BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of San Diego Gas & Electric Company (U 902 M) for Approval of The SDG&E Solar Energy Project	Application 08-07- **A0807017**

APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) FOR APPROVAL OF THE SDG&E SOLAR ENERGY PROJECT

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I.
INTRODUCTION

In compliance the California Public Utilities' Commission's ("Commission" or "CPUC") Rules of Practice and Procedure Rule 3.2, consistent with and in support of State policy and addressing a particular part of the photovoltaic ("PV") market which, to this point, has been undeveloped, San Diego Gas & Electric Company ("SDG&E") requests the Commission to approve the SDG&E Solar Energy Project. SDG&E expects that this proposal will result in up to 77 MW_{dc} of new installed solar capacity in the San Diego load basin. This proposal is designed in such a way so that roughly two-thirds will be built, owned and operated by SDG&E and one-third will be owned by host customers or independent third parties. For SDG&E's portion of the project, SDG&E proposes to build, own and operate up to 52[1] megawatts ("MW") direct current ("dc") of distribution-connected solar photovoltaic ("PV") generating facilities in

[1] The direct current capacity reporting basis is frequently utilized in the PV industry to report PV system output. If capacity is expressed on an alternating current (ac) basis the dc to ac conversion will be based on the CEC conversion of 1watt (dc) = 0.67 watt (ac) detailed as follows:
A Guide to Photovoltaic (PV) System Design and Installation, CEC 2001, pg. 8-9

DC to AC inverter conversion:	.90
Production tolerance derate:	.95
Temperature derate:	.89
Dirt & dust derate:	.93
Mismatch & wiring derate:	.95
Total (product):	.67

Using this conversion factor, 52 MW_{dc} equates to approximately 35 MW_{ac}.

SDG&E's load basin with a spending cap of $250 million over a five year period. SDG&E further expects that the opportunities the SDG&E Solar Energy Project will create for customers to co-construct solar PV facilities with SDG&E under this proposal may result in the installation of up to an additional 25 MW_{dc} of capacity under the California Solar Initiative ("CSI") that would not have otherwise been built. In total, this proposal may result in up to 77 MW_{dc} of new installed solar capacity in the San Diego load basin. SDG&E Solar Energy Project consists of multiple individual installations of solar PV generating facilities each in the 1 - 2 MW_{ac}[2] size range. SDG&E plans to utilize tracking technology that will maximize a PV system output coincident with the predicted SDG&E system peak. SDG&E proposes to partner with hosts offering sites with open areas and parking lots, such as shopping malls and local governments, and with solar industry vendors and installers. The open areas and parking lots of the host partners offer particular advantages in that they are located close to SDG&E's load areas and are in close proximity to locations where SDG&E's distribution system can accommodate systems of 1 – 2 MW_{ac} in size. SDG&E also proposes to issue a competitive solicitation for the equipment and installation of the systems.

As discussed in greater detail below and in the testimony served concurrently herewith and incorporated by reference, this Application asks the Commission to:

1. Approve SDG&E's Solar Energy Project Application which would authorize SDG&E to spend up to $250 million to build, own, maintain and operate up to 52 MW_{dc} of utility-owned solar photovoltaic generating facilities of approximately 1 to 2 MW_{ac} each from 2009 through 2013.
2. Approve SDG&E's request for funding to support the SDG&E Solar Energy Project in

[2] While 1-2 MW_{ac} is the primary target range, installations could be larger depending on specific site conditions.

the amounts of $214,000 in 2008 and $1,662,000 for each year from 2009 until included in the base margin generation revenue requirement after SDG&E's 2012 GRC for annual administration and preliminary development costs.

3. Find that SDG&E's proposed Tier 3 advice letter approval process is reasonable.

II.
BACKGROUND

A. Existing State Policy

California state policy is to increase the use of renewable energy in many ways. The renewable portfolio standard ("RPS") program, which requires 20% of retail electric sales be served by renewable resources by 2010, is foundational. Building on this, Governor Schwarzenegger signed landmark legislation establishing the Million Solar Roofs Plan or CSI, to develop 3,000 MW of rooftop solar photovoltaic installations by 2016.

More recently, the State set forth greenhouse gas ("GHG") emission reduction targets by enacting Assembly Bill ("AB") 32 to reduce statewide GHG emissions to 1990 levels by 2020, to be achieved in large part through increased production of renewable energy.

Further, the Commission and the California Energy Commission ("CEC") provided joint leadership in implementing programs to meet the renewable energy goals of the State in their 2003 joint Energy Action Plan ("EAP"), in which they stated their intent to achieve the 20% renewables goal by 2010, seven years ahead of the statutory deadline in effect at the time. In their 2008 update to the EAP, the Commission and the CEC placed particular emphasis on the potential benefits of solar energy: "...since California has an abundance of powerful sunlight."

In order to meet the State's renewable and GHG goals the Commission has focused significant attention on implementing the RPS program, the CSI program as well as encouraging investor owned utilities to build, own and operate renewable generation assets, particularly solar PV.

B. Existing State Programs

The CSI provides substantial incentives to promote the development of solar power on a small-scale basis, but only for projects up to 1 MW_{ac} in size. The CSI program is designed to reward PV systems which maximize energy production output. As a result, to date, all of the CSI solar installations located within the San Diego load center comprise fixed panel installations, both flat and tilted, which do not maximize their capacity output coincident with the time of day that SDG&E experiences its system peak.

The RPS, in contrast, allows investor owned utilities to purchase renewable power from commercial generators. To date, no projects of the 1 to 2 MW_{ac} size have been built in SDG&E's load center through SDG&E's RPS request for offers ("RFO") process.

Thus, in SDG&E's load center, a "gap" exists for constructing solar systems that are 1 to 2 MW_{ac} in size and capable of maximizing their capacity output coincident with the time of day that SDG&E experiences its system peak in its service territory

In addition to the CSI and RPS RFO programs, the Commission has urged the investor owned utilities to be creative in identifying other viable means of achieving their individual and, by implication, the State's RPS goals. In decision D.08-02-008 the Commission encouraged the utilities "...to actively assess the feasibility of utility ownership, and pursue such ownership when and where it makes sense."

Consistent with the State's policy, the Commission's programs and guidance, in an effort to remedy the solar PV generation gap identified above and to maximize the benefits offered by solar resources in its load center, SDG&E developed the SDG&E Solar Energy Project which will, as is discussed in greater detail in Chapters I through IV of SDG&E's testimony, effectively develop currently untapped solar power projects which complement both the CSI and RPS programs. In addition, the SDG&E Solar Energy Project will help facilitate the development by

third parties of up to an additional 25 MW_{dc} of new photovoltaic installations under the State's CSI program that would otherwise likely not have been developed.

III.
SUMMARY OF APPLICATION

The SDG&E Solar Energy Project Application requests the Commission to:

1. Approve SDG&E's Solar Energy Project Application which would authorize SDG&E to spend up to $250 million to build, own, maintain and operate up to 52 MW_{dc} of utility-owned solar photovoltaic generating facilities of approximately 1 to 2 MW_{ac} each from 2009 through 2013.
2. Approve SDG&E's request for funding to support the SDG&E Solar Energy Project in the amounts of $214,000 in 2008 and $1,662,000 for each year from 2009 until included in the base margin generation revenue requirement after SDG&E's 2012 GRC for annual administration and preliminary development costs.
3. Find that SDG&E's proposed Tier 3 Advice Letter approval process is reasonable.

The SDG&E Solar Energy Project Application is supported by five SDG&E witnesses: James Avery, Senior Vice President, Electric; Frank Thomas, Manager, Project Supply, Electric Project Development & Business Planning; Tom Bialek, Chief Engineer, Transmission & Distribution Asset Management; Christopher Yunker, Principal Business Analyst, Finance; and Michelle Somerville, Regulatory Accounts Manager, Tariffs and Regulatory Accounts. The witnesses' prepared direct testimony is served concurrently herewith, incorporated in the Application by reference, and summarized below.

A. SDG&E's Policy (Chapter I)

SDG&E witness James Avery describes SDG&E's policy and purpose in filing its

Application. Mr. Avery states that, consistent with and in support of State policy, the SDG&E Solar Energy Project addresses how a particular part of the solar PV market which, to this point, has been underdeveloped, can be developed through the Commission's approval of its Application to own and operate up to 52 MW_{dc} of distribution-connected solar PV capacity and energy in SDG&E's load center.

B. SDG&E'S Solar Energy Project (Chapter II)

SDG&E witnesses Frank Thomas and Tom Bialek describe the reasons for developing SDG&E's Solar Energy Project and the actions SDG&E intends to undertake to implement the SDG&E Solar Energy Project. Mr. Thomas and Mr. Bialek provide a detailed description of the proposed SDG&E Solar Energy Project, and describe the need for the SDG&E Solar Energy Project, the objectives and benefits of the SDG&E Solar Energy Project, the technology to be used therein, why SDG&E is well situated to implement the SDG&E Solar Energy Project, and costs of the SDG&E Solar Energy Project.

C. SDG&E Solar Energy Project's Revenue Requirements (Chapter III)

SDG&E witness Christopher Yunker, describes SDG&E's Solar Energy Project's revenue requirements. Mr. Yunker provides an illustrative revenue requirement which reflects the aggregate impact of the SDG&E Solar Energy Project fully implemented as well as the assumptions that are the basis for the calculations. Mr. Yunker describes how after Commission approval of the SDG&E Solar Energy Project in this Application, SDG&E will develop revenue requirements for individual installations to be provided in a Tier 3 Advice Letter. Revenue requirements for individual facilities will vary; the revenue requirement illustrated here provides the aggregate impact of all facilities developed under the SDG&E Solar Energy Project as if they were implemented at $7,000/kWdc, the upper end of the range as outlined in SDG&E witness

Thomas' testimony in Chapter II.

D. SDG&E's Solar Energy Project Cost Recovery Proposal (Chapter IV)

SDG&E witness Michelle Somerville describes SDG&E's outline for its proposal for recovery of costs associated with implementing SDG&E's Solar Energy Project. Ms. Somerville describes SDG&E's proposal to recover incremental preliminary development expenses, capital expenses, operation and maintenance expenses, and annual administrative costs for the SDG&E Solar Energy Project. SDG&E proposes to recover the administrative and preliminary development costs requested in this application through the Non-fuel Generation Balancing Account ("NGBA"). Upon approval and completion of individual facilities, the applicable revenue requirements as authorized by the Commission in Tier 3 Advice Letters will also be recovered through the NGBA. SDG&E also proposes to balance authorized revenue requirements for the SDG&E Solar Energy Project with recorded expenses in a new balancing account labeled the Solar Energy Project Balancing Account ("SEPBA"). In addition, SDG&E's proposes a regulatory framework for Commission approval of each individual solar installation prior to construction in a Tier 3 Advice Letter.

IV.
SDG&E'S SOLAR PV PROGRAM DOES NOT REQUIRE CEQA REVIEW BY THE COMMISSION

SDG&E's Solar Energy Project does not trigger environmental review by the Commission. It is long established that the act of ratemaking by the Commission is exempt from review under the California Environmental Quality Act ("CEQA"). As stated in California Public Resources Code § 21080(b)(8), the "establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies" including "obtaining funds for capital projects necessary to maintain service areas" is exempt from CEQA.

The Commission has repeatedly stated that its rate orders are exempt from CEQA and the California Supreme Court has declined to overturn. (CPUC Decision No. 87-02-028.) This proceeding clearly falls within such a statutory exemption and should be noted by the Commission in its findings, as required by CEQA Guidelines §15273(c).[3]

Further, agencies may dispense with CEQA review "if it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment." (CEQA Guidelines § 15061(b)(3)). Here, the proposed PV systems installations would not result in a significant effect on the environment. The proposed Solar Energy Project does not involve installations in residential areas. Instead, the individual installations would likely occur in existing parking lots of commercial and/or industrial areas with shaded parking and previously disturbed open areas in an effort to minimize environmental effects. The primary types of solar PV installations will be land based solar arrays and parking lot shading PV arrays. In addition, the inverter systems would either be located within building electrical rooms or would otherwise be located next to buildings in an unobtrusive manner. As a result, the installations contemplated by SDG&E's Solar Energy Project will not have a significant effect on the environment.

At this early planning stage in the proposed program, SDG&E contemplates certain locations for the installations but is uncertain as to the exact areas throughout its service territory and the detailed descriptions thereof. SDG&E has only anticipated a series of multiple installations between 2009 and 2013 up to the 52 MW_{dc} total capacity. In the absence of any project descriptions, even if the program was not exempt from CEQA, there would be no ability for an agency to perform any environmental review at this time.

[3] "(c) The public agency shall incorporate written findings in the record of any proceeding in which an exemption under this section is claimed setting forth with specificity the basis for the claim of exemption."

More importantly, under the California Solar Rights Act,[4] local governments are precluded from adopting ordinances that would unreasonably restrict the use of solar energy systems in residential and commercial capacities. The Act also states that it is the intent of the Legislature to prohibit local governments from adopting ordinances that "create unreasonable barriers to the installation of solar energy systems, including but not limited to, design review for aesthetic purposes..." (Cal. Govt. Code § 65850.5.) In addition, the Act requires that local governments use a non-discretionary permitting process for solar energy systems. (*See*, Cal. Govt. Code § 65850.5(a) and Cal. Health and Safety Code § 17959.1.) California law requires that this non-discretionary review process be limited to "those standards and regulations necessary to ensure that the solar energy system will not have a specific, adverse impact upon the public health or safety." (Cal. Govt. Code §65850.5(b).) The Act prevents cities and counties from denying solar energy system building permits unless there is substantial recorded evidence that it would have a specific, adverse impact on public health and safety. If the local jurisdiction found that the potential for an adverse impact existed, it would require that a discretionary permit be issued. (Cal. Govt. Code § 65850.5(c).) In that event, however, SDG&E would not pursue the installation of the proposed facilities.

Even though this ratemaking proceeding is exempt from CEQA review and SDG&E's proposed Solar Energy Project is exempt from CEQA review by the Commission at this time, SDG&E recognizes that such facilities must still comply with all "applicable safety and performance standards established by the National Electric Code, the Institute of Electrical and Electronics Engineers and accredited testing laboratories such as Underwriters Laboratories, and the rules of the Public Utilities Commission regarding safety and reliability."

[4] The Solar Rights Act is comprised of the following California Codes: Civil Code §§ 714 and 714.1, Civil Code §§ 801 and 801.5, Government Code § 65850.5, Health and Safety Code § 17959.1, Government Code § 66475.3 and

V.
STATUTORY AND PROCEDURAL REQUIREMENTS

A. Proposed Category, Issues to be Considered, Need for Hearings and Proposed Schedule

SDG&E proposes to categorize this Application as a "rate-setting" proceeding within the meaning of Rules 1.3(e) and 7.1. SDG&E proposes the following schedule:

Schedule

Filing of Application	July 11, 2008
Protests Due	August 8, 2008
Reply to Protests	August 21, 2008
Pre-Hearing Conference	August 28, 2008
DRA and Intervenors File Opening Testimony	September 25, 2008
Rebuttal Testimony Due	October 6, 2008
Hearings	October 20-24, 2008
Concurrent Opening Briefs Due	November 17, 2008
Concurrent Reply Briefs Due	December 1, 2008
Commission Issues Proposed Decision	February 15, 2009
Comments on Proposed Decision	March 16, 2009
Replies to Comments on Proposed Decision	March 23, 2009
Commission Issues Final Decision	April 2009

B. Statutory Authority – Rule 2.1

This Application is made pursuant to Sections 451, 701, 702 , 728, and 729 of the Public Utilities Code of the State of California; the Commission's Rule of Practice and Procedure; and the other relevant prior decisions, orders, and resolutions of the Commission.

Government Code § 66473.1.

C. Legal Name, Place of Business/Incorporation – Rule 2.1(a)

Applicant's legal name is San Diego Gas & Electric Company. SDG&E is a public utility corporation organized and exiting under the laws of the State of California, with its principal place of business at 8830 Century Park Court, San Diego, California 92123.

D. Correspondence – Rule 2.1(b)

Correspondence or communications regarding this application should be addressed to:

Rasha Prince
Regulatory Case Manager For:
San Diego Gas & Electric Company
555 West Fifth Street, GT14D6
Los Angeles, California 90013
Telephone: (213) 244-5141
Facsimile: (213) 244-4957
E-Mail: rprince@semprautilities.com

With a copy to:

Steven D. Patrick
Attorney For:
San Diego Gas & Electric Company
555 West 5th Street, Suite 1400
Los Angeles, CA 90013
Telephone: (213) 244-2954
Facsimile: (213) 629-9620
E-Mail: spatrick@sempra.com

E. Articles of Incorporation - Rule 16

SDG&E is incorporated under the laws of the State of California. A certified copy of the restated Articles of Incorporation, as last amended, currently in effect and certified by the California Secretary of State, was filed with the Commission on October 1, 1998 in connection with SDG&E Application No. 98-10-012, and is incorporated herein by reference.

F. Financial Statement, Balance Sheet, and Income Statement - Rule 3.2(a)(4)

Appendix A to this Application is SDG&E's Financial Statement, Balance Sheet and Income Statement as of March 31, 2008.

G. Rates – Rules 3.2(a)(2) and 3.2(a)(3)

The current and proposed rates that will result from this Application are described in Appendix B.

H. Property and Equipment – Rule 3.2(a)(4)

A general description of SoCalGas and SDG&E's respective properties was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is being incorporated herein by reference. Appendix C to this Application is a statement of SDG&E's Costs of Property and Depreciation Reserve applicable thereto as of March 31, 2008.

I. Summary of Earnings – Rules 3.2(a)(5)

Appendix D to this Application is a Summary of Earnings for SDG&E for the 3 months ended March 31, 2008.

J. Depreciation – Rule 3.2(7)

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 plant 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.

K. Proxy Statement – Rule 3.2(a)(8)

A copy of SDG&E's most recent proxy statement, dated April 4, 2008, was mailed to the California Public Utilities Commission on April 29, 2008 and is incorporated herein by reference.

L. Pass Through of Costs – Rule 3.2(a)(10)

The changes that SDG&E seeks in this Application reflect estimated costs to SDG&E, and SDG&E proposes to pass through to customers only costs that SDG&E incurs for the services and commodities it furnishes.

M. Service and Notice – Rule 3.2(b)

SDG&E is serving this Application on all parties to A.08-03-015, R.06-03-004, and R.04-04-026. Within ten days of filing this application, SDG&E will mail notice of this Application to the State of California and to cities and counties within SDG&E's service territory and SDG&E will post the notice in its offices and publish the notice in newspapers of general circulation in each county in its service territory. In addition, SDG&E will include notices with the regular bills mailed to all customers affected by the proposed rate changes. The service list of state and government agencies is attached hereto as Appendix E.

VI.
RELIEF REQUESTED

For the reasons set forth in this Application and accompanying testimony, SDG&E respectfully asks the Commission to:

1) Consider this Application and grant all the relief requested herein.

2) Find that SDG&E's proposals are in conformance with the Commission directives and policies.

3) Grant other such relief as the Commission may deem necessary.

WHEREFORE, SDG&E respectfully requests the Commission grant its Application as filed.

Dated this 11th day of July, 2008.

Respectfully submitted,

Lee Schavrien
Senior Vice President
San Diego Gas & Electric Company

Steven D. Patrick
Attorney for
San Diego Gas & Electric Company

VERIFICATION

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 are true and 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 this 11th day of July, 2008 at San Francisco, California.

Lee Schavrien
Senior Vice President
San Diego Gas & Electric Company

APPENDIX A

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2008

	1. UTILITY PLANT	2008
101	UTILITY PLANT IN SERVICE	$8,481,246,637
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	4,420,116
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	237,557,865
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(3,908,771,540)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(213,511,605)
118	OTHER UTILITY PLANT	554,340,627
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(145,816,139)
120	NUCLEAR FUEL - NET	33,970,712
	TOTAL NET UTILITY PLANT	5,043,436,673

	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	3,682,261
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(452,628)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	937,741,526
	TOTAL OTHER PROPERTY AND INVESTMENTS	940,971,159

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2008

3. CURRENT AND ACCRUED ASSETS

		2008
131	CASH	29,221,112
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	47,755
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	401,715
142	CUSTOMER ACCOUNTS RECEIVABLE	151,769,162
143	OTHER ACCOUNTS RECEIVABLE	71,393,602
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(2,451,519)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	5,161,619
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	11,971,695
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	61,007,752
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	398,243
165	PREPAYMENTS	29,064,824
171	INTEREST AND DIVIDENDS RECEIVABLE	12,144,646
173	ACCRUED UTILITY REVENUES	45,889,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	4,080,716
175	DERIVATIVE INSTRUMENT ASSETS	55,754,349
	TOTAL CURRENT AND ACCRUED ASSETS	475,854,671

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	20,797,757
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,117,400,592
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	78,681,217
184	CLEARING ACCOUNTS	(7,682)
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	19,681,631
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	33,265,184
190	ACCUMULATED DEFERRED INCOME TAXES	213,088,931
	TOTAL DEFERRED DEBITS	1,482,907,630
	TOTAL ASSETS AND OTHER DEBITS	7,943,170,133

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2008

5. PROPRIETARY CAPITAL

		2008
201	COMMON STOCK ISSUED	$291,458,395
204	PREFERRED STOCK ISSUED	78,475,400
207	PREMIUM ON CAPITAL STOCK	592,222,753
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	279,618,042
214	CAPITAL STOCK EXPENSE	(25,688,571)
216	UNAPPROPRIATED RETAINED EARNINGS	1,152,587,233
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(15,588,839)
	TOTAL PROPRIETARY CAPITAL	2,353,084,413

6. LONG-TERM DEBT

221	BONDS	1,636,905,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	253,720,000
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(2,813,565)
	TOTAL LONG-TERM DEBT	1,887,811,435

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	-
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	29,225,552
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	198,987,652
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	218
230	ASSET RETIREMENT OBLIGATIONS	564,637,856
	TOTAL OTHER NONCURRENT LIABILITIES	792,851,278

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2008

8. CURRENT AND ACCRUED LIABILITES

		2008
231	NOTES PAYABLE	33,000,000
232	ACCOUNTS PAYABLE	258,962,452
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	11,686,381
235	CUSTOMER DEPOSITS	51,281,568
236	TAXES ACCRUED	13,800,011
237	INTEREST ACCRUED	26,410,021
238	DIVIDENDS DECLARED	1,204,917
241	TAX COLLECTIONS PAYABLE	2,365,468
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	132,407,301
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	-
244	DERIVATIVE INSTRUMENT LIABILITIES	342,998,513
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	874,116,632

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	22,462,534
253	OTHER DEFERRED CREDITS	156,839,142
254	OTHER REGULATORY LIABILITIES	1,161,342,471
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	27,844,253
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	5,201,256
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	531,664,748
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	129,951,971
	TOTAL DEFERRED CREDITS	2,035,306,375
	TOTAL LIABILITIES AND OTHER CREDITS	$7,943,170,133

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2008

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		$763,575,945
401	OPERATING EXPENSES	$518,469,317	
402	MAINTENANCE EXPENSES	25,540,304	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	77,438,893	
408.1	TAXES OTHER THAN INCOME TAXES	16,898,533	
409.1	INCOME TAXES	31,689,862	
410.1	PROVISION FOR DEFERRED INCOME TAXES	5,713,652	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(2,376,428)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(638,255)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	(3,157,336)	
	TOTAL OPERATING REVENUE DEDUCTIONS		669,578,542
	NET OPERATING INCOME		93,997,403

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(23,870)	
418	NONOPERATING RENTAL INCOME	95,522	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	4,517,422	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	5,741,977	
421	MISCELLANEOUS NONOPERATING INCOME	187,662	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	10,518,713	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	684,092	
	TOTAL OTHER INCOME DEDUCTIONS	684,092	
408.2	TAXES OTHER THAN INCOME TAXES	74,545	
409.2	INCOME TAXES	(2,202,481)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	770,345	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	-	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	(1,357,591)	
	TOTAL OTHER INCOME AND DEDUCTIONS		12,560,396
	INCOME BEFORE INTEREST CHARGES		106,557,799
	NET INTEREST CHARGES*		31,438,479
	NET INCOME		$75,119,320

**NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (2,213,343)*

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2008

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	$1,078,672,830
NET INCOME (FROM PRECEDING PAGE)	75,119,320
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(1,204,917)
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	$1,152,587,233

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2008

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000	shares	Par Value $27,500,000
Preferred Stock	10,000,000	shares	Without Par Value
Preferred Stock	Amount of shares not specified		$80,000,000
Common Stock	255,000,000	shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK			
5.0%	375,000	shares	$7,500,000
4.50%	300,000	shares	6,000,000
4.40%	325,000	shares	6,500,000
4.60%	373,770	shares	7,475,400
$1.7625	550,000	shares	13,750,000
$1.70	1,400,000	shares	35,000,000
$1.82	640,000	shares	16,000,000
COMMON STOCK	116,583,358	shares	291,458,395

(b) Terms of Preferred Stock:
Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009 AND 06-05-01
to which references are hereby made.

(c) Brief Description of Mortgage:
Full information as to this item is given in Application No. 06-05-015 to which reference is hereby mad

(d) Number and Amount of Bonds Authorized and Issued

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2007
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	1,107,385
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	1,015,600
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	880,600
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	679,680
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	952,968
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	2,120,625
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD. due 2026	06-08-06	250,000,000	250,000,000	15,000,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	5,898,383
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	0
Unsecured Bonds:				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2008

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2007
Commercial Paper & ST Bank Loans	Various	Various	Various	0	$613,862

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

Preferred Stock	Shares Outstanding 12-31-07	Dividends Declared 2003	2004	2005	2006	2007	
5.0%	375,000	$375,000	$375,000	$375,000	$375,000	$375,000	
4.50%	300,000	270,000	270,000	270,000	270,000	270,000	
4.40%	325,000	286,000	286,000	286,000	286,000	286,000	
4.60%	373,770	343,868	343,868	343,868	343,868	343,868	
$ 1.7625	550,000	1,674,375	1,498,125	1,321,875	1,145,625	969,375	
$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000	2,380,000	2,380,000	
$ 1.82	640,000	1,164,800	1,164,800	1,164,800	1,164,800	1,164,800	
	3,963,770	$6,494,043	$6,317,793	$6,141,543	$5,965,293	$5,789,043	[2]
Common Stock							
Amount		$200,000,000	$200,000,000	$75,000,000	$0	$0	[1]

A balance sheet and a statement of income and retained earnings of Applicant for the three months ended March 31, 2008, are attached hereto.

[1] San Diego Gas & Electric Company dividend to parent.
[2] Includes $969,375 of interest expense related to redeemable preferred stock.

APPENDIX B

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT

Attachment A

SDG&E Application A.08-XX-XXX

CLASS AVERAGE RATES

	Based on Rates Effective 6/1/08 (AL 1994-E)			Based on Proposed Rates A.08-XX-XXX				
2009								
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)	Total Rate Change (¢/KWhr)	Total Rate Change (%)
Residential	6.881	8.610	15.491	6.881	8.659	15.540	0.049	0.31%
Small Commercial	6.604	9.282	15.885	6.604	9.334	15.938	0.052	0.33%
Med. & Large C&I	4.257	9.229	13.486	4.257	9.281	13.538	0.052	0.39%
Agriculture	6.768	8.796	15.565	6.768	8.846	15.614	0.049	0.32%
Lighting	8.247	6.384	14.631	8.247	6.420	14.667	0.036	0.25%
System Total	5.503	8.942	14.445	5.503	8.992	14.495	0.050	0.35%
2010								
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)	Total Rate Change (¢/KWhr)	Total Rate Change (%)
Residential	6.881	8.610	15.491	6.881	8.700	15.581	0.090	0.58%
Small Commercial	6.604	9.282	15.885	6.604	9.378	15.982	0.097	0.61%
Med. & Large C&I	4.257	9.229	13.486	4.257	9.325	13.582	0.096	0.71%
Agriculture	6.768	8.796	15.565	6.768	8.888	15.656	0.091	0.59%
Lighting	8.247	6.384	14.631	8.247	6.450	14.698	0.066	0.45%
System Total	5.503	8.942	14.445	5.503	9.035	14.538	0.093	0.64%
2011								
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)	Total Rate Change (¢/KWhr)	Total Rate Change (%)
Residential	6.881	8.610	15.491	6.881	8.737	15.618	0.127	0.82%
Small Commercial	6.604	9.282	15.885	6.604	9.419	16.022	0.137	0.86%
Med. & Large C&I	4.257	9.229	13.486	4.257	9.365	13.622	0.136	1.01%
Agriculture	6.768	8.796	15.565	6.768	8.926	15.694	0.130	0.83%
Lighting	8.247	6.384	14.631	8.247	6.478	14.725	0.094	0.64%
System Total	5.503	8.942	14.445	5.503	9.074	14.577	0.132	0.91%
2012								
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)	Total Rate Change (¢/KWhr)	Total Rate Change (%)
Residential	6.881	8.610	15.491	6.881	8.772	15.653	0.162	1.04%
Small Commercial	6.604	9.282	15.885	6.604	9.456	16.060	0.174	1.10%
Med. & Large C&I	4.257	9.229	13.486	4.257	9.403	13.660	0.173	1.29%
Agriculture	6.768	8.796	15.565	6.768	8.961	15.730	0.165	1.06%
Lighting	8.247	6.384	14.631	8.247	6.504	14.751	0.120	0.82%
System Total	5.503	8.942	14.445	5.503	9.110	14.613	0.168	1.16%
2013								
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)	Total Rate Change (¢/KWhr)	Total Rate Change (%)
Residential	6.881	8.610	15.491	6.881	8.805	15.686	0.195	1.26%
Small Commercial	6.604	9.282	15.885	6.604	9.492	16.095	0.210	1.32%
Med. & Large C&I	4.257	9.229	13.486	4.257	9.438	13.695	0.209	1.55%
Agriculture	6.768	8.796	15.565	6.768	8.995	15.763	0.199	1.28%
Lighting	8.247	6.384	14.631	8.247	6.528	14.775	0.144	0.99%
System Total	5.503	8.942	14.445	5.503	9.144	14.647	0.202	1.40%

Notes:
DWR-BC is included in Current and Proposed Total UDC Rate

SDG&E - Typical Residential Monthly Electric Bill Usage = 500 kWh/month				
2009				
	Present	Proposed	Change	Percentage Change
Electric Only				
Summer				
Inland	$ 70.51	$ 70.63	$ 0.12	0.2%
Coastal	$ 75.78	$ 76.13	$ 0.36	0.5%
Winter				
Inland	$ 70.85	$ 71.01	$ 0.17	0.2%
Coastal	$ 72.55	$ 72.81	$ 0.26	0.4%
2010				
	Present	Proposed	Change	Percentage Change
Electric Only				
Summer				
Inland	$ 70.51	$ 70.68	$ 0.16	0.2%
Coastal	$ 75.78	$ 76.27	$ 0.49	0.6%
Winter				
Inland	$ 70.85	$ 71.07	$ 0.23	0.3%
Coastal	$ 72.55	$ 72.91	$ 0.36	0.5%
2011				
	Present	Proposed	Change	Percentage Change
Electric Only				
Summer				
Inland	$ 70.51	$ 70.72	$ 0.21	0.3%
Coastal	$ 75.78	$ 76.39	$ 0.61	0.8%
Winter				
Inland	$ 70.85	$ 71.13	$ 0.28	0.4%
Coastal	$ 72.55	$ 73.00	$ 0.45	0.6%
2012				
	Present	Proposed	Change	Percentage Change
Electric Only				
Summer				
Inland	$ 70.51	$ 70.76	$ 0.24	0.3%
Coastal	$ 75.78	$ 76.50	$ 0.73	1.0%
Winter				
Inland	$ 70.85	$ 71.18	$ 0.34	0.5%
Coastal	$ 72.55	$ 73.08	$ 0.53	0.7%
2013				
	Present	Proposed	Change	Percentage Change
Electric Only				
Summer				
Inland	$ 70.51	$ 70.79	$ 0.28	0.4%
Coastal	$ 75.78	$ 76.61	$ 0.84	1.1%
Winter				
Inland	$ 70.85	$ 71.23	$ 0.39	0.5%
Coastal	$ 72.55	$ 73.16	$ 0.61	0.8%

APPENDIX C

SAN DIEGO GAS & ELECTRIC COMPANY

COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETC
AS OF MARCH 31, 2008

No.	Account	Original Cost	Reserve for Depreciation and Amortization
ELECTRIC DEPARTMENT			
302	Franchises and Consents	$ 222,841	$ 202,900
303	Misc. Intangible Plant	26,878,263	22,250,708
	TOTAL INTANGIBLE PLANT	27,101,104	22,453,609
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	42,801,254	10,050,475
312	Boiler Plant Equipment	115,839,127	13,746,471
314	Turbogenerator Units	99,363,922	13,606,411
315	Accessory Electric Equipment	33,364,110	4,272,490
316	Miscellaneous Power Plant Equipment	18,988,284	1,481,980
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	324,883,215	43,204,346
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	268,976,127	265,509,567
322	Boiler Plant Equipment	393,511,631	393,511,631
323	Turbogenerator Units	138,276,537	135,541,399
324	Accessory Electric Equipment	166,938,296	166,736,349
325	Miscellaneous Power Plant Equipment	259,301,276	208,797,122
107	ICIP CWIP	0	5,748,505
	TOTAL NUCLEAR PRODUCTION	1,227,287,544	1,176,128,249
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	4,421,921	382,547
342	Fuel Holders, Producers & Accessories	15,295,980	1,061,765
343	Prime Movers	20,824,413	2,260,536
344	Generators	160,683,496	8,336,007
345	Accessory Electric Equipment	9,285,717	817,909
346	Miscellaneous Power Plant Equipment	359,058	38,976
	TOTAL OTHER PRODUCTION	211,016,488	12,900,167
	TOTAL ELECTRIC PRODUCTION	1,763,187,247	1,232,232,762

No.	Account	Original Cost	Reserve for Depreciation and Amortization
350.1	Land	$ 34,598,156	$ 0
350.2	Land Rights	61,060,480	9,569,465
352	Structures and Improvements	81,077,901	27,470,926
353	Station Equipment	535,476,733	126,455,766
354	Towers and Fixtures	104,767,287	77,300,297
355	Poles and Fixtures	129,817,394	41,120,378
356	Overhead Conductors and Devices	216,372,118	148,385,473
357	Underground Conduit	105,870,411	9,994,196
358	Underground Conductors and Devices	91,987,981	13,015,752
359	Roads and Trails	21,906,133	5,096,685
	TOTAL TRANSMISSION	1,382,934,594	458,408,938
360.1	Land	16,850,971	0
360.2	Land Rights	67,074,968	26,597,409
361	Structures and Improvements	3,220,549	1,826,436
362	Station Equipment	305,811,278	70,191,089
364	Poles, Towers and Fixtures	400,867,577	185,137,480
365	Overhead Conductors and Devices	312,461,020	101,384,406
366	Underground Conduit	778,561,727	299,702,759
367	Underground Conductors and Devices	1,050,942,519	564,433,948
368.1	Line Transformers	391,992,133	64,080,049
368.2	Protective Devices and Capacitors	20,518,738	(145,026)
369.1	Services Overhead	98,684,924	118,779,382
369.2	Services Underground	268,258,791	161,706,859
370.1	Meters	88,201,100	32,192,495
370.2	Meter Installations	42,484,738	9,843,905
371	Installations on Customers' Premises	6,168,478	9,318,329
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	23,107,735	16,489,759
	TOTAL DISTRIBUTION PLANT	3,875,207,248	1,661,539,280
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,480,293	11,755,435
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	175,979	134,521
393	Stores Equipment	54,331	47,732
394.1	Portable Tools	13,165,372	4,185,301
394.2	Shop Equipment	572,160	347,480
395	Laboratory Equipment	300,344	(34,554)
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	102,892,687	46,389,998
398	Miscellaneous Equipment	462,560	(25,896)
	TOTAL GENERAL PLANT	154,706,927	62,999,035
101	TOTAL ELECTRIC PLANT	7,203,137,120	3,437,633,623

No.	Account	Original Cost	Reserve for Depreciation and Amortization
GAS PLANT			
302	Franchises and Consents	$ 86,104	$ 86,104
303	Miscellaneous Intangible Plant	713,559	574,758
	TOTAL INTANGIBLE PLANT	799,663	660,862
360.1	Land	0	0
361	Structures and Improvements	43,992	43,992
362.1	Gas Holders	0	0
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	0
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	407,546	361,754
	TOTAL STORAGE PLANT	451,538	405,746
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,027,793
366	Structures and Improvements	10,874,587	7,654,139
367	Mains	122,080,852	48,288,455
368	Compressor Station Equipment	60,649,294	39,535,941
369	Measuring and Regulating Equipment	16,831,678	10,524,409
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	217,302,740	107,030,737
374.1	Land	102,187	0
374.2	Land Rights	7,939,706	5,038,196
375	Structures and Improvements	43,447	61,253
376	Mains	498,119,887	272,150,872
378	Measuring & Regulating Station Equipment	8,652,580	5,654,991
380	Distribution Services	228,893,019	256,615,769
381	Meters and Regulators	73,139,580	30,131,781
382	Meter and Regulator Installations	58,620,863	21,885,651
385	Ind. Measuring & Regulating Station Equipm	1,516,811	788,296
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,205,558	4,118,835
	TOTAL DISTRIBUTION PLANT	882,233,638	596,445,642

No.	Account	Original Cost	Reserve for Depreciation and Amortization
392.1	Transportation Equipment - Autos	$ 0	$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	6,811,268	2,274,585
394.2	Shop Equipment	84,597	5,679
395	Laboratory Equipment	312,157	(104,449)
396	Power Operated Equipment	162,284	1,608
397	Communication Equipment	2,958,539	1,704,385
398	Miscellaneous Equipment	294,233	62,968
	TOTAL GENERAL PLANT	10,697,579	4,044,780
101	TOTAL GAS PLANT	1,111,485,158	708,587,768
COMMON PLANT			
303	Miscellaneous Intangible Plant	176,446,997	147,804,372
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,654,409	0
389.2	Land Rights	1,397,590	27,275
390	Structures and Improvements	151,429,307	55,339,419
391.1	Office Furniture and Equipment - Other	24,281,195	11,813,678
391.2	Office Furniture and Equipment - Computer E	42,921,790	30,914,555
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(86,812)
393	Stores Equipment	140,123	(162,496)
394.1	Portable Tools	168,535	5,647
394.2	Shop Equipment	312,954	137,430
394.3	Garage Equipment	2,638,193	761,868
395	Laboratory Equipment	2,504,678	845,256
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	74,991,580	45,643,626
398	Miscellaneous Equipment	2,924,131	970,114
118.1	TOTAL COMMON PLANT	485,878,794	293,482,024
	TOTAL ELECTRIC PLANT	7,203,137,120	3,437,633,623
	TOTAL GAS PLANT	1,111,485,158	708,587,768
	TOTAL COMMON PLANT	485,878,794	293,482,024
101 & 118.1	TOTAL	8,800,501,073	4,439,703,415
101	PLANT IN SERV-SONGS FULLY RECOVER	$ (1,167,020,770)	$ (1,167,020,770)
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	$ 0	$ 0

No.	Account	Original Cost	Reserve for Depreciation and Amortization
101	Accrual for Retirements		
	Electric	$ (3,914,821)	$ (3,914,821)
	Gas	(56,245)	(56,245)
	TOTAL PLANT IN SERV-NON RECON ACC	(3,971,066)	(3,971,066)
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	0	0
105	Plant Held for Future Use		
	Electric	4,420,116	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	4,420,116	0
107	Construction Work in Progress		
	Electric	234,158,035	
	Gas	8,458,717	
	Common	67,681,382	
	TOTAL CONSTRUCTION WORK IN PROGRESS	310,298,134	0
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	4,600,000
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	1,437,251
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	617,559,129
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0	617,559,129
120	NUCLEAR FUEL FABRICATION	82,591,759	53,679,935
143	FAS 143 ASSETS - Legal Obligation	126,668,513	(544,216,235)
	FIN 47 ASSETS - Legal Obligation	40,736,297	16,080,373
143	FAS 143 ASSETS - Non-legal Obligation	0	(1,086,762,230)
	TOTAL FAS 143	167,404,810	(1,614,898,093)
	UTILITY PLANT TOTAL	$ 8,194,224,056	$ 2,331,089,801

APPENDIX D

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
(DOLLARS IN MILLIONS)
THREE MONTHS ENDED MARCH 31, 2008

Line No.	Item	Amount
1	Operating Revenue	$764
2	Operating Expenses	670
3	Net Operating Income	$94
4	Weighted Average Rate Base	$4,007
5	Rate of Return*	8.23%

*Authorized Cost of Capital

APPENDIX E

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

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

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

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

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

City of Laguna Niguel
Attn. City Attorney
22781 La Paz Ste. B
Laguna Niguel, CA 92656

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

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

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

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

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

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

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

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

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

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

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

City of Carlsbad
Attn. City Clerk
1200 Carlsbad Village Drive
Carlsbad, CA 92008-1949

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

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

City of Imperial Beach
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Imperial Beach, CA 92032

City of Lemon Grove
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National City, CA 92050

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

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

Naval Facilities Engineering Command
Navy Rate Intervention
1314 Harwood Street SE
Washing Navy Yard, DC 20374-5018

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

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

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

City of San Diego
Attn. Mayor
202 C St.
San Diego, CA 92010

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

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

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202 C Street.
San Diego, CA 92101

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

City of San Diego
Attn. City Clerk
202 C St.
San Diego, CA 92010

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

City of San Diego
Attn. City Manager
202 C St.
San Diego, CA 92101

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

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Santee, CA 92071

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

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Attn. City Attorney
PO Box 1988
Vista, CA 92083

City of Vista
Attn. City Clerk
PO Box 1988
Vista, CA 92083

City of El Cajon
Attn. City Clerk
200 E. Main St.
El Cajon, CA 92020

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

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

City of Fallbrook
Attn. City Clerk
233 E. Mission Road
Fallbrook, CA 92028

City of Julian
Attn. City Clerk
P.O. Box 1866
2129 Main Street
Julian, CA

City of Alpine
Attn. City Clerk
2707 Alpine Blvd
Alpine, CA 91901
□U□`□`□f□f□f□f□o San Diego -

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

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

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

Appendix

Service List of Potential Interested Parties

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists: A.08-03-015 – Last Changed: July 10, 2008

carol.schmidfrazee@sce.com; mdjoseph@adamsbroadwell.com; marcel@turn.org; cec@cpuc.ca.gov; craig.lewis@greenvolts.com; policy@recurrentenergy.com; bcragg@goodinmacbride.com; jwiedman@goodinmacbride.com; edwardoneill@dwt.com; ecl8@pge.com; info@calseia.org; samuelk@greenlining.org; pilgrim@ccenergy.com; michaelboyd@sbcglobal.net; wynne@braunlegal.com; blaising@braunlegal.com; porter@exeterassociates.com; rprince@semprautilities.com; spatrick@sempra.com; dschneider@e5cleanenergy.com; case.admin@sce.com; liddell@energyattorney.com; hgreen@sunedison.com; Diane_Fellman@fpl.com; ek@a-klaw.com; filings@a-klaw.com; mcarboy@signalhill.com; nes@a-klaw.com; efm2@pge.com; garrett.hering@photon-magazine.com; rjl9@pge.com; sww9@pge.com; S2B9@pge.com; vjw3@pge.com; abrowning@votesolar.org; mday@goodinmacbride.com; policy@recurrentenergy.com; hilary@newsdata.com; cem@newsdata.com; sara@solaralliance.org; l_brown369@yahoo.com; arthur@resource-solutions.org; jhenri@sunedison.com; jody_london_consulting@earthlink.net; mrw@mrwassoc.com; kfoxx@keyesandfox.com; dmarcus2@sbcglobal.net; patrickm@crossborderenergy.com; juliettea7@aol.com; philm@scdenergy.com; jna@speakeasy.org; brbarkovich@earthlink.net; jweil@aglet.org; martinhomec@gmail.com; bernardo@braunlegal.com; steven@iepa.com; rliebert@cfbf.com; sas@a-klaw.com; mbachman@pacific-crest.com; ab1@cpuc.ca.gov; df1@cpuc.ca.gov; dbp@cpuc.ca.gov; jm3@cpuc.ca.gov; meb@cpuc.ca.gov; mts@cpuc.ca.gov; rmm@cpuc.ca.gov; kellie.smith@sen.ca.gov; mulloa@semprautilities.com; marywong@semprautilities.com; luluw@newsdata.com; centralfiles@semprautilities.com; mmunoz@sempra.com

david.kopans@fatspaniel.com; jeff@grosolar.com; tim@drakerlabs.com; Michael.Brown@utcpower.com; keith.mccrea@sablaw.com; sarahtuntland@yahoo.com; info@solarpathfinder.com; manjusuri@yahoo.com; lglover@solidsolar.com; Spatrick@sempra.com; hchoy@isd.co.la.ca.us; npedersen@hanmor.com; mmazur@3phasesRenewables.com; bob@energydynamix.net; susan.munves@smgov.net; mluevano@globalgreen.org; ph@phatmedia.com; steve@energyinnovations.com; djamison@capstoneturbine.com; douglass@energyattorney.com; akbar.jazayeri@sce.com; amber.dean@sce.com; annette.gilliam@sce.com; olivia.samad@sce.com; rkmoore@gswater.com; brad@bradburkearchitect.com; dfield@openenergycorp.com; michaely@sepcor.net; dan@energysmarthomes.net; troberts@sempra.com; liddell@energyattorney.com; andrew.mcallister@energycenter.org; irene.stillings@energycenter.org; lschavrien@semprautilities.com; kirk@NoElectricBill.com; gbeck@etfinancial.com; rod.larson@sbcglobal.net; dhardy@cabrilloedc.org; legislative@recsolar.com; shallin@recsolar.com; pepper@cleanpowermarkets.com; mdjoseph@adamsbroadwell.com; nsuetake@turn.org; cec@cpuc.ca.gov; dil@cpuc.ca.gov; stephen.morrison@sfgov.org; theresa.mueller@sfgov.org; matt@sustainablespaces.com; ek@a-klaw.com; sls@a-klaw.com; er@suntechamerica.com; jwmctarnaghan@duanemorris.com; placourciere@thelen.com; sww9@pge.com; policy@recurrentenergy.com; bcragg@goodinmacbride.com; enriqueg@lif.org; jsqueri@goodinmacbride.com; mday@goodinmacbride.com; tmacbride@goodinmacbride.com; jkarp@winston.com; rjl9@pge.com; ssmyers@att.net; ronnie@energyrecommerce.com; l_brown246@hotmail.com; cp@kacosolar.com; bkc7@pge.com; grant.kolling@cityofpaloalto.org; lex@consumercal.org; anewman@solarcity.com; gopal@recolteenergy.com; info@calseia.org; emackie@gridalternatives.org; jharris@volkerlaw.com; svolker@volkerlaw.com; LMerry@vervesolar.com; elarsen@rcmdigesters.com; gmorris@emf.net; robertg@greenlining.org; thaliag@greenlining.org; pucservice@dralegal.org; janice@strategenconsulting.com; jpross@sungevity.com; gary@sunlightandpower.com; tomb@crossborderenergy.com; stephen@seiinc.org; Tim@HMWInternational.com; sebesq@comcast.net; rbelur@enphaseenergy.com; michaelboyd@sbcglobal.net; julie.blunden@sunpowercorp.com; rob@consol.ws; johnrredding@earthlink.net; michaelkyes@sbcglobal.net; wamer@kirkwood.com; meganmmyers@yahoo.com; cmkehrein@ems-ca.com; glw@eslawfirm.com; jmcfarland@treasurer.ca.gov; jluckhardt@downeybrand.com; j.marston@suntechnics.com; ksoares@usc.edu; cte@eslawfirm.com; lmh@eslawfirm.com; kmills@cfbf.com; atrowbridge@daycartermurphy.com; ksheldon@sma-america.com; jnelson@psrec.coop; markgsp@sbcglobal.net; bills@clearEdgepower.com; ryan.flynn@pacificorp.com; rogerlaubacher@pvpowered.com; pbrehm@infiniacorp.com; john.schuster@utcpower.com; hfhunt@optonline.net; michelle.breyer@gs.com; ensmith@mwe.com; kdubin@mwe.com; obrienc@sharpsec.com; cswoollums@midamerican.com; jimross@r-c-s-inc.com; tcarlson@reliant.com; ghinners@reliant.com; bbaker@summitblue.com; dprall@solarpowerinc.net; kstokes@solarpowerinc.net; kjsimonsen@ems-ca.com; eshafner@solel.com; kennyk@solel.com; emello@sppc.com; tdillard@sppc.com; robert.pettinato@ladwp.com; cfaber@semprautilities.com; Marshall.Taylor@dlapiper.com; joel.davidson@sbcglobal.net; socal.forum@yahoo.com; david@nemtzow.com; tbardacke@globalgreen.org; ron@relenergy.com; sendo@ci.pasadena.ca.us; slins@ci.glendale.ca.us; THAMILTON5@CHARTER.NET; Jose.atilio@gmail.com; David.Townley@townleytech.com; bjeider@ci.burbank.ca.us; Javier.Burgos@sce.com; mponceatty@aol.com; mkay@aqmd.gov; Case.Admin@sce.com; james.lehrer@sce.com; mike.montoya@sce.com; paul.kubasek@sce.com; Robert.F.LeMoine@sce.com; rishii@aesc-inc.com; awhiting@openenergycorp.com; liddell@energyattorney.com; mshames@ucan.org; jim@dshsolar.com; rob@teamryno.com; usdepic@gmail.com; cmanzuk@semprautilities.com; jennifer.porter@energycenter.org; john.supp@energycenter.org; jon.bonk-vasko@energycenter.org; jyamagata@semprautilities.com; sephra.ninow@energycenter.org; cmanson@semprautilities.com; bautistafaith@yahoo.com; 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andy.vanhorn@vhcenergy.com; sandidgeo@aol.com; sewayland@comcast.net; Patricia.R.Thompson@gmail.com; sbeserra@sbcglobal.net; josephhenri@hotmail.com; pthompson@summitblue.com; dietrichlaw2@earthlink.net; nehemiah.stone@us.kema.com; nellie.tong@us.kema.com; karin.corfee@kema.com; phillip_mcleod@lecg.com;

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Terence Parker; United Solar Ovonic; 3800 Lapeer Road; Auburn Hills, MI 48326

Harvey Eder; Public Solar Power Coalition ; 1218 12th Street, No. 25; Santa Monica, CA 90401

David Coyle; ANZA Electric Co-Operative; P.O. Box 391908; Anza, CA 92539

George Wiltsee ; DRI Energy; 17182 Armstrong Avenue; Irvine, CA 92614

Mwirigi Imungi; The Energy Coalition ; 15615 Alton Parkway, Suite 245; Irvine, CA 92618

Heather J. Richman; Standford University; First Floor; Univ. of Public Affairs Bldg,170; Standford, CA 94305

Renee Webster-Hawkins; Dept. Of Community Services; P.O. Box 1947; Sacramento, CA 95812-1947

Calif. Environmental Protection; P.O. Box 2815; Sacramento, CA 95812-2815

Luke Tougas; Pacific Gas & Electric Co.; 77 Beale Street, B9A; San Francisco, CA 94105

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **NOTICE OF AVAILABILITY** of the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR APPROVAL OF SOLAR PV** has been electronically mailed to each party of record of the service list in **A.08-03-015, R.06-03-004/R.08-03-008, R.04-04-026, R.06-02-012 and R.06-05-027.** Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Chief Administrative Law Judge Angela Minkin

Executed this11th day of July, 2008 at Los Angeles, California.

Marivel Munoz

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902 M) for Approval of The SDG&E Solar Energy Project	Application 08-07-

NOTICE OF AVAILABILITY

APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) FOR APPROVAL OF THE SDG&E SOLAR ENERGY PROJECT

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July 11, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902 M) for Approval of The SDG&E Solar Energy Project	Application 08-07-

NOTICE OF AVAILABILITY

APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) FOR APPROVAL OF THE SDG&E SOLAR ENERGY PROJECT

TO: All Parties of Record in A.08-03-015, R.06-03-004/R.08-03-008, R.04-04-26, R.06-02-012 and R.06-05-027:

Pursuant to Rule 1.9 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), San Diego Gas & Electric Company ("SDG&E") hereby provides this Notice of Availability of: Application of San Diego Gas & Electric Company (U 902 M) for Approval of the SDG&E Solar Energy Project, filed with the Commission and served via this e-mail to the official service lists on July 11, 2008, in the above-captioned docket. The referenced submittal can be found on SDG&E's website at: http://sdge.com/regulatory/cpuc.shtml

Pursuant to Rule 2.3(c) of the Commission's Rules of Practice and Procedure, you may receive a copy of the Application by directing your request in writing to:

Ms. Martha Cendejas
Regulatory Case Analyst
SAN DIEGO GAS & ELECTRIC COMPANY
8330 Century Park Court, CP 31E
San Diego, CA 92123
Telephone: (858) 654-1176
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DATED at Los Angeles, California, on this 11th day of July, 2008.

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By: *____/s/ Steven D. Patrick_____*
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SAN DIEGO GAS & ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **NOTICE OF AVAILABILITY** of the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR APPROVAL OF SOLAR ENERGY PROJECT** has been electronically mailed to each party of record of the service list in **A.08-03-015, R.06-03-004/R.08-03-008, R.04-04-026**, **R.06-02-012 and R.06-05-027.** Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

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Executed this11th day of July, 2008 at Los Angeles, California.

/s/ Marivel Munoz
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