

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

**FILED**

4-25-17  
04:59 PM

Application of Southern California Edison Company (U 338-E), Pacific Gas and Electric Company (U 39-E), and San Diego Gas & Electric Company (U 902-E), for Approval of the Portfolio Allocation Methodology for all Customers.

A1704018 Application No. 17-04-\_\_\_\_

**JOINT APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E),  
PACIFIC GAS AND ELECTRIC COMPANY (U 39-E), AND SAN DIEGO GAS &  
ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF THE PORTFOLIO  
ALLOCATION METHODOLOGY FOR ALL CUSTOMERS**

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Dated: April 25, 2017

## Table Of Contents

<b><u>Section</u></b>	<b><u>Title</u></b>	<b><u>Page</u></b>
I. INTRODUCTION .....		1
II. EXECUTIVE SUMMARY .....		3
III. SUMMARY OF THE JOINT UTILITIES' REQUEST .....		4
IV. PROCEDURAL HISTORY AND LEGAL BACKGROUND .....		10
V. THE JOINT UTILITIES' PAM PROPOSAL IS REASONABLE AND SHOULD BE APPROVED .....		14
A. The Current Methodology is Broken and Must be Replaced .....		14
B. PAM Ensures Compliance with State Law and is Necessary Now to Ensure Customer Indifference .....		15
C. PAM is Fair, Equitable, Scalable, and Auditable .....		16
D. This Application is Complementary to Existing and Anticipated Commission Proceedings.....		17
VI. ORGANIZATION OF THE JOINT UTILITIES' TESTIMONY .....		20
VII. STATUTORY AND PROCEDURAL REQUIREMENTS .....		21
A. Statutory and Other Authority – Rule 2.1 .....		21
B. Legal Name and Principal Place of Business – Rule 2.1(a) .....		21
1. SCE .....		21
2. PG&E .....		22
3. SDG&E .....		22
C. Correspondence and Communication Regarding This Application – Rule 2.1(b) .....		23
D. Proposed Categorization, Need for Hearings, Issues To Be Considered, Proposed Schedule, and Relevant Safety Considerations — Rule 2.1(c).....		24
1. Proposed Category .....		25
2. Need for Hearings and Settlement .....		25

## Table Of Contents (Continued)

<b><u>Section</u></b>	<b><u>Title</u></b>	<b><u>Page</u></b>
3.	Issues to be Considered, Including Relevant Safety Considerations.....	26
4.	Procedural Schedule.....	28
E.	Organization and Qualification to Transact Business – Rule 2.2 .....	29
F.	Balance Sheet and Income Statement – Rule 3.2.(a)(1) .....	29
G.	Statement of Presently Effective and Proposed Rates – Rules 3.2(a)(2) and 3.2(a)(3).....	30
H.	Description of Joint Utilities’ Service Territory and Utility System – Rule 3.2(a)(4) .....	30
I.	Summary of Earnings – Rule 3.2.(a)(5).....	30
J.	Depreciation – Rule 3.2(a)(7) .....	30
K.	Capital Stock and Proxy Statement – Rule 3.2(a)(8).....	30
L.	Statement Pursuant to Rule 3.2(a)(10).....	30
M.	Service of Notice – Rule 3.2(b), (c) and (d) .....	31
N.	Index of Exhibits and Appendices to This Application .....	31
O.	Service List .....	32
VIII.	CONCLUSION .....	32
	APPENDIX A IOU INFORMATION RE: ORGANIZATION AND QUALIFICATION TO TRANSACT BUSINESS .....	
	APPENDIX B IOU BALANCE SHEETS AND INCOME STATEMENTS .....	
	APPENDIX C IOU STATEMENTS OF PRESENTLY EFFECTIVE RATES .....	
	APPENDIX D IOU SUMMARIES OF EARNINGS.....	
	APPENDIX E LISTS OF CITIES AND COUNTIES.....	

## Acronym List

Acronym	Definition
A.	Application
AB	Assembly Bill
CDWR or CERS	California Department of Water Resources
Commission or CPUC	California Public Utilities Commission
CCA	Community Choice Aggregation
CTC	Competition Transition Charge
CGDL	Customer Generation Departing Load
D.	Decision
ERRA	Energy Resource Recovery Account
GRC	General Rate Case
GTSR	Green Tariff and Shared Renewables
LCD	Least-Cost Dispatch
LSE	Load-Serving Entity
NEM	Net Energy Metering
NMDL	New Municipal Departing Load
NBC	non-bypassable charge
ORA	Office of Ratepayer Advocates
PG&E	Pacific Gas and Electric Company
PAC	Portfolio Allocation Charge
PAM	Portfolio Allocation Methodology
PCIA	Power Charge Indifference Adjustment
PCC	Product Content Category
PD	Proposed Decision
P.U. Code	Public Utilities Code
R.	Rulemaking
RDW	Rate Design Windows
REC	Renewable Energy Credit
RPS	Renewables Portfolio Standard
RA	Resource Adequacy
SDG&E	San Diego Gas & Electric Company
SONGS	San Onofre Nuclear Generating Station
SB	Senate Bill
SCP	Sonoma Clean Power Authority
SCE	Southern California Edison Company
TMDL	Transferred Municipal Departing Load
UOG	Utility-Owned Generation

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**I.**

**INTRODUCTION**

California stands at the cross-roads of its energy future. The State is ambitiously pursuing a fundamental transformation of the electric system to achieve historic greenhouse-gas reduction goals. At the same time, the move toward customer choice through Community Choice Aggregation (CCA), as well as other retail choice options, is accelerating. Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (together the Joint Utilities)<sup>1</sup> fully support California's environmental goals, as well as customer choice. It is imperative, however, that in implementing

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<sup>1</sup> Counsel for PG&E and SDG&E have authorized counsel for SCE to execute and file this Joint Application on behalf of the Joint Utilities pursuant to Commission Rule of Practice and Procedure 1.8(d).

these goals, costs are not shifted between customers, creating winners and losers among various customer groups. Not only is this a matter of equity, it is mandated by California law.

In this Application, the Joint Utilities propose a new methodology by which the costs and benefits of the their respective procurement portfolios are fairly allocated among two groups of customers: those that continue to purchase electricity from one of the utilities (bundled service customers) and those that choose to purchase electricity from another provider (departing load customers). By all accounts, the current methodology for allocating costs and benefits among these customer groups is fundamentally broken. A new path is urgently needed to ensure equal treatment for all customers, consistency with California law, and the long-term viability of customer choice programs in California.

The issue here is about all customers paying their fair share of the costs incurred to meet their electricity needs before they depart for other power procurement options, and receiving a fair share of the associated benefits. It is not about the Joint Utilities, who earn no money on the electricity that they purchase for their customers and are not financially impacted when customers choose another electricity supplier. But when customers elect to receive procurement service from another provider, bundled service customers should not shoulder greater costs as a result of this choice.

California's Legislature and the California Public Utilities Commission (CPUC or Commission) have repeatedly affirmed the fundamental principle of customer "indifference." In particular, the Legislature recently enacted California Public Utilities Code Section 366.3<sup>2</sup> which provides:

Bundled retail customers of an electrical corporation shall not experience any cost increase as a result of the implementation of a community choice aggregator program. The Commission shall also ensure that departing load does not experience any cost

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<sup>2</sup> All further statutory references are to the California Public Utilities Code (P.U. Code) unless otherwise noted.

increases as a result of an allocation of costs that were not incurred on behalf of the departing load.

Unfortunately, the current methodology used by the Commission to assign costs and benefits to bundled service and departing load customers has proved to be controversial, litigious, and fails to achieve the Legislature's requirement. The current approach forecasts costs based on administratively-determined estimates of hypothetical future market prices, with no true-up for actual costs. Because this complex process is not and cannot be based on actual, current market prices, it results in cost shifts between customer groups. This cost shift violates California law, is fundamentally unfair to those customers that bear the cost shift, and must be addressed now, because the costs shifts will substantially increase as departing load increases and are simply not sustainable.

The Joint Utilities' proposed approach is the Portfolio Allocation Methodology or "PAM." Under this approach, actual costs and benefits and a true-up process ensure that all customers pay their fair share of the actual costs that were incurred to procure contracts and resources on their behalf, and that they receive a fair share of the actual benefits associated with those contracts and resources. PAM is transparent, objective, and fully consistent with California law, as explained in more detail below, and should be expeditiously adopted by the Commission.

## **II.**

### **EXECUTIVE SUMMARY**

By this Application, the Joint Utilities respectfully request that the Commission adopt the Joint Utilities' PAM proposal. As Commissioner Peterman recently explained "the expansion of CCA [Community Choice Aggregation] reinforce[s] the notion that the departing load landscape has fundamentally changed since the Commission's decisions on related matters in 2005 and 2007: this argues for reviewing the Commission's underlying policy determinations, which were

made under a different set of circumstances than exist today.”<sup>3</sup> The Joint Utilities agree that CCA growth, as well as the possible further opening of direct access (DA), fundamentally changes the departing load landscape, and the time for the Commission to carefully examine these different circumstances is now. Action is necessary to comply with Sections 365.2 and 366.3, which became effective on January 1, 2016. The Commission’s policies on cost recovery in the context of customer choice programs must always adhere to law, which requires mechanisms that prevent one set of customers from bearing costs associated with another set of customers, *i.e.*, ensures customer indifference. This Application serves as effective notice that the Commission may – and for the reasons made plain herein, should – act swiftly to replace the current deficient indifference calculation with a method that achieves true indifference for all customers, through an accurate, equitable, and transparent allocation of costs and benefits of the Joint Utilities’ generation portfolios to all customers on whose behalf those portfolios were procured. It is in that context that the Joint Utilities submit this Application.

### **III.**

#### **SUMMARY OF THE JOINT UTILITIES’ REQUEST**

In this Application and supporting Testimony (Exhibits and Appendices), the Joint Utilities seek the following relief:

- The “Current Methodology” consists of departing load customers paying Power Charge Indifference Adjustment (PCIA) and Competition Transition Charge (CTC) rates. These rates are based on hypothetical projections of future market costs. Under this Application, the Current Methodology will be replaced by a PAM, which will consist of all departing load customers paying Portfolio Allocation Charge (PAC) and CTC rates. Under PAM, all departing load

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<sup>3</sup> March 28, 2017, Assigned Commissioner and Administrative Law Judge Ruling on Motion Seeking Consolidation in Application (A.) 16-06-013 at p. 7.



customers and remaining bundled service customers will pay the actual costs of the generation portfolios procured or built on their behalf. In addition, all departing load customers and remaining bundled service customers will be allocated the actual value of those portfolios (*e.g.*, energy and ancillary services revenues, Renewable Energy Credits (RECs) and Resource Adequacy (RA) attributes). PAM will be implemented on a “vintaged-portfolio” basis pursuant to the existing Commission methodology, which is dependent on the date a customer departs bundled utility procurement service, thereby ensuring that all customers are only assigned the costs and benefits of resources actually procured or built on their behalf. To further ensure indifference for all customers, PAC and CTC rates will be retrospectively “trued up” in the same manner that bundled service customers’ generation rates are today. The Joint Utilities propose that PAM be implemented through the Joint Utilities’ respective Energy Resource Recovery Account (ERRA) Forecast proceedings. The Joint Utilities propose that PAM would take effect no sooner than one year from Commission approval through the next utility-specific ERRA Forecast proceeding (*e.g.*, if approved in December 2017, PAM would be implemented in the Joint Utilities’ 2019 ERRA Forecast proceedings filed in 2018, with PAM rates in effect as of January 1, 2019).

- To ensure that departing load customers receive the full value of the generation portfolio attributes allocated to them, the Joint Utilities seek clarification of the existing Commission rules established in Decision (D.) 11-12-052 to confirm that RECs transferred to departing load customers retain their original Product Content Category (PCC) attributes. Specifically, the Joint Utilities request a finding that RECs transferred pursuant to Commission-mandated allocation mechanisms do not, by virtue of that allocation, become “unbundled RECs” as that term is used in

Section 399.16(b)(3)<sup>4</sup> and in D.11-12-052. Additionally, this Application requests that the Commission implement the long-term procurement requirement in the Renewables Portfolio Standard (RPS) statute, as revised in 2015 by Senate Bill (SB) 350,<sup>5</sup> to the extent necessary to clarify that RECs associated with either contracts between the procuring utility and the generator for delivery terms of 10 years or more or the procuring utility's ownership or ownership agreements for eligible renewable energy resources, and subsequently transferred to other Load-Serving Entities (LSEs) under PAM or another Commission-approved allocation methodology, count for the transferee as RECs from "its contracts of 10 years or more in duration" or "its ownership or ownership agreements for eligible renewable energy resources."<sup>6</sup> These clarifications will allow other LSEs to realize the full benefits of renewable procurement done on behalf of their customers and for which those customers will be paying their proportional share of the costs.

- The Joint Utilities propose to eliminate all arbitrary cost allocation periods<sup>7</sup> that have been applied by the Commission to the Current Methodology in the past.

For instance, there would be no 10-year cost allocation period limit for Utility-

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<sup>4</sup> All further statutory references are to the California Public Utilities Code unless otherwise noted.

<sup>5</sup> See Cal.Pub.Util. Code § 399.13(b) (requiring that, by January 1, 2021, at least 65 percent of a retail seller's procurement be from "its contracts of 10 years or more in duration or in its ownership or ownership agreements" for RPS-eligible resources). The Joint Utilities have historically categorized their contracts in reporting on RPS compliance as long-term (durations of 10 years or more) or short-term based upon the delivery term of contracts. The Commission has not yet implemented P.U. Code §399.13(b) as revised by SB 350, but it has previously clarified that "repackaged contracts," meaning those entered into by one entity and then re-packaged and transferred to other entities to meet their long-term contracting needs, continue to count toward the RPS long-term requirements added by SB 2 (1X) (2011). See D.12-06-038, pp. 44-45.

<sup>6</sup> Cal. Pub.Util.Code §399.13(b).

<sup>7</sup> The Joint Utilities propose to continue to exclude any "short-term" (*i.e.*, less than one year in length) contracts or transactions from departing load customers' cost recovery obligations. See D.11-12-018, Finding of Fact (FOF) 24 and Conclusion of Law (COL) 3.

Owned Generation (UOG) fossil fuel resources acquired through a procurement process after 2002. Similarly, Energy Storage contracts would also have no arbitrary 10-year limit for cost allocation. Under PAM, the actual costs and benefits associated with post-2002 UOG and Energy Storage will be allocated to both bundled service and departing-load customers. Any arbitrary time limitation on cost allocation necessarily results in either a cost increase to bundled service customers due to departing load or a failure to allocate benefits to departing load customers, depending on the actual market value of the resource(s). Accordingly, any such arbitrary limitation on cost allocation is contrary to law. Instead, the Joint Utilities propose in this Application that departing load cost recovery for UOG resources should be consistent between “legacy” (*i.e.*, pre-2002) and post-2002 UOG resources. Specifically, the Joint Utilities propose that both legacy and post-2002 UOG resources continue to be eligible for cost recovery from departing load customers until the last of the long-term contracts associated with those customers’ vintage expire, with the caveat that the Joint Utilities specifically reserve the right to seek Commission approval of future UOG cost recovery relief from those customers should circumstances so warrant.<sup>8</sup>

- In recognition that PAM will require greater data access for LSEs into the details of the Joint Utilities’ generation portfolios, the Joint Utilities seek a formal process to provide portfolio and contract data to LSEs as a part of PAM. To that end, the Joint Utilities propose to open a second phase in this proceeding. In Phase 2, the Joint Utilities will work with LSEs to develop proposals on this issue,

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<sup>8</sup> For example, if a utility experiences an expectedly-large load departure after the presumptive cost-recovery period ends but before the UOG resource is retired, it may become necessary to revisit the cost-recovery issue to preserve bundled service customer indifference as mandated by state law. In such a situation, the Joint Utilities reserve their rights to seek appropriate relief at the Commission.

including on the frequency and format of the portfolio data that will be shared with LSEs to facilitate their portfolio planning.

- As discussed in detail in the Joint Utilities’ Testimony, the Joint Utilities propose to establish certain new, and modify certain existing, regulatory cost recovery balancing accounts to implement PAM.
- As discussed in detail in the Joint Utilities’ Testimony, the Joint Utilities propose that the PAM apply to all bundled service and departing load customers, and that the net costs (*i.e.*, total costs less realized market revenues) of the resources for which the customers are responsible be collected in the following manner:
  - The Joint Utilities propose to apply CTC and PAC rates to customers in the same manner as CTC and PCIA are applied today.
  - Bundled service customers are responsible for all of the resources in their utility’s generation portfolio. As such, the net costs of the CTC-eligible resources will be recovered from bundled service customers through the CTC rate component, and the net costs of all other PAM-eligible resources will be recovered from bundled service customers through the bundled service generation rate.<sup>9</sup>
  - DA<sup>10</sup> and CCA customers are responsible for all CTC-eligible resources and all PAM-eligible resources procured or built prior to their departure. As such, the net costs of the CTC-eligible resources will be recovered from them through the CTC rate component, and the net costs of PAM-

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<sup>9</sup> In other words, instead of paying the PAC rates associated with all vintaged portfolios, bundled service customers will pay a single bundled service generation rate that includes both their “PAC-related” obligations and the other costs of meeting their generation service needs.

<sup>10</sup> To the extent that DA is expanded, the Joint Utilities propose that any future DA customers would pay a vintaged PAC and receive the associated benefits.

eligible resources for which they are responsible will be collected through a vintaged PAC rate where applicable.

- For other categories of departing load, the Joint Utilities propose to utilize the same process of allocating RA and REC benefits to these customers' LSEs. Where these benefits may not be allocated to the LSE, the Joint utilities propose to monetize these benefits and reduce the PAC and/or CTC responsibility for the customer. For example, nearly all Customer Generation Departing Load (CGDL) is subject to the CTC, and certain CGDL installed after February 2015 is subject to the 2001 vintage PCIA.<sup>11</sup> The Joint Utilities recognize that, under PAM, it is impractical to allocate RECs and RA to individual CGDL customers. Thus, under PAM the Joint Utilities propose that bundled service customers "buy back" the RECs and RA that would have otherwise been allocated to the CGDL customers.
- Pursuant to D.15-01-051, Green Tariff and Shared Renewables (GTSR) customers are subject to CTC and a vintaged PCIA based on the date they elect to begin service on GTSR. The Joint Utilities acknowledge that GTSR customers are responsible for the same generation-related above-market costs that are the subject of this Application; however, GTSR customers are also responsible for other generation-related costs that, together with the CTC and PCIA, are meant to ensure non-participant indifference. In light of the fact that indifference as it relates to GTSR customers consists of more than just the above-market costs associated with the CTC and PAC rates, the Joint Utilities propose that GTSR non-participant indifference, including the consideration of how the CTC and

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<sup>11</sup> See SCE AL 3263-E and 3263-E-A, SDG&E AL 2778-E and 2778-E-A, and PG&E AL 4743-E and 4743-E-A.

PAC rates should be applied, be considered once a final decision resolving this Application is issued.

- The Joint utilities propose to retain the current allocation methods used for setting CTC and PCIA rates for setting PAM rates until those methods can be revisited in each Utilities' General Rate Case (GRC) Phase II or Rate Design Window (RDW) proceedings.

Detailed descriptions and justifications for the Joint Utilities' proposals are set forth in the Testimony, served concurrently herewith and marked as Exhibit Joint IOUs-01 and supporting Appendices.

#### IV.

#### **PROCEDURAL HISTORY AND LEGAL BACKGROUND**

The Legislature, as an express condition of authorizing retail choice, required that procurement costs incurred on behalf of utility customers cannot be bypassed when those customers choose to depart utility service for another provider. This is reflected in Sections 365.2, 366.2, and 366.3, among others, which prohibit cost shifting or cost increases to remaining bundled service customers as a result of departing or migrating load, and, correspondingly, require that departing load customers not pay costs that were not incurred on their behalf.<sup>12</sup> These statutes protect all customers by providing that costs must be appropriately allocated to those on whose behalf they were incurred.

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<sup>12</sup> See e.g., Cal.Pub.Util. Code §366.2(a)(4) ("The implementation of a community choice aggregation program shall not result in a shifting of costs between the customers of the community choice aggregator and the bundled service customers of an electrical corporation."); §366.2(d)(1) ("It is further the intent of the Legislature to prevent any shifting of recoverable costs between customers."); §365.2 ("The commission shall ensure that bundled retail customers of an electrical corporation do not experience any cost increases as a result of retail customers of an electrical corporation electing to receive service from other providers. The commission shall also ensure that departing load does not experience any cost increases as a result of an allocation of costs that were not incurred on behalf of the departing load."); §366.3 ("Bundled retail customers of an electrical corporation shall not experience any cost increase as a result of the implementation of a community choice aggregator

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The Legislature has consistently adopted statutes that ensure an equitable allocation of costs and benefits among and between retail electric customers, especially in situations where customers have a choice of energy service providers. When California initially deregulated its energy markets, Section 367, which created the CTC, ensured that all customers bear their share of UOG and purchased power costs. Similarly, when the California Department of Water Resources (CDWR or CERS) was required to procure for the Joint Utilities' customers because of market dysfunction during the 2000-01 California Energy Crisis, the Legislature enacted statutes to ensure that all customers, including those customers departing from utility bundled service, pay their "fair share" of costs incurred on their behalf.<sup>13</sup>

When the Legislature enacted Assembly Bill (AB) 117, the enabling legislation for CCAs, it expressly included provisions to address the allocation of costs and benefits for customers receiving CCA service. Several parts of the statute are critical to the cost-benefit allocation issue. First, in the context of CCAs submitting their implementation plans to the Commission, Section 366.2 provides that the Commission's primary responsibility in reviewing these plans is to "determine the cost-recovery mechanism to be imposed" on the CCA<sup>14</sup> and that its findings on the implementation plan must address the cost recovery issue.<sup>15</sup> In fact, a CCA cannot start providing service until the Commission has determined the appropriate cost recovery mechanism.<sup>16</sup>

Second, the Legislature addressed specific costs that were to be recovered from bundled service customers departing to CCA service, including CDWR costs and utility procurement-

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program. The commission shall also ensure that departing load does not experience any cost increases as a result of an allocation of costs that were not incurred on behalf of the departing load.").

<sup>13</sup> Cal.Pub.Util. Code §366.1(d)(1) (requiring customers to pay a "fair share" of CDWR costs).

<sup>14</sup> *Id.* §366.2(c)(5).

<sup>15</sup> *Id.* §366.2(c)(7).

<sup>16</sup> *Id.* §366.2(c)(8); *see also* § 366.2(i) and (j).

related costs incurred prior to their departure.<sup>17</sup> CCA customers are required to pay their “share” of the procurement costs and to do so “through the expiration of all then existing electricity purchase contracts entered into by the electrical corporation.”<sup>18</sup> The charges to recover these costs are “nonbypassable.”<sup>19</sup> In other words, departing load customers cannot (legally or equitably) “bypass” these charges by choosing service from an alternative retail service provider, such as a CCA.

Finally, the Legislature addressed the allocation of benefits to departing CCA customers. Specifically, the Legislature required:

Estimated net unavoidable costs paid by the customers of a community choice aggregator shall be reduced by the value of any benefits that remain with bundled customers, unless the customers of the community choice aggregator are allocated a fair and equitable share of those benefits.<sup>20</sup>

Since it enacted the CCA enabling statute in 2002, the Legislature has continued to make clear that customers that depart utility bundled service procurement for CCA or DA service should pay their fair share of the procurement costs incurred on their behalf so as not to increase the costs to remaining bundled service utility customers. The most recent examples of this consistent Legislative policy are Sections 365.2 and 366.3, which were enacted as a part of SB 350 and became effective January 1, 2016, requiring that remaining utility customers “shall not experience any cost increase” as a result of customers departing for CCA or DA service. The statute similarly ensures that departing load customers do not experience any cost increases as a result of an allocation of costs that were not incurred on their behalf. It is against this statutory backdrop that the Joint Utilities propose the PAM methodology.

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<sup>17</sup> *Id.* §366.2(d)-(f).

<sup>18</sup> *Id.* §366.2(f)(2).

<sup>19</sup> *Id.* §366.2(h)(2).

<sup>20</sup> *Id.* §366.2(g).



The Commission has implemented the existing statutory requirements through a series of decisions over the past decade. For example, in D.04-12-048, the Commission approved a non-bypassable charge (NBC) to recover above-market costs when customers: (1) elect DA service; (2) depart to be served by a CCA; or (3) elect another departing load option. The amount of the NBC is determined based on the timing of the customer's departure (*i.e.*, customer vintage) and the date of the new generation resource commitment. D.08-09-012 approved the final calculation methodology associated with the new generation resource commitments authorized in D.04-12-048 using a vintaged total portfolio indifference calculation.<sup>21</sup> The Commission recently revised its vintaging methodology in D.16-09-044. The vintaged PCIA, as the Commission has defined it, is applicable to departing load customers not exempt from the NBC associated with the new generation resources, as defined in D.08-09-012.

As required by state law,<sup>22</sup> the purpose of the Current Methodology is to allocate the above-market costs associated with procurement made by the utility to those customers on whose behalf the procurement was made, including bundled service customers and customers that depart a utility's procurement service to receive service from an alternative supplier (*i.e.*, departing load customers). Bundled service customers pay their proportion of above-market costs through the utility's generation rates. The problem is that the "above-market" cost approximation allocated to departing load customers under the Current Methodology does not, in fact, reflect actual market costs. Indeed, when the Commission adopted the Current Methodology for use in determining departing load customers' cost responsibility for generation procured or built after the Energy Crisis, it acknowledged that:

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<sup>21</sup> The total portfolio indifference calculation, originally defined in D.06-07-030, as modified by D.07-01-025, D.08-09-012 and D.11-12-018, includes the addition of new generation resources to each utility's total portfolio of resources, by vintage.

<sup>22</sup> See D.08-09-012; D.11-12-018; Cal.Pub.Util. Code §§365.2, 366.1(d)(1), 366.2(a)(4), 366.2(c)(7) and 366.3.

If, due to future changing circumstances, the processes adopted by this decision for determining the [PCIA and CTC] become unworkable, unbalanced, or unfair, parties may propose and request, for our consideration, modifications to the form of the [PCIA and CTC] or the manner in which [it] should be determined or calculated.<sup>23</sup>

As will be described throughout the Application and Testimony, circumstances have changed; the Current Methodology has become unworkable, unbalanced, and unfair to remaining bundled service customers; and a complete replacement to the Current Methodology is now necessary.

## **V.**

### **THE JOINT UTILITIES' PAM PROPOSAL IS REASONABLE AND SHOULD BE APPROVED**

#### **A. The Current Methodology is Broken and Must be Replaced**

As discussed above, the Current Methodology consists of charging departing load customers PCIA and CTC rates. This Commission-approved method of recovering costs from departing load customers is broken, and results in a cost shift from departing load customers to remaining bundled service customers, which is prohibited by state law. It is imperative that the Commission act expeditiously to remedy the flawed cost recovery mechanism, prevent further cost-shifting, and provide certainty on cost responsibilities for communities that are evaluating customer choice programs.

Currently, the Commission relies on a method to allocate costs to departing load customers based on an estimate of the “above-market” costs for resources procured or built prior to their departure from bundled utility procurement service. Those “above-market” costs estimates are based on administratively-determined “market price benchmarks” for RECs and RA. Relying on those benchmarks is no longer reasonable because they are grossly inflated

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<sup>23</sup> D.08-09-012 p. 58.

relative to actual market conditions (making the Joint Utilities’ portfolios appear less “above-market”). This directly translates into departing load customers paying PCIA and CTC rates that do not fully pay for their share of the actual above-market costs of the portfolios, which is contrary to law. But the Joint Utilities ultimately recover these costs. Because these are pass-through costs (pursuant to AB 57), by definition the remaining utility bundled service customers pay the shortfall through their generation rates, resulting in a cost shift that is prohibited by statute.

Moreover, the Current Methodology cannot be “fixed,” because, among other reasons, it relies on benchmarks to proxy hypothetical market outcomes. By definition, any pre-determined benchmark cannot predict actual market outcomes with complete accuracy. This inevitable failure results in winners and losers, depending on actual market results. Accordingly, the Current Methodology does not comport with Sections 365.2 and 366.3, and must be replaced.

**B. PAM Ensures Compliance with State Law and is Necessary Now to Ensure Customer Indifference**

The Commission should replace the Current Methodology with PAM. The best way to comply with law is to remove the guesswork inherent in using administratively-set benchmarks, and replace it with a methodology that uses actual market results and actual costs (with everything trued-up), to accurately and transparently assign costs and benefits proportionally to those customers on whose behalf the underlying resources were procured. That is PAM. Any methodology that does not incorporate actual market costs, revenues, and results will, by definition, result in cost-shifting – either to, or from, one set of customers to others. Cost-shifting is occurring now and will only increase with increasing levels of departing load. California law prohibits such a result.

**C. PAM is Fair, Equitable, Scalable, and Auditable**

Not only will PAM bring back the Commission's departing load ratemaking regime back into compliance with the statutory customer indifference requirement, it is also fair and equitable to all customers, bundled service and departing load customers alike. First, under PAM, all customers pay for exactly all of the costs of the generation resources procured on their behalf, and receive exactly all of the benefits of those resources. Those benefits consist of the energy and ancillary services revenues as actually realized in the energy markets as offset by the actual costs of those resources,<sup>24</sup> as well as RA and REC attribute allocations.

Second, allocating the attributes of the Joint Utilities' respective portfolios to LSEs will enable those LSEs to plan for their future self-determined procurement with the knowledge of what obligations they have already met, and what costs their customers are still obligated to pay (and for how long). Those LSEs can accordingly scale their future procurement planning to serve their load to achieve the State's energy policy goals and mandates, including the long-term RPS resources required of all LSEs starting in 2021.

Third, PAM rates (*i.e.*, PAC and the new CTC) are transparent and should be more predictable than the existing rates under the Current Methodology (*i.e.*, PCIA and existing CTC). That is due to the fact that PAM eliminates the concept of fluctuating administratively-set benchmarks. The Joint Utilities' generation portfolios that will be allocated under PAM are largely made up of fixed-price, long-term RPS contracts.<sup>25</sup> This will provide greater rate stability and predictability than the Current Methodology.

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<sup>24</sup> The Joint Utilities will dispatch their portfolios into the energy markets consistent with the Commission's least-cost dispatch principles, just as they currently do.

<sup>25</sup> These contracts have all been previously approved by the Commission as just and reasonable, and in many cases entered into at the Commission's direction on a long-term basis. Under PAM, PAC rates will continue on a vintaged basis for the entire term of the contracts in the vintaged portfolio. This is both equitable and identical to the treatment of those contracts under the Current Methodology.

Fourth, PAM is scalable. Unlike the Current Methodology, which does not reflect actual market results and is completely unworkable at large levels of departing load,<sup>26</sup> as discussed in detail in the Joint Utilities' Testimony, PAM is "indifferent" to the level of departing load. It scales seamlessly from low to high levels of departing load (including if load returns to the Joint Utilities in the future).

**D. This Application is Complementary to Existing and Anticipated Commission Proceedings**

The Joint Utilities acknowledge that many of the Commission's existing and anticipated regulatory proceedings are and will address departing load ratemaking issues. This Application will not interfere with those proceedings. The intent here is to replace the Current Methodology. Until that time, the ERRA Forecast Proceedings will continue under the Current Methodology.

This Application is also complementary to and will not interfere with the Joint Utilities' annual ERRA Compliance proceedings. Because under PAM departing load customers and their LSEs will have a material vested interest in the Joint Utilities' generation portfolios, it is important that they have visibility into the Commission's robust oversight of the Joint Utilities' management of those portfolios. That oversight occurs in the Joint Utilities' respective annual ERRA Compliance proceedings, where the Commission ensures that the Joint Utilities prudently administer their generation contracts (which constitute the vast majority of the PAM-eligible

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<sup>26</sup> While the Current Methodology is flawed even when small amounts of load departs (as discussed above), the flaws are amplified with large amounts of load departure. In that situation -- which the State may soon face -- the Joint Utilities would need to liquidate the excess resources and would not be able to sell their portfolios and their attributes at prices anywhere near the benchmark prices because the market will be flooded with energy and other attributes. Indeed, even a more accurate market-based index, if one existed, would be unable to capture the effects of such a scenario. Simply put, there is no accurate way to use benchmarks to simulate an excess-attribute "fire sale." Therefore, as the level of departing load increases, the current "above-market" construct will result in an ever-decreasing number of remaining bundled service customers absorbing the inevitable, ever-increasing above-market portfolio costs.

resources), appropriately manage UOG outages, and dispatch all of their generation resources pursuant to the Commission's Least-Cost Dispatch (LCD) standard.

In addition, the Joint Utilities file periodic GRC Phase 2 and RDW applications. These ratemaking proceedings generally deal with cost allocation and rate design issues. The result from this proceeding will likely affect those proceedings, but only prospectively. The Joint Utilities' current GRC Phase 2 and RDW proceedings will continue to proceed pursuant to their current scopes and schedules.

The Commission also ordered a Working Group in D.16-09-044 to examine PCIA issues, to be led by SCE and Sonoma Clean Power Authority (SCP). Over the last six months, the Joint Utilities worked in good faith with SCP, many other CCA interests, DA interests, consumer advocate groups like the Office of Ratepayer Advocates (ORA), and labor and environmental groups. Those efforts were collaborative, cooperative, and led to the submission of a Final Report and a pending Joint Petition for Modification to improve transparency of the PCIA calculation under the Current Methodology. As the parties to that Joint Petition for Modification stated, all parties specifically "reserve[d] all of their respective rights to advocate for changes and/or a replacement to the PCIA in different forums."<sup>27</sup> Nothing in this Application is to the contrary. Moreover, the CCAs involved in the PCIA Working Group have acknowledged that while the Working Group "provided a forum for good discussion" it did not result "in a consensus proposal to date."<sup>28</sup> Having failed to reach consensus in the PCIA Working Group process, this Application, which proposes a solution for many of the concerns addressed in the PCIA Working Group, is appropriate.

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<sup>27</sup> Joint Utilities' and Community Choice Aggregators' Joint Petition for Modification of D.06-07-030, filed in R.02-01-011 on April 5, 2017, p. 2, n. 3.

<sup>28</sup> California Community Choice Association's Notice of Ex Parte Communication, filed in A.14-05-024 on March 17, 2017 at 2.

The Commission created a second phase in each of the Joint Utilities' 2017 ERRA Forecast proceedings<sup>29</sup> to ensure consistent treatment of pre-2009 vintaged DA customers and their associated indifference amounts across utilities, while taking into consideration the unique circumstances in each service territory.<sup>30</sup> Phase 2 of the 2017 ERRA Forecast proceeding was created to adjudicate the very discrete issue of whether the indifference requirement for the pre-2009 vintage DA customers has expired now that the CDWR contracts have expired—a question that is only relevant to a limited subset of customers under the construct of the Current Methodology and can and should proceed in parallel to this Application.<sup>31</sup>

The Commission issued a fourth amended scoping memo and ruling (CCA Bond Ruling) on March 1, 2017 in Rulemaking (R.)03-10-003, ruling that “[t]he proceeding now has one remaining task: developing a permanent methodology and process to implement the requirements of Section 394.25(e) with respect to customers of CCAs that are involuntarily returned to service provided by investor-owned utilities.”<sup>32</sup> The Joint Utilities agree with the scope and schedule set forth for the adoption of a permanent CCA bond methodology. Upon approval of this Application, the determination of how the approved CCA bond methodology is

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<sup>29</sup> A.16-04-018 for SDG&E, A.16-05-001 for SCE, and A.16-06-003 for PG&E, which are anticipated to be consolidated.

<sup>30</sup> November 7, 2016 Assigned Commissioner's Ruling Amending Scope by Creating a Second Phase.

<sup>31</sup> Consistent with the Joint Utilities' proposal in this proceeding, those 2001 vintage customers should no longer be responsible for PCIA (or PAC), with the caveat that the Joint Utilities specifically reserve the right to seek Commission approval of future UOG cost recovery relief from those customers should circumstances so warrant. In fact, one such particular scenario is currently before the Commission in the 2017 ERRA Forecast Phase 2 proceedings, specifically regarding ongoing cost recovery from 2001 vintage departing load customers related to SCE's and SDG&E's retired San Onofre Nuclear Generating Station (SONGS). This issue is known as the DA Consensus Ratemaking Proposal (approved by the Commission in D.14-05-003 and D.14-05-022). SCE and SDG&E view that issue as settled and final, but to the extent that departing load customer groups dispute that Commission-approved cost recovery mechanism, it should continue to be litigated in the 2017 ERRA Forecast Phase 2 proceedings.

<sup>32</sup> R.03-10-003, March 1, 2017, Fourth Amended Scoping Memo at p. 2.

applied under the PAM framework should be adjudicated in a subsequent phase of this proceeding or a separate proceeding.

Finally, the issues raised in this Application are appropriately addressed here. A petition (or petitions) for modification is not an appropriate means of pursuing the proposals set forth herein. The Joint Utilities do not seek to modify or update the existing cost recovery mechanisms that have been formed through dozens of Commission decisions over the last decade or so. Rather, the Joint Utilities propose a fundamental reform of the allocation of utility power procurement costs and benefits to achieve something the existing mechanisms do not achieve – and cannot through any modification or update achieve – true indifference, through an accurate, equitable and transparent new methodology. The nature of the proposed reforms must be supported through factual and policy testimony and an evidentiary record that would not be possible through a petition for modification. Broad policy reforms have typically been undertaken by the Commission through proceedings that allow for the development of a robust evidentiary record, rather than through a simple motion (petition) for modification of existing (often dated) decisions.

## **VI.**

### **ORGANIZATION OF THE JOINT UTILITIES' TESTIMONY**

The Joint Utilities' Testimony submitted in support of this Application, which has preliminarily been marked for identification as Exhibit Joint IOUs-01, comprises the following sections.

Section I: Introduction

Section II: Executive Summary

Section III: Overall Procurement Policy Guiding Principles and Procurement History

Section IV: Current Methodology

Section V: Description of PAM

Section VI: Cost Recovery and Rate Design



Section VII: Arbitrary Time Limits for Cost Recovery Are No Longer Appropriate  
Appendices A-E

**VII.**

**STATUTORY AND PROCEDURAL REQUIREMENTS**

**A. Statutory and Other Authority – Rule 2.1**

Rule 2.1 of the Commission’s Rules of Practice and Procedure requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and, (3) be verified by the applicant. Rules 2.1(a), 2.1(b), and 2.1(c) set forth further requirements that are addressed separately below.

The Joint Utilities file this Application pursuant to California Public Utilities Code Sections 365.2, 366.2, 366.3, 367, 451, and 454, as well as the Commission’s Rules of Practice and Procedure, and prior decisions, orders, and resolutions of this Commission. This Application complies with Rules 1.5 through 1.11 and 1.13 of the Commission’s Rules of Practice and Procedure, which specify the procedures for, among other things, filing documents, as well as Rules 2.1, 2.2, and 3.2.

This Application has been verified by an officer of each of the Joint Utilities as provided in Rules 1.11 and 2.1.

**B. Legal Name and Principal Place of Business – Rule 2.1(a)**

**1. SCE**

Full Legal Name: Southern California Edison Company

SCE is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of generating, purchasing, transmitting, distributing and selling electric energy for light, heat and power in portions of central and southern California as a public utility subject to the jurisdiction of the California Public Utilities Commission. SCE’s properties, which are located primarily within the State of California,

consist mainly of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business.

SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California, and its post office address and telephone number are:

Southern California Edison Company  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1212

## **2. PG&E**

Full Legal Name: Pacific Gas and Electric Company

PG&E is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of electricity and natural gas as a public utility subject to the jurisdiction of the California Public Utilities Commission, among other state and federal regulatory agencies. PG&E's properties, which are located primarily within the State of California, consist mainly of electric transmission and distribution, electric generation, and natural gas transmission and distribution facilities and other property necessary in connection with its business.

PG&E's principal place of business is:

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, California, 94105  
Telephone: (415) 973-7000

## **3. SDG&E**

Full Legal Name: San Diego Gas & Electric Company

SDG&E is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of electricity and natural gas as a public utility subject to the jurisdiction of the California Public Utilities Commission. SDG&E's properties, which are located primarily within the State of California, consist mainly of electric

transmission and distribution, electric generation, and natural gas transmission and distribution facilities and other property necessary in connection with its business.

SDG&E's principal place of business is:

San Diego Gas & Electric Company  
8330 Century Park Court  
San Diego, CA 92123  
Telephone: 92101

**C. Correspondence and Communication Regarding This Application – Rule 2.1(b)**

All correspondence and communications regarding this Application should be addressed to the following individuals at the addresses listed below:

Russell A. Archer  
Southern California Edison Company  
Law Department  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2865  
Facsimile: (626) 302-3990  
E-mail: Russell.Archer@sce.com

Case Administration  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
Telephone: (626) 302-6906  
Facsimile: (626) 302-5060  
E-mail: case.admin@sce.com

Charles R. Middlekauff  
Pacific Gas and Electric Company  
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77 Beale Street, B30A  
Post Office Box 7442  
San Francisco, California 94105  
Telephone: (415) 973-6971  
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Lauren Hudson  
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Post Office Box 7442  
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Gregory Barnes  
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8330 Century Park Court  
CP32D  
San Diego, California 92101-3017  
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Facsimile: (619) 699-5027  
E-mail: gbarnes@semprautilities.com

Despina Niehaus  
San Diego Gas & Electric Company  
California Regulatory Affairs  
8330 Century Park Court, CP32F  
San Diego, California 92101-3017  
Telephone: (619) 654-1714  
Facsimile: (619) 699-5027  
E-mail: dnierhaus@semprautilities.com

**D. Proposed Categorization, Need for Hearings, Issues To Be Considered, Proposed Schedule, and Relevant Safety Considerations — Rule 2.1(c)**

Commission Rule 2.1(c) requires that all applications shall state “the proposed category for the proceeding, the need for hearing, the issues to be considered including relevant safety considerations, and a proposed schedule.”

**1. Proposed Category**

The Joint Utilities propose this application be designated a “ratesetting” proceeding, as defined in Section 1701.1(c)(3) and Rule 1.3(e).<sup>33</sup>

**2. Need for Hearings and Settlement**

The Joint Utilities believe hearings will likely be necessary. However, the need for hearings on this Application, and the issues to be considered in such hearings, will depend in large part on the degree to which other parties contest the Application, and the need for hearings will ultimately be determined by the assigned Administrative Law Judge(s). The proposed procedural schedule below allows for evidentiary hearings.

The Joint Utilities encourage interested parties to join in settlement discussions to narrow and potentially resolve the issues in this Application for replacing the Current Methodology with a new method -- the PAM -- for achieving indifference as a result of customer choice programs, and have set aside a period of time for settlement discussions in the proposed procedural schedule.<sup>34</sup> To the extent that any settlements are reached, the Joint Utilities will file the proposed settlements consistent with Article 12 of the Commission’s Rules of Practice and Procedure.

The Joint Utilities also contemplate that separate settlements may be negotiated with individual CCAs, ESPs, or other providers to resolve the departing load obligations of their customers, should there be interest in doing so. PG&E has engaged in ongoing settlement

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<sup>33</sup> “Ratesetting cases, for purposes of this article, are cases in which rates are established for a specific company, including, but not limited to, general rate cases, performance-based ratemaking, and other ratesetting mechanisms.” Cal.Pub.Util. Code §1701.1(c) (3). “‘Ratesetting’ proceedings are proceedings in which the Commission sets or investigates rates for a specifically named utility (or utilities), or establishes a mechanism that in turn sets the rates for a specifically named utility (or utilities).” CPUC Rules of Practice and Procedure, Rule 1.3(e).

<sup>34</sup> The Joint Utilities recognize that settlements can occur at any time during a proceeding. By including a specific period for settlement, the Joint Utilities are not implying that this is the only period during which settlement discussions can occur. Settlement discussions can occur throughout this proceeding to the extent desired by parties.

discussions with SCP as a means for resolving its customers' departing load obligations, or an alternative to the PAM proposal, and intends to continue those discussions after the filing of this Application. Any such settlement would require review and approval by the Commission. Individual settlements would not negate the need for a new method to replace the Current Methodology to ensure customer indifference in the context of departing load.

**3. Issues to be Considered, Including Relevant Safety Considerations**

In general, the issues to be considered are discussed above and in more detail in the Joint Utilities' Testimony served concurrently with this Application. These issues include:

- 1) Whether the Current Methodology used to determine the PCIA and CTC fails to ensure that bundled service customers do not experience any cost increase as a result of implementing customer choice programs, or fails to ensure that departing load does not experience any cost increase as a result of an allocation of costs that were not incurred on behalf of the departing load;
- 2) Whether a methodology that is based on actual market results and true-up mechanisms is a superior approach to determining the market value of the Joint Utilities' generation portfolios than one based on projected market costs and administratively-determined benchmarks without true-up mechanisms;
- 3) Whether the Joint Utilities' PAM proposal to set PAC and CTC rates for departing load customers ensures that bundled service customers from experiencing any cost increase as a result of customer choice programs, and that departing load does not experience any cost increase as a result of an allocation of costs that were not incurred on behalf of the departing load;
- 4) Whether PAM should be implemented no sooner than one year from the Commission approval of this Application, and be implemented through each of the Joint Utilities' respective ERRA Forecast proceedings;

- 5) Whether the RECs transferred under PAM should retain their original PCC attributes and should not become unbundled RECs in order to preserve the value of these RECs for departing load;
- 6) Whether the RECs transferred under PAM associated with contracts with delivery terms of 10 years or more or the procuring utility's ownership or ownership agreements should count as RECs from contracts of more than 10 years or associated with ownership or ownership agreements under Section 399.13(b);
- 7) What the departing load cost allocation period should be for UOG fossil fuel resources and/or energy storage resources, in order to ensure that bundled service customers from experiencing any cost increase as a result of customer choice programs, and that departing load does not experience any cost increase as a result of an allocation of costs that were not incurred on behalf of the departing load;
- 8) What process should be established to provide LSEs data associated with the resources covered by PAM that would be allocated to those LSEs to permit reasonable transparency and predictability of the PAC and CTC rates;
- 9) Whether the cost allocation, ratemaking, and balancing account proposals described in the Joint Utilities' Testimony are just and reasonable and should be adopted; and,
- 10) Whether the Joint Utilities' proposal for the treatment of continuous DA, CGDL, New Municipal Departing Load (NMDL), Transferred Municipal Departing Load (TMDL), and GTSR customers, as described in more detail in the Joint Utilities' Testimony, are reasonable and should be adopted.

The Commission has previously explained that the “safe and reliable provision of utilities at predictable rates promotes public safety.”<sup>35</sup> As demonstrated in this Application and the Testimony, the Joint Utilities’ PAM proposal ensures just and reasonable rates and is consistent with statutory requirements. PAM will promote the safe and reliable provision of electric service and establish just, reasonable, and more predictable rates, all of which will facilitate public safety.

**4. Procedural Schedule**

The Joint Utilities propose the following procedural schedule for this proceeding:

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<sup>35</sup> D.14-12-053 pp.12- 13.



<b>Event</b>	<b>Date</b>
Joint Utilities File Application	April 25, 2017
Protests / Responses to Application	30 days from the date the notice of the filing of the Application appears in the Daily Calendar
Reply to Protests / Responses	10 days from the deadline for filing Protests / Responses
Settlement Discussion Period	June 1-9, 2017
Prehearing Conference	June 13, 2017
Intervenor Testimony Due	July 14, 2017
Rebuttal or Reply Testimony Due	August 11, 2017
Evidentiary Hearings (if necessary)	Week of September 18, 2017
Concurrent Opening Briefs	October 6, 2017
Reply Briefs	October 20, 2017
Commission issues Proposed Decision	November 2017
Comments on Proposed Decision	[20 days from issuance of PD]
Replies to Comments on Proposed Decision	[5 days after Comments]
Commission issues Final Decision	December 2017

**E. Organization and Qualification to Transact Business – Rule 2.2**

Appendix A to this Application contains the required information regarding the Organization and Qualification to Transact Business for each of the Joint Utilities.

**F. Balance Sheet and Income Statement – Rule 3.2.(a)(1)**

Appendix B to this Application contains the Balance Sheet and Income Statement information for the most recent period available for each of the Joint Utilities.

**G. Statement of Presently Effective and Proposed Rates – Rules 3.2(a)(2) and 3.2(a)(3)**

Appendix C to this Application includes the Joint Utilities' respective presently effective rates. With regard to proposed rates, the timing and magnitude of changes to certain customer classes are not currently known, as PAM is not expected to be implemented until 2019, at the earliest. Rate changes will be implemented through future ratemaking proceedings and detailed rate impacts will be noticed at that time.

**H. Description of Joint Utilities' Service Territory and Utility System – Rule 3.2(a)(4)**

Because this Application is not a general rate case application, this requirement is not applicable.

**I. Summary of Earnings – Rule 3.2(a)(5)**

Appendix D to this Application contains the Summary of Earnings information for the most recent period available for each of the Joint Utilities.

**J. Depreciation – Rule 3.2(a)(7)**

Because this Application is not a general rate case application, this requirement is not applicable.

**K. Capital Stock and Proxy Statement – Rule 3.2(a)(8)**

Because this Application is not a general rate case application, this requirement is not applicable.

**L. Statement Pursuant to Rule 3.2(a)(10)**

Rule 3.2(a)(10) requires that the “application of electrical ... corporations shall separately state whether or not the increase reflects and passes through to customers only increased costs to the corporation for the services or commodities furnished by it.”

The rate change requested/proposed in this application does not reflect changes in the Joint Utilities' base revenues to reflect the costs the Joint Utilities incur to own, operate, and maintain their respective electric and gas plants and to enable the Joint Utilities to provide service to their respective customers.

**M. Service of Notice – Rule 3.2(b), (c) and (d)**

As potentially required by Rule 3.2(b), each of the Joint Utilities will mail a notice stating in general terms the proposed changes to ratemaking mechanisms requested in this application to the parties listed in Appendix E to this application, including the State of California and cities and counties served by the Joint Utilities.

Pursuant to Rule 3.2(c), the Joint Utilities will each publish in newspapers of general circulation in each county in their service territories a notice of filing of this application.

Finally, pursuant to Rule 3.2(d), the Joint Utilities will include notices with regular bills mailed to all customers affected by the proposed changes, or by electronically linking to such notice for customers that receive their bills electronically.

**N. Index of Exhibits and Appendices to This Application**

The Joint Utilities' submission in support of this Application include the following, which are incorporated herein by reference:

### **Appendices to Application**

- Appendix A: Joint Utilities Information Re: Organization and Qualification to Transact Business
- Appendix B: Joint Utilities Balance Sheets and Income Statements
- Appendix C: Joint Utilities Statements of Presently Effective and Proposed Rates
- Appendix D: Joint Utilities Summaries of Earnings
- Appendix E: Joint Utilities Lists of Cities & Counties

### **Exhibits to Application**

- Exhibit Joint IOUs-01: Joint Utilities Testimony in Support of Application

### **O. Service List**

The official service list has not yet been established in this proceeding. The Joint Utilities are serving this application and supporting testimony on the Commission's Office of Ratepayer Advocates, as well as the service list established by the Commission for R.02-01-011, R.03-10-003, A.14-05-024, A.16-04-018, A.16-05-001, and A.16-06-003.

## **VIII.**

### **CONCLUSION**

The Joint Utilities request that the Commission issue appropriate orders finding that:

- 1) The Current Methodology used to determine the PCIA and CTC fails to ensure that bundled service customers do not experience any cost increase as a result of customer choice programs;
- 2) A methodology that is based on actual market results and true-up mechanisms is a superior approach to determining the market value of the Joint Utilities' generation portfolios than one based on projected market costs and administratively-determined benchmarks without true up mechanisms;

- 3) The Joint Utilities' PAM proposal to set PAC and CTC rates for departing load customers ensures that bundled service customers do not experience any cost increase as a result of customer choice programs and that departing load does not experience any cost increase as a result of an allocation of costs that were not incurred on behalf of the departing load, and thus should be adopted;
- 4) PAM should be implemented no sooner than one year from the Commission approval of this Application, and be implemented through each of the Joint Utilities' respective ERRA Forecast proceedings;
- 5) The RECs transferred under PAM should retain their original PCC attributes and should not become unbundled RECs in order to preserve the value of these RECs for departing load customers;
- 6) The RECs transferred under PAM associated with contracts with delivery terms of 10 years or more or the procuring utility's ownership or ownership agreements should count as RECs from contracts of more than 10 years or associated with ownership or ownership agreements under Section 399.13(b);
- 7) The departing load cost allocation period for UOG resources proposed by the Joint Utilities in this Application and in the Joint Utilities' Testimony should be adopted;
- 8) A process should be established to provide LSEs data associated with the resources covered by PAM that would be allocated to those LSEs to permit reasonable transparency and predictability to the PAC and CTC rates;
- 9) The cost allocation, ratemaking, and balancing account proposals described in the Joint Utilities' Testimony are just and reasonable and should be adopted;
- 10) The Joint Utilities' proposal for the treatment of continuous DA, CGDL, NMDL, TMDL, and GTSR customers, as described in more detail in the Joint Utilities' Testimony, are reasonable and should be adopted; and,
- 11) Granting such additional relief as the Commission may deem proper.

The Joint Utilities respectfully request that the Commission approve this Application as filed.

Respectfully submitted,

/s/ Russell A. Archer

By: Russell A. Archer

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY on behalf of  
the JOINT UTILITIES pursuant to Rule 1.8(d)

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2865  
E-mail: Russell.Archer@sce.com

April 25, 2017

### **VERIFICATION**

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the CPUC to make this Verification for and on behalf of said corporation, and I make this Verification for that reason. I have read the foregoing Application and I am informed and believe that the matters therein concerning Pacific Gas and Electric Company are true. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 19 day of April, 2017, at San Francisco, California

A handwritten signature in black ink, appearing to read 'Fong Wan', is written over a horizontal line.

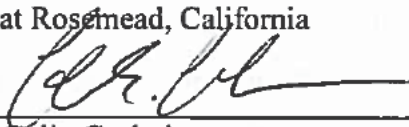
By: Fong Wan  
Senior Vice President, Energy Policy and  
Procurement

## **VERIFICATION**

I am an officer of Southern California Edison Company, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2<sup>nd</sup> day of April, 2017, at Rosemead, California

By:   
Colin Cushnie  
Vice President of Energy Procurement and  
Management

SOUTHERN CALIFORNIA EDISON COMPANY  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770



## 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 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 this 20<sup>th</sup> day of April, 2017, at San Diego, California.



Emily C. Shults  
Vice President – Energy Procurement  
San Diego Gas & Electric Company

## **Appendix A**

### **IOU Information Re: Organization and Qualification to Transact Business**

## **Organization and Qualification to Transact Business– Rule 2.2**

Rule 2.2 requires the applicant to submit a copy of its organizing documents and evidence of its qualification to transact business in California, or to refer to that documentation if previously filed with the Commission.

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series D Preference Stock, filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock, filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock, filed with the California Secretary of State, were filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and are by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock, filed with the California Secretary of State on May 5, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock, filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock, filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series J Preference Stock, filed with the California Secretary of State on August 19, 2015, and presently in effect,

certified by the California Secretary of State, was filed with the Commission on October 2, 2015, in connection with Application No. 15-10-001, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series K Preference Stock, filed with the California Secretary of State on March 2, 2016, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2016, in connection with Application No. 16-04-001, and is by reference made a part hereof.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934, and copies of SCE's latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated March 17, 2017, pursuant to Commission General Order Nos. 65-A and 104-A.

## **Articles of Incorporation – Rule 2.2**

PG&E is, and since October 10, 1905, has been an operating public utility corporation, organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E's Restated Articles of Incorporation, effective April 12, 2004, is on record before the Commission in connection with PG&E's Application 04-05-005, filed with the Commission on May 3, 2004. These articles are incorporated herein by reference.

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.

## **Appendix B**

### **IOU Balance Sheets and Income Statements**

SOUTHERN CALIFORNIA EDISON COMPANY

(h) A balance sheet as of the latest available date, together with an income statement covering the period from close of last year for which an annual report has been filed with the Commission to the date of the balance sheet attached to the application.

STATEMENT OF INCOME  
TWELVE MONTHS ENDED DECEMBER 31, 2016

(In millions)

OPERATING REVENUE	\$ 11,830
OPERATING EXPENSES:	
Purchase power and fuel	4,527
Other operation and maintenance	2,737
Depreciation, decommissioning and amortization	1,998
Property and other taxes	351
Total operating expenses	9,613
OPERATING INCOME	2,217
Interest and other income	123
Interest expense	(541)
Other expenses	(44)
INCOME BEFORE INCOME TAX	1,755
INCOME TAX	256
NET INCOME	1,499
Less: Preferred and preference stock dividend requirements	123
NET INCOME AVAILABLE FOR COMMON STOCK	\$ 1,376



SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET  
DECEMBER 31, 2016  
ASSETS  
(in millions)

UTILITY PLANT:

Utility plant, at original cost	\$ 42,890
Less- accumulated provision for depreciation and decommissioning	9,000
	<u>33,890</u>
Construction work in progress	2,790
Nuclear fuel, at amortized cost	126
	<u>36,806</u>

OTHER PROPERTY AND INVESTMENTS:

Nonutility property - less accumulated depreciation of \$75	75
Nuclear decommissioning trusts	4,242
Other investments	50
	<u>4,367</u>

CURRENT ASSETS:

Cash and equivalents	39
Receivables, less allowances of \$61 for uncollectible accounts	699
Accrued unbilled revenue	369
Inventory	239
Derivative assets	73
Regulatory assets	350
Other current assets	262
	<u>2,031</u>

DEFERRED CHARGES:

Regulatory assets	7,455
Derivative assets	1
Other long-term assets	231
	<u>7,687</u>
	<u>\$ 50,891</u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET  
DECEMBER 31, 2016  
CAPITALIZATION AND LIABILITIES  
(in millions)

CAPITALIZATION:

Common stock	\$ 2,168
Additional paid-in capital	657
Accumulated other comprehensive loss	(20)
Retained earnings	9,433
Common shareholder's equity	<u>12,238</u>
Preferred and preference stock	2,245
Long-term debt	<u>9,754</u>
Total capitalization	<u>24,237</u>

CURRENT LIABILITIES:

Short-term debt	769
Current portion of long-term debt	579
Accounts payable	1,344
Accrued taxes	45
Customer deposits	269
Derivative liabilities	216
Regulatory liabilities	756
Other current liabilities	729
	<u>4,707</u>

DEFERRED CREDITS:

Deferred income taxes and credits	9,886
Derivative liabilities	941
Pensions and benefits	896
Asset retirement obligations	2,586
Regulatory liabilities	5,726
Other deferred credits and other long-term liabilities	1,912
	<u>21,947</u>

\$ 50,891

**Pacific Gas and Electric Company**  
**CONSOLIDATED STATEMENTS OF INCOME**  
(in millions)

	Year ended December 31,		
	2016	2015	2014
<b>Operating Revenues</b>			
Electric	\$ 13,865	\$ 13,657	\$ 13,656
Natural gas	3,802	3,176	3,432
<b>Total operating revenues</b>	<b>17,667</b>	<b>16,833</b>	<b>17,088</b>
<b>Operating Expenses</b>			
Cost of electricity	4,765	5,099	5,615
Cost of natural gas	615	663	954
Operating and maintenance	7,352	6,949	5,635
Depreciation, amortization, and decommissioning	2,754	2,611	2,432
<b>Total operating expenses</b>	<b>15,486</b>	<b>15,322</b>	<b>14,636</b>
<b>Operating Income</b>	2,181	1,511	2,452
Interest income	22	8	8
Interest expense	(819)	(763)	(720)
Other income, net	88	87	77
<b>Income Before Income Taxes</b>	<b>1,472</b>	<b>843</b>	<b>1,817</b>
Income tax provision (benefit)	70	(19)	384
<b>Net Income</b>	<b>1,402</b>	<b>862</b>	<b>1,433</b>
Preferred stock dividend requirement	14	14	14
<b>Income Available for Common Stock</b>	<b>\$ 1,388</b>	<b>\$ 848</b>	<b>\$ 1,419</b>

See accompanying Notes to the Consolidated Financial Statements.

**Pacific Gas and Electric Company**  
**CONSOLIDATED BALANCE SHEETS**  
(in millions)

	<b>Balance at December 31,</b>	
	<b>2016</b>	<b>2015</b>
<b>ASSETS</b>		
<b>Current Assets</b>		
Cash and cash equivalents	\$ 71	\$ 59
Restricted cash	7	234
Accounts receivable		
Customers (net of allowance for doubtful accounts of \$58 and \$54 at respective dates)	1,252	1,106
Accrued unbilled revenue	1,098	855
Regulatory balancing accounts	1,500	1,760
Other	801	284
Regulatory assets	423	517
Inventories		
Gas stored underground and fuel oil	117	126
Materials and supplies	346	313
Income taxes receivable	159	130
Other	282	338
<b>Total current assets</b>	<b>6,056</b>	<b>5,722</b>
<b>Property, Plant, and Equipment</b>		
Electric	52,556	48,532
Gas	17,853	16,749
Construction work in progress	2,184	2,059
<b>Total property, plant, and equipment</b>	<b>72,593</b>	<b>67,340</b>
Accumulated depreciation	(22,012)	(20,617)
<b>Net property, plant, and equipment</b>	<b>50,581</b>	<b>46,723</b>
<b>Other Noncurrent Assets</b>		
Regulatory assets	7,951	7,029
Nuclear decommissioning trusts	2,606	2,470
Income taxes receivable	70	135
Other	1,110	958
<b>Total other noncurrent assets</b>	<b>11,737</b>	<b>10,592</b>
<b>TOTAL ASSETS</b>	<b>\$ 68,374</b>	<b>\$ 63,037</b>

See accompanying Notes to the Consolidated Financial Statements.

**Pacific Gas and Electric Company**  
**CONSOLIDATED BALANCE SHEETS**  
(in millions, except share amounts)

	<b>Balance at December 31,</b>	
	<b>2016</b>	<b>2015</b>
<b>LIABILITIES AND SHAREHOLDERS' EQUITY</b>		
<b>Current Liabilities</b>		
Short-term borrowings	\$ 1,516	\$ 1,019
Long-term debt, classified as current	700	160
Accounts payable		
Trade creditors	1,494	1,414
Regulatory balancing accounts	645	715
Other	453	418
Disputed claims and customer refunds	236	454
Interest payable	214	203
Other	2,072	1,750
<b>Total current liabilities</b>	<b>7,330</b>	<b>6,133</b>
<b>Noncurrent Liabilities</b>		
Long-term debt	15,872	15,577
Regulatory liabilities	6,805	6,321
Pension and other postretirement benefits	2,548	2,534
Asset retirement obligations	4,684	3,643
Deferred income taxes	10,510	9,487
Other	2,230	2,282
<b>Total noncurrent liabilities</b>	<b>42,649</b>	<b>39,844</b>
<b>Commitments and Contingencies (Note 13)</b>		
<b>Shareholders' Equity</b>		
Preferred stock	258	258
Common stock, \$5 par value, authorized 800,000,000 shares; 264,374,809 shares outstanding at respective dates	1,322	1,322
Additional paid-in capital	8,050	7,215
Reinvested earnings	8,763	8,262
Accumulated other comprehensive income	2	3
<b>Total shareholders' equity</b>	<b>18,395</b>	<b>17,060</b>
<b>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</b>	<b>\$ 68,374</b>	<b>\$ 63,037</b>

See accompanying Notes to the Consolidated Financial Statements.

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
**Sep 30, 2016**

<b>(a) Amounts and Kinds of Stock Authorized:</b>				
Common Stock		255,000,000	shares	Without Par Value
<b>Amounts and Kinds of Stock Outstanding:</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.

**(c) Number and Amount of Bonds Authorized and Issued:**

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2015
Var% Series OO, due 2027	12-01-92	0	0	7,002,188
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,938
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	3,000,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	2,650,187
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
.4677% Series OOO, due 2017	03-12-15	140,000,000	140,000,000	522,662
1.9140% Series PPP, due 2022	03-12-15	64,095,275	64,095,275	1,847,542
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	-
<b>Total 1st. Mortgage Bonds:</b>			<b>4,216,600,275</b>	<b>170,265,647</b>
1.050% Commercial Paper	11-19-15	53,650,000	53,650,000	18,777
<b>TOTAL LONG-TERM DEBT</b>			<b>4,270,250,275</b>	

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
**Sep 30, 2016**

<b>Other Indebtedness:</b>	<b>Date of Issue</b>	<b>Date of Maturity</b>	<b>Interest Rate</b>	<b>Outstanding</b>	<b>Interest Paid 2016</b>
Commercial Paper & ST Bank	Various	Various	Various	-	\$212,386

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 12-31-14</b>					
		<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
5.00%	-	\$375,000	\$281,250	-	-	-
4.50%	-	270,000	202,500	-	-	-
4.40%	-	286,000	214,500	-	-	-
4.60%	-	343,868	257,901	-	-	-
1.70%	-	2,380,000	1,785,000	-	-	-
1.82%	-	1,164,800	873,600	-	-	-
<b>Total</b>	-	<b>\$4,819,668</b>	<b>\$3,614,751</b>	-	-	-

<b>Common Stock</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
[1]	-	-	\$200,000,000	300,000,000	175,000,000

**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 (pg 9.1).

A balance sheet and a statement of income and retained earnings of applicant for the nine months ended Sep 30, 2016 are attached hereto.

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

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**September 30, 2016**

<b>1. UTILITY PLANT</b>		<b>2016</b>
101	UTILITY PLANT IN SERVICE	\$15,207,919,704
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	11,307,728
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	971,631,842
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,813,786,126)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(618,159,664)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,187,728)
118	OTHER UTILITY PLANT	1,085,541,058
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(264,789,245)
120	NUCLEAR FUEL - NET	-
TOTAL NET UTILITY PLANT		<u>11,667,422,291</u>
 <b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	5,946,616
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(364,300)
158	NON-CURRENT PORTION OF ALLOWANCES	183,299,834
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,067,734,851
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	<u>89,061,624</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>1,345,678,625</u>

Data from SPL as of Dec 21, 2016



**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**September 30, 2016**

<b>3. CURRENT AND ACCRUED ASSETS</b>		<u>2016</u>
131	CASH	3,225,697
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	291,510,593
143	OTHER ACCOUNTS RECEIVABLE	17,281,917
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,867,475)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	107,624,758
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	666,036
151	FUEL STOCK	693,732
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	107,137,915
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	202,233,571
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(183,299,834)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	245,036
165	PREPAYMENTS	163,737,656
171	INTEREST AND DIVIDENDS RECEIVABLE	713,396
173	ACCRUED UTILITY REVENUES	70,730,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	5,230,284
175	DERIVATIVE INSTRUMENT ASSETS	111,852,857
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(89,061,624)
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<u><b>806,655,015</b></u>
<b>4. DEFERRED DEBITS</b>		
181	UNAMORTIZED DEBT EXPENSE	33,259,838
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,271,977,857
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	174,137
184	CLEARING ACCOUNTS	1,810,748
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	25,469,365
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	12,805,692
190	ACCUMULATED DEFERRED INCOME TAXES	<u>276,823,237</u>
	<b>TOTAL DEFERRED DEBITS</b>	<u><b>3,622,320,874</b></u>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<u><u><b>17,442,076,805</b></u></u>

Data from SPL as of Dec 21, 2016

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**September 30, 2016**

**5. PROPRIETARY CAPITAL**

	<u>2016</u>
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	(4,159,610,448)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>7,454,042</u>
 TOTAL PROPRIETARY CAPITAL	 <u>(5,489,957,507)</u>

**6. LONG-TERM DEBT**

221 BONDS	(4,348,934,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(53,652,271)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>10,844,745</u>
 TOTAL LONG-TERM DEBT	 <u>(4,391,741,526)</u>

**7. OTHER NONCURRENT LIABILITIES**

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(599,278,895)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(27,487,869)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(231,535,407)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244 LONG TERM PORTION OF DERIVATIVE LIABILITIES	(189,242,492)
230 ASSET RETIREMENT OBLIGATIONS	<u>(830,185,747)</u>
 TOTAL OTHER NONCURRENT LIABILITIES	 <u>(1,877,730,410)</u>

Data from SPL as of Dec 21, 2016

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**September 30, 2016**

**8. CURRENT AND ACCRUED LIABILITIES**

	<u>2016</u>
231 NOTES PAYABLE	0
232 ACCOUNTS PAYABLE	(458,932,832)
233 NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234 ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(30,369,955)
235 CUSTOMER DEPOSITS	(71,096,853)
236 TAXES ACCRUED	(31,114,618)
237 INTEREST ACCRUED	(51,875,190)
238 DIVIDENDS DECLARED	-
241 TAX COLLECTIONS PAYABLE	(4,345,924)
242 MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(158,209,952)
243 OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(42,637,444)
244 DERIVATIVE INSTRUMENT LIABILITIES	(235,052,849)
244 LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	189,242,492
245 DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	<u>-</u>
 TOTAL CURRENT AND ACCRUED LIABILITIES	 <u>(894,393,125)</u>

**9. DEFERRED CREDITS**

252 CUSTOMER ADVANCES FOR CONSTRUCTION	(58,572,012)
253 OTHER DEFERRED CREDITS	(396,625,895)
254 OTHER REGULATORY LIABILITIES	(1,432,723,743)
255 ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(21,296,716)
257 UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281 ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282 ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(2,140,209,421)
283 ACCUMULATED DEFERRED INCOME TAXES - OTHER	<u>(738,826,450)</u>
 TOTAL DEFERRED CREDITS	 <u>(4,788,254,237)</u>

TOTAL LIABILITIES AND OTHER CREDITS (\$17,442,076,805)

(\$4,788,254,237)

Data from SPL as of Dec 21, 2016

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**Nine Months Ended September 30, 2016**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$3,516,532,527
401	OPERATING EXPENSES	\$2,138,908,385	
402	MAINTENANCE EXPENSES	112,553,955	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	452,335,935	
408.1	TAXES OTHER THAN INCOME TAXES	96,977,236	
409.1	INCOME TAXES	106,317,455	
410.1	PROVISION FOR DEFERRED INCOME TAXES	221,561,581	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(130,819,978)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	2,567,785	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>3,000,402,354</u>
	NET OPERATING INCOME		516,130,173

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	10,231	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	25,243	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	4,792,144	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	35,256,954	
421	MISCELLANEOUS NONOPERATING INCOME	2,462,421	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>42,546,993</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>3,503,544</u>	
	TOTAL OTHER INCOME DEDUCTIONS	<u>3,691,080</u>	
408.2	TAXES OTHER THAN INCOME TAXES	479,073	
409.2	INCOME TAXES	(272,297)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	5,805,031	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	<u>(1,535,703)</u>	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>4,476,104</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>34,379,809</u>
	INCOME BEFORE INTEREST CHARGES		550,509,982
	EXTRAORDINARY ITEMS AFTER TAXES		0
	NET INTEREST CHARGES*		<u>131,467,842</u>
	NET INCOME		<u><u>\$419,042,140</u></u>

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$11,633,689)

Data from SPL as of Dec 21, 2016

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**Nine Months Ended September 30, 2016**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,915,568,308
NET INCOME (FROM PRECEDING PAGE)	419,042,140
DIVIDEND TO PARENT COMPANY	(175,000,000)
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u><u>\$4,159,610,448</u></u>

## **Appendix C**

### **IOU Statements of Presently Effective Rates**

**SCE's Current Revenue Requirements and System Average Rates by Customer Class**  
**Effective January 1, 2017**

	Current Revenues [System] \$000	Current Rates [Bundled] [¢/kWh]
<b><u>Residential</u></b>	<b>4,917,589</b>	<b>17.9</b>
GS-1	1,001,745	17.7
TC-1	10,666	18.2
GS-2	2,306,375	17.2
TOU-GS-3	1,100,229	15.4
<b><u>Total LSMP</u></b>	<b>4,419,015</b>	<b>16.9</b>
TOU-8-SEC	996,620	13.8
TOU-8-PRI	584,383	12.5
TOU-8-SUB	396,948	8.5
<b><u>Total Large Power</u></b>	<b>1,977,952</b>	<b>12.0</b>
TOU-PA-2	258,002	13.6
TOU-PA-3	154,601	11.6
<b><u>Total Ag. &amp; Pumping</u></b>	<b>412,602</b>	<b>12.7</b>
<b><u>Street Lighting</u></b>	<b>132,948</b>	<b>18.1</b>
TOU-8-SEC-S	27,510	13.9
TOU-8-PRI-S	89,790	13.3
TOU-8-SUB-S	157,939	8.2
<b><u>Total Standby</u></b>	<b>275,239</b>	<b>9.7</b>
<b><u>Total</u></b>	<b>12,135,346</b>	<b>15.8</b>

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

RESIDENTIAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE E-1			1
2	MINIMUM BILL (\$/MONTH)	\$10.00	\$10.00	2
3	ES UNIT DISCOUNT (\$/UNIT/MONTH)	\$1.76	\$1.76	3
4	ET UNIT DISCOUNT (\$/UNIT/MONTH)	\$6.06	\$6.06	4
5	ES/ET MINIMUM RATE LIMITER (\$/KWH)	\$0.04892	\$0.04892	5
6	ENERGY (\$/KWH)			6
7	TIER 1 (Baseline Quantity - BQ)	\$0.19979	\$0.19979	7
8	TIER 2 > 100% of BQ	\$0.27612	\$0.27612	8
10	High User Surcharge (HUS) > 400% of BQ	\$0.40139	\$0.40139	9
12	SCHEDULE EL-1 (CARE)			10
13	MINIMUM BILL (\$/MONTH)	\$5.00	\$5.00	11
14	ENERGY (\$/KWH)			12
15	TIER 1 (Baseline Quantity - BQ)	\$0.12643	\$0.12643	13
16	TIER 2 > 100% of BQ	\$0.17261	\$0.17261	14
17	High User Surcharge (HUS) > 400% of BQ	\$0.23970	\$0.23970	15



PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

RESIDENTIAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE E-6 / EM-TOU			1
2	MINIMUM BILL (\$/MONTH)	\$10.00	\$10.00	2
3	E-6 METER CHARGE (\$/MONTH)	\$7.70	\$7.70	3
4	ON-PEAK ENERGY (\$/KWH)			4
5	TIER 1 (Baseline Quantity - BQ)	\$0.35933		5
6	TIER 2 > 100% of BQ	\$0.43566		6
7	PART-PEAK ENERGY (\$/KWH)			7
8	TIER 1 (Baseline Quantity - BQ)	\$0.24406	\$0.18845	8
9	TIER 2 > 100% of BQ	\$0.32039	\$0.26478	9
10	OFF-PEAK ENERGY (\$/KWH)			10
11	TIER 1 (Baseline Quantity - BQ)	\$0.16728	\$0.17162	11
12	TIER 2 > 100% of BQ	\$0.24362	\$0.24795	12
13	SCHEDULE EL-6 / EML-TOU			13
14	MINIMUM BILL (\$/MONTH)	\$5.00	\$5.00	14
15	EL-6 METER CHARGE(\$/MONTH)	\$6.16	\$6.16	15
16	ON-PEAK ENERGY (\$/KWH)			16
17	TIER 1 (Baseline Quantity - BQ)	\$0.24323		17
18	TIER 2 > 100% of BQ	\$0.29049		18
19	PART-PEAK ENERGY (\$/KWH)			19
20	TIER 1 (Baseline Quantity - BQ)	\$0.15873	\$0.11797	20
21	TIER 2 > 100% of BQ	\$0.20599	\$0.16521	21
22	OFF-PEAK ENERGY (\$/KWH)			22
23	TIER 1 (Baseline Quantity - BQ)	\$0.10245	\$0.10562	23
24	TIER 2 > 100% of BQ	\$0.14971	\$0.15287	24

PACIFIC GAS AND ELECTRIC COMPANY  
 PRESENT ELECTRIC RATES as of  
 Wednesday, March 01, 2017

RESIDENTIAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE EV: RATE A			1
2	MINIMUM BILL (\$/MONTH)	\$10.00	\$10.00	2
3	ON-PEAK ENERGY (\$/KWH)	\$0.45389	\$0.32018	3
4	PART-PEAK ENERGY (\$/KWH)	\$0.24986	\$0.19794	4
5	OFF-PEAK ENERGY (\$/KWH)	\$0.12225	\$0.12503	5
6	SCHEDULE EV: RATE B			6
7	EV-B METER CHARGE (\$/MONTH)	\$1.50	\$1.50	7
8	ON-PEAK ENERGY (\$/KWH)	\$0.44738	\$0.31325	8
9	PART-PEAK ENERGY (\$/KWH)	\$0.24660	\$0.19447	9
10	OFF-PEAK ENERGY (\$/KWH)	\$0.12179	\$0.12453	10

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

SMALL L&P RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE A-1			1
2	CUSTOMER CHARGE: SINGLE-PHASE (\$/MO.)	\$10.00	\$10.00	2
3	CUSTOMER CHARGE: POLYPHASE (\$/MO.)	\$20.00	\$20.00	3
4	ENERGY (\$/KWH)	\$0.24730	\$0.19270	4
5	SCHEDULE A-1 TOU			5
6	CUSTOMER CHARGE: SINGLE-PHASE (\$/MO.)	\$10.00	\$10.00	6
7	CUSTOMER CHARGE: POLYPHASE (\$/MO.)	\$20.00	\$20.00	7
8	ENERGY (\$/KWH)			8
9	ON-PEAK	\$0.26298		9
10	PART-PEAK	\$0.23933	\$0.22047	10
11	OFF-PEAK ENERGY	\$0.21197	\$0.19956	11
12	SCHEDULE A-6			12
13	CUSTOMER CHARGE: SINGLE-PHASE (\$/MO.)	\$10.00	\$10.00	13
14	CUSTOMER CHARGE: POLYPHASE (\$/MO.)	\$20.00	\$20.00	14
15	METER CHARGE (\$/MONTH)	\$6.12	\$6.12	15
16	METER CHARGE - RATE W (\$/MONTH)	\$1.80	\$1.80	16
17	METER CHARGE - RATE X (\$/MONTH)	\$6.12	\$6.12	17
18	ENERGY (\$/KWH)			18
19	ON-PEAK	\$0.55478		19
20	PART-PEAK	\$0.25796	\$0.20442	20
21	OFF-PEAK ENERGY	\$0.18638	\$0.18618	21
22	SCHEDULE A-15			22
23	CUSTOMER CHARGE (\$/MONTH)	\$10.00	\$10.00	23
24	FACILITY CHARGE (\$/MONTH)	\$25.00	\$25.00	24
25	ENERGY (\$/KWH)	\$0.24730	\$0.19270	25
26	SCHEDULE TC-1			26
27	CUSTOMER CHARGE (\$/MONTH)	\$10.00	\$10.00	27
28	ENERGY (\$/KWH)	\$0.18432	\$0.18432	28

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

MEDIUM L&P RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE A-10			1
2	CUSTOMER CHARGE (\$/MONTH)	\$140.00	\$140.00	2
3	MAXIMUM DEMAND CHARGE (\$/KW/MO)			3
4	SECONDARY VOLTAGE	\$18.26	\$10.93	4
5	PRIMARY VOLTAGE	\$17.37	\$11.23	5
6	TRANSMISSION VOLTAGE	\$11.68	\$8.31	6
7	ENERGY CHARGE (\$/KWH)			7
8	SECONDARY VOLTAGE	\$0.16286	\$0.12626	8
9	PRIMARY VOLTAGE	\$0.15316	\$0.12258	9
10	TRANSMISSION VOLTAGE	\$0.12016	\$0.10162	10
11	SCHEDULE A-10 TOU			11
12	CUSTOMER CHARGE (\$/MONTH)	\$140.00	\$140.00	12
13	MAXIMUM DEMAND CHARGE (\$/KW/MO)			13
14	SECONDARY VOLTAGE	\$18.26	\$10.93	14
15	PRIMARY VOLTAGE	\$17.37	\$11.23	15
16	TRANSMISSION VOLTAGE	\$11.68	\$8.31	16
17	ENERGY CHARGE (\$/KWH)			17
18	SECONDARY			18
19	ON PEAK	\$0.21766		19
20	PARTIAL PEAK	\$0.16253	\$0.13435	20
21	OFF-PEAK	\$0.13446	\$0.11729	21
22	PRIMARY			22
23	ON PEAK	\$0.20596		23
24	PARTIAL PEAK	\$0.15540	\$0.13239	24
25	OFF-PEAK	\$0.12877	\$0.11651	25
26	TRANSMISSION			26
27	ON PEAK	\$0.16948		27
28	PARTIAL PEAK	\$0.12260	\$0.11081	28
29	OFF-PEAK	\$0.09730	\$0.09624	29

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

E-19 FIRM RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
*****				
1	SCHEDULE E-19 T FIRM			1
2	CUSTOMER CHARGE > 500 KW (\$/MONTH)	\$1,800.00	\$1,800.00	2
3	CUSTOMER CHARGE < 500 KW (\$/MONTH)	\$140.00	\$140.00	3
4	TOU METER CHARGE - RATES V & X (\$/MONTH)	\$140.00	\$140.00	4
5	TOU METER CHARGE - RATE W (\$/MONTH)	\$140.00	\$140.00	5
6	DEMAND CHARGE (\$/KW/MONTH)			6
7	ON-PEAK	\$12.42		7
8	PARTIAL PEAK	\$3.11	\$0.00	8
9	MAXIMUM	\$9.13	\$9.13	9
10	ENERGY CHARGE (\$/KWH)			10
11	ON-PEAK	\$0.10559		11
12	PARTIAL-PEAK	\$0.09298	\$0.09497	12
13	OFF-PEAK	\$0.07631	\$0.08216	13
*****				
14	SCHEDULE E-19 P FIRM			14
15	CUSTOMER CHARGE > 500 KW (\$/MONTH)	\$1,000.00	\$1,000.00	15
16	CUSTOMER CHARGE < 500 KW (\$/MONTH)	\$140.00	\$140.00	16
17	TOU METER CHARGE - RATES V & X (\$/MONTH)	\$140.00	\$140.00	17
18	TOU METER CHARGE - RATE W (\$/MONTH)	\$140.00	\$140.00	18
19	DEMAND CHARGE (\$/KW/MONTH)			19
20	ON-PEAK	\$16.60		20
21	PARTIAL PEAK	\$4.53	\$0.15	21
22	MAXIMUM	\$14.40	\$14.40	22
23	ENERGY CHARGE (\$/KWH)			23
24	ON-PEAK	\$0.14165		24
25	PARTIAL-PEAK	\$0.10327	\$0.09809	25
26	OFF-PEAK	\$0.07860	\$0.08469	26
*****				
27	SCHEDULE E-19 S FIRM			27
28	CUSTOMER CHARGE > 500 KW (\$/MONTH)	\$600.00	\$600.00	28
29	CUSTOMER CHARGE < 500 KW (\$/MONTH)	\$140.00	\$140.00	29
30	TOU METER CHARGE - RATES V & X (\$/MONTH)	\$140.00	\$140.00	30
31	TOU METER CHARGE - RATE W (\$/MONTH)	\$140.00	\$140.00	31
32	DEMAND CHARGE (\$/KW/MONTH)			32
33	ON-PEAK	\$18.64		33
34	PARTIAL PEAK	\$5.18	\$0.12	34
35	MAXIMUM	\$17.56	\$17.56	35
36	ENERGY CHARGE (\$/KWH)			36
37	ON-PEAK	\$0.15178		37
38	PARTIAL-PEAK	\$0.11127	\$0.10573	38
39	OFF-PEAK	\$0.08445	\$0.09111	39
*****				

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

E-20 FIRM RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE E-20 T FIRM			1
2	CUSTOMER CHARGE (\$/MONTH)-FIRM	\$2,000.00	\$2,000.00	2
3	DEMAND CHARGE (\$/KW/MONTH)			3
4	ON-PEAK	\$15.89		4
5	PARTIAL PEAK	\$3.79	\$0.00	5
6	MAXIMUM	\$8.31	\$8.31	6
7	ENERGY CHARGE (\$/KWH)			7
8	ON-PEAK	\$0.10080		8
9	PARTIAL-PEAK	\$0.08857	\$0.09049	9
10	OFF-PEAK	\$0.07238	\$0.07806	10
11	SCHEDULE E-20 P FIRM			11
12	CUSTOMER CHARGE (\$/MONTH)	\$1,500.00	\$1,500.00	12
13	DEMAND CHARGE (\$/KW/MONTH)			13
14	ON-PEAK	\$19.26		14
15	PARTIAL PEAK	\$5.13	\$0.12	15
16	MAXIMUM	\$15.09	\$15.09	16
17	ENERGY CHARGE (\$/KWH)			17
18	ON-PEAK	\$0.14393		18
19	PARTIAL-PEAK	\$0.10331	\$0.09796	19
20	OFF-PEAK	\$0.07833	\$0.08447	20
21	SCHEDULE E-20 S FIRM			21
22	CUSTOMER CHARGE (\$/MONTH)	\$1,200.00	\$1,200.00	22
23	DEMAND CHARGE (\$/KW/MONTH)			23
24	ON-PEAK	\$18.05		24
25	PARTIAL PEAK	\$5.01	\$0.05	25
26	MAXIMUM	\$17.44	\$17.44	26
27	ENERGY CHARGE (\$/KWH)			27
28	ON-PEAK	\$0.14244		28
29	PARTIAL-PEAK	\$0.10559	\$0.10024	29
30	OFF-PEAK	\$0.08029	\$0.08653	30

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

OIL AND GAS EXTRACTION RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE E-37			1
2	CUSTOMER CHARGE (\$/MONTH)	\$36.36	\$36.36	2
3	TOU METER CHARGE - RATE W (\$/MONTH)	\$1.20	\$1.20	3
4	TOU METER CHARGE - RATE X (\$/MONTH)	\$6.00	\$6.00	4
5	ON PEAK DEMAND CHARGE (\$/KW/MO)	\$9.85		5
6	MAXIMUM DEMAND CHARGE (\$/KW/MO)			6
7	SECONDARY VOLTAGE	\$15.37	\$5.95	7
8	PRIMARY VOLTAGE DISCOUNT	\$1.71	\$0.18	8
9	TRANSMISSION VOLTAGE DISCOUNT	\$11.49	\$5.12	9
10	ENERGY (\$/KWH)			10
11	ON-PEAK	\$0.20990		11
12	PART-PEAK		\$0.11199	12
13	OFF-PEAK	\$0.09189	\$0.08358	13

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

STANDBY RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE S - TRANSMISSION			1
2	CONTRACT CAPACITY CHARGE (\$/KW/MO.)	\$1.55	\$1.55	2
3	EFFECTIVE RESERVATION CHARGE (\$/KW/MO.)	\$1.32	\$1.32	3
4	ENERGY (\$/KWH)			4
5	ON-PEAK	\$0.12593		5
6	PART-PEAK	\$0.11275	\$0.11482	6
7	OFF-PEAK	\$0.09532	\$0.10144	7
8	SCHEDULE S - PRIMARY			8
9	CONTRACT CAPACITY CHARGE (\$/KW/MO.)	\$7.24	\$7.24	9
10	EFFECTIVE RESERVATION CHARGE (\$/KW/MO.)	\$6.15	\$6.15	10
11	ENERGY (\$/KWH)			11
12	ON-PEAK	\$0.57610		12
13	PART-PEAK	\$0.26660	\$0.13903	13
14	OFF-PEAK	\$0.11071	\$0.11792	14
15	SCHEDULE S - SECONDARY			15
16	CONTRACT CAPACITY CHARGE (\$/KW/MO.)	\$7.24	\$7.24	16
17	EFFECTIVE RESERVATION CHARGE (\$/KW/MO.)	\$6.15	\$6.15	17
18	ENERGY (\$/KWH)			18
19	ON-PEAK	\$0.57495		19
20	PART-PEAK	\$0.26545	\$0.13788	20
21	OFF-PEAK	\$0.10956	\$0.11677	21



PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

STANDBY RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE S CUSTOMER AND METER CHARGES			1
2	RESIDENTIAL			2
3	CUSTOMER CHARGE (\$/MO)	\$5.00	\$5.00	3
4	TOU METER CHARGE (\$/MO)	\$3.90	\$3.90	4
5	AGRICULTURAL			5
6	CUSTOMER CHARGE (\$/MO)	\$27.60	\$27.60	6
7	TOU METER CHARGE (\$/MO)	\$6.00	\$6.00	7
8	SMALL LIGHT AND POWER (less than or equal to 50 kW)			8
9	SINGLE PHASE CUSTOMER CHARGE (\$/MO)	\$20.00	\$20.00	9
10	POLY PHASE CUSTOMER CHARGE (\$/MO)	\$30.00	\$30.00	10
11	METER CHARGE (\$/MO)	\$6.12	\$6.12	11
12	MEDIUM LIGHT AND POWER (>50 kW, <500 kW)			12
13	CUSTOMER CHARGE (\$/MO)	\$140.00	\$140.00	13
14	METER CHARGE (\$/MO)	\$5.40	\$5.40	14
15	MEDIUM LIGHT AND POWER (>500kW)			15
16	TRANSMISSION CUSTOMER CHARGE (\$/MO)	\$1,800.00	\$1,800.00	16
17	PRIMARY CUSTOMER CHARGE (\$/MO)	\$1,000.00	\$1,000.00	17
18	SECONDARY CUSTOMER CHARGE (\$/MO)	\$600.00	\$600.00	18
19	LARGE LIGHT AND POWER (> 1000 kW)			19
20	TRANSMISSION CUSTOMER CHARGE (\$/MO)	\$2,000.00	\$2,000.00	20
21	PRIMARY CUSTOMER CHARGE (\$/MO)	\$1,500.00	\$1,500.00	21
22	SECONDARY CUSTOMER CHARGE (\$/MO)	\$1,200.00	\$1,200.00	22
23	REDUCED CUSTOMER CHARGES (\$/MO)			23
24	SMALL LIGHT AND PWR ( < 50 kW)	\$7.75	\$7.75	24
25	MED LIGHT AND PWR (Res Capacity >75 kW and <500 kW) S	\$52.00	\$52.00	25
26	MED LIGHT AND PWR (Res Capacity > 500 kW and < 1000 kW) S	\$177.39	\$177.39	26

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

AGRICULTURAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE AG-1A			1
2	CUSTOMER CHARGE (\$/MONTH)	\$17.47	\$17.47	2
3	CONNECTED LOAD CHARGE (\$/KW/MONTH)	\$7.96	\$1.52	3
4	ENERGY CHARGE (\$/KWH)	\$0.27939	\$0.21527	4
5	SCHEDULE AG-RA			5
6	CUSTOMER CHARGE - RATES A & D (\$/MONTH)	\$17.47	\$17.47	6
7	METER CHARGE - RATE A (\$/MONTH)	\$6.80	\$6.80	7
8	METER CHARGE - RATE D (\$/MONTH)	\$2.00	\$2.00	8
9	CONNECTED LOAD CHARGE (\$/KW/MONTH)	\$7.08	\$1.16	9
10	ENERGY (\$/KWH)			10
11	ON-PEAK	\$0.52724		11
12	PART-PEAK		\$0.18868	12
13	OFF-PEAK	\$0.18508	\$0.15508	13
14	SCHEDULE AG-VA			14
15	CUSTOMER CHARGE - RATES A & D (\$/MONTH)	\$17.47	\$17.47	15
16	METER CHARGE - RATE A (\$/MONTH)	\$6.80	\$6.80	16
17	METER CHARGE - RATE D (\$/MONTH)	\$2.00	\$2.00	17
18	CONNECTED LOAD CHARGE (\$/KW/MONTH)	\$7.10	\$1.20	18
19	ENERGY (\$/KWH)			19
20	ON-PEAK	\$0.49261		20
21	PART-PEAK		\$0.18995	21
22	OFF-PEAK	\$0.18195	\$0.15563	22
23	SCHEDULE AG-4A			23
24	CUSTOMER CHARGE - RATES A & D (\$/MONTH)	\$17.47	\$17.47	24
25	METER CHARGE - RATE A (\$/MONTH)	\$6.80	\$6.80	25
26	METER CHARGE - RATE D (\$/MONTH)	\$2.00	\$2.00	26
27	CONNECTED LOAD CHARGE (\$/KW/MONTH)	\$8.12	\$1.23	27
28	ENERGY (\$/KWH)			28
29	ON-PEAK	\$0.44481		29
30	PART-PEAK		\$0.20179	30
31	OFF-PEAK	\$0.19503	\$0.16356	31
32	SCHEDULE AG-5A			32
33	CUSTOMER CHARGE - RATES A & D (\$/MONTH)	\$17.47	\$17.47	33
34	METER CHARGE - RATE A (\$/MONTH)	\$6.80	\$6.80	34
35	METER CHARGE - RATE D (\$/MONTH)	\$2.00	\$2.00	35
36	CONNECTED LOAD CHARGE (\$/KW/MONTH)	\$11.77	\$2.19	36
37	ENERGY (\$/KWH)			37
38	ON-PEAK	\$0.30744		38
39	PART-PEAK		\$0.16587	39
40	OFF-PEAK	\$0.15756	\$0.14048	40

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017  
AGRICULTURAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE AG-1B			1
2	CUSTOMER CHARGE (\$/MONTH)	\$23.23	\$23.23	2
3	MAXIMUM DEMAND CHARGE (\$/KW/MONTH)			3
4	SECONDARY VOLTAGE	\$11.63	\$2.34	4
5	PRIMARY VOLTAGE DISCOUNT	\$1.21	\$0.32	5
6	ENERGY CHARGE (\$/KWH)	\$0.23904	\$0.18603	6
7	SCHEDULE AG-RB			7
8	CUSTOMER CHARGE - RATES B & E (\$/MONTH)	\$23.23	\$23.23	8
9	METER CHARGE - RATE B (\$/MONTH)	\$6.00	\$6.00	9
10	METER CHARGE - RATE E (\$/MONTH)	\$1.20	\$1.20	10
11	ON-PEAK DEMAND CHARGE (\$/KW/MONTH)	\$3.69		11
12	MAXIMUM DEMAND CHARGE (\$/KW/MONTH)			12
13	SECONDARY VOLTAGE	\$9.59	\$1.93	13
14	PRIMARY VOLTAGE DISCOUNT	\$0.83	\$0.31	14
15	ENERGY CHARGE (\$/KWH)			15
16	ON-PEAK	\$0.47501		16
17	PART-PEAK		\$0.16422	17
18	OFF-PEAK	\$0.17492	\$0.13590	18
19	SCHEDULE AG-VB			19
20	CUSTOMER CHARGE - RATES B & E (\$/MONTH)	\$23.23	\$23.23	20
21	METER CHARGE - RATE B (\$/MONTH)	\$6.00	\$6.00	21
22	METER CHARGE - RATE E (\$/MONTH)	\$1.20	\$1.20	22
23	ON-PEAK DEMAND CHARGE (\$/KW/MONTH)	\$3.66		23
24	MAXIMUM DEMAND CHARGE (\$/KW/MONTH)			24
25	SECONDARY VOLTAGE	\$9.65	\$1.91	25
26	PRIMARY VOLTAGE DISCOUNT	\$0.88	\$0.30	26
27	ENERGY CHARGE (\$/KWH)			27
28	ON-PEAK	\$0.44032		28
29	PART-PEAK		\$0.16158	29
30	OFF-PEAK	\$0.17006	\$0.13421	30

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

AGRICULTURAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE AG-4B			1
2	CUSTOMER CHARGE - RATES B & E (\$/MONTH)	\$23.23	\$23.23	2
3	METER CHARGE - RATE B (\$/MONTH)	\$6.00	\$6.00	3
4	METER CHARGE - RATE E (\$/MONTH)	\$1.20	\$1.20	4
5	ON-PEAK DEMAND CHARGE (\$/KW/MONTH)	\$5.17		5
6	MAXIMUM DEMAND CHARGE (\$/KW/MONTH)			6
7	SECONDARY VOLTAGE	\$9.79	\$2.26	7
8	PRIMARY VOLTAGE DISCOUNT	\$1.03	\$0.35	8
9	ENERGY CHARGE (\$/KWH)			9
10	ON-PEAK	\$0.29150		10
11	PART-PEAK		\$0.15783	11
12	OFF-PEAK	\$0.15746	\$0.13306	12
13	SCHEDULE AG-4C			13
14	CUSTOMER CHARGE - RATES C & F (\$/MONTH)	\$65.44	\$65.44	14
15	METER CHARGE - RATE C (\$/MONTH)	\$6.00	\$6.00	15
16	METER CHARGE - RATE F (\$/MONTH)	\$1.20	\$1.20	16
17	DEMAND CHARGE (\$/KW/MONTH)			17
18	ON-PEAK	\$12.10		18
19	PART-PEAK	\$2.31	\$0.54	19
20	MAXIMUM	\$4.96	\$2.40	20
21	PRIMARY VOLTAGE DISCOUNT			21
22	ON-PEAK	\$1.33		22
23	MAXIMUM		\$0.31	23
24	TRANSMISSION VOLTAGE DISCOUNT			24
25	ON-PEAK	\$6.31		25
26	PART-PEAK	\$1.29	\$0.54	26
27	MAXIMUM	\$0.24	\$1.66	27
28	ENERGY CHARGE (\$/KWH)			28
29	ON-PEAK	\$0.26604		29
30	PART-PEAK	\$0.15676	\$0.13113	30
31	OFF-PEAK	\$0.11857	\$0.11411	31
32	SCHEDULE AG-5B			32
33	CUSTOMER CHARGE - RATES B & E (\$/MONTH)	\$36.36	\$36.36	33
34	METER CHARGE - RATE B (\$/MONTH)	\$6.00	\$6.00	34
35	METER CHARGE - RATE E (\$/MONTH)	\$1.20	\$1.20	35
36	ON-PEAK DEMAND CHARGE (\$/KW/MONTH)	\$9.85		36
37	MAXIMUM DEMAND CHARGE (\$/KW/MONTH)			37
38	SECONDARY VOLTAGE	\$15.37	\$5.95	38
39	PRIMARY VOLTAGE DISCOUNT	\$1.71	\$0.18	39
40	TRANSMISSION VOLTAGE DISCOUNT	\$11.49	\$5.12	40
41	ENERGY CHARGE (\$/KWH)			41
42	ON-PEAK	\$0.20990		42
43	PART-PEAK		\$0.11199	43
44	OFF-PEAK	\$0.09189	\$0.08358	44

PACIFIC GAS AND ELECTRIC COMPANY  
PRESENT ELECTRIC RATES as of  
Wednesday, March 01, 2017

AGRICULTURAL RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE AG-5C			1
2	CUSTOMER CHARGE - RATES C & F (\$/MONTH)	\$161.58	\$161.58	2
3	METER CHARGE - RATE C (\$/MONTH)	\$6.00	\$6.00	3
4	METER CHARGE - RATE F (\$/MONTH)	\$1.20	\$1.20	4
5	DEMAND CHARGE (\$/KW/MONTH)			5
6	ON-PEAK	\$16.62		6
7	PART-PEAK	\$3.44	\$0.89	7
8	MAXIMUM	\$5.95	\$3.71	8
9	PRIMARY VOLTAGE DISCOUNT			9
10	ON-PEAK	\$2.48		10
11	MAXIMUM		\$0.25	11
12	TRANSMISSION VOLTAGE DISCOUNT			12
13	ON-PEAK	\$10.30		13
14	PART-PEAK	\$1.51	\$0.89	14
15	MAXIMUM	\$3.38	\$2.43	15
16	ENERGY CHARGE (\$/KWH)			16
17	ON-PEAK	\$0.16234		17
18	PART-PEAK	\$0.11173	\$0.09854	18
19	OFF-PEAK	\$0.09289	\$0.08997	19
20	SCHEDULE AG-ICE			20
21	CUSTOMER CHARGE (\$/MONTH)	\$40.00	\$40.00	21
22	METER CHARGE (\$/MONTH)	\$6.00	\$6.00	22
23	ON-PEAK DEMAND CHARGE (\$/KW/MO)	\$6.95		23
24	MAXIMUM DEMAND CHARGE (\$/KW/MO)			24
25	SECONDARY	\$8.99	\$0.00	25
26	PRIMARY	\$7.85	\$0.00	26
27	TRANSMISSION	\$2.74	\$0.00	27
28	ENERGY CHARGE (\$/KWH)			28
29	ON-PEAK	\$0.18415		29
30	PART-PEAK	\$0.14364	\$0.14732	30
31	OFF-PEAK	\$0.07366	\$0.07366	31

PACIFIC GAS AND ELECTRIC COMPANY  
 PRESENT ELECTRIC RATES as of  
 Wednesday, March 01, 2017

STREETLIGHTING RATES

LINE NO.		3/1/17 RATES SUMMER	3/1/17 RATES WINTER	LINE NO.
1	SCHEDULE LS-1			1
2	ENERGY CHARGE (\$/KWH)	\$0.15874	\$0.15874	2
3	SCHEDULE LS-2			3
4	ENERGY CHARGE (\$/KWH)	\$0.15874	\$0.15874	4
5	SCHEDULE LS-3			5
6	SERVICE CHARGE (\$/METER/MO.)	\$6.00	\$6.00	6
7	ENERGY CHARGE (\$/KWH)	\$0.15874	\$0.15874	7
8	SCHEDULE OL-1			8
9	ENERGY CHARGE (\$/KWH)	\$0.16599	\$0.16599	9



Pacific Gas & Electric Company														
3/1/2017 RCBG Rate Change - Capped Alternative 2														
3/1/2017														
ELECTRIC RATES FOR SCHEDULES LS-1, LS-2 AND OL-1														
NOMINAL LAMP RATINGS														
AVERAGE	INITIAL	ALL NIGHT RATES PER LAMP PER MONTH												
LAMP	KWHr PER	SCHEDULE LS-1												
WATTS	MONTH	A	C	A	B	C	D	E	F	OL-1	HALF-HOUR ADJ.			
											LS-1 &	LS-2	OL-1	
HIGH PRESSURE SODIUM VAPOR LAMPS														
AT 120 VOLTS														
35	15	\$2.588	--	--	--	--	--	--	--	--				
50	21	\$3.541	--	--	--	--	--	--	--	--				
70	29	\$4.810	\$8.597	\$11.117	--	\$11.385	\$14.326	\$15.081	\$12.470	\$11.328				
100	41	\$6.715	\$10.502	\$13.022	--	\$13.290	\$16.231	\$16.986	\$14.375	\$13.320				
150	60	\$9.731	\$13.518	\$16.038	--	\$16.306	\$19.247	\$20.002	\$17.391	--				
200	80	\$12.906	--	\$19.213	--	\$19.481	\$22.422	\$23.177	\$20.566	--				
250	100	\$16.081	--	\$22.388	--	\$22.656	\$25.597	\$26.352	\$23.741	--				
400	154	\$24.653	--	\$30.960	--	\$31.228	\$34.169	\$34.924	\$32.313	--				
AT 240 VOLTS														
50	24	\$4.017	--	--	--	--	--	--	--	--				
70	34	\$5.604	\$9.391	\$11.911	--	--	\$15.120	--	--	--				
100	47	\$7.668	\$11.455	\$13.975	--	\$14.243	\$17.184	\$17.939	\$15.328	--				
150	69	\$11.160	\$14.947	\$17.467	--	\$17.735	\$20.676	\$21.431	\$18.820	--				
200	81	\$13.065	\$16.852	\$19.372	--	\$19.640	\$22.581	\$23.336	\$20.725	\$19.959				
250	100	\$16.081	\$19.868	\$22.388	--	\$22.656	\$25.597	\$26.352	\$23.741	\$23.113				
310	119	\$19.097	--	--	--	--	--	--	--	--				
360	144	\$23.066	--	--	--	--	--	--	--	--				
400	154	\$24.653	\$28.440	\$30.960	--	\$31.228	\$34.169	\$34.924	\$32.313	\$32.076				
METAL HALIDE LAMPS														
70	30	\$4.969	--	--	--	--	--	--	--	--				
100	41	\$6.715	--	--	--	--	--	--	--	--				
150	63	\$10.208	--	--	--	--	--	--	--	--				
175	72	\$11.636	--	--	--	--	--	--	--	--				
250	105	\$16.875	--	--	--	--	--	--	--	--				
400	162	\$25.923	--	--	--	--	--	--	--	--				
1,000	387	\$61.639	--	--	--	--	--	--	--	--				
INDUCTION LAMPS														
23	9	\$1.636	--	--	--	--	--	--	--	--				
35	13	\$2.271	--	--	--	--	--	--	--	--				
40	14	\$2.429	--	--	--	--	--	--	--	--				
50	18	\$3.064	--	--	--	--	--	--	--	--				
55	19	\$3.223	--	--	--	--	--	--	--	--				
65	24	\$4.017	--	--	--	--	--	--	--	--				
70	27	\$4.493	--	--	--	--	--	--	--	--				
80	28	\$4.652	--	--	--	--	--	--	--	--				
85	30	\$4.969	--	--	--	--	--	--	--	--				
100	36	\$5.922	--	--	--	--	--	--	--	--				
120	42	\$6.796	--	--	--	--	--	--	--	--				
135	48	\$7.827	--	--	--	--	--	--	--	--				
150	51	\$8.303	--	--	--	--	--	--	--	--				
165	58	\$9.414	--	--	--	--	--	--	--	--				
200	72	\$11.636	--	--	--	--	--	--	--	--				





**Pacific Gas & Electric Company**  
**3/1/2017 RCBG Rate Change - Capped Alternative 2**

3/1/17

**LIGHT EMITTING DIODE (LED) LAMPS**

**TOTAL RATES (FACILITY + ENERGY CHGS)**

<u>NOMINAL LAMP RATINGS</u>		ALL NIGHT RATES PER LAMP PER MONTH	HALF-HOUR ADJUSTMENT	ALL NIGHT RATES PER LAMP PER MONTH				
Lamp Watts	Average kWh Per Month	LS-2A	LS-1A, C, E, F & LS-2A	LS-1A	LS-1C	LS-1D	LS-1E	LS-1F
0.0-5.0	0.9	\$0.350	\$0.007	\$6.657	\$6.925	\$9.866	\$10.621	\$8.010
5.1-10.0	2.6	\$0.620	\$0.019	\$6.927	\$7.195	\$10.136	\$10.891	\$8.280
10.1-15.0	4.3	\$0.890	\$0.031	\$7.197	\$7.465	\$10.406	\$11.161	\$8.550
15.1-20.0	6.0	\$1.159	\$0.043	\$7.466	\$7.734	\$10.675	\$11.430	\$8.819
20.1-25.0	7.7	\$1.429	\$0.056	\$7.736	\$8.004	\$10.945	\$11.700	\$9.089
25.1-30.0	9.4	\$1.699	\$0.068	\$8.006	\$8.274	\$11.215	\$11.970	\$9.359
30.1-35.0	11.1	\$1.969	\$0.080	\$8.276	\$8.544	\$11.485	\$12.240	\$9.629
35.1-40.0	12.8	\$2.239	\$0.092	\$8.546	\$8.814	\$11.755	\$12.510	\$9.899
40.1-45.0	14.5	\$2.509	\$0.105	\$8.816	\$9.084	\$12.025	\$12.780	\$10.169
45.1-50.0	16.2	\$2.779	\$0.117	\$9.086	\$9.354	\$12.295	\$13.050	\$10.439
50.1-55.0	17.9	\$3.048	\$0.129	\$9.355	\$9.623	\$12.564	\$13.319	\$10.708
55.1-60.0	19.6	\$3.318	\$0.141	\$9.625	\$9.893	\$12.834	\$13.589	\$10.978
60.1-65.0	21.4	\$3.604	\$0.154	\$9.911	\$10.179	\$13.120	\$13.875	\$11.264
65.1-70.0	23.1	\$3.874	\$0.167	\$10.181	\$10.449	\$13.390	\$14.145	\$11.534
70.1-75.0	24.8	\$4.144	\$0.179	\$10.451	\$10.719	\$13.660	\$14.415	\$11.804
75.1-80.0	26.5	\$4.414	\$0.191	\$10.721	\$10.989	\$13.930	\$14.685	\$12.074
80.1-85.0	28.2	\$4.683	\$0.203	\$10.990	\$11.258	\$14.199	\$14.954	\$12.343
85.1-90.0	29.9	\$4.953	\$0.216	\$11.260	\$11.528	\$14.469	\$15.224	\$12.613
90.1-95.0	31.6	\$5.223	\$0.228	\$11.530	\$11.798	\$14.739	\$15.494	\$12.883
95.1-100.0	33.3	\$5.493	\$0.240	\$11.800	\$12.068	\$15.009	\$15.764	\$13.153
100.1-105.1	35.0	\$5.763	\$0.253	\$12.070	\$12.338	\$15.279	\$16.034	\$13.423
105.1-110.0	36.7	\$6.033	\$0.265	\$12.340	\$12.608	\$15.549	\$16.304	\$13.693
110.1-115.0	38.4	\$6.303	\$0.277	\$12.610	\$12.878	\$15.819	\$16.574	\$13.963
115.1-120.0	40.1	\$6.572	\$0.289	\$12.879	\$13.147	\$16.088	\$16.843	\$14.232
120.1-125.0	41.9	\$6.858	\$0.302	\$13.165	\$13.433	\$16.374	\$17.129	\$14.518
125.1-130.0	43.6	\$7.128	\$0.315	\$13.435	\$13.703	\$16.644	\$17.399	\$14.788

130.1-135.0	45.3	\$7,398	\$0.327	\$13.705	\$13.973	\$16.914	\$17.669	\$15.058
135.1-140.0	47.0	\$7,668	\$0.339	\$13.975	\$14.243	\$17.184	\$17.939	\$15.328
140.1-145.0	48.7	\$7,938	\$0.351	\$14.245	\$14.513	\$17.454	\$18.209	\$15.598
145.1-150.0	50.4	\$8,207	\$0.364	\$14.514	\$14.782	\$17.723	\$18.478	\$15.867
150.1-155.0	52.1	\$8,477	\$0.376	\$14.784	\$15.052	\$17.993	\$18.748	\$16.137
155.1-160.0	53.8	\$8,747	\$0.388	\$15.054	\$15.322	\$18.263	\$19.018	\$16.407
160.1-165.0	55.5	\$9,017	\$0.400	\$15.324	\$15.592	\$18.533	\$19.288	\$16.677
165.1-170.0	57.2	\$9,287	\$0.413	\$15.594	\$15.862	\$18.803	\$19.558	\$16.947
170.1-175.0	58.9	\$9,557	\$0.425	\$15.864	\$16.132	\$19.073	\$19.828	\$17.217
175.1-180.0	60.6	\$9,827	\$0.437	\$16.134	\$16.402	\$19.343	\$20.098	\$17.487
180.1-185.0	62.4	\$10,112	\$0.450	\$16.419	\$16.687	\$19.628	\$20.383	\$17.772
185.1-190.0	64.1	\$10,382	\$0.463	\$16.689	\$16.957	\$19.898	\$20.653	\$18.042
190.1-195.0	65.8	\$10,652	\$0.475	\$16.959	\$17.227	\$20.168	\$20.923	\$18.312
195.1-200.0	67.5	\$10,922	\$0.487	\$17.229	\$17.497	\$20.438	\$21.193	\$18.582
200.1-205.0	69.2	\$11,192	\$0.499	\$17.499	\$17.767	\$20.708	\$21.463	\$18.852
205.1-210.0	70.9	\$11,462	\$0.512	\$17.769	\$18.037	\$20.978	\$21.733	\$19.122
210.1-215.0	72.6	\$11,732	\$0.524	\$18.039	\$18.307	\$21.248	\$22.003	\$19.392
215.1-220.0	74.3	\$12,001	\$0.536	\$18.308	\$18.576	\$21.517	\$22.272	\$19.661
220.1-225.0	76.0	\$12,271	\$0.548	\$18.578	\$18.846	\$21.787	\$22.542	\$19.931
225.1-230.0	77.7	\$12,541	\$0.561	\$18.848	\$19.116	\$22.057	\$22.812	\$20.201
230.1-235.0	79.4	\$12,811	\$0.573	\$19.118	\$19.386	\$22.327	\$23.082	\$20.471
235.1-240.0	81.1	\$13,081	\$0.585	\$19.388	\$19.656	\$22.597	\$23.352	\$20.741
240.1-245.0	82.9	\$13,367	\$0.598	\$19.674	\$19.942	\$22.883	\$23.638	\$21.027
245.1-250.0	84.6	\$13,636	\$0.610	\$19.943	\$20.211	\$23.152	\$23.907	\$21.296
250.1-255.0	86.3	\$13,906	\$0.623	\$20.213	\$20.481	\$23.422	\$24.177	\$21.566
255.1-260.0	88.0	\$14,176	\$0.635	\$20.483	\$20.751	\$23.692	\$24.447	\$21.836
260.1-265.0	89.7	\$14,446	\$0.647	\$20.753	\$21.021	\$23.962	\$24.717	\$22.106
265.1-270.0	91.4	\$14,716	\$0.660	\$21.023	\$21.291	\$24.232	\$24.987	\$22.376
270.1-275.0	93.1	\$14,986	\$0.672	\$21.293	\$21.561	\$24.502	\$25.257	\$22.646
275.1-280.0	94.8	\$15,256	\$0.684	\$21.563	\$21.831	\$24.772	\$25.527	\$22.916
280.1-285.0	96.5	\$15,525	\$0.696	\$21.832	\$22.100	\$25.041	\$25.796	\$23.185
285.1-290.0	98.2	\$15,795	\$0.709	\$22.102	\$22.370	\$25.311	\$26.066	\$23.455
290.1-295.0	99.9	\$16,065	\$0.721	\$22.372	\$22.640	\$25.581	\$26.336	\$23.725
295.1-300.0	101.6	\$16,335	\$0.733	\$22.642	\$22.910	\$25.851	\$26.606	\$23.995
300.1-305.0	103.4	\$16,621	\$0.746	\$22.928	\$23.196	\$26.137	\$26.892	\$24.281
305.1-310.0	105.1	\$16,891	\$0.758	\$23.198	\$23.466	\$26.407	\$27.162	\$24.551
310.1-315.0	106.8	\$17,160	\$0.771	\$23.467	\$23.735	\$26.676	\$27.431	\$24.820
315.1-320.0	108.5	\$17,430	\$0.783	\$23.737	\$24.005	\$26.946	\$27.701	\$25.090

320.1-325.0	110.2			\$17,700	\$0.795	\$24,007	\$24,275	\$27,216	\$27,971	\$25,360
325.1-330.0	111.9			\$17,970	\$0.807	\$24,277	\$24,545	\$27,486	\$28,241	\$25,630
330.1-335.0	113.6			\$18,240	\$0.820	\$24,547	\$24,815	\$27,756	\$28,511	\$25,900
335.1-340.0	115.3			\$18,510	\$0.832	\$24,817	\$25,085	\$28,026	\$28,781	\$26,170
340.1-345.0	117.0			\$18,780	\$0.844	\$25,087	\$25,355	\$28,296	\$29,051	\$26,440
345.1-350.0	118.7			\$19,049	\$0.856	\$25,356	\$25,624	\$28,565	\$29,320	\$26,709
350.1-355.0	120.4			\$19,319	\$0.869	\$25,626	\$25,894	\$28,835	\$29,590	\$26,979
355.1-360.0	122.1			\$19,589	\$0.881	\$25,896	\$26,164	\$29,105	\$29,860	\$27,249
360.1-365.0	123.9			\$19,875	\$0.894	\$26,182	\$26,450	\$29,391	\$30,146	\$27,535
365.1-370.0	125.6			\$20,145	\$0.906	\$26,452	\$26,720	\$29,661	\$30,416	\$27,805
370.1-375.0	127.3			\$20,415	\$0.919	\$26,722	\$26,990	\$29,931	\$30,686	\$28,075
375.1-380.0	129.0			\$20,684	\$0.931	\$26,991	\$27,259	\$30,200	\$30,955	\$28,344
380.1-385.0	130.7			\$20,954	\$0.943	\$27,261	\$27,529	\$30,470	\$31,225	\$28,614
385.1-390.0	132.4			\$21,224	\$0.955	\$27,531	\$27,799	\$30,740	\$31,495	\$28,884
390.1-395.0	134.1			\$21,494	\$0.968	\$27,801	\$28,069	\$31,010	\$31,765	\$29,154
395.1-400.0	135.8			\$21,764	\$0.980	\$28,071	\$28,339	\$31,280	\$32,035	\$29,424

LED lights are only applicable to LS-1A, 1C, 1E and 1F

LIGHT EMITTING DIODE (LED) LAMPS CONVERSION (with LED Surcharge)						
ALL NIGHT RATES PER LAMP PER MONTH						HALF-HOUR ADJUSTMENT LS-1A, C, D, E E & F
LS-1A	LS-1C	LS-1D	LS-1E	LS-1F		
\$9.471	\$9.739	\$22.634	\$13.435	\$10.824		\$0.007
\$9.741	\$10.009	\$22.904	\$13.705	\$11.094		\$0.019
\$10.011	\$10.279	\$23.174	\$13.975	\$11.364		\$0.031
\$10.280	\$10.548	\$23.443	\$14.244	\$11.633		\$0.043
\$10.550	\$10.818	\$23.713	\$14.514	\$11.903		\$0.056
\$10.820	\$11.088	\$23.983	\$14.784	\$12.173		\$0.068
\$11.090	\$11.358	\$24.253	\$15.054	\$12.443		\$0.080
\$11.360	\$11.628	\$24.523	\$15.324	\$12.713		\$0.092
\$11.630	\$11.898	\$24.793	\$15.594	\$12.983		\$0.105
\$11.900	\$12.168	\$25.063	\$15.864	\$13.253		\$0.117
\$12.169	\$12.437	\$25.332	\$16.133	\$13.522		\$0.129
\$12.439	\$12.707	\$25.602	\$16.403	\$13.792		\$0.141
\$12.725	\$12.993	\$25.888	\$16.689	\$14.078		\$0.154
\$12.995	\$13.263	\$26.158	\$16.959	\$14.348		\$0.167
\$13.265	\$13.533	\$26.428	\$17.229	\$14.618		\$0.179
\$13.535	\$13.803	\$26.698	\$17.499	\$14.888		\$0.191
\$13.804	\$14.072	\$26.967	\$17.768	\$15.157		\$0.203
\$14.074	\$14.342	\$27.237	\$18.038	\$15.427		\$0.216
\$14.344	\$14.612	\$27.507	\$18.308	\$15.697		\$0.228
\$14.614	\$14.882	\$27.777	\$18.578	\$15.967		\$0.240
\$14.884	\$15.152	\$28.047	\$18.848	\$16.237		\$0.253
\$15.154	\$15.422	\$28.317	\$19.118	\$16.507		\$0.265
\$15.424	\$15.692	\$28.587	\$19.388	\$16.777		\$0.277
\$15.693	\$15.961	\$28.856	\$19.657	\$17.046		\$0.289
\$15.979	\$16.247	\$29.142	\$19.943	\$17.332		\$0.302
\$16.249	\$16.517	\$29.412	\$20.213	\$17.602		\$0.315

\$16.519	\$16.787	\$29.682	\$20.483	\$17.872	\$0.327
\$16.789	\$17.057	\$29.952	\$20.753	\$18.142	\$0.339
\$17.059	\$17.327	\$30.222	\$21.023	\$18.412	\$0.351
\$17.328	\$17.596	\$30.491	\$21.292	\$18.681	\$0.364
\$17.598	\$17.866	\$30.761	\$21.562	\$18.951	\$0.376
\$17.868	\$18.136	\$31.031	\$21.832	\$19.221	\$0.388
\$18.138	\$18.406	\$31.301	\$22.102	\$19.491	\$0.400
\$18.408	\$18.676	\$31.571	\$22.372	\$19.761	\$0.413
\$18.678	\$18.946	\$31.841	\$22.642	\$20.031	\$0.425
\$18.948	\$19.216	\$32.111	\$22.912	\$20.301	\$0.437
\$19.233	\$19.501	\$32.396	\$23.197	\$20.586	\$0.450
\$19.503	\$19.771	\$32.666	\$23.467	\$20.856	\$0.463
\$19.773	\$20.041	\$32.936	\$23.737	\$21.126	\$0.475
\$20.043	\$20.311	\$33.206	\$24.007	\$21.396	\$0.487
\$20.313	\$20.581	\$33.476	\$24.277	\$21.666	\$0.499
\$20.583	\$20.851	\$33.746	\$24.547	\$21.936	\$0.512
\$20.853	\$21.121	\$34.016	\$24.817	\$22.206	\$0.524
\$21.122	\$21.390	\$34.285	\$25.086	\$22.475	\$0.536
\$21.392	\$21.660	\$34.555	\$25.356	\$22.745	\$0.548
\$21.662	\$21.930	\$34.825	\$25.626	\$23.015	\$0.561
\$21.932	\$22.200	\$35.095	\$25.896	\$23.285	\$0.573
\$22.202	\$22.470	\$35.365	\$26.166	\$23.555	\$0.585
\$22.488	\$22.756	\$35.651	\$26.452	\$23.841	\$0.598
\$22.757	\$23.025	\$35.920	\$26.721	\$24.110	\$0.610
\$23.027	\$23.295	\$36.190	\$26.991	\$24.380	\$0.623
\$23.297	\$23.565	\$36.460	\$27.261	\$24.650	\$0.635
\$23.567	\$23.835	\$36.730	\$27.531	\$24.920	\$0.647
\$23.837	\$24.105	\$37.000	\$27.801	\$25.190	\$0.660
\$24.107	\$24.375	\$37.270	\$28.071	\$25.460	\$0.672
\$24.377	\$24.645	\$37.540	\$28.341	\$25.730	\$0.684
\$24.646	\$24.914	\$37.809	\$28.610	\$25.999	\$0.696
\$24.916	\$25.184	\$38.079	\$28.880	\$26.269	\$0.709
\$25.186	\$25.454	\$38.349	\$29.150	\$26.539	\$0.721
\$25.456	\$25.724	\$38.619	\$29.420	\$26.809	\$0.733
\$25.742	\$26.010	\$38.905	\$29.706	\$27.095	\$0.746
\$26.012	\$26.280	\$39.175	\$29.976	\$27.365	\$0.758
\$26.281	\$26.549	\$39.444	\$30.245	\$27.634	\$0.771
\$26.551	\$26.819	\$39.714	\$30.515	\$27.904	\$0.783

\$26.821	\$27.089	\$39.984	\$30.785	\$28.174	\$0.795
\$27.091	\$27.359	\$40.254	\$31.055	\$28.444	\$0.807
\$27.361	\$27.629	\$40.524	\$31.325	\$28.714	\$0.820
\$27.631	\$27.899	\$40.794	\$31.595	\$28.984	\$0.832
\$27.901	\$28.169	\$41.064	\$31.865	\$29.254	\$0.844
\$28.170	\$28.438	\$41.333	\$32.134	\$29.523	\$0.856
\$28.440	\$28.708	\$41.603	\$32.404	\$29.793	\$0.869
\$28.710	\$28.978	\$41.873	\$32.674	\$30.063	\$0.881
\$28.996	\$29.264	\$42.159	\$32.960	\$30.349	\$0.894
\$29.266	\$29.534	\$42.429	\$33.230	\$30.619	\$0.906
\$29.536	\$29.804	\$42.699	\$33.500	\$30.889	\$0.919
\$29.805	\$30.073	\$42.968	\$33.769	\$31.158	\$0.931
\$30.075	\$30.343	\$43.238	\$34.039	\$31.428	\$0.943
\$30.345	\$30.613	\$43.508	\$34.309	\$31.698	\$0.955
\$30.615	\$30.883	\$43.778	\$34.579	\$31.968	\$0.968
\$30.885	\$31.153	\$44.048	\$34.849	\$32.238	\$0.980
Decorative LED lights are only applicable to LS-1D					



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28858-E  
Canceling Revised Cal. P.U.C. Sheet No. 28844-E

## 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.

### Cal. P.U.C. Sheet No

TITLE PAGE..... 16015-E

TABLE OF CONTENTS..... 28858, 28845, 27839, 28613, 28783, 28825, 28396-E  
28784, 26325, 28785, 28859, 28247, 26298-E

### **PRELIMINARY STATEMENT:**

I. General Information..... 8274, 26126, 22140-E

### **II. Balancing Accounts**

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

(Continued)

1C5

Advice Ltr. No. 2985-E-A

Decision No. 16-06-029

Issued by  
**Dan Skopec**  
Vice President  
Regulatory Affairs  
C-26

Date Filed Mar 14, 2017

Effective Mar 17, 2017

Resolution No.

T  
T





San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	28845-E
Canceling	Revised	Cal. P.U.C. Sheet No.
		28767-E

## TABLE OF CONTENTS

Sheet 2

### II. Balancing Accounts (Continued)

SONGS O&M Balancing Account (SONGSBA).....	27953, 27954-E
On-Bill Financing Balancing Account (OBFBA)	22061-E
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

### III. Memorandum Accounts

Description/Listing of Accounts	19451, 28842-E	T
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 (RTEEMA).....	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	N

(Continued)



San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	28364-E
Canceling	Revised	Cal. P.U.C. Sheet No.
		28004-E

## 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
Wildfire Expense Memorandum Account (WEMA).....	21959-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)	28362-E
Sutter Energy Center Memorandum Account (SECMA)....	22847-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).....	24572-E
Residential Disconnect Memorandum Account (RDMA).....	25227-E
Mitsubishi Net Litigation Memorandum Account (MNLMA)....	25578, 25579-E
Nuclear Fuel Cancellation Incentive Memo Account (NFICMA).	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 (MMA).....	27751, 27752-E
Green Tariff Shared Renewables Administrative Costs Memorandum Account (GTSRACMA).....	27434-E
Green Tariff Marketing, Education & Outreach Memorandum Account (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

### **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)



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28748-E  
Canceling Revised Cal. P.U.C. Sheet No. 28387-E

## TABLE OF CONTENTS

Sheet 4

### 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 .....	28651, 28652, 28653, 26559, 27653, 24223-E	T
DR-TOU	Domestic Time-of-Use Service .....	28654, 28655, 28656, 28657, 28658, 27659-E 25535, 26565-E	T
TOU-DR	Residential – Time of Use Service	28659, 28660, 28661, 28662, 26057, 25542-E	T
DR-SES	Domestic Households with a Solar Energy System	28196, 26571, 26572, 24335-E	T
E-CARE	California Alternate Rates for Energy .....	28663, 28664, 26575, 26576, 26577, 26578-E 26579-E	T
DM	Multi-Family Service .....	28665, 28666, 28667, 26583, 27668, 24242-E	T
DS	Submetered Multi-Family Service .....	28668, 28669, 28670, 26587, 24247, 27672-E 24249, 24250-E	T
DT	Submetered Multi-Family Service Mobilehome Park	28671, 28672, 28673, 26591, 24455, 27676-E 24257, 24258, 24259-E	T
DT-RV	Submetered Service – Recreational Vehicle Parks and Residential Marinas	28674, 28675, 28677, 26595, 24455, 27680-E 24266, 24267-E	T
EV-TOU	Domestic Time-of-Use for Electric Vehicle Charging	28677, 26597, 24270-E	T
EV-TOU-2	Domestic Time-of-Use for Households With Electric Vehicles	28678, 26599, 24272, 24274-E	T
DE	Domestic Service to Utility Employee .....	20017-E	
FERA	Family Electric Rate Assistance .....	28685, 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	
TOU-DR-E1	Control Your Use E1 (Experimental)	27440, 28679, 28680, 27443, 27444, 27445-E	T
TOU-DR-E2	Control Your Use E2 (Experimental)	27446, 28681, 28682, 27449, 27450, 27451-E	T
TOU-DR-E3	Control Your Use E3 (Experimental)	28131, 28683, 28684, 27455, 27456-E	T
TOU-DR2	Residential Time-of-Use DR2 (Experimental)	28374, 28375, 28376, 28377, 28378, 28379-E	
TOU-DR3	Residential Time-of-Use DR3 (Experimental)	28380, 28381, 28382, 28383, 28384, 28385-E	
	<u>Commercial/Industrial Rates</u>		
A	General Service .....	28686, 25927, 24280-E	T
TOU-A	General Service – Time of Use Service .....	28687, 28688, 24373, 25256-E	T
A-TC	Traffic Control Service .....	28689, 24282, 24283-E	T
AD	General Service - Demand Metered .....	28690, 28691, 21772-E	T
A-TOU	General Service - Small - Time Metered .....	28692, 24286, 20503, 21773-E	T
AL-TOU	General Service - Time Metered .....	28693, 26756, 28694, 28695, 20508, 21434-E 21774, 26878-E	T
AY-TOU	General Service – Time Metered – Optional .....	28696, 28697, 25433, 21776-E	T
A6-TOU	General Service - Time Metered .....	28698, 28699, 25435, 20521, 21777-E	T
DG-R	Distributed Generation Renewable –Time Metered	28700, 27887, 28701, 25437, 21059, 21060-E, 21061-E	T
OL-TOU	Outdoor Lighting – Time Metered .....	28702, 24302, 21448, 21449-E	T

(Continued)

4C8	Issued by	Date Filed	Jan 17, 2017
Advice Ltr. No. 3034-E	<b>Dan Skopec</b>	Effective	Mar 1, 2017
Decision No. 16-12-053	Vice President Regulatory Affairs C-29	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28783-E  
Canceling Revised Cal. P.U.C. Sheet No. 28614-E

## TABLE OF CONTENTS

Sheet 5

SCHEDULE NO.	SERVICE	CAL. P.U.C. SHEET NO.
	<u>Lighting Rates</u>	
LS-1	Lighting - Street and Highway – Utility-Owned Installations .....	28575, 28576, 28577, 12626, 12627, 12628-E 21439-E
LS-2	Lighting - Street and Highway – Customer-Owned Installations .....	28578, 28579, 28580, 28581, 2852, 22362-E 22363, 22364-E
LS-3	Lighting - Street and Highway - Customer-Owned Installations .....	28583, 14943, 21441-E
OL-1	Outdoor Area Lighting Service .....	28584, 20280, 21442-E
OL-2	Outdoor Area Lighting Service Metered – Customer- Owned Installation .....	28585, 21444, 21445-E
DWL	Residential Walkway Lighting .....	28586, 21450-E
	<u>Miscellaneous</u>	
PA	Power – Agricultural .....	28587, 26507, 26508-E
TOU-PA	Power - Agricultural Time of Use Service .....	27015, 28588, 26511, 26512-E
PA-T-1	Power – Agricultural – Optional Time-of-Use .....	27017, 28589, 28590, 27072, 27073, 26518-19-E
S	Standby Service .....	28591, 18256, 21453-E
S-I	Standby Service – Interruptible .....	17678, 6085, 6317-E
SE	Service Establishment Charge .....	18651, 11594-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 .....	22951, 22952, 23042, 22954, 22955-E
OBMC	Optional Binding Mandatory Curtailment Plan .....	14625, 15198, 14627, 21948-21951-E
PEVSP	Plug-in Electric Vehicle Submetering Pilot (Phase I) .....	25237, 25378, 25239, 25379, 25241-E
PEVSP2	Plug-in Electric Vehicle Submetering Pilot (Phase 2) .....	27637, 27638, 28240, 28241, 27641-E
SLRP	Scheduled Load Reduction Program .....	14584, 22957, 22958, 14587, 18367-E
RBRP	Rolling Blackout Reduction Program .....	18259, 18260, 20546, 18262-E
DBP	Demand Bidding Program .....	25218, 23478, 23479, 25219-E
DBP-DA	Demand Bidding - Day Ahead (US Navy) .....	25220, 25221, 23630, 23631-E
NEM	Net Energy Metering .....	25272, 25273, 25274, 25275, 25276, 25277-E 25278, 25279, 25280, 25281, 25282, 25283-E 25284, 25285, 25286, 25287, 25288, 25289-E
NEM-FC	Net Energy Metering for Fuel Cell Customer Generators .....	28777, 23437, 23438, 23439, 23440, 23441-E 23442, 23442, 28778-E
E-PUC	Surcharge to Fund Public Utilities Commission Reimbursement Fee .....	15214-E
DWR-BC	Department of Water Resources Bond Charge .....	28592-E
DA-CRS	Direct Access Cost Responsibility Surcharge .....	21812, 27045, 27046, 27047, 27048-E
CGDL-CRS	Customer Generation Departing Load Cost Responsibility Surcharge .....	27487, 19582, 18583, 18584, 18391-E
CCA	Transportation of Electric Power, For Community Choice Aggregation Customers .....	17894, 17895, 17896, 17897-E
CCA-CRS	Community Choice Aggregation Cost Responsibility Surcharge .....	27049, 21817-E
CCA-INFO	Information Release to Community Choice Providers .....	22783, 17858, 22784, 17860-E
CBP	Capacity Bidding Program .....	25207, 25781, 25209, 25210, 25211, 25212-E 25213, 25214, 25215, 25216, 25217-E
UM	Unmetered Electric Service .....	28593, 19337, 19338-E

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T

(Continued)

5C6	Issued by	Date Filed	Feb 14, 2017
Advice Ltr. No. 3044-E	<b>Dan Skopec</b>	Effective	Feb 14, 2017
Decision No. AB 1637	Vice President Regulatory Affairs C-30	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28825-E  
Canceling Revised Cal. P.U.C. Sheet No. 28790-E

## TABLE OF CONTENTS

Sheet 6

### 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-E 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-E
NEM-V-ST	Virtual Net Metering for Multi-Tenant and Meter Properties Successor Tariff.....	27197-27208-E
VNM-A	Virtual Net Metering for Multi-Family Affordable Housing.....	22385, 22402, 22403, 22404, 22405-E
VNM-A-ST	Virtual Net Metering for Multi-Family Affordable Housing Successor Tariff.....	27209-27216-E
RES-BCT	Renewable Energy Self-Generation Bill Credit Transfer.....	22582, 25424, 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.....	27051, 28823, 27052-E
ECR	Enhanced Community Renewables.....	28786, 28267, 28787, 28269, 28270-E 28271, 28788, 28409-E
GT	Green Tariff.....	28273, 28274, 28275, 28276, 28277-E 28410-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
	<u>Commodity Rates</u>	
EECC	Electric Energy Commodity Cost .....	28594, 28595, 28596, 28597, 28598-E 28599, 28600, 28601, 28602, 28603-E 28604, 27918-E
EECC-TOU-DR-P	Electric Commodity Cost - Time of Use Plus	28605, 25547, 25548, 26613, 28070-E
EECC-TOU-A-P	Electric Commodity Cost – Time of Use Plus	26533, 28606, 26535-6, 26537, 28071-E
EECC-TOU-PA-P	Electric Commodity Cost – Time of Use Plus	27921, 28607, 26540, 26617, 28072-E
EECC-TBS	Electric Energy Commodity Cost – Transitional Bundled Service.....	22903, 22904, 16432, 19750-E
EECC-CPP-D	Electric Energy Commodity Cost – Critical Peak Pricing Default.....	28608, 28609, 25458, 25514, 25515-E 25516, 25517, 22929-E
EECC-CPP-D-AG	Electric Commodity Cost, Critical Peak Pricing Default Agricultural	28610, 28611, 25459, 25518, 25519-E 25520, 25521, 24349-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)

6C5	Issued by	Date Filed	Feb 24, 2017
Advice Ltr. No. 3034-E-A	<b>Dan Skopec</b>	Effective	Mar 1, 2017
Decision No. 16-12-053	Vice President Regulatory Affairs C-31	Resolution No.	





San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28811-E  
Canceling Revised Cal. P.U.C. Sheet No. 28300-E

## TABLE OF CONTENTS

Sheet 7

RULE NO.	SERVICE	CAL. P.U.C. SHEET NO.
1	Definitions .....	20584, 20585, 23310, 23700, 20588, 17687, 22066, 18413-E 14854, 24475, 19394, 24671, 24476, 22068-E 15591-15600, 15601, 15602, 15603, 20415-E
2	Description of Service .....	15484, 15485-E
3	Applications for Service .....	15488, 15489, 15490-E
4	Contracts .....	20644, 20645-E
5	Special Information Available for Customers ...	20223, 25228-E
6	Establishment & Re-establishment of Credit....	25229, 20228-E
7	Deposits .....	17405-E
8	Notices .....	25230, 20141, 20142, 20143-E
9	Rendering and Payment of Bills .....	19756-E
10	Disputed Bills .....	25231, 25232, 25233, 19693, 25248, 19695 – 19697, 22793-E
11	Discontinuance of Service .....	19399-E
12	Rates and Optional Rates .....	19757-E
13	Temporary Service .....	4794-E
14	Shortage of Electric Supply/Interruption Divry	19758, 11221, 11222, 22237, 13202, 13203, 20417, 12777-E 17074, 17075, 17076, 22238, 22239, 20420-E
15	Distribution Line Extensions .....	11233, 22794, 10501, 11235, 11236, 13238-E 11238, 11239, 11240, 19759, 11242, 11243, 11244, 11245-E
16	Service Extensions .....	26153, 20343-E
17	Meter Reading .....	16585, 22130, 22131-E
18	Meter Tests and Adjustment of Bills .....	18704, 20591, 26879, 22515-E
19	Supply to Separate Premises and Resale .....	25251, 15505, 15506, 15507, 15508-E
20	Replacement of Overhead With Underground Electric Facilities .....	27716, 28005-6, 25991, 27718-19, 24948, 28007-10, 24953, 27218-22-E 27720, 27724-29, 28011, 27231, 28012, 27721-27, 28013, 27729-34-E 28014, 27736-38, 28015-22, 27259-60, 28023-27, 27266-88, 28028-34-E 28095, 28050, 27312, 27319, 28096, 28097, 27322-363, 28804-809-E
21	Interconnection Standards for Non-Utility Owned Generation	7966-7976, 7977-7986, 7989-E 8713, 8714-E
21.1	Final Standard Offer 4 Qualifying Facilities .....	19760, 15189, 15190, 15191, 15192, 15123, 10623, 10624-E 10625, 12720, 12721, 12722, 12723, 12724-E
22	Special Service Charges .....	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
23	Competition Transition Charge Responsibility .	23413, 22644, 22727, 22646, 21889, 21699, 21700, 22728-E 23317, 23318, 21704, 28297, 28298, 23416-E 19818-E
25	Direct Access Rules .....	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
25.1	Switching Exemptions .....	14167, 14168, 14169, 14170, 14171-E
25.2	DA Qualified Nonprofit Charitable Org	22966, 22967, 22968, 22969, 22970, 22971, 22972, 22973-E
27	Community Choice Aggregation .....	19658, 19659, 19660, 19661, 19662, 19663-E
27.2	CCA Open Season	21265, 21266, 21267, 21268, 21269, 21270-E
28	Provision of Utility Right-of-Way Information.	22041, 22042, 22043, 22044, 22045, 22046-E
29	Third-Party Marketers for BIP	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
30	Capacity Bidding Program	23298, 23299, 23300, 23301, 23302, 23303, 23304, 23305-E
31	Participating Load Pilot	20937-E
31.1	Demand Response Wholesale Market Pilot	21501, 21502, 21503, 21504, 21505, 21506-E
32	Direct Participation Demand Response	26465, 23976, 26466, 26467, 26468, 26469, 26470-E 20554, 20555, 20556, 20557, 25472- 25475-E
33	Privacy & Security – Energy Use Data	
40	On-Bill Financing Program	
41	DR Multiple Program Participation	
43	On-Bill Repayment Pilots	
44	Mobilehome Park Utility Upgrade Program	

(Continued)

7C5	Issued by	Date Filed	Feb 24, 2017
Advice Ltr. No. 2959-E-A	<b>Dan Skopec</b>	Effective	Oct 21, 2016
Decision No. 16-06-052	Vice President Regulatory Affairs C-32	Resolution No.	

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28784-E  
Canceling Revised Cal. P.U.C. Sheet No. 28372-E

## TABLE OF CONTENTS

Sheet 8

### SAMPLE FORMS

Form No.	Date	Applications, Agreements & Contracts	Cal. P.U.C. Sheet No.
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	12-16	Generating Facility Interconnection Agreement (NEM/Non- NEM Generating Facility Export).....	28779-E
117-2160-A	12-16	Generating Facility Interconnection Agreement (NEM/Non- NEM Generating Facility Export) Federal Government Only..	28780-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)

8C5	Issued by	Date Filed	Feb 14, 2017
Advice Ltr. No. 3044-E	<b>Dan Skopec</b>	Effective	Feb 14, 2017
Decision No. AB 1637	Vice President Regulatory Affairs C-33	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 27492-E  
Canceling Revised Cal. P.U.C. Sheet No. 26894-E

## 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.....	26302-E
142-732/1	04-15	Residential Rate Assistance Application (IVR/System-Gen).....	26303-E
142-732/2	04-15	Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program.....	26304-E
142-732/3	12-15	CARE Program Recertification Application & Statement of Eligibility	26890-E
142-732/4	12-15	CARE/FERA Program Renewal - Application & Statement of Eligibility for Sub-metered Customers.....	26891-E
142-732/5	12-15	CARE Post Enrollment Verification.....	26892-E
142-732/6	04-15	Residential Rate Assistance Application (Vietnamese).....	26308-E
142-732/8	04-15	Residential Rate Assistance Application (Direct Mail).....	26309-E
142-732/10	04-15	Residential Rate Assistance Application (Mandarin Chinese).....	26310-E
142-732/11	04-15	Residential Rate Assistance Application (Arabic).....	26311-E
142-732/12	04-15	Residential Rate Assistance Application (Armenian).....	26312-E
142-732/13	04-15	Residential Rate Assistance Application (Farsi).....	26313-E
142-732/14	04-15	Residential Rate Assistance Application (Hmong).....	26314-E
142-732/15	04-15	Residential Rate Assistance Application (Khmer).....	26315-E
142-00832	04-15	Application for CARE for Qualified Nonprofit Group Living Facilities	26321-E

(Continued)

9C5	Issued by	Date Filed	May 5, 2016
Advice Ltr. No. 2893-E	<b>Dan Skopec</b>	Effective	Jun 4, 2016
Decision No.	Vice President Regulatory Affairs	Resolution No.	





San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28785-E  
Canceling Revised Cal. P.U.C. Sheet No. 28373-E

## TABLE OF CONTENTS

Sheet 10

### SAMPLE FORMS

Form No.	Date	Applications, Agreements & Contracts	Sheet No.
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.....	28781-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	06-14	Rule 21 Generator Interconnection Agreement (GIA).....	25064-E
142-02772	06-14	Rule 21 Detailed Study Agreement.....	25065-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	09-12	Generator Interconnection Agreement for Fast Track Process.....	23216-E
142-05201	09-12	Exporting Generating Facility Interconnection Request.....	23217-E
142-05202	01-01	Generating Facility Interconnection Application Agreement....	14152-E
142-05203	06-15	Generating Facility Interconnection Application.....	26363-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	08-16	Base Interruptible Program Contract.....	28073-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

(Continued)

10C5	Issued by	Date Filed	Feb 14, 2017
Advice Ltr. No. 3044-E	<b>Dan Skopec</b>	Effective	Feb 14, 2017
Decision No. AB 1637	Vice President Regulatory Affairs	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 27995-E  
Canceling Revised Cal. P.U.C. Sheet No. 27385-E

## TABLE OF CONTENTS

Sheet 11

### SAMPLE FORMS

Form No.	Date	Applications, Agreements and Contracts	Cal. P.U.C. Sheet No.	
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	11-12	Technical Incentive Program Application.....	23264-E	
142-05219/1	11-12	Technical Incentive Program Agreement.....	23265-E	
142-0541	06-02	Customer Generation Agreement.....	15384-E	
142-0542	08-16	Generating Facility Interconnection Agreement..... (3 <sup>rd</sup> Party Inadvertent Export)	27989-E	T
142-0543	08-16	Generating Facility Interconnection Agreement..... (3 <sup>rd</sup> Party Non-Exporting)	27990-E	T
142-0544	08-16	Generating Facility Interconnection Agreement..... (Inadvertent Export)	27991-E	T
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	04-10	Direct Access Customer Relocation Declaration.....	23417-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)

11C6	Issued by	Date Filed	Aug 8, 2016
Advice Ltr. No. 2939-E	<b>Dan Skopec</b>	Effective	Sep 7, 2016
Decision No. 16-06-052	Vice President Regulatory Affairs	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 28258-E  
Canceling Revised Cal. P.U.C. Sheet No. 27843-E

## 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
<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.....	19128-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

Advice Ltr. No. 2954-E-A

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

Issued by  
**Dan Skopec**  
Vice President  
Regulatory Affairs  
C-37

Date Filed Nov 16, 2016

Effective Dec 16, 2016

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

T



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 26298-E  
Canceling Revised Cal. P.U.C. Sheet No. 25423-E

## 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 Shut-off (Mailed).....	25420-E
101-01073	05-14	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units) .....	24851-E
101-02171	05-10	Notice of Disconnect (MDTs).....	21885-E
101-02172	03-14	Notice to Tenants - Request for Termination of Gas and Electric Service Customer Payment Notification.....	24582-E
101-2452G	02-04		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

13C6

Advice Ltr. No. 2734-E

Decision No. D.14-05-016

Issued by  
**Lee Schavrien**  
Senior Vice President  
Regulatory Affairs  
C-38

Date Filed Apr 28, 2015

Effective May 1, 2015

Resolution No.

## **Appendix D**

### **IOU Summaries of Earnings**

**Southern California Edison  
Summary of Earnings  
2015 GRC Adopted Revenue Requirement  
Thousands of Dollars**

Line		
No.	Item	Total
1.	<b>Base Revenues</b>	5,182,297
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	1,984,387
4.	Depreciation	1,532,289
5.	Taxes	442,687
6.	Revenue Credits	(147,491)
7.	Total Expenses	3,811,871
8.	<b>Net Operating Revenue</b>	1,370,425
9.	<b>Rate Base</b>	17,375,834
10.	<b>Rate of Return</b>	7.89%

**Southern California Edison  
Summary of Earnings  
2016 GRC Adopted Revenue Requirement  
Thousands of Dollars**

Line No.	Item	Total
1.	<b>Base Revenues</b>	5,385,537
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	2,037,603
4.	Depreciation	1,546,128
5.	Taxes	474,761
6.	Revenue Credits	(149,196)
7.	Total Expenses	<u>3,909,295</u>
8.	<b>Net Operating Revenue</b>	1,476,242
9.	<b>Rate Base</b>	18,713,446
10.	<b>Rate of Return</b>	7.89%



**Southern California Edison  
Summary of Earnings  
2017 GRC Adopted Revenue Requirement  
Thousands of Dollars**

Line No.	Item	Total
1.	<b>Base Revenues</b>	5,657,371
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	2,096,676
4.	Depreciation	1,575,482
5.	Taxes	542,386
6.	Revenue Credits	(148,941)
7.	Total Expenses	4,065,603
8.	<b>Net Operating Revenue</b>	1,591,768
9.	<b>Rate Base</b>	20,175,800
10.	<b>Rate of Return</b>	7.89%



**PACIFIC GAS AND ELECTRIC COMPANY**  
REVENUE, EXPENSE, RATE BASE AND RATE OF RETURN  
YEAR 2015 SUMMARY OF EARNINGS  
RECORDED ADJUSTED FOR RATEMAKING  
(000\$)

<b>Line No.</b>		<b>Total Utility Operations</b>
1	<b>Operating Revenue</b>	16,995,959
2	<b>Expenses</b>	
3	Operation & Maintenance Expense	11,343,046
4	Depreciation	2,545,957
5	Taxes	919,152
6	Other	62,920
7	<b>Total Expenses</b>	<u>14,871,075</u>
8	<b>Operating Income</b>	2,124,884
9	Weighted Average Rate Base	30,305,380
10	<b>Return on Rate Base</b>	7.01%

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**SUMMARY OF EARNINGS**  
**Nine Months Ended September 30, 2016**  
**(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,516
2	Operating Expenses	<u>3,000</u>
3	Net Operating Income	<u><u>\$516</u></u>
4	Weighted Average Rate Base	\$7,859
5	Rate of Return*	7.79%

\*Authorized Cost of Capital

## **Appendix E**

### **Lists of Cities and Counties**

## Incorporated Cities and Counties Served by SCE

### COUNTIES

Fresno	Kern	Madera	Riverside	Tuolumne
Imperial	Kings	Mono	San Bernardino	Tulare
Inyo	Los Angeles	Orange	Santa Barbara	Ventura

### CITIES

Adelanto	Commerce	Hesperia	Los Alamitos	Port Hueneme	Simi Valley
Agoura Hills	Compton	Hidden Hills	Lynwood	Porterville	South El Monte
Alhambra	Corona	Highland	Malibu	Rancho Cucamonga	South Gate
Aliso Viejo	Costa Mesa	Huntington Beach	Mammoth Lakes	Rancho Mirage	South Pasadena
Apple Valley	Covina	Huntington Park	Manhattan Beach	Rancho Palos Verdes	Stanton
Arcadia	Cudahy	Indian Wells	Maywood	Rancho Santa Margarita	Tehachapi
Artesia	Culver City	Industry	McFarland	Redlands	Temecula
Avalon	Cypress	Inglewood	Menifee	Redondo Beach	Temple City
Baldwin Park	Delano	Irvine	Mission Viejo	Rialto	Thousand Oaks
Barstow	Desert Hot Springs	Irwindale	Monrovia	Ridgecrest	Torrance
Beaumont	Diamond Bar	Jurupa Valley	Montclair	Rolling Hills	Tulare
Bell	Downey	La Canada Flintridge	Montebello	Rolling Hills Estates	Tustin
Bell Gardens	Duarte	La Habra	Monterey Park	Rosemead	Twentynine Palms
Bellflower	Eastvale	La Habra Heights	Moorpark	San Bernardino	Upland
Beverly Hills	El Monte	La Mirada	Moreno Valley	San Buenaventura	Valencia
Big Bear Lake	El Segundo	La Palma	Murrieta	San Dimas	Victorville
Bishop	Exeter	La Puente	Newport Beach	San Fernando	Villa Park
Blythe	Farmersville	La Verne	Norco	San Gabriel	Visalia
Bradbury	Fillmore	Laguna Beach	Norwalk	San Jacinto	Walnut
Brea	Fontana	Laguna Hills	Ojai	San Marino	West Covina
Buena Park	Fountain Valley	Laguna Niguel	Ontario	Santa Ana	West Hollywood
Calabasas	Fullerton	Laguna Woods	Orange	Santa Barbara	Westlake Village
California City	Garden Grove	Lake Elsinore	Oxnard	Santa Clarita	Westminster
Calimesa	Gardena	Lake Forest	Palm Desert	Santa Fe Springs	Whittier
Camarillo	Glendora	Lakewood	Palm Springs	Sierra Madre	Wildomar
Canyon Lake	Goleta	Lancaster	Palmdale	Signal Hill	Woodlake (Three Rivers)
Carpinteria	Grand Terrace	Lawndale	Paramount		Yorba Linda
Carson	Hanford	Lindsay	Perris		Yucaipa
Cathedral City	Hawaiian Gardens	Loma Linda	Pico Rivera		Yucca Valley
Cerritos	Hawthorne	Lomita	Placentia		
Chino	Hemet	Long Beach	Pomona		
Chino Hills	Hermosa Beach				
Claremont					

## SERVICE OF NOTICE OF APPLICATION

In accordance with Rule 3.2(b), Applicant will mail a notice to the following, stating in general terms its proposed change in rates.

### State of California

To the Attorney General and the Department of General Services.

State of California  
Office of Attorney General  
1300 I St Ste 1101  
Sacramento, CA 95814

and

Department of General Services  
Office of Buildings & Grounds  
505 Van Ness Avenue, Room 2012  
San Francisco, CA 94102

### Counties

To the County Counsel or District Attorney and the County Clerk in the following counties:

Alameda	Mariposa	Santa Clara
Alpine	Mendocino	Santa Cruz
Amador	Merced	Shasta
Butte	Modoc	Sierra
Calaveras	Monterey	Siskiyou
Colusa	Napa	Solano
Contra Costa	Nevada	Sonoma
El Dorado	Placer	Stanislaus
Fresno	Plumas	Sutter
Glenn	Sacramento	Tehama
Humboldt	San Benito	Trinity
Kern	San Bernardino	Tulare
Kings	San Francisco	Tuolumne
Lake	San Joaquin	Yolo
Lassen	San Luis Obispo	Yuba
Madera	San Mateo	
Marin	Santa Barbara	

## Municipal Corporations

To the City Attorney and the City Clerk of the following municipal corporations:

Alameda	Colusa	Hanford
Albany	Concord	Hayward
Amador City	Corcoran	Healdsburg
American Canyon	Corning	Hercules
Anderson	Corte Madera	Hillsborough
Angels Camp	Cotati	Hollister
Antioch	Cupertino	Hughson
Arcata	Daly City	Huron
Arroyo Grande	Danville	Ione
Arvin	Davis	Isleton
Atascadero	Del Rey Oaks	Jackson
Atherton	Dinuba	Kerman
Atwater	Dixon	King City
Auburn	Dos Palos	Kingsburg
Avenal	Dublin	Lafayette
Bakersfield	East Palo Alto	Lakeport
Barstow	El Cerrito	Larkspur
Belmont	Elk Grove	Lathrop
Belvedere	Emeryville	Lemoore
Benicia	Escalon	Lincoln
Berkeley	Eureka	Live Oak
Biggs	Fairfax	Livermore
Blue Lake	Fairfield	Livingston
Brentwood	Ferndale	Lodi
Brisbane	Firebaugh	Lompoc
Buellton	Folsom	Loomis
Burlingame	Fort Bragg	Los Altos
Calistoga	Fortuna	Los Altos Hills
Campbell	Foster City	Los Banos
Capitola	Fowler	Los Gatos
Carmel	Fremont	Madera
Ceres	Fresno	Manteca
Chico	Galt	Maricopa
Chowchilla	Gilroy	Marina
Citrus Heights	Gonzales	Mariposa
Clayton	Grass Valley	Martinez
Clearlake	Greenfield	Marysville
Cloverdale	Gridley	McFarland
Clovis	Grover Beach	Mendota
Coalinga	Guadalupe	Menlo Park
Colfax	Gustine	Merced
Colma	Half Moon Bay	Mill Valley

Millbrae  
Milpitas  
Modesto  
Monte Sereno  
Monterey  
Moraga  
Morgan Hill  
Morro Bay  
Mountain View  
Napa  
Newark  
Nevada City  
Newman  
Novato  
Oakdale  
Oakland  
Oakley  
Orange Cove  
Orinda  
Orland  
Oroville  
Pacific Grove  
Pacifica  
Palo Alto  
Paradise  
Parlier  
Paso Robles  
Patterson  
Petaluma  
Piedmont  
Pinole  
Pismo Beach  
Pittsburg  
Placerville  
Pleasant Hill  
Pleasanton  
Plymouth  
Point Arena  
Portola  
Portola Valley  
Rancho Cordova  
Red Bluff  
Redding  
Redwood City  
Reedley  
Richmond

Ridgecrest  
Rio Dell  
Rio Vista  
Ripon  
Riverbank  
Rocklin  
Rohnert Park  
Roseville  
Ross  
Sacramento  
Saint Helena  
Salinas  
San Anselmo  
San Bruno  
San Carlos  
San Francisco  
San Joaquin  
San Jose  
San Juan Bautista  
San Leandro  
San Luis Obispo  
San Mateo  
San Pablo  
San Rafael  
San Ramon  
Sand City  
Sanger  
Santa Clara  
Santa Cruz  
Santa Maria  
Santa Rosa  
Saratoga  
Sausalito  
Scotts Valley  
Seaside  
Sebastopol  
Selma  
Shafter  
Shasta Lake  
Soledad  
Solvang  
Sonoma  
Sonora  
South San Francisco  
Stockton  
Suisun City

Sunnyvale  
Sutter Creek  
Taft  
Tehama  
Tiburon  
Tracy  
Trinidad  
Turlock  
Ukiah  
Union City  
Vacaville  
Vallejo  
Victorville  
Walnut Creek  
Wasco  
Waterford  
Watsonville  
West Sacramento  
Wheatland  
Williams  
Willits  
Willows  
Windsor  
Winters  
Woodland  
Woodside  
Yountville  
Yuba City

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  
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