

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



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Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program
and Other Distributed Generation Issues

Rulemaking 08-03-008
(Filed March 13, 2008)

**JOINT PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND
SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E)
FOR MODIFICATION OF DECISION 06-01-024**

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September 12, 2008

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Pursuant to Rule 16.4 of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) and Southern California Edison Company (“SCE”) (collectively, the “Joint Petitioners”) hereby submits this petition to modify D.06-01-024 (“PFM”).

**I.
SUMMARY**

The Joint Petitioners ask the Commission for two things in this PFM. The first is a modification to D.06-01-024 to explicitly allow, but not require, an IOU to file an advice letter (“AL”) with the Commission for approval to reduce its California Solar Initiative (“CSI”) collections from customers due to an over collection thereof. The second is, notwithstanding the Commission’s approval of the above referenced AL request, to specifically provide the requested prudent rate relief for SDG&E’s and SCE’ electric customers in 2009 by granting SDG&E and SCE each the authority to temporarily suspend collection of their otherwise required CSI revenue requirements for the duration of calendar year 2009 effective January 1.¹

¹ TURN has authorized the Joint Petitioners to indicate on its behalf that TURN supports the temporary suspension of collecting from customers the 2009 CSI revenue requirement.

SDG&E and SCE submit that suspension of the collection of this revenue requirement in the manner described in this PFM provides a rate decrease to their respective electric customers in 2009. This rate relief is in the best interest of such customers especially in these challenging economic times. This proposal will have no impact on the incentive funds available to or the operation of the CSI program in either SDG&E's or SCE's service territory.

II. INTRODUCTION AND BACKGROUND

Pursuant to D.06-01-024 and D.06-08-028, as modified by D.06-12-033, SDG&E and SCE implemented the CSI program in their respective service territories. SDG&E's and SCE's electric customers contribute to the CSI program currently through electric distribution rates as adopted by the Commission (D.06-01-024, OP4). The California Center for Sustainable Energy ("CCSE") administers the CSI program in SDG&E's service territory, while SCE is the Program Administrator in its service territory.

In 2006, SDG&E and SCE each respectively implemented a California Solar Initiative Balancing Account ("CSIBA") to record revenues and expenses attributable to the CSI program. The CSIBA does include an interest component whereby the net activity of funds collected and spent earn interest on a monthly basis. To date, the revenue collected and credited to each CSIBA is much greater than the solar incentives and associated program administration costs paid out and charged to each CSIBA pursuant to the operation of the CSI program in SDG&E's and SCE's respective service territories. To address this situation in favor of SDG&E's and SCE's electric customers, the Joint Petitioners recommend that the Commission allow SDG&E and SCE to temporarily suspend collection of the 2009 CSI funds from their respective electric customers and approve the Advice Letter process to effect any similar future temporary suspensions.

THE COMMISSION SHOULD MODIFY THE TIMING OF COLLECTING CSI FUNDING FROM ELECTRIC CUSTOMERS TO PROVIDE RATE RELIEF

The Joint Petitioners specifically petition the Commission to allow SDG&E and SCE to temporarily suspend collection of the 2009 CSI funds from their respective electric customers. SDG&E's and SCE's electric ratepayers have, to date, contributed far in excess of the incentives and associated program administration expenses paid with the likely prospect that the difference between collections and incentives will continue for each utility. D.06-01-024 established the funding for the CSI program in such a manner that the annual CSI budgets are relatively high in the early years and decline in later years as rebate levels fall. In addition, given that larger solar projects are taking upwards of 24 months to complete and performance based incentives are paid over a five year period, it is not unexpected that collections are outpacing incentives related to the CSI program.

Specifically, SDG&E customers will have contributed over \$100 million to the CSI program by the end of 2008. However, since the inception of the program through June 30, 2008, SDG&E has only paid out \$10 million in incentives and associated program administration expenses, and currently forecasts that no more than \$15 million in incentives will be paid by year-end 2008. From a cash flow perspective, SDG&E expects an overcollection of approximately \$90 million in the CSIBA at the end of 2008. Even if future commitments were added to the analysis, which are expected to be paid over the next few years, SDG&E would still have approximately \$30 million remaining. (See Attachment A.) SCE expects an overcollection of over \$343 million in the CSIBA at the end of 2009. (See Attachment B.) Based on current annual authorized funding and program spending projections, SCE could suspend the 2009 authorized CSI revenue collections of \$147 million well beyond 2009 and still support all current and projected program incentives with existing and future customer-contributed funds on hand.

In order to better match the timing of CSI program collections from customers with actual program costs, SDG&E and SCE propose to each suspend collection of the 2009 CSI funding from their respective electric customers until such time as the CSI program spending in each utility's service territory approaches equilibrium with the program funds available.

SDG&E and SCE are seeking a one-time temporary suspension of only the 2009 CSI revenue requirement. This proposal does not impact the schedule outline in D.06-12-033 for the collection of the CSI revenue requirements in future years. Both Utilities will begin collecting the 2010 CSI revenue requirement beginning January 1, 2010. Going forward, SDG&E and SCE propose to evaluate whether to recover their respective temporarily suspended 2009 authorized funding annually hereafter and will file as part of their respective annual regulatory account balance update advice letters to resume collection of their respective suspended 2009 CSI revenue requirements when appropriate as to each utility.

SDG&E and SCE submit that each of their respective proposed decreases to their respective customer rates in 2009 is in the best interest of their respective electric customers especially in these challenging economic times. SDG&E and SCE anticipate significant increased rate pressure in 2009 primarily from higher electric commodity costs (primarily driven by natural gas prices), higher electric transmission costs (primarily driven by increased infrastructure to meet growth and ensure compliance with current NERC reliability standards), as well as higher distribution costs as authorized in each respective general rate cases. [This is specific to SDG&E only]. Therefore, a rate offset for lower program collections would give customers some relief at a critical time.

For a typical SDG&E residential customer using 500 kWh per month, suspension of the CSI revenue requirement would result in a bill reduction of \$0.90 per month or 1.2%. For a

small commercial customer using 1,500 kWh per month, suspension of the CSI revenue requirement would result in a bill reduction of \$2.73 per month or about 1.0%.

(See Attachment C.)

Similarly, for a typical SCE residential customer using 500 kWh per month, suspension of the CSI revenue requirement would result in a bill reduction of \$1.35 per month, or 2.1%. For a small commercial customer using 1,500 kWh per month, suspension of the CSI revenue requirement would result in a bill reduction of \$3.16 per month, or 1.3%.

THE COMMISSION SHOULD APPROVE AN ADVICE LETTER MECHANISM TO ALLOW UTILITIES TO TEMPORARILY REDUCE CUSTOMERS' RATES IN AN OVERCOLLECTION SITUATION

On page 7 of D.06-01-024, Section III entitled "Summary of Program Funding," the Commission states the following:

"If the difference between program expenditures and the amounts the utilities collect in rates is substantial, we will consider adjusting the collection of the revenue requirement. Table 2 illustrates the allocation of total program revenue requirement by utility."

On page 8 of D.06-01-024 it further states:

"We herein direct each utility to collect the revenue requirement established in this order according to the schedule we adopt for each of the program years unless a subsequent order modifies this schedule."² (p.8)

The Decision does not specify a preferred procedural mechanism by which an IOU can seek Commission permission to authorize such an adjustment. The Joint Petitioners request the Commission modify the Decision, as set forth below, in order specifically allow IOUs to seek such rate reductions via the Commission's AL process.

² ALJ Duda indicated at the July 14 workshop on CSI Budgets, Incentives, and Dropouts that a change in the CSI revenue requirement as directed by D.06-01-024 would have to be filed as a Petition for Modification.

THIS PROPOSAL LEAVES THE CSI PROGRAM UNAFFECTED

In making this request, the Joint Petitioners recognize and support the strides made under the CSI program to increase solar installations in California and believe the budget levels to do so are appropriate. Furthermore, the Joint Petitioners recognize that CSI program participation has met or even exceeded those levels of participation determined in the initial CSI program design. For this reason, the Joint Petitioners are not suggesting in this PFM that any other changes be made to the CSI program itself, including incentive levels, program specifics, or CSI program operations that would impact either program administrators or program applicants.

SDG&E's and SCE's specific rate relief proposals are consistent with the discussion contained D.06-01-024, Section III, , in part: "As the staff report suggests, we set annual CSI budgets so that they are relatively high in the early years, and decline in later years as rebate levels fall and, hopefully, as the market's need for financial support decreases. *We will also provide for funding flexibility between program years in recognition of actual demand for funding*" [italics added].³

By granting this Petition for Modification the Commission will provide needed rate relief to utility customers but in so doing will not otherwise impact the incentive funds available to the CSI program, which SDG&E and SCE have shown to be more than adequate to fund anticipated CSI incentives in 2009 and projected future commitments. In addition, both SDG&E and SCE receive balancing account treatment of CSI program collections and incentives paid through the CSIBA. As a result even in the highly unlikely event that incentive payments exceeded CSI

³ D.06-01-024, Interim Order Adopting Policies and Funding for the California Solar Initiative, Section III, "Summary of Program Funding." January 12, 2006.

funds temporarily, the utilities would pay the incentives and receive balancing account protection.

The granting of this Petition for Modification will neither alter nor affect in any way the operation of the CSI program in either SDG&E's or SCE's service territory. In fact, SDG&E recognizes that CCSE's administration of the CSI program has resulted in customer reservations that have exceeded the pace outlined for the program. The program participation has been rapid in comparison to the expectation during the design phase of the program. The Commission should grant the Joint Petitioner's request for rate relief for the customers of SDG&E and SCE as requested.

THIS PETITION FOR MODIFICATION COULD NOT HAVE BEEN PRESENTED TO THE COMMISSION WITHIN ONE YEAR OF THE EFFECTIVE DATE OF D.06-01-024 AND D.06-12-033

Pursuant to Rule 16.4, if more than one year has elapsed since the effective date of the decision, a petition for modification must state the reason that the petition could not have been presented within one year. The Joint Petitioners' petition to modify the provisions of D.06-01-024 dealing with the timing of collecting the 2009 authorized CSI revenue requirement from IOU electric customers is based on the significant lag in funding CSI incentives over time, the current economic climate and the anticipated increased rate pressures on customers from higher electric commodity costs. Given the timing of these events, this petition could not have been brought to the Commission within one year of the effective date of D.06-01-024.

III. SUMMARY AND CONCLUSION

This proposal will have no impact on the funds available or the success of the CSI program but will provide rate relief to customers at a time when it is needed. As such, the Commission should approve this petition for modification completely and expeditiously. As stated above, specifically for SDG&E's and SCE's respective rate reduction requests, there are sufficient funds available to provide incentives for CSI projects and meet program administration in SDG&E's and SCE's respective service territories in the future. The Commission should approve SDG&E's and SCE's request to temporarily suspend collections of their respective 2009 CSI authorized revenue requirement of \$33 million for SDG&E and \$147 million for SCE and allow for possible future requests for funding flexibility as provided in D.06-01-024 to be addressed through the advice letter process.

PROPOSED MODIFICATION TO D.06-01-024

On page 7 of D.06-01-024, Section III entitled “Summary of Program Funding,” the Commission states the following:

"If the difference between program expenditures and the amounts the utilities collect in rates is substantial, we will consider adjusting the collection of the revenue requirement. Table 2 illustrates the allocation of total program revenue requirement by utility."

The Joint Petitioners propose the following new language (underlined):

"If the difference between program expenditures and the amounts the utilities collect in rates is substantial, the utilities may file an advice letter to request adjusting the collection of the revenue requirement. Table 2 illustrates the allocation of total program revenue requirement by utility."

Additionally, the Joint Petitioners propose the following language addition to Ordering Paragraph 4 of D.06-01-024 (addition underlined):

“PG&E, SCE, SDG&E, and SoCalGas shall allocate the funds adopted herein to the California Solar Initiative and collect those funds in distribution rates in appropriate ratemaking proceedings. If the difference between program expenditures and the amounts collected in rates is substantial, the investor-owned utilities listed above may file an advice letter to request adjusting the collection of the revenue requirement.”

For the reasons stated above the Joint Petitioners respectfully request the Commission grant this Petition For Modification as requested.

Respectfully submitted,

By: /s/ Steven D. Patrick
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September 12, 2008

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ATTACHMENT A

(SDG&E – CSI)

	Recorded Jan-08	Recorded Feb-08	Recorded Mar-08	Recorded Apr-08	Recorded May-08	Recorded Jun-08	Forecast Jul-08	Forecast Aug-08	Forecast Sep-08	Forecast Oct-08	Forecast Nov-08	Forecast Dec-08	Fcst 2009	Fcst 2010	Fcst 2011	
Scenario 1 - Status Quo Forecast (in Millions)																
CSI BA	Beginning Balance	\$ (68,510)	\$ (71,022)	\$ (73,588)	\$ (75,457)	\$ (77,877)	\$ (79,722)	\$ (81,670)	\$ (83,210)	\$ (85,002)	\$ (86,437)	\$ (87,614)	\$ (89,043)	\$ (90,475)	\$ (94,120)	\$ (76,102)
	Revenue	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(33,000)	(25,000)	(25,000)
	Expenses	483	380	1,049	481	1,035	937	1,358	1,108	1,469	1,719	1,469	1,469	32,530	45,945	45,105
	Net Activity	(2,267)	(2,370)	(1,701)	(2,269)	(1,715)	(1,813)	(1,392)	(1,642)	(1,281)	(1,031)	(1,281)	(1,281)	(470)	20,945	20,105
	Interest	(245)	(196)	(168)	(150)	(131)	(134)	(148)	(151)	(154)	(146)	(149)	(151)	(3,175)	(2,928)	(2,312)
	Transfer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Ending Balance	\$ (71,022)	\$ (73,588)	\$ (75,457)	\$ (77,877)	\$ (79,722)	\$ (81,670)	\$ (83,210)	\$ (85,002)	\$ (86,437)	\$ (87,614)	\$ (89,043)	\$ (90,475)	\$ (94,120)	\$ (76,102)	\$ (58,309)

Scenario 2 - Forecast with Collections Suspended in 2009 (in Millions)

CSI BA	Beginning Balance	\$ (68,510)	\$ (71,022)	\$ (73,588)	\$ (75,457)	\$ (77,877)	\$ (79,722)	\$ (81,670)	\$ (83,210)	\$ (85,002)	\$ (86,437)	\$ (87,614)	\$ (89,043)	\$ (90,475)	\$ (60,542)	\$ (41,350)
	Revenue	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	(2,750)	-	(25,000)	(25,000)
	Expenses	483	380	1,049	481	1,035	937	1,358	1,108	1,469	1,719	1,469	1,469	32,530	45,945	45,105
	Net Activity	(2,267)	(2,370)	(1,701)	(2,269)	(1,715)	(1,813)	(1,392)	(1,642)	(1,281)	(1,031)	(1,281)	(1,281)	32,530	20,945	20,105
	Interest	(245)	(196)	(168)	(150)	(131)	(134)	(148)	(151)	(154)	(146)	(149)	(151)	(2,597)	(1,752)	(1,095)
	Transfer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Ending Balance	\$ (71,022)	\$ (73,588)	\$ (75,457)	\$ (77,877)	\$ (79,722)	\$ (81,670)	\$ (83,210)	\$ (85,002)	\$ (86,437)	\$ (87,614)	\$ (89,043)	\$ (90,475)	\$ (60,542)	\$ (41,350)	\$ (22,340)

ATTACHMENT B

(SCE – CA Solar Initiative BA Recd thru July 08)

ATTACHMENT C

(SDG&E Average Rates)

**San Diego Gas & Electric Company
Electric Class Average Rates (Cents/kWh)
1-Sep-08**

	Current	Proposed	Change ¢/kWh	%
Residential	16.803	16.620	(0.183)	-1.1%
Small Comm.	17.167	16.985	(0.182)	-1.1%
Med. & Lg. C&I	14.239	14.095	(0.144)	-1.0%
Agriculture	16.807	16.632	(0.175)	-1.0%
Lighting	15.409	15.246	(0.163)	-1.1%
System Total	15.460	15.298	(0.162)	-1.1%

**Residential Bill (\$ / Month)
Typical Customer - Summer Inland**

500 kWh/Month	\$72.03	\$71.13	-\$0.90	-1.2%
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**Small Commercial Bill (\$ / Month)
Summer Season**

1,500 kWh/Month	\$294.61	\$291.88	-\$2.73	-0.9%
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **JOINT PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E) FOR MODIFICATION OF DECISION 06-01-024** on all known interested parties of record in **R.06-03-004, R.08-03-008 and R.04-03-017** electronic mail. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge Dorothy Duda, Maryam Ebke and Commissioner Michael R. Peevey.

Dated at Los Angeles, California this 12th day of September, 2008.

/s/ Marivel Munoz

Marivel Munoz

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