terminate Aggregator for PLP.....	21273-E
165-1002/1	06-10	Notice to Add, Change or Terminate Aggregator for DRWMP.....	22049-E
165-1003	06-09	Notice by Aggregator to Add or Delete Customers for PLP.....	21274-E
165-1003/1	06-10	Notice by Aggregator to Add or Delete Customers for DRWMP.....	22050-E
175-1000	07-09	Customer Energy Network – Terms and Conditions.....	21298-E
182-1000	11-13	Renewable Energy Credits Compensation Agreement.....	23970-E
183-1000	07-14	PEV Submetering Pilot (Phase I) Customer Enrollment Agreement.....	26187-E
183-2000	07-14	Submeter MDMA Registration Agreement.....	26188-E
185-1000	02-14	Customer Information Service Request Form.....	24202-E
185-2000	12-15	Energy Efficiency Financing Pilot Programs Authorization or Revocation of Authorization to Release Customer Information.....	26941-E
187-1000	04-15	Rule 33 Standard Non-Disclosure Agreement (NDA).....	26294-E
187-2000	04-15	Rule 33 Terms of Service Acceptance Form.....	26295-E
189-1000	11-14	Mobilehome Park Utility Upgrade Agreement.....	25558-E
189-2000	11-14	Mobilehome Park Utility Upgrade Application.....	25559-E
190-1000	10-15	Bioenergy Market Adjusting Tariff Power Purchase Agreement.....	26846-E
190-2000	10-15	Green Tariff Shared Renewables (GTSR) Enhanced Community Renewables (ECR) Program Project Development Tariff Rider and Amendment.....	26874-E
195-1000	05-17	Station Power -Agreement for Energy Storage Devices.....	28966-E
200-1000	09/17	Declaration of Eligibility for Foodbank Discount	29285-E
<u>Deposits, Receipts and Guarantees</u>			
144-0812	03-09	Critical Peak Pricing - Event Notification Information Form .....	21134-E
144-0813	03-09	Critical Peak Pricing - Future Communications Contact Information Form	21135-E
155-100	03-06	Application and Contract for Unmetered Service.....	30273-E
160-1000	10-12	Public Agency and Wastewater Agency Agreement.....	23240-E
160-2000	10-12	Customer Renewable Energy Agreement.....	23241-E
101-00197	09-08	Payment Receipt for Meter Deposit .....	11197-E
101-363	04-98	Guarantor's Statement .....	20604-E
101-1652B	04-08	Receipt of Payment.....	2501-E
103-1750-E	03-68	Return of Customer Deposit.....	2500-E
<u>Bills and Statements</u>			
108-01214	03-14	Residential Meter Re-Read Verification .....	24576-E
110-00432	11-16	Form of Bill - General, Domestic, Power, and Lighting Service - Opening, Closing, and Regular Monthly Statements.....	28256-E
110-00432/2	07-16	Form of Bill - Past Due Format.....	27837-E

(Continued)

12C5

Issued by

Date Filed

Mar 7, 2018

Advice Ltr. No. 3198-E

**Dan Skopec**

Effective

Apr 6, 2018

Decision No. \_\_\_\_\_

Vice President  
Regulatory Affairs

Resolution No. \_\_\_\_\_



**TABLE OF CONTENTS**

Sheet 13

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>		<u>Cal. P.U.C. Sheet No.</u>
<u>Collection Notices (Continued)</u>			
101-00751	08-14	Final Notice Before Disconnect (MDTs).....	25419-E
101-00752	04-11	Final Notice Before Disconnect (delivered).....	22324-E
101-00753	03-14	Back of Urgent Notice Applicable to Forms 101-00753/1 through 101-00753/11.....	24579-E
101-00753/1	04-11	Urgent Notice Payment Request Security Deposit to Establish Credit.....	22325-E
101-00753/2	03-05	Urgent Notice Payment Request Security Deposit to Re-Establish Credit.....	18084-E
101-00753/3	04-11	Urgent Notice Payment Request for Past Due Security Deposit.....	22326-E
101-00753/4	04-11	Urgent Notice Payment Request for Past Due Bill.....	22327-E
101-00753/5	02-04	Urgent Notice Payment Request for Returned Payment.....	16948-E
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill.....	16949-E
101-00753/7	02-04	Urgent - Sign Up Notice for Service.....	16950-E
101-00753/8	02-04	Reminder Notice – Payment Request for Past Due Bill.....	16951-E
101-00753/9	02-04	Closing Bill Transfer Notification.....	16952-E
101-00753/10	03-14	Payment Agreement Confirmation.....	24580-E
101-00753/11	02-04	ESP Reminder Notice – Payment Request for Past Due Bill.....	16954-E
101-00754	03-14	Final Notice Before Disconnection (mailed), Notice of Past Due Closing Bill, and Notice of Past Due Closing Bill Final Notice.....	24581-E
101-01071	04-11	Notice of Disconnect (delivered).....	22330-E
101-01072	08-14	Notice of Disconnect (delivered).....	25420-E
101-01073	05-14	Notice of Shut-off (Mailed).....	24851-E
101-02171	05-10	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units).....	21885-E
101-02172	03-14	Notice of Disconnect (MDTs).....	24582-E
101-2452G	02-04	Notice to Tenants - Request for Termination of Gas and Electric Service Customer Payment Notification.....	16959-E
<u>Operation Notices</u>			
101-2371	11-95	No Access Notice.....	8826-E
101-3052B	3-69	Temporary "After Hour" Turn On Notice.....	2512-E
101-15152B	3-69	Door Knob Meter Reading Card.....	2515-E
107-04212	4-99	Notice of Temporary Electric Service Interruption (English & Spanish).....	12055-E
115-00363/2	9-00	Sorry We Missed You.....	13905-E
115-002363	9-00	Electric Meter Test.....	13906-E
115-7152A		Access Problem Notice.....	3694-E
124-70A		No Service Tag.....	2514-E

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Advice Ltr. No. 2734-E

Decision No. D.14-05-016

Issued by  
**Lee Schavrien**  
Senior Vice President  
Regulatory Affairs

Date Filed Apr 28, 2015

Effective May 1, 2015

Resolution No. \_\_\_\_\_

# **ATTACHMENT C**

## **STATEMENT OF PROPOSED RATES**

## ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

The charts shown below illustrate the changes in rates that would result from CPUC approval of this application, compared to current rate levels.

If the CPUC approves SDG&E's application, a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours per month could see a monthly winter bill decrease of 5.0%, or \$6.87, from a typical current monthly bill of \$137.38 to \$130.51.

The first table below provides illustrative bill changes for bundled customers, while the second table presents illustrative bill changes for DA customers. For DA customers who do not pay commodity, the Utility Distribution Company (UDC) rate changes on a class average basis are presented below. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

### SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC BUNDLED RATE DECREASE (TOTAL RATES INCLUDE UDC<sup>1</sup> AND COMMODITY<sup>2</sup>)

Customer Class	Class Average Rates Effective 01/01/2018 <sup>3</sup> (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Decrease Per application (¢/kWh)	Total Rate Decrease (¢/kWh)	Percentage Rate Decrease (%)
<b>Residential</b>	27.561	26.183	(1.378)	-5.00%
<b>Small</b>	26.242	24.918	(1.324)	-5.05%
<b>Commercial</b>				
<b>Medium and Large C&amp;I<sup>4</sup></b>	21.385	20.152	(1.233)	-5.77%
<b>Agricultural</b>	19.468	18.271	(1.197)	-6.15%
<b>Lighting</b>	21.635	20.739	(0.896)	-4.14%
<b>System Total</b>	23.997	22.686	(1.311)	-5.46%

<sup>1</sup> UDC rates include Department of Water Resources (DWR) Bond Charge.

<sup>2</sup> Commodity rates include DWR Power Charge credit.

<sup>3</sup> Rates effective 1/1/18 per Advice Letter (AL) 3167-E.

<sup>4</sup> C&I stands for Commercial and Industrial.

**SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC UDC<sup>1</sup>  
RATE INCREASE**

<b>Customer Class</b>	<b>Class Average Rates Effective 01/01/18<sup>2</sup> (¢/kWh)</b>	<b>Class Average Rates Reflecting Proposed Revenue Increase Per application (¢/kWh)</b>	<b>Total Rate Increase (¢/kWh)</b>	<b>Percentage Rate Increase (%)</b>
<b>Residential Small</b>	16.054	16.261	0.207	1.29%
<b>Commercial Medium and Large C&amp;I<sup>3</sup></b>	14.947	15.057	0.110	0.74%
<b>Agricultural</b>	9.878	9.990	0.112	1.13%
<b>Lighting</b>	9.891	9.967	0.076	0.77%
<b>System Total</b>	14.020	14.174	0.154	1.10%
	12.575	12.718	0.143	1.14%

<sup>1</sup> UDC rates include DWR Bond Charge.

<sup>2</sup> Rates effective 1/1/18 per AL 3167-E.

<sup>3</sup> C&I stands for Commercial and Industrial.

**ATTACHMENT D**

**COST OF PROPERTY AND DEPRECIATION RESERVE**

**SAN DIEGO GAS & ELECTRIC COMPANY**

**COST OF PROPERTY AND  
DEPRECIATION RESERVE APPLICABLE THERETO  
AS OF SEPTEMBER 30, 2017**

<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>173,853,295.61</u>	<u>100,757,286.73</u>
	TOTAL INTANGIBLE PLANT	<u>174,076,136.97</u>	<u>100,960,187.03</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	96,426,870.08	45,809,590.00
312	Boiler Plant Equipment	170,106,000.10	77,532,091.53
314	Turbogenerator Units	138,276,524.45	53,328,056.32
315	Accessory Electric Equipment	85,828,855.55	38,538,182.32
316	Miscellaneous Power Plant Equipment	48,921,056.89	12,552,954.74
	Steam Production Decommissioning	<u>0.00</u>	<u>0.00</u>
	TOTAL STEAM PRODUCTION	<u>554,085,825.36</u>	<u>227,807,393.20</u>
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	27,285,711.08	2,658,162.87
322	Boiler Plant Equipment	243,225,717.06	21,662,290.99
323	Turbogenerator Units	26,982,364.66	2,370,893.39
324	Accessory Electric Equipment	10,878,214.63	1,458,232.53
325	Miscellaneous Power Plant Equipment	166,754,468.81	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	<u>(475,126,476.33)</u>	<u>(76,957,383.29)</u>
	TOTAL NUCLEAR PRODUCTION	<u>(0.09)</u>	<u>0.00</u>
340.1	Land	224,368.91	0.00
340.2	Land Rights	56,032.61	10,749.79
341	Structures and Improvements	22,998,376.59	7,920,554.57
342	Fuel Holders, Producers & Accessories	21,368,232.01	7,222,009.82
343	Prime Movers	94,575,339.90	37,439,185.01
344	Generators	363,096,532.25	143,974,857.00
345	Accessory Electric Equipment	32,510,919.85	13,634,825.82
346	Miscellaneous Power Plant Equipment	<u>28,737,787.92</u>	<u>14,073,088.26</u>
	TOTAL OTHER PRODUCTION	<u>563,567,590.04</u>	<u>224,275,270.27</u>
	TOTAL ELECTRIC PRODUCTION	<u>1,117,653,415.31</u>	<u>452,082,663.47</u>



<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	72,885,534.18	0.00
350.2	Land Rights	161,003,639.68	21,843,806.50
352	Structures and Improvements	493,795,041.52	70,379,588.29
353	Station Equipment	1,532,187,648.29	303,172,828.94
354	Towers and Fixtures	895,325,171.21	169,719,035.57
355	Poles and Fixtures	523,088,584.70	103,621,800.13
356	Overhead Conductors and Devices	603,020,523.48	231,204,138.49
357	Underground Conduit	359,887,249.66	59,181,093.59
358	Underground Conductors and Devices	377,369,140.09	58,242,015.97
359	Roads and Trails	315,987,111.57	32,067,795.45
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	<b>TOTAL TRANSMISSION</b>	<b>5,334,549,644.38</b>	<b>1,049,432,102.93</b>
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	86,479,481.17	42,133,980.29
361	Structures and Improvements	4,650,797.97	1,801,462.69
362	Station Equipment	513,755,796.72	182,003,577.12
363	Storage Battery Equipment	118,782,258.39	14,025,173.10
364	Poles, Towers and Fixtures	702,054,263.80	271,602,010.57
365	Overhead Conductors and Devices	664,497,338.22	212,012,383.15
366	Underground Conduit	1,220,991,318.98	481,636,260.78
367	Underground Conductors and Devices	1,521,381,120.58	908,791,483.69
368.1	Line Transformers	615,728,544.51	156,029,397.11
368.2	Protective Devices and Capacitors	35,586,463.68	6,983,094.16
369.1	Services Overhead	157,001,427.50	118,824,004.14
369.2	Services Underground	349,772,158.00	246,864,997.53
370.1	Meters	192,127,177.87	86,929,608.28
370.2	Meter Installations	56,342,857.93	22,734,114.70
371	Installations on Customers' Premises	9,096,091.24	10,329,022.94
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	30,290,377.74	19,198,434.24
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>6,294,713,702.10</b>	<b>2,781,899,004.49</b>
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	42,751,891.65	24,800,134.11
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	15,475.12
393	Stores Equipment	2,940.48	2,781.68
394.1	Portable Tools	26,920,293.82	8,847,442.99
394.2	Shop Equipment	278,147.42	198,328.08
395	Laboratory Equipment	5,152,106.01	648,939.97
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	281,213,449.55	113,370,644.90
398	Miscellaneous Equipment	7,630,452.47	1,294,011.38
	<b>TOTAL GENERAL PLANT</b>	<b>371,380,098.54</b>	<b>149,345,144.11</b>
101	<b>TOTAL ELECTRIC PLANT</b>	<b>13,292,372,997.30</b>	<b>4,533,719,102.03</b>

<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
	TOTAL INTANGIBLE PLANT	<u>86,104.20</u>	<u>86,104.20</u>
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
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	2,242,164.87	1,154,420.56
	TOTAL STORAGE PLANT	<u>2,242,164.87</u>	<u>1,154,420.56</u>
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,418,275.80
366	Structures and Improvements	19,300,808.67	10,323,836.04
367	Mains	232,589,901.62	79,892,076.06
368	Compressor Station Equipment	90,884,464.97	69,778,064.10
369	Measuring and Regulating Equipment	23,394,274.74	16,993,255.73
371	Other Equipment	1,790,612.34	31,126.74
	TOTAL TRANSMISSION PLANT	<u>374,841,497.89</u>	<u>178,436,634.47</u>
374.1	Land	1,083,616.95	0.00
374.2	Land Rights	8,331,838.10	7,028,107.40
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,077,139,734.63	381,310,688.56
378	Measuring & Regulating Station Equipment	18,076,116.89	8,344,831.83
380	Distribution Services	279,305,858.30	296,870,962.29
381	Meters and Regulators	158,677,113.71	59,423,629.40
382	Meter and Regulator Installations	103,639,405.40	42,029,010.17
385	Ind. Measuring & Regulating Station Equipm	1,516,810.70	1,223,550.98
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,402,088.90	5,202,530.59
	TOTAL DISTRIBUTION PLANT	<u>1,659,216,030.49</u>	<u>801,494,564.32</u>

<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	44,627.10	44,627.23
394.1	Portable Tools	10,310,176.87	3,877,603.58
394.2	Shop Equipment	53,038.12	29,779.24
395	Laboratory Equipment	0.00	(7,344.15)
396	Power Operated Equipment	16,162.40	10,320.96
397	Communication Equipment	2,175,724.02	691,112.64
398	Miscellaneous Equipment	466,038.81	84,466.10
	TOTAL GENERAL PLANT	<u>13,065,767.32</u>	<u>4,756,068.60</u>
101	TOTAL GAS PLANT	<u>2,049,451,564.77</u>	<u>985,927,792.15</u>
<b>COMMON PLANT</b>			
303	Miscellaneous Intangible Plant	430,129,671.50	289,012,973.72
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	857,384.59	27,776.34
390	Structures and Improvements	379,414,111.54	154,139,377.79
391.1	Office Furniture and Equipment - Other	35,076,061.00	13,247,708.82
391.2	Office Furniture and Equipment - Computer E	34,541,735.76	11,781,563.55
392.1	Transportation Equipment - Autos	406,418.22	(264,738.47)
392.2	Transportation Equipment - Trailers	107,976.46	(5,404.50)
393	Stores Equipment	345,381.86	13,382.44
394.1	Portable Tools	1,446,233.62	403,559.59
394.2	Shop Equipment	142,759.33	87,644.08
394.3	Garage Equipment	1,607,265.62	293,547.37
395	Laboratory Equipment	1,925,371.62	883,510.42
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	168,721,437.76	66,286,510.31
398	Miscellaneous Equipment	2,230,872.92	355,277.96
118.1	TOTAL COMMON PLANT	<u>1,064,121,596.36</u>	<u>536,069,710.32</u>
	TOTAL ELECTRIC PLANT	13,292,372,997.30	4,533,719,102.03
	TOTAL GAS PLANT	2,049,451,564.77	985,927,792.15
	TOTAL COMMON PLANT	<u>1,064,121,596.36</u>	<u>536,069,710.32</u>
101 & 118.1	TOTAL	<u>16,405,946,158.43</u>	<u>6,055,716,604.50</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	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>
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-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,540,513.52)	(1,540,513.52)
		<u>(1,540,513.52)</u>	<u>(1,540,513.52)</u>
101	Accrual for Retirements		
	Electric	(4,487,613.12)	(4,487,613.12)
	Gas	(119,823.92)	(119,823.92)
		<u>(4,607,437.04)</u>	<u>(4,607,437.04)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE		
		<u>(4,607,437.04)</u>	<u>(4,607,437.04)</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	16,388,764.14
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>16,388,764.14</u>
	TOTAL PLANT LEASED TO OTHERS		
		<u>85,194,000.02</u>	<u>16,388,764.14</u>
105	Plant Held for Future Use		
	Electric	4,941,794.28	0.00
	Gas	0.00	0.00
		<u>4,941,794.28</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE		
		<u>4,941,794.28</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,057,778,627.52	
	Gas	115,796,735.80	
	Common	162,811,269.30	
		<u>1,336,386,632.62</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS		
		<u>1,336,386,632.62</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	1,040,589,155.49
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,040,589,155.49
101.1	ELECTRIC CAPITAL LEASES	1,352,823,281.00	255,026,794.00
118.1	COMMON CAPITAL LEASE	21,664,770.35	20,855,546.16
		1,374,488,051.35	275,882,340.16
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	17,240,858.67	(1,035,943,589.77)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	84,742,931.67	36,274,061.81
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,544,599,334.35)
	TOTAL FAS 143	101,983,790.34	(2,544,268,862.31)
	UTILITY PLANT TOTAL	19,302,792,476.48	4,838,160,051.42

**ATTACHMENT E**  
**SUMMARY OF EARNINGS**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**SUMMARY OF EARNINGS**  
**Nine Months Ended September 30, 2017**  
**(\$ IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$ 3,387
2	Operating Expenses	<u>3,018</u>
3	Net Operating Income	<u><u>\$ 369</u></u>
4	Weighted Average Rate Base	\$ 8,387
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

Department of U.S. Administration  
General Services Administration  
300 N. Los Angeles St. #3108  
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 San Diego  
Attn. Mayor  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

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

County of San Diego  
Attn. County Counsel  
1600 Pacific Hwy  
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

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 Attorney  
1 Civic Center Dr.  
San Marcos, CA 92069

City of San Marcos  
Attn. City Clerk  
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

**ATTACHMENT G**

**GHG REVENUE AND RECONCILIATION FORM  
(ATTACHMENT D of DECISIONS D.14-10-033  
and D.15-01-024)**

## **GHG Revenue and Reconciliation Application Form**

### *Notes:*

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Appendix D of the Proposed Decision mailed 9/12/14 in A.13-08-002 et al. Appendix D provides specific information on reporting methodology and confidentiality treatment of data.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

For Template D-4, each utility must provide the data in spreadsheet format, but may modify the template as appropriate to present the requested information by rate schedule.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	2013		2014		2015		2016		2017		2018		2019	
	Forecast	Recorded	Forecast <sup>1</sup>	Recorded	Forecast <sup>1</sup>	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast <sup>1</sup>	Recorded <sup>1</sup>	Forecast	Recorded
1. Proxy GHG Price (\$/MT)														
2. Allocated Allowances (MT)	6,919,341	6,919,341	6,549,142	6,549,142	6,426,430	6,406,805	6,406,805	6,406,805	6,460,042	6,460,042	6,288,321	N/A	N/A	6,186,936
3. Revenues														
4. Prior Balance														
5. Allowance Revenue	(\$103,302,000)	(\$82,453,505)	(\$94,570,000)	(\$76,756,698)	(\$77,695,500)	(\$79,929,224)	(\$84,121,350)	(\$81,538,628)	(\$92,539,677)	(\$98,286,457)	(\$98,286,457)	(\$97,382,373)	(\$97,382,373)	(\$97,382,373)
6. Interest	\$0	(\$49,626)	(\$28,773)	(\$47,002)	(\$76,463)	\$24,203	\$24,203	\$15,193	\$96,857	\$65,917	\$91,282	\$91,282	\$91,282	(\$10,803)
7. Franchise Fees and Uncollectibles	\$0	\$0	(\$1,771,359)	(\$1,066,341)	(\$1,900,048)	(\$661,289)	(\$1,066,495)	(\$661,289)	(\$1,013,589)	(\$991,175)	(\$1,066,881)	(\$1,066,881)	(\$1,063,375)	(\$1,063,375)
8. Subtotal Revenues	(\$103,302,000)	(\$82,503,131)	(\$96,444,632)	(\$77,823,041)	(\$79,595,552)	(\$80,719,665)	(\$83,187,845)	(\$82,199,917)	(\$91,549,091)	(\$98,120,777)	(\$99,414,118)	(\$100,114,944)	(\$100,691,110)	(\$100,691,110)
9. Expenses														
10. Outreach and Administrative Expenses <sup>3</sup>	\$1,227,500	\$0	\$187,500	\$801,369	\$334,835	\$334,989	\$80,036	\$80,994	(\$2,063)	(\$369)	\$48,463	\$48,463	\$47,500	\$47,500
11. Franchise Fees and Uncollectibles	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12. Interest	\$0	\$0	\$0	(\$119)	\$0	(\$154)	\$0	(\$958)	\$0	(\$1,694)	\$0	\$0	\$0	\$0
13. Subtotal Expenses	\$1,227,500	\$0	\$187,500	\$801,250	\$334,835	\$334,835	\$80,036	\$80,036	(\$2,063)	(\$2,063)	\$48,463	\$48,463	\$47,500	\$47,500
14. Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs <sup>4</sup>	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,281,995	\$0	\$10,300,000	\$10,300,000	\$9,738,237	\$9,738,237
15. Net GHG Revenues (Line 8 + Line 13 - Line 14)	(\$102,074,500)	(\$82,503,131)	(\$96,257,132)	(\$77,924,410)	(\$79,595,552)	(\$80,719,665)	(\$83,187,845)	(\$82,199,917)	(\$91,549,091)	(\$98,120,777)	(\$99,414,118)	(\$100,114,944)	(\$100,691,110)	(\$100,691,110)
16. GHG Revenues to be Distributed in Future Years	\$0	\$0	\$51,037,250	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17. Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(\$102,074,500)	(\$82,503,131)	(\$45,219,882)	(\$77,924,410)	(\$79,595,552)	(\$80,719,665)	(\$83,187,845)	(\$82,199,917)	(\$91,549,091)	(\$98,120,777)	(\$99,414,118)	(\$100,114,944)	(\$100,691,110)	(\$100,691,110)
18. GHG Revenue Returned to Eligible Customers	\$0	\$0	\$1,588,553	\$0	\$0	\$0	\$4,238,010	\$2,999,416	\$760,200	\$668,775	\$669,179	\$669,179	\$464,512	\$464,512
19. ETE Customer Return <sup>5,6,7</sup>	\$0	\$0	\$10,982,219	\$11,533,823	\$6,954,493	\$13,247,750	\$3,648,498	\$4,062,479	\$2,701,990	\$3,100,138	\$3,638,944	\$3,638,944	\$3,876,971	\$3,876,971
20. Small Business Volumetric Return	\$0	\$0	\$45,915,031	\$35,982,852	\$31,314,308	\$39,050,655	\$0	\$1,767,675	\$0	(\$3,550)	\$0	\$0	\$0	\$0
21. Residential Volumetric Return	\$0	\$0	\$58,480,803	\$47,116,675	\$39,653,361	\$52,298,405	\$7,886,508	\$8,429,148	\$3,462,190	\$3,765,363	\$4,308,123	\$4,308,123	\$4,341,483	\$4,341,483
22. Subtotal ETE + Volumetric Returns	\$0	\$0	\$114,384,595	\$94,633,348	\$77,968,064	\$94,347,218	\$11,321,024	\$12,626,171	\$6,625,273	\$6,831,793	\$7,616,266	\$7,616,266	\$7,616,266	\$7,616,266
23. Number of Households Eligible for the California Climate Credit	\$0.00	\$0.00	\$36.24	\$36.24	\$23.99	\$23.99	\$17.44	\$17.44	\$29.62	\$29.62	\$33.55	\$33.55	\$33.55	\$33.55
24. Per-Household Semi-Annual Climate Credit <sup>8</sup>	(\$0.5 x (Line 17 + 22) ÷ Line 23)													
25. Revenue Distributed for the Climate Credit	\$0	\$0	\$88,739,079	\$94,702,116	\$58,729,139	\$79,138,793	\$46,570,284	\$46,001,913	\$77,865,656	\$78,837,566	\$88,900,639	\$88,900,639	\$86,563,889	\$86,563,889
26. Revenue Balance (Line 15 + Line 22 + Line 25)	N/A	(\$82,503,131)	N/A	(\$18,393,131)	N/A	\$31,892,368	N/A	\$4,334,942	N/A	(\$6,529,128)	N/A	(\$2,233,959)	N/A	N/A

<sup>1</sup> Includes 50% of 2013 allowance revenues and expenses.

<sup>2</sup> Recorded data is equal to forecast and will be updated with the November Update Filing.

<sup>3</sup> Forecasted Outreach & Administrative Expenses are the forecasted expenses from Template D-3 adjusted for any forecasted prior year's under/over-collection in the GHGCOENA and GHGACMA.

<sup>4</sup> The 2017 recorded column includes the Multifamily Program set aside consistent with the March 18, 2016 Administrative Law Judge ruling in the Development of a Successor to Net Energy Metering proceeding (Rulemaking 14-07-002). The 2018 forecasted column represents the October 24, 2017 AJU email ruling directing SDG&E to file an updated calculation of the amount attributable to Senate Bill 92.

<sup>5</sup> SDG&E's forecasted 2016 ETE Customer Return represents Prior Year ETE Customer Return of \$2,968,113 to be distributed in 2016, as well as the 2016 forecasted ETE Customer Return of \$1,269,887.

<sup>6</sup> In accordance with the methodology approved in D. 15-01-024, the ETE Customer Return forecast for 2017 includes: a) 2016 ETE return, b) the 8-1-16 FF&U factor applied to the 2016 ETE return, and c) the 9-1-17 FF&U for ETE returns from 2013 to 2016.

<sup>7</sup> In accordance with D.15-01-024, the 2018 ETE Customer Return forecast includes the 2016 revenue returned to ETE customers and will be updated with the November update.

<sup>8</sup> Due to timing in receiving approval of D.15-03-019, the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household. The October residential CCC was based on the authorized 2015 residential CCC of \$23.99 per household.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016		2017		2018		2019	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)														
2	Utility Owned Generation (UOG)														
3	Tolling Agreements														
4	Energy Imports (Specified)														
5	Energy Imports (Unspecified)														
6	RPS Adjustment														
7	Qualifying Facility (QF) Contracts														
8	Contract with Financial Settlement														
9	Subtotal														
9	Indirect GHG Emissions (MTCO2e)														
10	CAISO Market Purchases														
11	Contract Purchases														
12	Subtotal														
13	Total Emissions (MTCO2e)	5,596,398	5,678,547	5,473,713	5,590,681	4,811,519	5,013,119	4,203,567	4,545,471	4,243,313	3,881,870	3,879,511	3,879,511	3,824,027	-
14	Proxy GHG Price (\$/MT)	\$17.35	\$13.57	\$14.44	\$12.04	\$12.09	\$12.79	\$13.13	\$12.84	\$13.23	\$14.57	\$15.63	\$15.63	\$15.74	
15	GHG Costs (\$)														
16	Direct GHG Costs <sup>1</sup>														
17	Direct GHG Costs - Financial Settlement														
18	Indirect GHG Costs														
19	Previous Year's Forecast Reconciliation <sup>2</sup>														
20	Total Costs (\$)	\$89,750,005	\$61,221,829	\$61,715,000	\$64,361,474	\$32,289,561	\$24,934,218	\$47,848,837	\$39,973,966	\$48,264,166	\$28,671,382	\$41,043,967	\$41,043,967	\$60,190,181	\$0
21	Forecast Variance <sup>3</sup> (\$)	N/A	(\$28,528,177)	N/A	\$2,646,474	N/A	(\$7,355,343)	N/A	(\$7,874,871)	N/A	(\$19,592,784)	N/A	\$0	N/A	(\$60,190,181)

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<sup>1</sup>Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes

<sup>2</sup>The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition, due to updates to recorded 2013 and 2014 amounts, this figure has been updated.

<sup>3</sup>Also reflects adjustment for shift in regulatory accounting from cash to accrual

**Template D-3: Detail of Outreach and Administrative Expenses**

Line Description	2013		2014		2015		2016		2017		2018		2019	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded <sup>1</sup>	Forecast	Recorded
<b>1 Utility Outreach</b>														
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-	-	-	-	-
3 Other (Consultant) <sup>2,5</sup>	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-	-	-	-	-
<b>5 Utility Administrative</b>														
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	30,912	-	-	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	-	-	-	-	-
9 Marketing - SDG&E (email, bill insert) <sup>3</sup>	-	N/A	35,000	33,699	35,000	51,342	35,000	25,512	35,000	26,809	47,500	47,500	47,500	47,500
10 Other <sup>4</sup>	-	N/A	12,500	12,500	12,500	-	12,500	-	12,500	2,361	-	-	-	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	56,424	47,500	34,770	47,500	47,500	47,500	47,500
<b>Utility Outreach and Administrative Expenses (Line 4 + Line 11)</b>	477,500	N/A	47,500	133,081	47,500	88,683	47,500	56,424	47,500	34,770	47,500	47,500	47,500	47,500
<b>13 Additional (Non-Utility) Statewide Outreach</b>	750,000	N/A	140,000	750,000	140,000	-	140,000	-	140,000	-	140,000	140,000	187,500	140,000
<b>14 Total Outreach and Administrative Expenses (Line 12 + Line 13)</b>	1,227,500	-	187,500	883,081	187,500	88,683	187,500	56,424	187,500	34,770	187,500	187,500	187,500	47,500

<sup>1</sup> Recorded data is equal to forecast and will be updated with the November Update Filing.

<sup>2</sup> 2013 forecasted expenses were revised from D.13-12-041 to shift the \$52.5k for Targetbase costs from admin to outreach pursuant to Resolution E-4611.

<sup>3</sup> 2014 forecasted expenses were revised from D.13-12-041 to shift the \$35k for marketing from outreach to administration pursuant to Resolution E-4611.

<sup>4</sup> Direct labor costs associated with: (1) Subsequent pricing and credit updates to the billing system; (2) customer eligibility review and verification process; (3) Manual set-up and maintenance required for the identified ETE customers; and (4) Monitoring of check cutting activities related to Net Energy Metering customers.

<sup>5</sup> Bill inserts and emails costs of \$19,540 booked to GHGCOEMA in April/May/December 2014 were transferred to GHGACMA in October 2015.



Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Status (Open/Closed) (B)	Bundled Customers				Unbundled Customers				Total
		Forecast MWh Sales (MWh) (C)	Forecast GHG Revenue Req (\$) <sup>1</sup> (D)	Rate Impact (\$/kWh) <sup>2</sup> (E)	Forecast GHG Revenue (\$) (F)	Forecast MWh Sales (MWh) (G)	Forecast GHG Revenue Req (\$) <sup>1</sup> (H)	Rate Impact (\$/kWh) <sup>2</sup> (I)	Forecast GHG Revenue (\$) (J)	Forecast GHG Revenue (\$) (K-F+J)
<b>Residential</b>		6,510,592	\$ 26,092,422	0.00401	\$ 86,476,353	8,739	N/A	N/A	\$ 87,536	\$ 86,563,890
DR	Open									
DR-LI	Open									
TOU-DR-E1	Open									
TOU-DR-E2	Open									
TOU-DR-E3	Open									
TOU-DR	Open									
DM	Open									
DS	Closed									
DT	Closed									
DT-RV	Open									
DR-TOU	Open									
DR-SES	Open									
EV-TOU	Open									
EV-TOU-2	Open									
<b>Small Commercial</b>		2,221,722	\$ 8,085,111	0.00364	\$ 3,701,208	20,393	N/A	N/A	\$-	\$ 3,701,208
A	Closed									
TOU-A	Open									
ATC	Open									
A-TOU	Open									
UM	Open									
<b>Med/Large C&amp;I<sup>3</sup></b>		6,649,689	\$ 25,605,679	0.00385	\$ 363,962	3,508,572	N/A	N/A	\$ 228,961	\$ 592,923
AD	Closed									
AD-TOU	Closed									
AL-TOU	Open									
AY-TOU	Closed									
DGR	Open									
A6-TOU	Open									
OL-TOU	Open									
VGI	Open									
<b>Agricultural</b>		276,320	\$ 913,350	0.00331	\$ 47,352	24,063	N/A	N/A	\$-	\$ 47,352
PA	Closed									
TOU-PA	Open									
PA-T-1	Open									
<b>Streetlighting</b>		84,642	\$ 224,617	0.00265	\$-	107	N/A	N/A	\$-	\$-
LS-1	Open									
LS-2	Open									
LS-3	Open									
OL-1	Open									
OL-2	Open									
DWL	Open									
<b>System Total</b>		15,742,966	\$ 60,921,179	0.00387	\$ 90,588,876	3,561,875	N/A	N/A	\$ 316,497	\$ 90,905,373

<sup>1</sup>In accordance with Section 2.5. of the Amended Joint Investor - Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap and-trade costs incurred will be captured as part of the larger ERRR true-up process. SDG&E will true-up total ERRR balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRR Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column D does not include a GHG cost reconciliation.

<sup>2</sup>Rate impacts are based on customer class.

<sup>3</sup>The VGI rate is based on the Medium and Large Commercial and Industrial rate.

**Template D-5: History of Revenue, Costs, and Emissions Intensity**

Line	Information	2013	2014	2015	2016	2017 (forecast)	2018 (forecast)	2019 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,409,838	\$56,269,888	\$50,636,186	\$60,636,751	\$60,190,181
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$81,558,628)	(\$92,539,677)	(\$98,286,457)	(\$97,382,373)
3	Emissions Intensity (MTCO/MWh) *	0.322	0.284	0.269	0.242			

\* SDG&E Emissions Intensities are calculated based on renewable energy consumed and RECs associated with consumption in that year. It is not adjusted for RPS Compliance banking or modifications to RPS Adjustments in that year.

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