BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning	Rulemaking 04-04-003 (Filed April 1, 2004)

COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY ON THE PROPOSED DECISION OF ALJ BROWN IN R.04-04-003

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April 9, 2007

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning	Rulemaking 04-04-003 (Filed April 1, 2004)

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Pursuant to Article 14 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), San Diego Gas & Electric Company ("SDG&E") hereby respectfully files its comments in support of the Proposed Decision (PD) of Administrative Law Judge (ALJ) Brown issued in the above-captioned proceeding.

I.
COMMENTS

On December 2, 2005, Southern California Edison Company ("SCE") and Pacific Gas & Electric Company ("PG&E") filed a Petition for Modification (PFM) of Commission decisions (D).02-12-074 and (D).04-12-048. The PFM requested the modification of those decisions so as to alter the energy utilities' requirement to file periodic Energy Resource Recovery Accounts (ERRA) reports with the Commission. Specifically, the proposed change, if granted, would have resulted in quarterly ERRA filings as opposed to the monthly filings currently required of the utilities.

The PD issued on March 9, 2007, denies in part the request to change the current monthly filing requirement to a quarterly requirement while granting the request requiring the utilities to supply a breakdown of costs with their ERRA monthly filings and to make available all supporting documentation to Commission Staff, upon request.

SDG&E supports the ongoing efforts to reduce and streamline administrative burdens associated with regulatory reporting processes in this and other active proceedings. Thus while SDG&E certainly supports the PFM's request to change from monthly to quarterly filings, SDG&E believes the PD strikes a reasonable balance on the issue by authorizing the energy utilities to provide the monthly detailed summary report showing the activity in the Energy Resource Recovery Account while allowing the utilities to make available the supporting documentation for review by Commission Staff at the offices of the utility. Accordingly, SDG&E supports Commission adoption of the PD as a reasonable compromise that ensures Staff access to the energy utilities' ERRA cost detail and supporting documentation, while streamlining and easing administration of the utilities' ERRA reporting requirements. SDG&E notes that further changes to the Commission's reporting processes may prove necessary to further the worthwhile goal of streamlining administrative review.

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II.
CONCLUSION

WHEREFORE, for the forgoing reasons, SDG&E supports adoption of the PD issued in this proceeding, without modification.

Dated at San Diego, California this 9th day of April, 2007.

Respectfully submitted,

/s/ Carlos F. Peña_
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the forgoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY ON THE PROPOSED DECISION OF ALJ BROWN IN R.04-04-003** on each party named in the official service list for proceeding R.04-04-003 by electronic mail to the parties for whom an electronic address has been provided and by also mailing a properly addressed copy by first-class mail with postage prepaid. A copy was mailed to Commissioner Michael R. Peevey, ALJ Carol A. Brown, and Mark S. Wetzell via FedEx.

Executed this 9th day of April, 2007 at San Diego, California.

___/s/ Deanna M. Gutierrez
Deanna M. Gutierrez

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0404003 - CPUC - PG&E, EDISON,
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