



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

Application of San Diego Gas & Electric Company  
(U 902 M) to Adopt 2024-2031 Energy Efficiency  
Rolling Portfolio Business Plan Pursuant to  
D.21-05-031

Application 22-03-\_\_\_\_\_

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**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) TO  
ADOPT 2024-2031 ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS  
PLAN PURSUANT TO D.21-05-031**

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## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
A.	Content and Format of this Application.....	1
II.	BASIS FOR THIS APPLICATION .....	3
III.	SDG&E’S BUSINESS PLAN AND PORTFOLIO PROPOSAL .....	4
A.	Exhibit 1: Business Plan Summary.....	4
B.	Exhibit 1: Business Plan Chapters .....	6
1.	Program Administrator’s Vision for EE in CA: 2024-2031 .....	6
2.	Annual Portfolio Budgets .....	6
3.	Recommendations for New or Modified EE Policy .....	6
C.	Exhibit 2: SDG&E 2024-2027 Portfolio Summary .....	7
D.	Exhibit 2: SDG&E 2024-2027 Portfolio Chapters .....	10
1.	Portfolio Summary .....	10
2.	Forecast Methodology .....	10
3.	Segmentation Strategy .....	11
4.	Sector Strategy .....	13
5.	Portfolio Management .....	20
6.	EM&V.....	22
7.	Cost & Cost Recovery .....	23
IV.	APPENDICES AND ATTACHMENTS.....	28
V.	STATUTORY AND PROCEDURAL REQUIREMENTS.....	29
A.	Rule 2.1(a) – (c) .....	29
1.	Rule 2.1(a) – Legal Name .....	29
2.	Rule 2.1(b) – Correspondence .....	29
3.	Rule 2.1(c) – categorization, hearings and schedule.....	30
B.	Rule 2.2 – Articles of Incorporation .....	31

C.	Authority to Change Rates – Rule 3.2 (a-d) .....	31
1.	Rule 3.2(a)(1) – Balance Sheet .....	31
2.	Rule 3.2(a)(2) – Statement of Effective Rates .....	32
3.	Rule 3.2(a)(3) – Statement of Proposed Rate Change .....	32
4.	Rule 3.2(a)(4) – Description of Property and Equipment.....	32
5.	Rule 3.2(a)(5) and (6) – Summary of Earnings .....	32
6.	Rule 3.2(a)(7) – Statement Regarding Tax Depreciation .....	33
7.	Rule 3.2(a)(8) – Proxy Statement .....	33
8.	Rule 3.2(a)(10) – Statement re Pass Through to Customers.....	33
9.	Rule 3.2(b) – Notice to State, Cities and Counties .....	33
10.	Rule 3.2(c) – Newspaper Publication .....	34
11.	Rule 3.2(d) – Bill Insert Notice.....	34
VI.	SERVICE.....	34
VII.	CONCLUSION.....	34
OFFICER VERIFICATION		
ATTACHMENT A: 2024-2031 Budgets, Savings Cost-Effectiveness and Metrics Tables		
ATTACHMENT B: Supplemental Budget Information		
ATTACHMENT C: Redlined Preliminary Statement Statewide Energy Efficiency Balancing Account		
ATTACHMENT D: Redlined Preliminary Statement Statewide Energy Efficiency Gas Balancing Account		
APPENDIX A: Balance Sheet, Income Statement and Financial Statement		
APPENDIX B: Statement of Effective Rates		
APPENDIX C: Statement of Original Cost and Depreciation Reserves		
APPENDIX D: Summary of Earnings		
APPENDIX E: Notice List		

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Pursuant to Article 2 of the California Public Utilities Commission (“CPUC” or “Commission”) Rules of Practice and Procedure, Decision (“D.”)15-10-028 and D.16-08-019, and D.21-05-031, San Diego Gas & Electric Company (“SDG&E”) submits this application for adoption of its Energy Efficiency Rolling Portfolio Business Plan (“Business Plan” or “Strategic Business Plan”).

**I. INTRODUCTION**

**A. Content and Format of this Application**

This application includes the following:

1. SDG&E’s Strategic Business Plan, including the Portfolio Overview for 2024-2031, which is Exhibit 1 to the prepared direct testimony attached to this application;<sup>1</sup>
2. SDG&E’s Energy Efficiency (“EE”) Portfolio Plan for the years 2024-2027 which is Exhibit 2 to the prepared direct testimony attached to this application.
3. The application is supported by the prepared direct testimony of seven witnesses:
  - Hollie Bierman, who adopts the SDG&E’s Business Plan, contained in Exhibit 1 as her testimony;
  - Padmashree (Rama) Moorthy, who adopts Chapters I and V of Exhibit 2 as her testimony;

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<sup>1</sup> Because of the large file size of this exhibit, it is not appended to this application but is made available on a website posting through a Notice of Availability per Commission’s Rules of Practice and Procedure (“Rule”), Rule 1.9(d).

- M. Elaine Allyn, who adopts Chapters II and IV of Exhibit 2 as her testimony;
  - Jennifer Taylor, who adopts Chapter III of Exhibit 2 as her testimony;
  - Kelvin Valenzuela, who adopts Chapter VI of Exhibit 2 as his testimony; and
  - Kenneth C. Pitsko, who adopts Chapter VII of Exhibit 2 as his testimony.
4. While not appended to the filed application, this testimony is served concurrently with the application and is accessible at the link provided through the Notice of Availability filed herewith.

In addition, this application has an executed verification as required by Rule 2.1 immediately following the signature page.

SDG&E's Application requests the Commission to:

1. Approve SDG&E's Application, which would authorize SDG&E to implement its 2024-2031 EE Business Plan and 2024-2027 Portfolio Plan with all recommended EE policy changes as filed;
2. Approve SDG&E's request for funding to support SDG&E's EE and Integrated Demand-Side Management ("IDSM") program activities, as described in this Application;
3. Approve SDG&E's proposal to move to a One-Stage, Two-Step solicitation process for Third-Party Solicitations;
4. Modify the definition of Portfolio Administration Costs by categorizing Third-Party program solicitation costs as Direct Implementation Non-Incentive ("DINI") costs;
5. Approve modifications to various EE related balancing accounts:
  - To transfer the remaining balance of its Electric Procurement Energy Efficiency Balancing Account (EPEEBA) to the Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA) and to close the EPEEBA.
  - To close all PEEEBAs and Post-2005 Gas Energy Efficiency Balancing Account (PGEEBA) subaccounts and consolidate to minimize efforts in managing separate subaccounts. SDG&E will continue to collect and record revenues and expenditures as outlined in this request to its' PEEEBAs and PGEEBA.

- To modify how SDG&E currently records expenses incurred by SDG&E for the administration of statewide EE programs as the Lead Program Administrator (PA). SDGE is requesting to modify both Statewide Energy Efficiency Balancing Account (SWEEBA) and the Statewide Energy Efficiency Gas Balancing Account (SWEEGBA) preliminary statements by transferring the recording of expenses incurred by SDG&E for the administration of statewide EE programs as the Lead PA to PEEEBBA and PGEEBA. If approved, SDG&E will update its Preliminary Statement as shown in the Business Plan Application Section VII. Attachment C and D.

6. Grant other such relief as the Commission deems necessary and prudent.

## **II. BASIS FOR THIS APPLICATION**

In the open EE rulemaking (“R.”) 13-11-005 the Commission “... contemplated moving away from triennial review towards a ‘rolling’ review of EE program portfolios” and established the requirement for an EE business plan.<sup>2</sup> The Commission has described the business plan concept as follows:

Business Plan -- [Program Administrator] PA and stakeholder developed, PAs file periodically via application for Commission review; explains at a high level of abstraction how PAs will achieve the goals of the Commission’s strategic plan; leads to a Commission guidance decision adopting the business plan and setting budget expectations to be more fully developed in annual budget filings.<sup>3</sup>

D.15-10-028 and D.16-08-019 detailed the Commission’s expectations for the business plan’s substantive content. D.21-05-031 modified D.15-10-028 and the rolling portfolio process to require a four-year program portfolio filing, with an eight-year business plan overlay containing strategic information, with updates to the potential and goals, as well as technical inputs and avoided costs, every two years.<sup>4</sup>

The Commission provided additional guidance on the content of the Strategic Business Plan and the Four-Year Portfolio in Attachment A of D.21-05-031. SDG&E’s Business Plan

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<sup>2</sup> D.15-10-028 at 3.

<sup>3</sup> *Id.* at 43. SDG&E is a Program Administrator and/or PA.

<sup>4</sup> D.21-05-031 at 3.

follows the Commission's guidance to provide a high-level discussion of SDG&E's long-term strategic goals for its EE portfolio over eight years.<sup>5</sup> Per the Commission's direction in D.21-05-031, SDG&E's Portfolio for 2024-2027 provides a more detailed, sector-by-sector and program-by-program strategy, budget and cost-effectiveness showing for the four-year period.<sup>6</sup> It further follows the Commission's direction to segment the EE Portfolio into three segments: Resource Acquisition, Market Support, and Equity. SDG&E outlines the structure of its Strategic Business Plan and Portfolio Proposal for 2024-2027 in the following section.

### **III. SDG&E'S BUSINESS PLAN AND PORTFOLIO PROPOSAL**

#### **A. Exhibit 1: Business Plan Summary**

The Business Plan attached as Exhibit 1 to the prepared direct testimony, sets out SDG&E's vision and strategy for Energy Efficiency in California in 2024-2031. In alignment with the California Public Utilities Commission (Commission or CPUC) and the California Energy Commission's (CEC) goal to maximize the impact of Energy Efficiency programs in support of the state's ambitious, economy-wide GHG emission reduction goals, as well as SDG&E's own sustainability and affordability goals, SDG&E's EE Business Plan strategy aims to:

- Reinforce commitment to innovation in customer offerings and technology advancements, including promoting fuel-substitution measures through effective collaboration with Third-Party Program Implementers, Investor-Owned Utility (IOU) and non-IOU portfolio administrators (PAs), Market Transformation administrator, and Codes & Standards and Emerging Technology programs.
- Mobilize end-to-end energy efficiency markets and participants, from original equipment manufacturers to program implementers, builders, contractors, local governments, Community Choice Aggregators (CCAs), Regional Energy Networks (RENs) and end-user customers, to enable greater adoption of energy efficient measures, promote behavioral changes and accelerate customers' path to

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<sup>5</sup> D.21-05-031 at 29.

<sup>6</sup> D.21-05-031 at 30.

Zero Net Energy or ZNE.

- Encourage and facilitate greater outreach and education to all providers and participants, with special emphasis on facilitating accessibility of programs and offerings to customers and providers in underserved communities consistent with the Commission’s Environmental and Social Justice Action Plan.
- SDG&E’s long-term EE portfolio will closely coordinate with the Commission’s initiatives in response to Senate Bill (SB) 1477.
- In the mid-term (2024 –2027), SDG&E intends to employ strategies to help reduce the high cost of certain long-life electric measures and associated customer investments required for fuel-substitution.

SDG&E supports strategies that will accelerate the adoption of electrification measures.

To move the state toward electrification, SDG&E believes that it would be effective to offer non-cost-effective electric technologies in the Market Support and Equity segments. In addition, SDG&E plans to support their inclusion in Market Transformation program(s) and pursue state and federal funds to further subsidize these long-life measures and associated panel upgrade investments. SDG&E believes this could effectuate greater market adoption, leading to price reduction and increased cost-effectiveness of such measures.

Partnering with Third-Party Implementers is central to SDG&E’s portfolio planning and continued success in achieving CPUC goals. SDG&E has incorporated input from its Third-Party Implementer community within its Business Plan. SDG&E will continue to rely on Third-Party Implementers to cultivate a sophisticated, agile approach towards the continued development of energy efficiency markets, measures and metrics, policy and advocacy, reporting and compliance, quality controls, codes and standards, and customer privacy and cybersecurity. These are imperative to continued growth of energy efficiency in its service territory and the state as well as to ensure safe, prudent, and cost-effective utilization of ratepayer funds.

As Program/Portfolio Administrator, SDG&E will continuously monitor and optimize its portfolio and Third-Party Implementers’ performance to ensure compliance with CPUC policies



and guidance. Robust Third-Party contracts, pay-for-performance compensation design, solid quality assurance processes and procedures, compliant evaluation and measurement methodologies and accuracy in reporting are some of the activities SDG&E will rely on to ensure strong portfolio administration to meet short term contractual and CPUC goals, and longer-term SDG&E, CPUC and state decarbonization and electrification goals.

The Chapters in the Business Plan are further summarized in the section, below.

## **B. Exhibit 1: Business Plan Chapters**

### **1. Program Administrator’s Vision for EE in CA: 2024-2031**

This chapter presents an overview of SDG&E’s Vision for Energy Efficiency. The overview identifies the strategies SDG&E will employ to achieve its portfolio goals, which were identified above. This overview includes:

- The desired outcomes of the portfolio
- A description of SDG&E’s service territory
- SDG&E’s EE Strategy, including strategies for the methodology for savings forecasting and quantification methods, market intervention and EE adoption, spurring innovation, and portfolio management.

### **2. Annual Portfolio Budgets**

This chapter includes the annual projected portfolio budgets adding up to the 8-year authorized budget cap, including savings, cost-effectiveness and total system benefit (“TSB”) forecasts.

### **3. Recommendations for New or Modified EE Policy**

This chapter includes SDG&E’s recommendations for new or modified policies to improve efficiency and equity, as well as to clarify existing policy and general statewide Investor-Owned Utilities (“IOUs”) alignment. This chapter includes:

- A proposal for a One-Stage, Two-Step solicitation process

- A proposal to categorize Third-Party program solicitation costs as Direct Implementation Non-Incentive (“DINI”) costs
- A proposal to adopt the new Equity and Market Support metrics.

**C. Exhibit 2: SDG&E 2024-2027 Portfolio Summary**

SDG&E’s 2024-2027 Portfolio Summary is attached as Exhibit 2 to the prepared direct testimony. The primary goals of SDG&E’s 2024-2027 Portfolio are to serve the utility’s customers and make significant progress towards achieving the state’s greenhouse gas (“GHG”) reduction and grid decarbonization goals. To support these outcomes, SDG&E’s long-term portfolio planning is targeted to meet the savings and cost-effectiveness goals set forth by the Commission, as well as mobilize customer adoption through development of effective market sectors and segmentation, Third-Party solicitations, and contracting best practices. Table 1, below, summarizes SDG&E’s Portfolio Energy Savings Goals and Targets for each year of the portfolio.

**Table 1. SDG&E Portfolio Energy Savings Goals and Target**

	2024	2025	2026	2027
Forecasted Portfolio TSB (w/out C&S)	\$ 66,866,561	\$ 76,501,655	\$ 77,996,216	\$ 86,093,559
TSB Goals	\$ 27,389,666	\$ 31,386,333	\$ 35,088,813	\$ 41,758,229
Percent of TSB Goal Forecasted	244%	244%	222%	206%
Codes & Standards TSB	\$ 265,698,988	\$ 250,313,220	\$ 237,139,641	\$ 225,575,627

SDG&E’s approach to portfolio planning and risk management begins with the assessment of SDG&E’s unique and evolving customer characteristics, in conjunction with (1) historical program and portfolio performance, (2) the Commission’s most current Energy Efficiency potential and goals study,<sup>7</sup> (3) existing and new intervention strategies to serve

<sup>7</sup> CPUC, *2021 Energy Efficiency Potential and Goals Study* (August 20, 2021) (2021 EE Potential & Goals Study), available at <https://pda.energydataweb.com/api/view/2531/2021%20PG%20Study%20DRAFT%20Report%202021%20Final.pdf>.

customers, and (4) management of risks to ensure CPUC policies, mandates and guidance are met and ratepayer dollars are prudently managed. In addition to classifying programs by market sectors, the programs are also categorized into three portfolio segments: Resource Acquisition, Market Support and Equity.<sup>8</sup> SDG&E’s proposed portfolio has a total of 85 programs (including existing and new) with detailed 4-year and high-level 8-year budget and strategies within this Application. SDG&E agrees that business plan proposed outcomes as they tie to portfolio, sector, and segment-level metrics in the 4-year portfolio application are critical for tracking and quantifying the progress of the 4-year portfolio and budget, which will lead to achieving 8-year business plan strategic outcomes.

**Table 2. SDG&E Annualized EE Portfolio Budget**

2024	2025	2026	2027	Total 4 Years
\$ 79,664,685	\$ 83,915,516	\$ 82,638,623	\$ 85,940,881	\$ 332,159,706

**Table 3. SDG&E EE Four-Year Portfolio Budget**

2024-2027	2028-2031
\$332,159,706	\$343,763,524

In addition to SDG&E’s EE portfolio budget, SDG&E proposes to continue successful IDSM activities that include coordinated and integrated offerings with Demand Response (“DR”) activities and other proceedings. They are as follows:

1. Demand Response: As directed by D.18-05-041<sup>9</sup> and D.21-12-105<sup>10</sup> IDSM DR activities will be focused on facilitating and supporting residential and commercial automatic response and integrating DR capabilities into EE efforts. SDG&E requests an IDSM DR annual budget of \$4.750 million for 2024 through 2027.
2. Water Energy Nexus (“WEN”): All WEN activities and measures as approved by the Commission will be funded with Energy Efficiency monies. SDG&E will

<sup>8</sup> D.21-05-31 at 14.

<sup>9</sup> D.18-05-041 OP 10, at 184 and at 36-38.

<sup>10</sup> D.21-12-015 at 84-85.

work with its various local water agencies to leverage their water conservation and water efficiency programs to promote WEN activities and measures.

3. Decarbonization: SDG&E will coordinate with the TECH program administrator to layer incentives from the EE programs with TECH incentives as appropriate per D.21-11-002.<sup>11</sup>
4. Energy Savings Assistance (“ESA”) Programs: EE Residential programs will coordinate with the various ESA programs so that customers who are interested in EE but qualify for ESA programs are referred to the appropriate programs.

**Table 4. 2024-2027 Total Proposed Annualized Budget**

<b>Year</b>	<b>Spending Budget Request</b>	<b>Demand Response</b>	<b>Energy Efficiency</b>	<b>Electric Procurement</b>	<b>Gas</b>
	<b>A = (a) + B</b>	<b>(a)</b>	<b>B = (b) + (c)</b>	<b>(b)</b>	<b>(c)</b>
2024	\$84,414,685	\$4,750,000	\$79,664,685	\$53,375,339	\$26,289,346
2025	\$88,665,516	\$4,750,000	\$83,915,516	\$56,223,396	\$27,692,120
2026	\$87,388,624	\$4,750,000	\$82,638,624	\$55,367,878	\$27,270,746
2027	\$90,690,881	\$4,750,000	\$85,940,881	\$57,580,390	\$28,360,491
Total	\$351,159,706	\$19,000,000	\$332,159,706	\$222,547,003	\$109,612,703

SDG&E expects that this 8-year business plan and 4-year program portfolio outlined in this application will evolve over time. The Commission provides SDG&E several opportunities to adjust its EE portfolio as needed in order to achieve the stated goals.<sup>12</sup> SDG&E will be filing a Tier 2 Advice Letter to review and potentially true-up the existing 4-year portfolio every 2 years upon the Commission’s adoption of future potential and goals.<sup>13</sup> Additionally, SDG&E will file its 2028-2031 4-year program portfolio application in 2026 with updated and specific portfolio details for program years 2028-2031, which will be informed by the actual performance of this

<sup>11</sup> D.21-11-002 OP 1 and Appendix A.

<sup>12</sup> D.21-05-031, Table 4 at 61-63.

<sup>13</sup> D.21-05-031 at 42, and Table 4 at 61-63.

first 4-year cycle and changes in market conditions.<sup>14</sup>

Each chapter of the 2024-2027 Portfolio Plan is summarized in the sections below.

## **D. Exhibit 2: SDG&E 2024-2027 Portfolio Chapters**

### **1. Portfolio Summary**

This chapter presents an overview of SDG&E’s portfolio. The overview provides key metrics and outcomes for the portfolio, as well as the general strategies that will be used to meet the portfolio goals and targets that are discussed, in Section III.C., above. This chapter also includes:

1. A summary of the Annual Budget Request;
2. Distribution of the Budget Across Segments and Sectors;
3. Projected Sector-Level and Portfolio-Level Cost Effectiveness;
4. Forecasted Annual Program TSB, kilowatt-hours, kilowatts, and Therms; and
5. Projected Percentage of the Portfolio that is Third-Party Solicited

### **2. Forecast Methodology**

This chapter reviews the forecast methodology used in SDG&E’s Business Plan and 2024-2027 Portfolio Plan, including program modifications from the 2023 portfolio. SDG&E has undertaken a zero-based budgeting approach in the development of its portfolio savings and budget for 2024-2027. SDG&E also provides a comparison of the proposed budgets to its actual 2020 expenditures. SDG&E’s forecasting process optimizes the total system benefits and designs its portfolio to meet Commission objectives. During the implementation phase, SDG&E undertakes a cyclical optimization and refinement process to track its portfolio performance towards meeting portfolio goals and objectives. The chapter also discusses portfolio administration and program implementation costs.

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<sup>14</sup> D.21-05-031, Ordering Paragraph (“OP”) 5 at 81-82.

### 3. Segmentation Strategy

In D. 21-05-031, the Commission directed the Program Administrators to segment its portfolio or assign programs to the appropriate segment. The segments are as follows:

- Resource Acquisition: Programs with a primary purpose of, and a short-term ability to, deliver cost-effective avoided cost benefits to the electricity and natural gas systems.
- Market Support: Programs with a primary objective of supporting the long-term success of the energy efficiency market by educating customers, training contractors, building partnerships, or moving beneficial technologies towards greater cost-effectiveness.
- Equity: Programs with a primary purpose of providing energy efficiency to hard-to-reach or underserved customers and disadvantaged communities in advancement of the Commission's Environmental and Social Justice (ESJ) Action Plan.
- Codes & Standards: Programs that support the development of the next generation of state and federal building and appliance standards.

SDG&E has developed specific strategies, goals and outcomes for each of the three portfolio segments, as well as Codes & Standards. This allows SDG&E to focus on cost effective energy savings and benefits along with addressing important policies that may have negative impacts on cost effectiveness, e.g., hard-to reach programs, disadvantaged communities, training and outreach, etc. Such segmentation allows SDG&E to motivate and support these customers more effectively, which in turn helps to achieve energy savings and GHG reduction in these sensitive groups.

Most SDG&E programs and budgets are classified under the Resource Acquisition segment. The remaining portfolio budget is allocated to the Market Support and Equity segments (not to exceed 30 percent of the budget), Codes and Standards, and Evaluation Measurement & Verification ("EM&V") (budgeted at 4 percent of the total portfolio budget).<sup>15</sup>

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<sup>15</sup> D.12-05-015, OP 157 at 433.

Market Support is primarily made up of the Statewide Residential and Non-Residential New Construction Program, led by Pacific Gas & Electric Company (“PG&E”). It also includes the Statewide WE&T program, as well as SDG&E’s local Workforce Education and Training (“WE&T”) program, which SDG&E plans to outsource to a Third-Party. In addition, SDG&E has proposed a new, local Residential Fuel Substitution Program as well as a program targeting property managers in commercial spaces.

In the Equity Segment, SDG&E will solicit for two new offerings. First, a residential single family and multi-family program focused on customers who are defined as hard-to-reach, but who do not qualify for Energy Savings Assistance (“ESA”) program. Second, SDG&E will offer a Small Business Customer Outreach program, also focused on customers defined as hard-to-reach.

SDG&E will rely heavily on Resource Acquisition to meet its energy savings goals, as well as the goal defined in Senate Bill 350 of doubling EE by 2030. SDG&E’s vision for this segment will focus on achieving deeper energy efficiency savings in each market sector by overcoming market barriers that have historically impeded participation and suppressed energy efficiency investment.

Following the CPUC’s direction per D.16-08-019, PG&E was assigned as the Lead Program Administrator (“Lead PA”) for Codes & Standards (“C&S”) Statewide Advocacy Program, which SDG&E supports through co-funding. SDG&E’s C&S business plan pertains primarily to three locally implemented C&S subprograms: Compliance Improvement, Reach Codes, and Planning & Coordination. C&S and the other cross-cutting programs are focused on supporting statewide policy objectives, such as the doubling of energy efficiency by 2030, decarbonization and efforts towards ZNE buildings.

#### **4. Sector Strategy**

This chapter begins with an overview of SDG&E's sector-specific strategies, along with the market characterization of the SDG&E's service territory. SDG&E plans to service all sectors previously served through SDG&E programs and offerings. This includes Commercial, Residential, Industrial, Agricultural, Public and Cross-Cutting (Finance, Workforce Education & Training, Codes & Standards and Emerging Technologies). SDG&E has planned its portfolio to ensure full coverage of all customer sectors and sub-markets, with an emphasis on avoiding overlap or duplicative offerings.

The chapter contains a detailed review of each of the sectors that will be served by SDG&E's portfolio.

##### **a. Agricultural Sector**

SDG&E's Agricultural sector has a significantly smaller consumption than the agricultural customers of other utilities within California. It is also the smallest sector in SDG&E's energy efficiency portfolio, representing just 1.4 percent of total portfolio electric consumption and 0.6 percent of portfolio gas consumption. The Agricultural sector provides 0.15 percent of the portfolio's electric savings and 3.4 percent of the gas savings. SDG&E created goals, strategies, and sample tactics in the 2018 – 2025 Business Plan intended to remove barriers and attract both customers and vendors to energy efficiency. These goals and strategies are still applicable today for the Agricultural sector. SDG&E has two goals for this sector: 1) Double the Energy Efficiency Participation by the Agricultural Sector, and 2) Provide the Agricultural Sector an Offering to Address the Water/Energy Nexus. SDG&E has developed strategies to achieve those goals, which are further discussed in Chapter III of Exhibit 2.



## **b. Commercial Sector**

SDG&E's commercial sector is the largest sector within the service territory and is perhaps the most important component of SDG&E's energy efficiency portfolio in terms of market size and energy savings opportunities. Although the commercial sector is SDG&E's largest, it primarily consists of very small customers. SDG&E defines customers by electric demand: small (<20 kW), medium (20 –199 kW), and large (>200 kW). In this chapter, SDG&E provides examples of how its existing Third-Party programs support the strategies described in the Business Plan and how it will leverage many of these existing program interventions, as it launches new energy efficiency programs. Combining current program-level interventions with new, innovative, and targeted approaches will allow SDG&E to penetrate the sector's various segments more efficiently and achieve its savings goals based upon approved budgets.

As further described in this chapter, SDG&E has three goals for the Commercial Sector:

- Improve the Energy Efficiency Penetration in the Property Management Market
- Increase Savings Through an Improved Customer Experience
- Maximize Savings and Efficiency by Executing New Approaches

As part of its strategy, SDG&E will propose these new Resource Acquisition programs in the Commercial Sector:

- Lodging (hotels/motels)
- Groceries, Restaurants, and Food Storage
- Wholesale/Retail/Offices, including Entertainment & Services
- Private Institutions/Healthcare (medical facilities, private schools)
- Non-Residential Behavioral Program

Further discussion on SDG&E's strategies for the Commercial Sector can be found in Chapter III of Exhibit 2.

### **c. Workforce Education & Training**

Workforce Education & Training (“WE&T”) offerings need to continue to account for a diverse group of both trade professionals and end-use customers. SDG&E asserts that trade professionals can impact energy savings through the selling, design, installation, and maintenance of energy efficient equipment and customers need education to understand and prioritize the value proposition of energy efficiency when planning projects. SDG&E will contribute to statewide efforts that prepare the workforce to achieve the energy efficiency needs of the state, as well as address the unique and specific needs of the local community. To achieve these goals, technical education offerings and collaboration with appropriate organizations will be critical.

To accomplish the mission to educate the workforce, SDG&E has established the following WE&T sector goals:

- Prepare Workforce to Meet California’s Goal of Doubling Energy Efficiency Savings by 2030.
- Design and Deliver WE&T Programs that Help SDG&E’s Energy Efficiency Sectors Achieve Savings Goals.
- Deliver an Energy Efficiency Workforce through Statewide Programs that Focus on Career Awareness and Inclusion of Disadvantaged Workers.

Chapter III of Exhibit 2 contains more detail regarding this sector and the strategies required to achieve these goals.

### **d. Emerging Technologies**

SDG&E is a funding IOU for both Statewide Gas & Electric Emerging Technologies programs. More on the statewide efforts can be found in Southern California Edison Company and Southern California Gas Company’s Business Plan.

#### **e. Codes and Standards**

The core aim of the Codes and Standards program is to strengthen or develop regulations to promote and support energy efficiency, but the program also continues to support regulations that promote a number of other important state policy objectives (e.g., water efficiency, electrification, greenhouse gas reduction, alternative fuel vehicles, grid flexibility and sustainability, indoor air quality, and equity considerations) as they relate to EE. SDG&E's Local C&S Program supports and complements Statewide C&S Advocacy Program, led by PG&E. These efforts will continue to enable the program to cost effectively address current, evolving, and future needs for codes and standards in California.

SDG&E will both support implementation of the statewide C&S subprograms and locally implement the reach codes and compliance improvement subprograms. To support implementation of the advocacy subprograms, SDG&E staff will assist the selected statewide implementer(s) in carrying out their responsibilities within SDG&E's service territory and help ensure that SDG&E's ratepayers' interests are well represented. SDG&E staff will also serve as local resources for its programs staff to ensure that development and implementation of energy efficiency programs (whether local or third-party implemented) incorporates past and future updates to codes and standards. Finally, working jointly with SDG&E's local government partnerships group, SDG&E staff will support municipalities interested in pursuing reach codes and with their compliance improvement activities.

To help accomplish California's energy efficiency policy objectives and initiatives, SDG&E has established the following overarching goals and strategies for the three locally implemented C&S subprograms:

- Technical assistance for local governments to develop and adopt reach codes.
- Compliance improvement activities that strive to raise and maintain high

compliance margins for California's Title 24, Part 6 California Energy Code and Part 11 CALGreen Code, and Title 20 and Federal Appliance Standards for homes, buildings and appliances across California.

- The Planning & Coordination group will work with California Energy Commission, CPUC, key market actors, emerging technologies, voluntary programs to create a strategic approach for the development of key measures and technologies in support of building decarbonization, ZNE and climate action goals. This will also contribute to improving code compliance by delivering education, conducting outreach and soliciting additional input on future code development from impacted industries for future code cycles.

The challenges and strategies for achieving those goals are further discussed in Chapter III of Exhibit 2.

#### **f. Financing**

SDG&E will support both implementation of the statewide financing pilots and locally implement the On-Bill Financing ("OBF") subprogram. OBF offers interest-free, unsecured, on-the-utility-bill loans that work in conjunction with utility energy efficiency programs. It is designed primarily to facilitate the purchase and installation of qualified energy efficiency measures by non-residential customers who may lack up-front capital to invest in real and sustainable long-term energy cost reductions.

The statewide program consists of a portfolio of financing options including the OBF program and the California Hub for Energy Efficiency Financing ("CHEEF") financing pilot programs for single family and multifamily residential customers as well as commercial customers. On-Bill Financing is designed to facilitate the adoption of energy efficiency by removing one of the major barriers to participation – up-front costs. By allowing customers to finance upgrades, OBF advances the objectives of the California Long Term Strategic Plan; specifically, the commercial programmatic goal of zero net energy by 2030. The goals of the program are to reduce customer first-cost hurdles to EE projects, provide interest-free loans, and do so while remaining bill neutral, so that customer's bills are not significantly impacted.

SDG&E staff will also serve as local resources for the company's programs staff to ensure that their development and implementation of energy efficiency programs (whether local or third-party implemented) incorporates relevant finance components. SDG&E will continue to promote and evolve the financing options for customers in San Diego while supporting the efforts for statewide financing.

**g. Industrial Sector**

Though diverse, SDG&E's Industrial sector has significantly smaller consumption than the industrial customers of other utilities, even within California. Most local industrial accounts are "small-sized," with almost three-quarters of accounts registering 20 kW of demand or less. SDG&E's Industrial sector comprises roughly 8 percent of the service territory electricity consumption. To support the EE Strategic Plan vision, SDG&E's mission for the Industrial sector is to educate and enable customers on their path to increased sustainability by providing targeted energy tools and solutions as well as continuous improvement offerings. SDG&E will do this by striving to double the EE participation by SDG&E's Industrial Sector.

Within the Industrial sector, there is a market segment comprised of industrial customers operating inside the entrusted 34 miles of the San Diego Bay and waterfront lands currently being managed by the Port of San Diego. The objective for this market segment is to implement innovative Third-Party EE programs ("Third-Party programs") that reliably capture, and document cost-effective energy savings (kWh, kW and/or Therm) applicable to SDG&E's Local Industrial Port Tenants customer facilities and provide the Industrial sector a solution addressing the highly complex systems, which exist within its heterogeneous customer segments.

More detail regarding SDG&E's strategies for achieving the goals for the Industrial Sector can be found in Chapter III of Exhibit 2.

## **h. Public Sector**

The public sector is defined as the group of customers that are taxpayer funded, have political mandates, and that must go through a public budgeting and decision-making process. Despite being a relatively small percentage of direct electric consumption and electric savings in SDG&E's service territory, the public sector influences and informs and therefore contributes to both residential and non-residential markets, making it important to all sectors. SDG&E's mission for the public sector is to support public customers with the knowledge and resources required to champion energy efficiency within their own facilities and communities.

In reviewing existing barriers, SDG&E has determined that programs will continue to evolve based on changes in the Code, collaborative relationships are critical, and the whole building approach will be a key component in program design. SDG&E has developed the following goals for this Sector:

- Empower Leaders by Equipping Them with Knowledge and Tools to Make Informed EE Decisions
- Eliminate Barriers to Public Sector Participation by Developing Tailored Solutions and Financing Options
- Influence Private Sector EE Activities Through Reach Codes and Engagement

More detail about the strategies and challenges for achieving the goals in this sector can be found in Chapter III of Exhibit 2.

## **i. Residential Sector**

The primary focus for SDG&E's residential sector is to develop a common pathway that meets customers where they are on their journey and encourages them towards ZNE, while providing a more seamless customer experience. Traditionally, financial constraints are the largest reasons customers cite for not being able to incorporate the most energy efficient

measures into their homes.<sup>16</sup> SDG&E has analyzed these barriers and considered the direction set by the California Long Term Energy Efficiency Strategic Plan (CALTEESP)<sup>17</sup> to determine the goals needed to establish a unified, achievable framework that will yield concrete results in support of the mission and vision of the residential sector, much of which is geared towards reaching the objectives of the Residential Zero Net Energy Action Plan.<sup>18</sup> SDG&E has developed the following goals for this sector:

- Increase Energy Efficiency Savings in the Residential Sector Through an Improved Customer Experience
- Increase Energy Efficiency Participation in the Multifamily Sector
- Continue to Innovate by Executing New Approaches to the Market

The challenges and strategies for achievement of these goals are further discussed in Chapter III of Exhibit 2.

## **5. Portfolio Management**

As the Portfolio Administrator, SDG&E takes a proactive, dynamic and comprehensive approach to portfolio optimization and risk management. Partnering with its contracted Third-Party implementers, and working closely with the CPUC, California IOU and Non-IOU PAs is central to SDG&E's portfolio planning and optimization efforts. The Company's primary goal is to serve its customers and move toward achieving the State's goal of GHG reductions and grid decarbonization.

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<sup>16</sup> CPUC, *Whole House Retrofit Impact Evaluation, Evaluation of Energy Upgrade California Programs* (September 9, 2014), available at [http://www.calmac.org/publications/CPUC\\_WO46\\_Final\\_Report.pdf](http://www.calmac.org/publications/CPUC_WO46_Final_Report.pdf).

<sup>17</sup> CPUC, *California Long Term Energy Efficiency Strategic Plan* (September 2008), available at <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/e/5305-ee-strategicplan.pdf>.

<sup>18</sup> CPUC, *New Residential Zero Net Energy Action Plan 2015-2020* (June 2015), available at <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/z/5307-zneresexecutivesummary-final.pdf>.

SDG&E's approach to portfolio planning and optimization is based on three primary pillars:

- The biennial Potential and Goals (P&G) Study, conducted and adopted by the CPUC;
- Historical EE portfolio and program performance; and
- Unique customer and economic characteristics of SDG&E's service territory

SDG&E employs a systematic approach to portfolio planning, program year tracking and intervention, and reporting. Budgeted portfolio planning is conducted roughly 6-9 months prior to launch of the actual program year during the 4-year program cycle. For this cycle, it will be based on the most current 2021 EE Potential & Goals Study; annual DEER resolutions that provide measure updates and schedules; available EM&V study results and IOU response to recommendations (RTRs); historical market sector achievements; market feedback from SDG&E's Third-Party Implementers; and availability of EE measures. SDG&E will continue to implement its robust procedures to monitor and assess the performance of its Third-Party local and statewide programs towards meeting goals and targets.

The adoption of portfolio segments - Resource Acquisition, Market Support and Equity - combined with different cost effectiveness requirements for each of these segments, allows the PA to develop appropriate Market Support and Equity programs, as these segments do not count against the TRC threshold. Furthermore, the Commission relaxed the TRC threshold that applies only to the Resource Acquisition segment, to be greater than 1.0 rather than the 1.25 threshold, a threshold that has been increasingly difficult to meet if all programs counted towards the TRC. This flexibility allows SDG&E to manage its portfolio to keep it on track to meet or exceed Commission goals.



This chapter contains SDG&E’s proposal to modify the Two-Stage solicitation process currently required by D.18-01-004. After three years of implementing the two-stage process and frequent discussions with the Procurement Review Group (“PRG”) and Independent Evaluator (“IE”), as well as other stakeholders who attend the semi-annual Third-Party Solicitations Stakeholder Forums, several obstacles and challenges have been identified related to length of time needed and amount of resources required for bidders, the IE, and the utility.

Instead, SDG&E recommends that the Commission adopt a One-Stage, Two-Step solicitation process. This recommendation eliminates the RFA stage and instead focuses on a more in-depth RFP stage and includes an interview step prior to contracting. This recommendation is consistent with the recently approved solicitation process adopted by the Commission for the Energy Savings Assistance Multifamily Whole Building statewide program in D.21-06-015,<sup>19</sup> which states, “We find that this protocol is less burdensome than a formal two-stage solicitation process and increases the opportunity for a complete assessment of the bidders.”<sup>20</sup>

More details on SDG&E’s Portfolio management can be found in Chapter IV of Exhibit 2.

## **6. EM&V**

SDG&E utilizes the recommendations from the various impact evaluations (i.e., deemed, custom, and other uncertain measures, as well as the biennial P&G Study that the Commission uses as the basis for developing EE savings goals) to improve current and/or future program design, program systems, and updates to measure package assumptions to improve results at the end of the evaluated year, along with allowing a better start for Program Years offering similar

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<sup>19</sup> D.21-06-015, OP 116 at 500,

<sup>20</sup> D.21-06-015 at 355.

measures. Incorporating this feedback is necessary for evaluation work, as well as working with the ex-ante team and the measure package development. EM&V activities from impact evaluations and studies shape the next round of DEER Resolution updates. Program activities on the front-end are also enhanced when EM&V and Program leads are engaging in these Project Coordinating Groups (PCGs) directly from Energy Division staff and their evaluation team, which could help with any course corrections for associated programs. This current activity will increase in the new Business Plan, as newer and more innovative programs and measures are deployed and will need to be continuously evaluated. SDG&E is proposing to modify the IOU/ED EM&V budget share from the 27.5 percent for SDG&E and 83.5 percent for ED to 30 percent for SDG&E and 70 percent for ED. More information on SDG&E's proposed EM&V for the 2024-2027 Portfolio Plan can be found in Chapter V of Exhibit 2.

## **7. Cost & Cost Recovery**

### **a. Summary**

The purpose of this chapter is to describe SDG&E's cost recovery mechanism and the various balancing accounts (BAs) used to manage the revenue collection and program expenditures. In addition, SDG&E discusses its proposals for modifications to these BAs, including the closure of the following BAs and subaccounts:

- Electric Procurement Energy Efficiency Balancing Account (EPEEBA)
- Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA) subaccounts
- Post-2005 Gas Energy Efficiency Balancing Account (PGEEBA) subaccounts

See Chapter VI for additional detail on the costs and cover recovery for SDG&E's Business Plan and 2024-2027 Portfolio Plan.

**b. Rate Impacts**

SDG&E seeks approval of energy efficiency 8-year funding in the amount of \$713.923 million. SDG&E also seeks approval of incremental demand response annual funding in the amount of \$4.750 million for 2024 through 2031. The table below provides the annual budgets for 2024 through 2031 for the energy efficiency and demand response programs.

**Table 5. Energy Efficiency and IDSM Demand Response Annual Budgets 2021-2031**

Year	Spending Budget Request	Demand Response	Energy Efficiency	Electric Procurement	Gas
	A = (a) + B	(a)	B = (b) + (c)	(b)	(c)
2024	\$84,414,685	\$4,750,000	\$79,664,685	\$53,375,339	\$26,289,346
2025	\$88,665,516	\$4,750,000	\$83,915,516	\$56,223,396	\$27,692,120
2026	\$87,388,624	\$4,750,000	\$82,638,624	\$55,367,878	\$27,270,746
2027	\$90,690,881	\$4,750,000	\$85,940,881	\$57,580,390	\$28,360,491
2028	\$90,690,881	\$4,750,000	\$85,940,881	\$57,580,390	\$28,360,491
2029	\$90,690,881	\$4,750,000	\$85,940,881	\$57,580,390	\$28,360,491
2030	\$90,690,881	\$4,750,000	\$85,940,881	\$57,580,390	\$28,360,491
2031	\$90,690,881	\$4,750,000	\$85,940,881	\$57,580,390	\$28,360,491
<b>Total</b>	<b>\$713,923,230</b>	<b>\$38,000,000</b>	<b>\$675,923,230</b>	<b>\$452,868,564</b>	<b>\$223,054,666</b>

If the CPUC approves SDG&E's request, SDG&E will adjust rates to reflect authorization of the electric and gas program budgets. Note that the 2023 rates align with the illustrative rates provided in the 2022-2023 Energy Efficiency Budget Advice Letter, Advice Letter 3887-E-A/3035-G-A, based on current rates at the time of the advice letter filing. The 2024-2031 rates are based on January 1, 2022, current effective rates. The following tables reflect the annual impact to rates:

**Table 6. Electric Rate Impacts Table (2024-2031)**

Customer Classes	2023 Electric <sup>1</sup>	2024 Electric	Increase/ Decrease (€)	2024 Proposed Percentage Change In Electric Revenue and Rates	Customer Classes	2024 Electric	2025 Electric	Increase/ Decrease (€)	2025 Proposed Percentage Change In Electric Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)	(a)	Average Rate	Average Rate	(d)	(e)
	€/kWh	€/kWh	(c) - (b)	(d)/(b)		€/kWh	€/kWh	(c) - (b)	(d)/(b)
	(b)	(c)				(b)	(c)		
Residential	32.286	34.441	2.155	6.67%	Residential	34.441	34.453	0.012	0.03%
Small Commercial	29.035	32.099	3.064	10.55%	Small Commercial	32.099	32.120	0.021	0.07%
Medium and Large Commercial	26.227	28.994	2.767	10.55%	Medium and Large Commercial	28.994	29.012	0.018	0.06%
Agricultural	20.132	23.053	2.921	14.51%	Agricultural	23.053	23.069	0.016	0.07%
Street Lighting	26.181	29.002	2.821	10.77%	Street Lighting	29.002	29.003	0.001	0.00%
System Total	28.202	30.950	2.748	9.74%	System Total	30.950	30.966	0.016	0.05%

Note 1: 2023 align with illustrative rates provided in AL 3887-E based on current rates at the time of filing. 2024-2031 based on 1/1/2022 current effective rates.

Customer Classes	2025 Electric	2026 Electric	Increase/ Decrease (€)	2026 Proposed Percentag e Change In Electric Revenue and Rates	Customer Classes	2026 Electric	2027 Electric	Increase/ Decrease (€)	2027 Proposed Percentag e Change In Electric Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)	(a)	Average Rate	Average Rate	(d)	(e)
	€/kWh	€/kWh	(c) - (b)	(d)/(b)		€/kWh	€/kWh	(c) - (b)	(d)/(b)
	(b)	(c)				(b)	(c)		
Residential	34.453	34.450	-0.003	-0.01%	Residential	34.450	34.459	0.009	0.03%
Small Commercial	32.120	32.114	-0.006	-0.02%	Small Commercial	32.114	32.131	0.017	0.05%
Medium and Large Commercial	29.012	29.007	-0.005	-0.02%	Medium and Large Commercial	29.007	29.020	0.013	0.04%
Agricultural	23.069	23.064	-0.005	-0.02%	Agricultural	23.064	23.077	0.013	0.06%
Street Lighting	29.003	29.003	0	0.00%	Street Lighting	29.003	29.003	0	0.00%
System Total	30.966	30.962	-0.004	-0.01%	System Total	30.962	30.974	0.012	0.04%

**Continuation of Table 6. Electric Rate Impacts Table (2024-2031)**

Customer Classes	2027 Electric	2028 Electric	Increase/ Decrease) (¢)	2028 Proposed Percentag e Change In Electric Revenue and Rates		Customer Classes	2028 Electric	2029 Electric	Increase/ Decrease (¢)	2029 Proposed Percentag e Change In Electric Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)		(a)	Average Rate	Average Rate	(d)	(e)
	¢/kWh	¢/kWh	(c) - (b)	(d)/(b)			¢/kWh	¢/kWh	(c) - (b)	(d)/(b)
	(b)	(c)					(b)	(c)		
Residential	34.459	34.459	0	0.00%		Residential	34.459	34.459	0	0.00%
Small Commercial	32.131	32.131	0	0.00%		Small Commercial	32.131	32.131	0	0.00%
Medium and Large Commercial	29.02	29.020	0	0.00%		Medium and Large Commercial	29.02	29.020	0	0.00%
Agricultural	23.077	23.077	0	0.00%		Agricultural	23.077	23.077	0	0.00%
Street Lighting	29.003	29.003	0	0.00%		Street Lighting	29.003	29.003	0	0.00%
System Total	30.974	30.974	0	0.00%		System Total	30.974	30.974	0	0.00%

Customer Classes	2029 Electric	2030 Electric	Increase/ Decrease (¢)	2030 Proposed Percentag e Change In Electric Revenue and Rates		Customer Classes	2030 Electric	2031 Electric	Increase/ Decrease (¢)	2031 Proposed Percentag e Change In Electric Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)		(a)	Average Rate	Average Rate	(d)	(e)
	¢/kWh	¢/kWh	(c) - (b)	(d)/(b)			¢/kWh	¢/kWh	(c) - (b)	(d)/(b)
	(b)	(c)					(b)	(c)		
Residential	34.459	34.459	0	0.00%		Residential	34.459	34.459	0	0.00%
Small Commercial	32.131	32.131	0	0.00%		Small Commercial	32.131	32.131	0	0.00%
Medium and Large Commercial	29.02	29.020	0	0.00%		Medium and Large Commercial	29.02	29.020	0	0.00%
Agricultural	23.077	23.077	0	0.00%		Agricultural	23.077	23.077	0	0.00%
Street Lighting	29.003	29.003	0	0.00%		Street Lighting	29.003	29.003	0	0.00%
System Total	30.974	30.974	0	0.00%		System Total	30.974	30.974	0	0.00%

**Table 7. Natural Gas Rate Impacts Table (2024-2031)**

Customer Classes	2023 Gas	2024 Gas	Increase/Decrease (\$)	2024 Proposed Percentage Change In Gas Revenue and Rates	Customer Classes	2024 Gas	2025 Gas	Increase/Decrease (\$)	2025 Proposed Percentage Change In Gas Revenue and Rates
(a)	Average Rate <sup>1</sup>	Average Rate	(d)	(e)	(a)	Average Rate	Average Rate	(d)	(e)
	\$/Therm	\$/Therm	(c) - (b)	(d)/(b)		\$/Therm	\$/Therm	(c) - (b)	(d)/(b)
	(b)	(c)				(b)	(c)		
Residential	2.060	2.100	0.039	1.90%	Residential	2.100	2.101	0.001	0.06%
Core Commercial/Industrial	1.200	1.252	0.052	4.33%	Core Commercial/Industrial	1.252	1.256	0.004	0.36%
Non-Core Commercial/Industrial	0.172	0.232	0.060	35.18%	Non-Core Commercial/Industrial	0.232	0.237	0.005	2.16%

Note 1: 2023 align with illustrative rates provided in AL 3887-E based on current rates at the time of filing. 2024-2031 based on 1/1/2022 current effective rates.

Customer Classes	2025 Gas	2026 Gas	Increase/Decrease (\$)	2026 Proposed Percentage Change In Gas Revenue and Rates	Customer Classes	2026 Gas	2027 Gas	Increase/Decrease (\$)	2027 Proposed Percentage Change In Gas Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)	(a)	Average Rate	Average Rate	(d)	(e)
	\$/Therm	\$/Therm	(c) - (b)	(d)/(b)		\$/Therm	\$/Therm	(c) - (b)	(d)/(b)
	(b)	(c)				(b)	(c)		
Residential	2.101	2.100	0.000	-0.02%	Residential	2.100	2.101	0.001	0.05%
Core Commercial/Industrial	1.256	1.255	-0.001	-0.11%	Core Commercial/Industrial	1.255	1.258	0.004	0.28%
Non-Core Commercial/Industrial	0.237	0.236	-0.002	-0.64%	Non-Core Commercial/Industrial	0.236	0.240	0.004	1.66%

**Continuation of Table 7. Natural Gas Rate Impacts Table (2024-2031)**

Customer Classes	2027 Gas	2028 Gas	Increase/Decrease (\$)	2028 Proposed Percentage Change In Gas Revenue and Rates	Customer Classes	2028 Gas	2029 Gas	Increase/Decrease (\$)	2029 Proposed Percentage Change In Gas Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)	(a)	Average Rate	Average Rate	(d)	(e)
	\$/Therm	\$/Therm	(c) - (b)	(d)/(b)		\$/Therm	\$/Therm	(c) - (b)	(d)/(b)
	(b)	(c)				(b)	(c)		
Residential	2.101	2.101	0.000	0.00%	Residential	2.101	2.101	0.000	0.00%
Core Commercial/Industrial	1.258	1.258	0.000	0.00%	Core Commercial/Industrial	1.258	1.258	0.000	0.00%
Non-Core Commercial/Industrial	0.240	0.240	0.000	0.00%	Non-Core Commercial/Industrial	0.240	0.240	0.000	0.00%

Customer Classes	2029 Gas	2030 Gas	Increase/Decrease (\$)	2030 Proposed Percentage Change In Gas Revenue and Rates	Customer Classes	2030 Gas	2031 Gas	Increase/Decrease (\$)	2031 Proposed Percentage Change In Gas Revenue and Rates
(a)	Average Rate	Average Rate	(d)	(e)	(a)	Average Rate	Average Rate	(d)	(e)
	\$/Therm	\$/Therm	(c) - (b)	(d)/(b)		\$/Therm	\$/Therm	(c) - (b)	(d)/(b)
	(b)	(c)				(b)	(c)		
Residential	2.101	2.101	0.000	0.00%	Residential	2.101	2.101	0.000	0.00%
Core Commercial/Industrial	1.258	1.258	0.000	0.00%	Core Commercial/Industrial	1.258	1.258	0.000	0.00%
Non-Core Commercial/Industrial	0.240	0.240	0.000	0.00%	Non-Core Commercial/Industrial	0.240	0.240	0.000	0.00%

**IV. APPENDICES AND ATTACHMENTS**

In addition, the Application is supported by the following Appendices:

1. Appendix A: Balance Sheet, Income Statement and Financial Statement
2. Appendix B: Statement of Effective Rates
3. Appendix C: Statement of Original Cost and Depreciation Reserves
4. Appendix D: Summary of Earnings
5. Appendix E: Notice List

The Application is supported by the following Attachments:

1. Attachment A: 2024-2031 Budgets, Savings Cost-Effectiveness and Metrics Tables
2. Attachment B: Supplemental Budget Information
3. Attachment C: Redlined Preliminary Statement Statewide Energy Efficiency Balancing Account
4. Attachment D: Redlined Preliminary Statement Statewide Energy Efficiency Gas Balancing Account

## **V. STATUTORY AND PROCEDURAL REQUIREMENTS**

### **A. Rule 2.1(a) – (c)**

In accordance with Rule 2.1(a) – (c) of the Commission’s Rules and Practice and Procedure, SDG&E provides the following information.

#### **1. Rule 2.1(a) – Legal Name**

SDG&E is a corporation organized and existing under the laws of the state of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. The exact legal name of the Applicant is San Diego Gas & Electric Company. SDG&E’s principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E’s attorney in this matter is Erica L. Martin.

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

Correspondence or communications regarding this Application should be addressed to

Geneveve Bucsit  
8326 Century Park Ct.  
San Diego, CA 92123  
Telephone: 619-676-8991  
Email: gbucsit@sdge.com



with copies to:

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San Diego, CA 92123  
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Email: emartin8@sdge.com

**3. Rule 2.1(c) – categorization, hearings and schedule**

**a. Proposed Category of Proceeding**

Pursuant to Rule 7.1, SDG&E requests that this application be categorized as ratesetting as defined in Rule 1.3(e), as the most appropriate of the available categories.

**b. Need for hearings (Rule 2.1 (c))**

SDG&E submits that the Commission should not set this matter for hearing, because, pursuant to D.15-10-028, D.16-08-019, and D.21-05-031 this application is being filed for the primary purpose of submitting SDG&E's Strategic Business Plan, which is a high-level view of SDG&E's plan to meet the Commission's EE-related goals and strategies and SDG&E's four-year Portfolio Plan, which contains SDG&E's specific portfolio plan for reaching those goals during the years 2024-2027. As it has done in R.13-11-005, the Commission can receive stakeholder input through the briefing process, as well as workshops. In addition, any policy issues implicated by this request can be examined and resolved through written comments.

**c. Issues to be considered**

The issues to be considered are described in this application, the accompanying Strategic Business Plan attached to the prepared direct testimony as Exhibit 1, and the 2024-2027 Portfolio Plan attached to the prepared direct testimony as Exhibit 2.

**d. Proposed schedule**

<b>Date</b>	<b>Activity</b>
March 4, 2022	SDG&E Application filed
March 10, 2022	CAEECC Workshop
April 4, 2022	Protests to SDG&E Application
April 14, 2022	SDG&E Reply to Protests
April 18, 2022-May 3, 2022	Prehearing Conference (PHC), PHC Statements, and Scoping Memo
Summer 2022	Workshops, if needed
December 1, 2022	Intervenor Testimony/Deadline to file motion for evidentiary hearings
January 31, 2023	Rebuttal Testimony Due
February 9, 2023	Meet and Confer Pursuant to Rule 13.9
March 15-24, 2023	Evidentiary Hearings (if needed) & Discovery Cutoff
May 9, 2023	Concurrent Opening Briefs
June 8, 2023	Concurrent Reply Briefs
August 2023	Proposed Decision
September 1, 2023	True-Up Advice Letter
September 2023	Final Decision

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

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014 in connection with SDG&E Application No. 14-09-008, and is incorporated herein by reference.

**C. Authority to Change Rates – Rule 3.2 (a-d)**

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.<sup>21</sup>

**1. Rule 3.2(a)(1) – Balance Sheet**

SDG&E’s financial statement, balance sheet and income statement for the nine-month period ending September 30, 2021 are included with this Application as Appendix A.

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<sup>21</sup> Note: Rule 3.2(a) (9) is not applicable to SDG&E.

**2. Rule 3.2(a)(2) – Statement of Effective Rates**

A statement of all of SDG&E’s presently effective electric rates can be viewed on SDG&E’s website. Appendix B to this Application provides the current table of contents from SDG&E’s electric tariffs on file with the Commission.

**3. Rule 3.2(a)(3) – Statement of Proposed Rate Change**

A statement of proposed rate increases is described in Section III, Table 6 and Table 7, above.

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

SDG&E is in the business of generating, transmitting and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange and Imperial Counties. This includes a composite 92% ownership in the 500,000-volt Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500,000-volt Sunrise Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of the Moreno gas compressor station in Riverside County and the Rainbow compressor station located in San Diego County. The gas is transmitted through high and low-pressure distribution mains and service lines.

Applicant’s original cost of utility plant, together with the related reserves for depreciation and amortization for the nine-month period ending September 30, 2021, is shown on the Statement of Original Cost and Depreciation Reserves included as Appendix C.

**5. Rule 3.2(a)(5) and (6) – Summary of Earnings**

A summary of SDG&E’s earnings (for the total utility operations for the company) for

nine-month period ending September 30, 2021, is included as Appendix D to this Application.

**6. Rule 3.2(a)(7) – Statement Regarding Tax Depreciation**

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

**7. Rule 3.2(a)(8) – Proxy Statement**

A copy of the most recent proxy statement sent to all shareholders of SDG&E’s parent company, Sempra Energy, dated March 26, 2021, was mailed to the Commission on April 13, 2021, and is incorporated herein by reference.

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

The rate increase reflected in this Application passes through to customers increased costs to SDG&E for the services or commodities furnished by it.

**9. Rule 3.2(b) – Notice to State, Cities and Counties**

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing this Application, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in

Appendix E to this Application.

**10. Rule 3.2(c) – Newspaper Publication**

In compliance with Rule 3.2 (c) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing of this Application, publish in newspapers of general circulation in each county in its service territory notice of this Application.

**11. Rule 3.2(d) – Bill Insert Notice**

In compliance with Rule 3.2 (d) of the Commission’s Rules of Practice and Procedure, SDG&E will, within 45 days after the filing of this Application, provide notice of this Application to all of its customers along with the regular bills sent to those customers that will generally describe the proposed rate changes addressed in this Application.

**VI. SERVICE**

This is a new application. No service list has been established. Accordingly, SDG&E will serve this application, testimony and related exhibits on parties to the service list for R.13- 11-005, A.17-01-013 and Related Matters.

**VII. CONCLUSION**

WHEREFORE, SDG&E requests that the Commission grant SDG&E’s application, as described herein.

Respectfully submitted this 4th of March, 2022.

Respectfully submitted,

By:                     /s/ Erica L. Martin                      
Erica L. Martin

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Attorney for SAN DIEGO GAS & ELECTRIC  
COMPANY

## OFFICER VERIFICATION

I, Tashonda Taylor, declare the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) TO ADOPT 2024-2031 ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN PURSUANT TO D.21-05-031** 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 4th day of March, 2022 at San Diego, California.



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Tashonda Taylor  
Vice President  
Customer Operations  
San Diego Gas & Electric Company

## **ATTACHMENT A**

### **2024-2031 BUDGETS, SAVINGS COST-EFFECTIVENESS AND METRICS TABLES**

Pursuant to the ALJ's Procedural Email Providing Guidance on Spreadsheets to be Included in Portfolio Applications, sent on February 14, 2022, the Attachment A must be provided in spreadsheets, therefore it will be sent in CD-ROM form.

**ATTACHMENT B**  
**SUPPLEMENTAL BUDGET INFORMATION**



**ATTACHMENT B**

**(Modified to Incorporate Dates Relevant to D.21-05-031)**

**Approved Meet & Confer Document by Program Administrators, Office of Ratepayers and The Utility Reform Network in  
A.17-01-003 et. al.**

**Required by D.18-05-041 Ordering Paragraph 44**

## Table of Contents

Background:.....	3
I. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS	3
A. Narrative description of in-house departments/organizations supporting the PA’s EE portfolio .....	3
B. Table showing PA EE “Full Time Equivalent” headcount by department/organization.....	11
C. Table showing costs by functional area of management structure .....	13
D. Table showing cost drivers across the EE organization.....	13
E. Explanation of allocation of labor and O&M costs between EE-functions and GRC-functions or other non-EE functions .....	14
II. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO	17
A. Attachment-A, Question C.8.....	17
B. Attachment-A, Question C.9.....	17
C. Attachment-A, Question C.10.....	18

## **Attachment B**

### **Approved Meet & Confer Document by Program Administrators, Office of Ratepayers and The Utility Reform Network**

#### **BACKGROUND:**

Decision (D.) 18-05-041 Ordering Paragraph 44 states:

Beginning with the annual budget advice letters due on September 3, 2019, the program administrators must include updated budget estimates in the same format as the supplemental budget information filed in this proceeding on June 12, 2017.

Therefore, consistent with this Commission direction, this narrative and the accompanying Attachment A Tables 9 through 16, PA provides the following information in Attachment B.

#### **I. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS**

##### **A. Narrative description of in-house departments/organizations supporting the PA's EE portfolio**

###### **1. Functions conducted by each department/organization**

#### **SDG&E Response:**

Please refer to the definition of functions in the Attachment A Tab: Function Definitions.

- 1) SDG&E's Customer Programs (CP) Department includes EE, Energy Savings Assistance (ESA), Demand Response and other non-EE customer programs. The following are the managerial areas under Customer Programs:
  - a) Customer Programs Energy Efficiency:
    - i) Manages all customer EE programs
      - Local Programs: manages all local programs.
      - Statewide programs: manages all Statewide programs.
      - Technology & Standards manages Emerging Technology for Energy Efficiency and Codes & Standard programs.
    - ii) Manages Non-EE Programs

- Other Programs: manages local customer service programs not related to Energy Efficiency, manages pilot programs and a procurement program for SDG&E
  - Technology & Standards manages Emerging Technology for Demand Response
- b) Customer Programs & Engagement manages non-EE residential programs (including ESA, CARE)
  - c) Financial Business Analysis: manages finances and expenditures, including financial reporting, for the CP department, which includes Energy Efficiency, Demand Response, Renewables and Low-Income proceedings.
  - d) Customer Programs Engineering, Systems & Support: Manages the engineering functions that support both EE (e.g., work papers, customer ex ante review process) and non-EE programs, along with EM&V, Inspections, Reporting and Systems Support.
  - e) Customer Programs Policy manages EE and non-EE Customer Programs policy and strategy issues, including CPUC, CEC, legislative related issues, and compliance and other and data request processes.
  - f) Product & Transition Management: Manages development and management of potential customer-facing products and services, both EE and non-EE products.
    - i) Solicitations: Manages the solicitation process for all new Third-Party programs.
    - ii) Contract Management Office: supports contract development and renewals,
- 2) Although an organization chart is not included, the following departments support both EE and non-EE programs.
    - a) The IT department provides support for EE as required and as it relates to EE systems support.
    - b) Marketing & Communications oversees the company's various marketing initiatives, research and analysis. It supports the EE Marketing Education & Outreach (ME&O) efforts.
    - c) Marketing Analytics may provide support for various customer surveys to support EE programs.

Additional departments that support EE but do not bill to EE (not exhaustive) are Accounting (including Accounts Payable), Human Resources, Regulatory Case Management, Legal and Supply Management. These activities are covered through SDG&E's General Rates Case.

## **2. Energy Efficiency Management Structure and Org Chart**

**SDG&E Response:**

See Appendix A for the 2021 EE Management organization charts. This is the SDG&E EE organization as of this filing March 4, 2022.

**3. Staffing needs by department/organization, including current and forecast for 2022-2023, as well as a description of what changes are expected between 2024-2027 or why it's impossible to predict beyond 2024, if that's the PA's position.**

**SDG&E Response:**

As reflected in the Portfolio full-time equivalents (FTE) Program Year 2024-2027 forecast, program administration is continuing to change as new Third-Party programs begin implementation. Their implementation may include program implementation support, e.g., processing, account representative services, etc. to which SDG&E will need to adjust its own in-house activities.

The following are the activities associated with new Third-Party programs.

a) Ramp-up Activities for Third-Party Program Implementation

The Implementation Plan will be drafted by the Third-Party implementer who is responsible for the design and delivery of the program. SDG&E will work with the implementer to ensure that the final implementation plan and overall program design aligns with the scope of work in the implementer's contract. The final implementation plan will be posted on CEDARS no later than 60 days after Commission approval of the Third-Party contract.<sup>1</sup>

Upon Third-Party Advice Letter (AL) approval, SDG&E will issue a Notice-to-Proceed (NTP) and initiate ramp-up activities with the implementer. The ramp-up plan will start with a planning meeting to review and approve all tasks and timelines with the Third-Party. Following the initial ramp-up activities, meetings will be scheduled, as necessary, to review and approve all deliverables starting with the program's documentation. The implementer will be required to submit all documentation necessary for the delivery of services to SDG&E, such as:

- Final Implementation Plan
- Program Policy and Procedure manual

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<sup>1</sup> D.18-05-041, OP 3.

- Customer application
- Invoice template
- Customer satisfaction survey

In parallel, SDG&E will do a final review of the following items to ensure that all measures can be accurately reported and that the program complies with the latest Commission requirements:

- Program measure offerings
- Quality Assurance procedures
- Measurement and Verification plan

SDG&E will also conduct training on its administrative processes, such as data request and release process, and invoicing and reporting systems. These systems will be used to upload data to support all projects and process invoices.

As part of the onboarding process, the implementer will be required to provide a detailed requirements and integration Plan and configure its invoice and reporting tools to support SDG&E's requirements. SDG&E will then verify that all applicable systems are configured, tested, and ready to support Third-Party program operations. Lastly, once system setup activities are complete, SDG&E will coordinate with the implementer to finalize the program's marketing materials for distribution and circulation, before providing approval to launch the program.

#### b) Ramp-Down activities for SDG&E's Existing Programs

In conjunction with the program ramp-up activities, SDG&E will be conducting ramp-down activities for its existing programs that overlap with the new Third-Party programs.

The ramp-down activities begin with SDG&E's program staff conducting a meeting to discuss program close-out requirements, timeline and support needed from all applicable stakeholders. Following the initial meeting, SDG&E's program staff will work with all internal stakeholders to finalize a Shutdown Plan and Schedule and will also work on finalizing all applicable program closure notifications. Once these tasks have been finalized internally, SDG&E's program staff will communicate out to all internal and external stakeholders and will begin to execute the Shutdown Plans for the programs. During this step all shutdown activities will be completed, and program offerings will be stopped.

Once the Shutdown Plan is finalized, close-out activities, such as final inspections and invoicing will occur. A Final Report, summarizing the program's activities and results, will be developed and approved. Upon the completion, SDG&E's program staff will verify that all shutdown activities are completed, inform Supply Management of their completion and

conduct a final debrief with all stakeholders to discuss and document Lessons Learned and Best Practices to incorporate into the processes going forward.

c) SDG&E Contract Functions

As part of its contract management, SDG&E will continue general administration functions consistent with Commission-approved administration functions.<sup>2</sup> Administrative costs are necessary to support the Third-Party program. Contract administrative functions consistent with Administrative Overhead costs include, but are not limited to, contract administration labor, accounting support, IT services and support, reporting database, regulatory and filing support, data request responses, quality verification of project installation and other ad-hoc support required to verify contract invoices.

In addition to its administration and oversight functions listed above, SDG&E plans to continue using utility staff personnel to ensure a successful delivery of the Third-Party programs. SDG&E delivery functions and Direct Implementation Costs for the new Third-Party programs include, but are not limited to the following:

i) Engineering

- Workpaper review and updates
- Workpaper development and submittal to ED for approval
- Measure changes
- Ex-Ante reviews
- Data request responses
- Response to Recommendation activities
- California Technical Forum (Cal TF) and DEER support

ii) Evaluation, Measurement and Verification (EM&V)

- Program and project evaluation activities, NMEC evaluations,
- Ex-post reviews, Impact evaluations

ii) Inspections

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<sup>2</sup> *Energy Efficiency Policy Manual* Version 6, April 2020, Appendix C,

- Inspection and verification of installation of measures by our Third-Party Implementers
- iii) System Support
- System configuration, testing, and maintenance
- iv) Marketing
- Co-branding activities
  - Marketing and communications support
- v) Multifamily Single Point of Contact

For the Multifamily sector Third-Party program, SDG&E will continue the Multifamily SPOC (Single Point of Contact) as ordered in D.17-12-009. SDGE's SPOC support for the program delivery functions includes, but are not limited to, the one-stop shop approach for Multifamily property managers, owners and their tenants. SDG&E's current SPOC coordinates all eligible common area and in-unit enrollments across low income and energy efficiency programs creating a seamless and comprehensive whole building approach for the participant. The SPOC holds Multifamily workshops to educate property owners/operators about the availability of program offerings. The SPOC provides technical assistance to property owners from project support through implementation. The SPOC currently works with not only Energy Efficiency (EE) eligible multifamily facilities but, includes Energy Savings Assistance (ESA) and Solar On Multifamily Affordable Housing (SOMAH) eligible facilities as well.

Additionally, the SPOC attends association conferences and events where opportunities exist to network and identify potential property owners/operators for program eligibility. In doing so, SDG&E's Multifamily SPOC approach allows for better visibility and identification of areas for potential refinements within all the different residential Multifamily programs SDG&E offers and thereby works to streamline and align program processes at a holistic level for its Residential Multifamily customers.

SDG&E's SPOC adheres to the following general procedure to identify and work with Multifamily customers:

- (1) The SPOC meets with the property owner or operator and documents general information about the property and the owner in order to perform property evaluation.
- (2) After internal analysis, the SPOC determines potentially eligible programs and provides recommendations for energy efficiency measures for the property.
- (3) Starting with Master Metered Properties, SDG&E's authorized contractor assists the property owners by enrolling the property in Energy Star Portfolio manager for benchmarking purposes, gathering the utility data,



and calculating the Energy Use Intensity (EUI).

- (4) If the property owner is interested in participation, the SPOC will connect the property leads to the appropriate programs and resources based on their unique needs, as well as provide enrollment support; the level of technical assistance depends on the property needs and the complexity of project.

SDG&E's SPOC will coordinate with the Multifamily Sector Third-Party program. This will allow for low-income customer referrals to the various low-income programs and other relevant programs for the multifamily sector.

Although SDG&E provided a menu of SDG&E Account Executive services that can be used for this solicitation, the existing Third-Party programs have opted not to utilize SDG&E's Account Executives for program support.

**4. Non-program functions currently performed by contractors (e.g. advisory consultants), as well as a description of what changes are expected between 2024-2027 or why it's impossible to predict beyond 2024, if that's the PA's position.**

**SDG&E Response:**

SDG&E continues to contract with various consultants who provide a variety of EE support services, including, but not limited to, engineering, reporting, portfolio analytics and forecasting, IT, marketing, EM&V (e.g., process evaluations, customer surveys, etc.), and EE employee development.

**5. Anticipated drivers of in-house cost changes by department/organization**

**SDG&E Response:**

SDG&E has accounted for an increase in inspection and verification personnel to ensure that Statewide led programs are performing optimally, and reporting is accurate. This quality assurance check, SDG&E feels is essential to the overall operation of all programs.

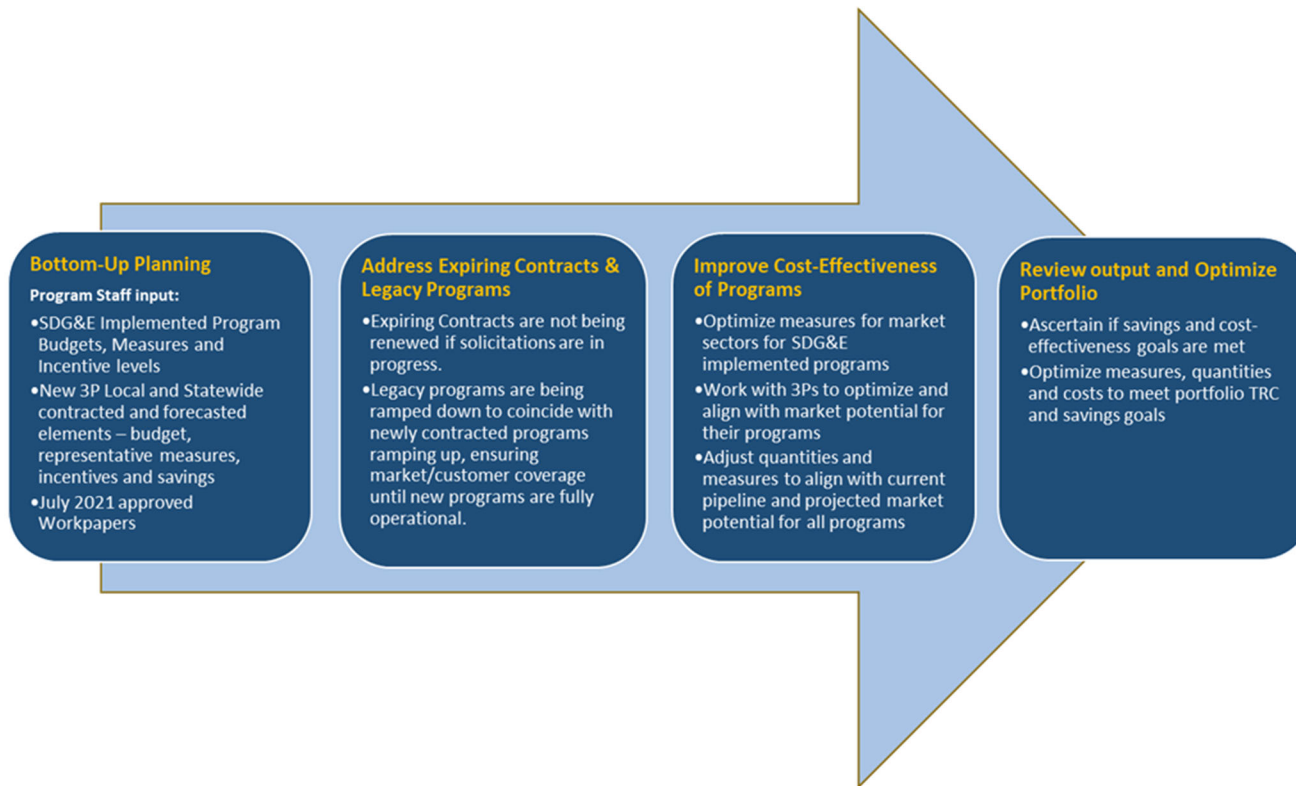
**6. Explanation of method for forecasting costs**

**SDG&E Response:**

SDG&E has undertaken a zero-based budgeting approach in the development of its portfolio savings and budget for 2024-2027. SDG&E escalated the labor and non-labor costs using the 4th Quarter 2021 IHS Markit Global Insight Power Planner (Global Insight) utility cost forecast as shown below. Global Insight escalation rates for both labor and non-labor (O&M and administrative) cost were also used in SDG&E's 2019 General Rate Case application (A.17-10-007).

Year	Labor	Non-Labor
2021	1.0000	1.0000
2022	1.0389	1.0503
2023	1.0693	1.0573
2024	1.0984	1.0638
2025	1.1276	1.0725
2026	1.1591	1.0863

SDG&E also provides a comparison of the proposed budgets to its actual 2020 expenditures. Information on its 2022 and 2023 portfolio are also provided as additional points of reference. (see Attachment A Tabs 9 through 16). Exhibit 2, II. Forecast Methodology and the narrative within this document provides additional assumptions used in the development of the 2024-2027 portfolio budget. The following illustration summarizes the various planning steps SDG&E undertook to develop its proposed 2024-2027 portfolio budget.



**B. Table showing PA EE “Full Time Equivalent” headcount by department/organization**

**7. TURN and CAL PA like this example, taken from testimony PG&E’s 2017 GRC addressing its Energy Procurement department. We would be looking for 2019, 2020, or 2021 “recorded” positions, depending on what’s most appropriate for the PA, or both, if that provides the most clarity. For forecast years, we’d want at least 2024.**

- Note, if PAs’ FTE needs change, these changes can be made without reporting or seeking CPUC approval

**TABLE 6-3(a)**  
**EP HEADCOUNT**  
**NUMBER OF PLANNED POSITIONS**

Line No.	Description	2014 Positions	2015 Forecast	2016 Forecast	2017 Forecast
1	EP Administrative Office	4	4	4	4
2	Energy Supply Management (ESM)	126	131	131	134
3	Renewable Energy (RE)	38	40	40	41
4	Energy Policy, Planning and Analysis (EPPA)	46	46	46	46
5	Value Based Reliability (VBR)	10	12	12	12
6	Energy Contract Management and Settlements (ECMS)	79	80	80	80
7	Energy Compliance and Reporting (ECR)	18	18	18	18
8	<b>Total</b>	<b>321</b>	<b>331</b>	<b>331</b>	<b>335</b>

(a) See WP Table 6-7, Exhibit (PG&E-5).

### SDG&E Response:

Please refer to Attachment A for the following worksheets: Function Definitions and Table 10 Portfolio FTE. This table provides the full-time equivalents (FTEs) for 2020 and 2022 - 2027. SDG&E calculated only productive hours, since the Vacation & Sick Leave (V&S) is covered separately but will be represented in the fully loaded value of the various FTEs. SDG&E calculated an FTE as follows:

#### The productive hours would not include:

- vacation (2.5 weeks = 100 hours);
- holidays/floaters (14 days = 112 hours); and/or
- sick leave (10 days = 80 hours).

Therefore, the annual hours for an FTE would be approximately 1788 (2080 - 292) or 149 hours a month.

**C. Table showing costs by functional area of management structure**

**8. Expenses broken out into labor, non-labor O&M (with contract labor identified) (\* Note, in case of conflict, excel budget template will control.)**

**SDG&E Response:**

Please refer to Attachment A worksheet: Table 9 Portfolio Summary, and Tables 11 – 16 of Sector level breakdowns.

**9. Identify any capital costs**

**SDG&E Response:**

SDG&E did not identify any capital costs in its forecast.

**D. Table showing cost drivers across the EE organization**

**10. TURN and CAL PA like this example, taken from testimony PG&E's 2017 GRC addressing its Energy Procurement department.**

- While this example pertains to departmental cost increases, in our case, cost increases or decreases would be attributed to major cost drivers.

**TABLE 6-2(a)**  
**EP COST INCREASE**  
**2015-2017 EXPENSE BY COST DRIVER**

Line No.	Description	Increase in Thousands of \$	Percent of Total Increase
1	Escalation	3,597	57
2	Portfolio Complexity	1,136	18
3	Regulatory Mandates	1,192	19
4	Process Improvements	400	6
5	Total	6,324	100

(a) See WP Table 6-6, Exhibit (PG&E-5).

**SDG&E Response:**

SDG&E does not have data comparable to the data illustrated in the sample table above.

**E. Explanation of allocation of labor and O&M costs between EE-functions and GRC-functions or other non-EE functions**

**11. When an employee spends less than 100% of her/his time on EE, how are costs tracked and recovered (e.g., on a pro rata basis between EE rates and GRC rates; when time exceeds a certain threshold, all to EE; etc.).**

**SDG&E Response:**

SDG&E tracks each employee's time through cost centers and internal orders. For its EE programs, SDG&E has an extensive set of internal orders and cost centers to track programs and cost categories (Administration, Marketing, Direct Implementation). Similarly, non-EE General Rate Case (GRC) work hours are charged to appropriate cost centers and internal orders.

All labor hours, which are tracked in SDG&E's My Time system, are approved on a bi-weekly basis by the employees' respective supervisor. Costs recorded in EE internal orders are tracked in the various EE balancing accounts for appropriate

cost recovery.

**12. Describe the method used to determine the proportion charged to EE balancing accounts for all employees who also do non-EE work.**

**SDG&E Response:**

Each employee works with their respective supervisor to determine the appropriate hours or percentage of their time to be charged to various activities. Each employee's time allocation is documented in SDG&E's My Time system and reviewed regularly by the supervisor with their respective employees. Change in job duties, reorganizations and increase/decrease in workload are all triggers for time allocations.

All labor hours, which are tracked in the My Time system, are approved on a bi-weekly basis by the employees' respective supervisors. Costs recorded in EE internal orders are tracked in the various EE balancing accounts for appropriate cost recovery and non-EE costs (e.g., General Rate Case (GRC) operations and maintenance, Demand Response Program (DRP), Energy Savings Assistance (ESA), etc.) are recorded in appropriate accounts.

**13. Identify the EE functions that are most likely to be performed by employees who also do non-EE work (e.g. Customer Account Representatives?)**

**SDG&E Response:**

The following are CP managerial areas supporting both EE and non-EE programs:

- Customer Programs & Engagement
- Energy Innovation Center
- Financial Business Analysis
- Customer Programs Engineering, Systems & Support
- Customer Programs Policy & Strategy
- Product & Transition Management
- Business Services

The following SDG&E departments support both EE and non-EE programs:

- IT department
- Marketing & Communications
- Marketing Analytics
- Accounting (including Accounts Payable)
- Human Resources
- Regulatory Case Management
- Legal
- Supply Management

For further details, please refer to response to Question 1 above.

**14. Are labor costs charged to EE fully loaded?**

**SDG&E Response:**

No, SDG&E only charges vacation and sick leave and payroll taxes loaders to EE for EE FTEs. Pensions & Benefits (P&B) are part of GRC.

**15. How are burden benefit-related administrative and general (A&G) expenses for employees who work on EE programs recovered (EE rates or GRC rates)? \*\*PG&E allocates these costs to EE pursuant to a settlement agreement with MCE and TURN, which was adopted in D.14-08-032.**

**SDG&E Response:**

Please refer to response to Question 14 above

**16. When EE and non-EE activities are supported by the same non-labor resources, how are the costs of those resources or systems allocated to EE and non-EE activities?**

**SDG&E Response:**



SDG&E charges and recovers non-labor costs similarly as described in response to Question 11 above.

**17. Identify the EE O&M costs that are most likely to be spread to non-EE functions as well as EE, if any**

**SDG&E Response:**

Not applicable.

**II. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO**

This section refers to the April 14, 2017 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges in A.17-01-003 et. al.

**A. Attachment-A, Question C.8**

“Present a single table summarizing energy savings targets, and expenditures by sector (for the six specified sectors). This table should enable / facilitate assessment of relative contributions of the sectors to savings targets, and relative cost-effectiveness.”

**18. TURN and CAL PA invite the PAs to propose a common table format for this information. We don’t have anything specific in mind. Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.8 Table.**

**SDG&E Response:**

Please refer to Attachment A: Table 9 Portfolio Summary worksheet.

**B. Attachment-A, Question C.9**

“Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a “meet and confer” session), display how much of each year’s budget each PA anticipates spending “in-house” (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program.”

**19. TURN and CAL PA invite the PAs to propose a common table format for this information. We don't have anything specific in mind.**

**SDG&E Response:**

Please refer to Attachment A: Table 11 Residential, Table 12 Commercial, Table 13 Industrial, Table 14 Agricultural, Table 15 Public Sector, Table 16 Cross Cutting worksheets

**20. Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.9 Table.**

**SDG&E Response:**

Labor costs by function use the standard SDG&E labor cost assumptions. Program Advisors, who plan the program budgets, determine the various functions required to support their programs. Non-labor costs are based on experience from previous program years and any updated activities. Managers review and approve the forecast.

**C. Attachment-A, Question C.10**

“Present a table akin to PG&E’s Figure 1.9 (Portfolio Overview, p 37) or SDG&E’s Figure 1.10 (p. 23) that not only shows anticipated solicitation schedule of “statewide programs” by calendar year and quarter, but also expected solicitation schedule of local third-party solicitations, by sector, and program area (latter to extent known, and/or by intervention strategy if that is more applicable). For both tables, and for each program entry on the calendar, give an approximate size of budget likely to be available for each solicitation (can be a range).”

**21. TURN and CAL PA invite the PAs to propose a common table format for this information. We don't have anything specific in mind. Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.10 Table.**

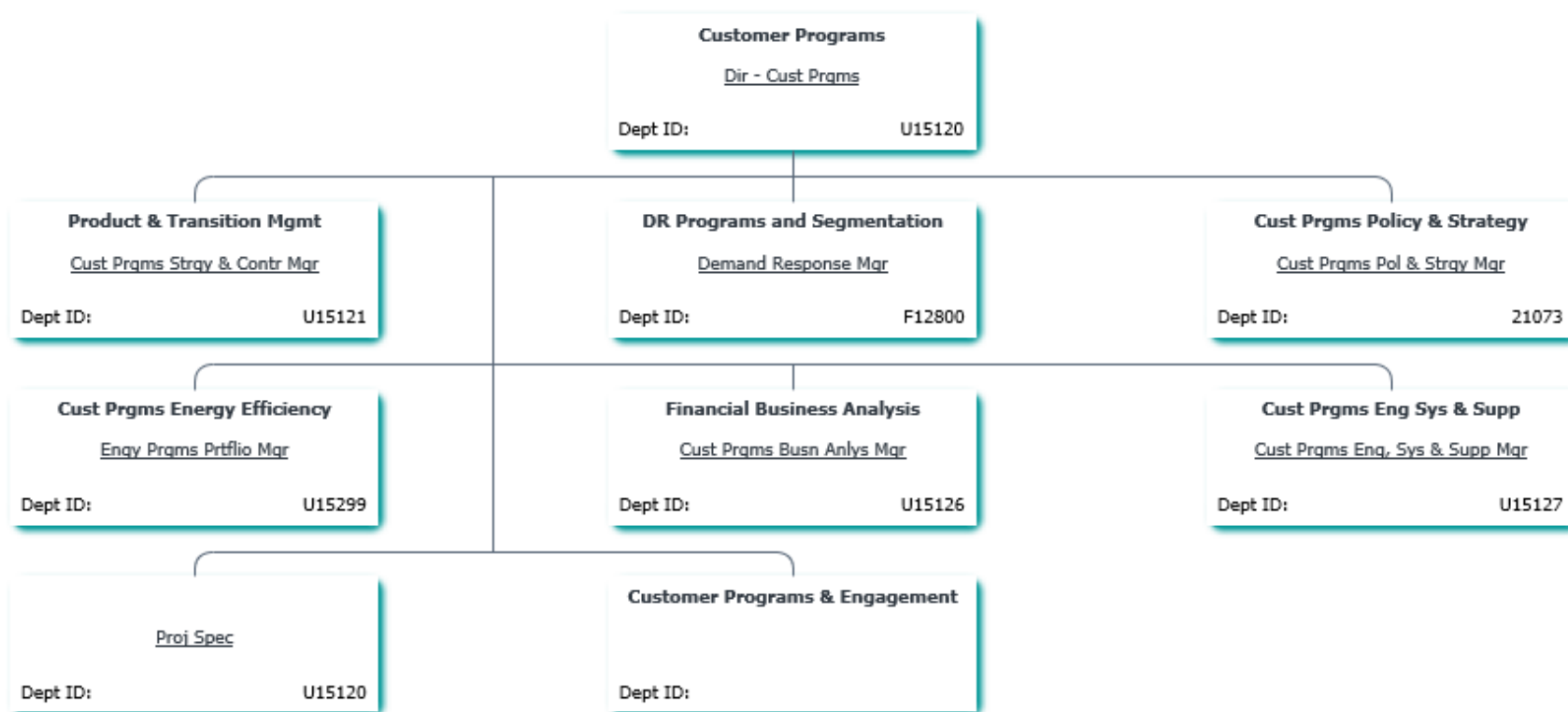
**SDG&E Response:**

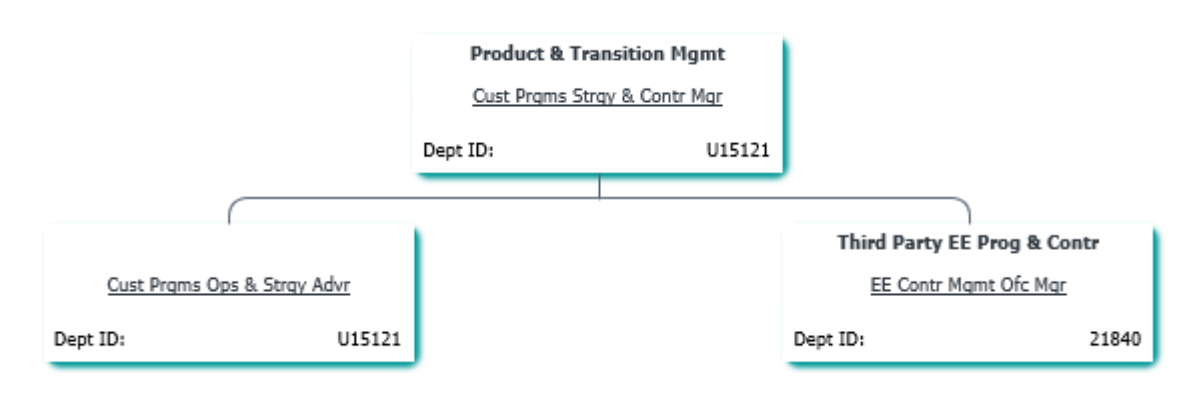
The current Statewide Solicitation schedule is available at SDG&E's Energy Efficiency Third Party Solicitation webpage <https://www.sdge.com/more-information/doing-business-with-us/energy-efficiency-third-party-solicitations>.

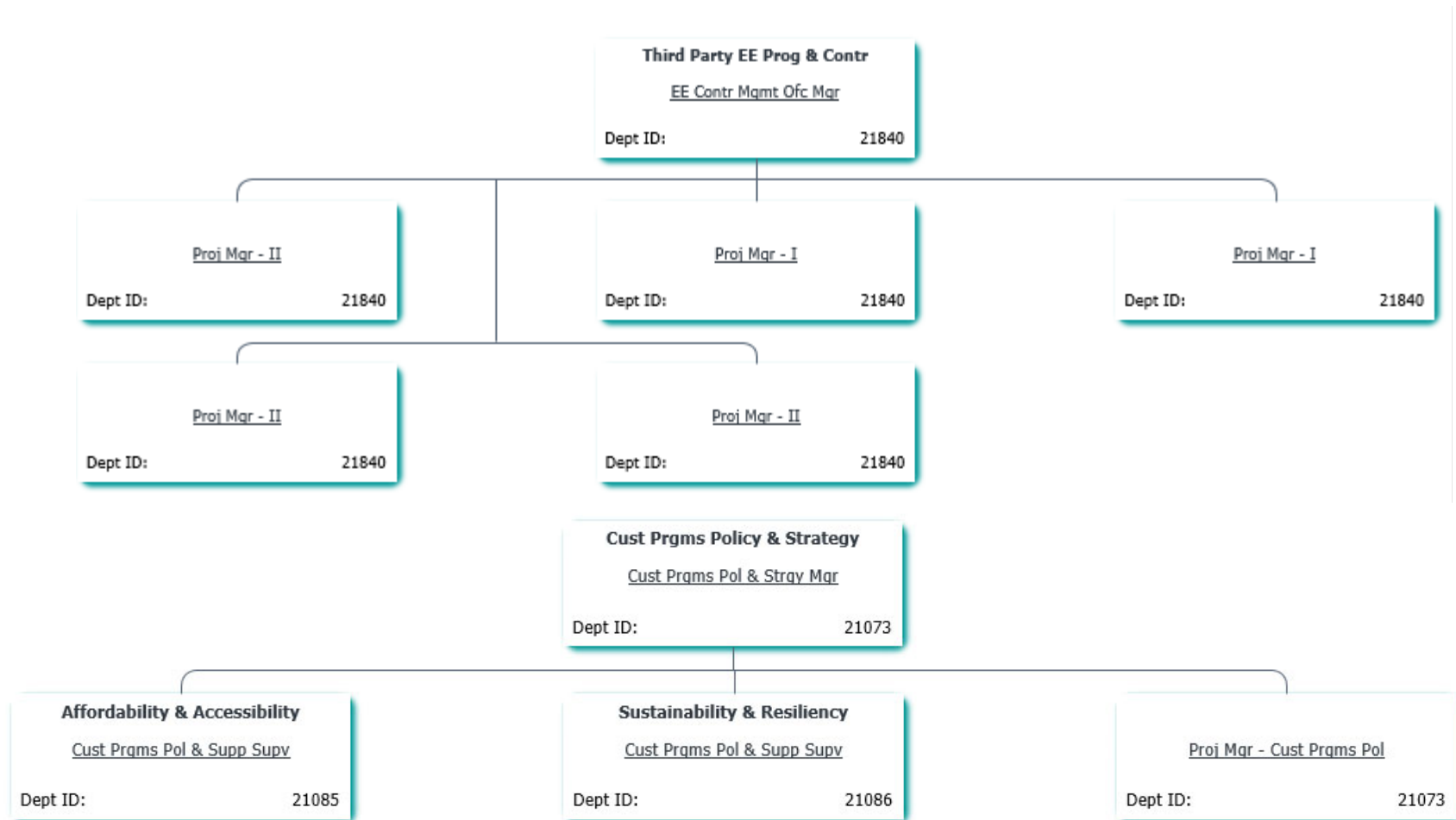
SDG&E has also included anticipated solicitation schedules in Chapter 5, Portfolio Management within the Solicitation Strategy section. Budgets for all planned solicitations have been included in the CEDARS upload of this filing.

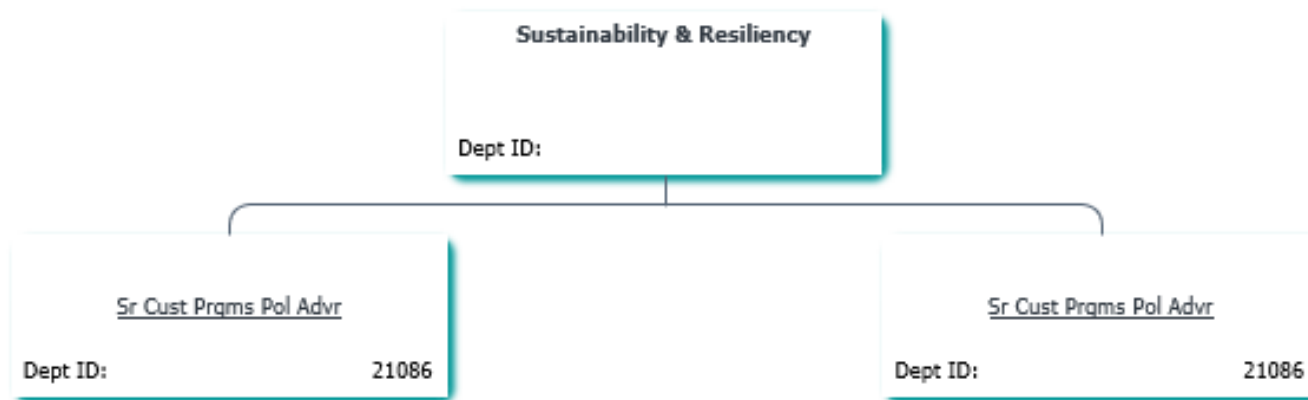
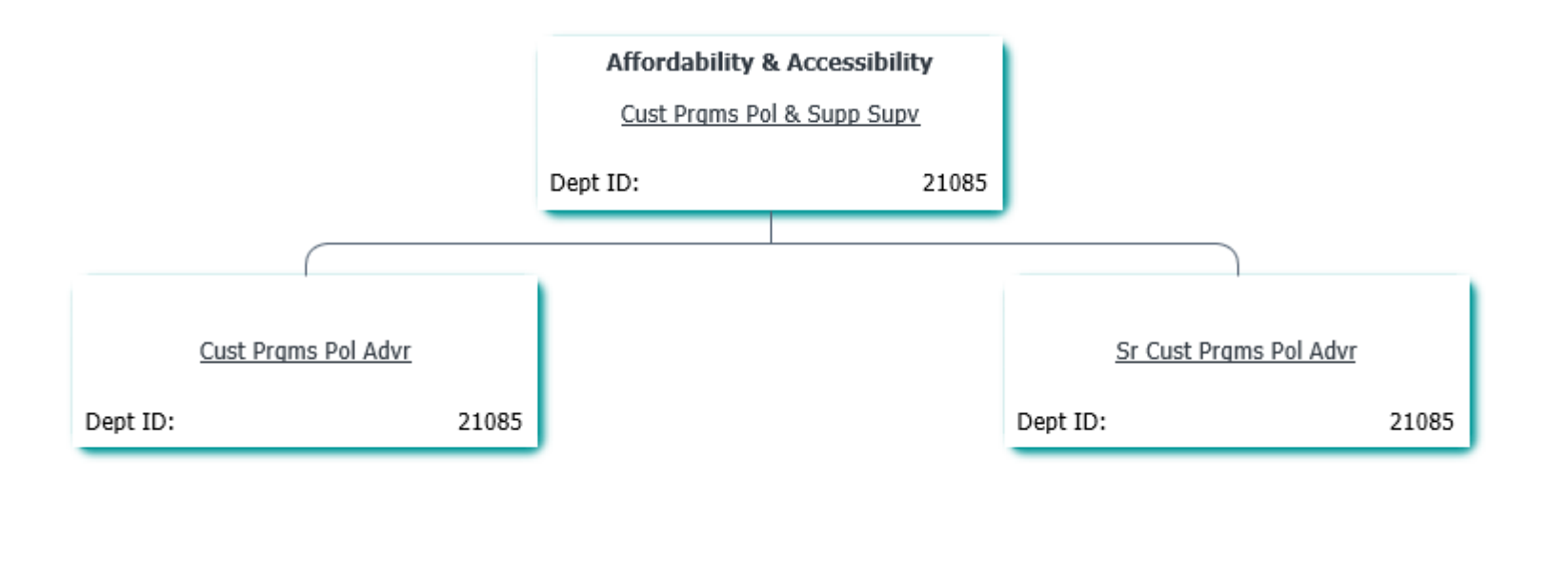
## APPENDIX A OF ATTACHMENT B—2021 ENERGY EFFICIENCY MANAGEMENT ORGANIZATION CHART

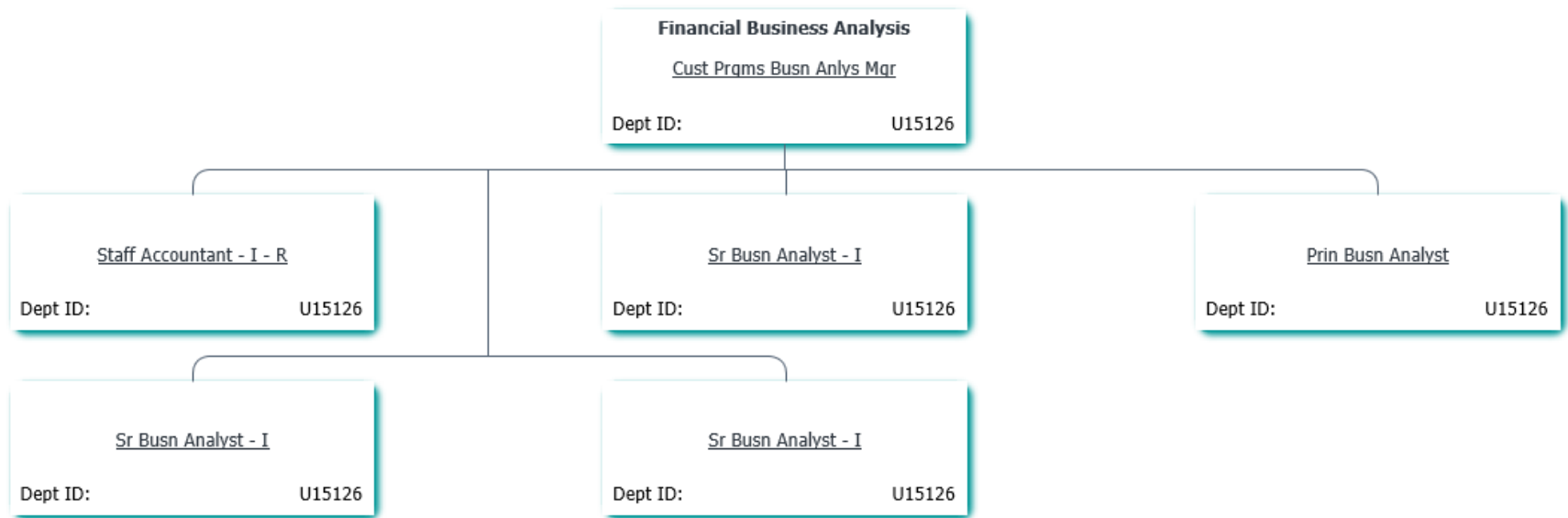
### Customer Programs Organization (As of 1/11/2022)



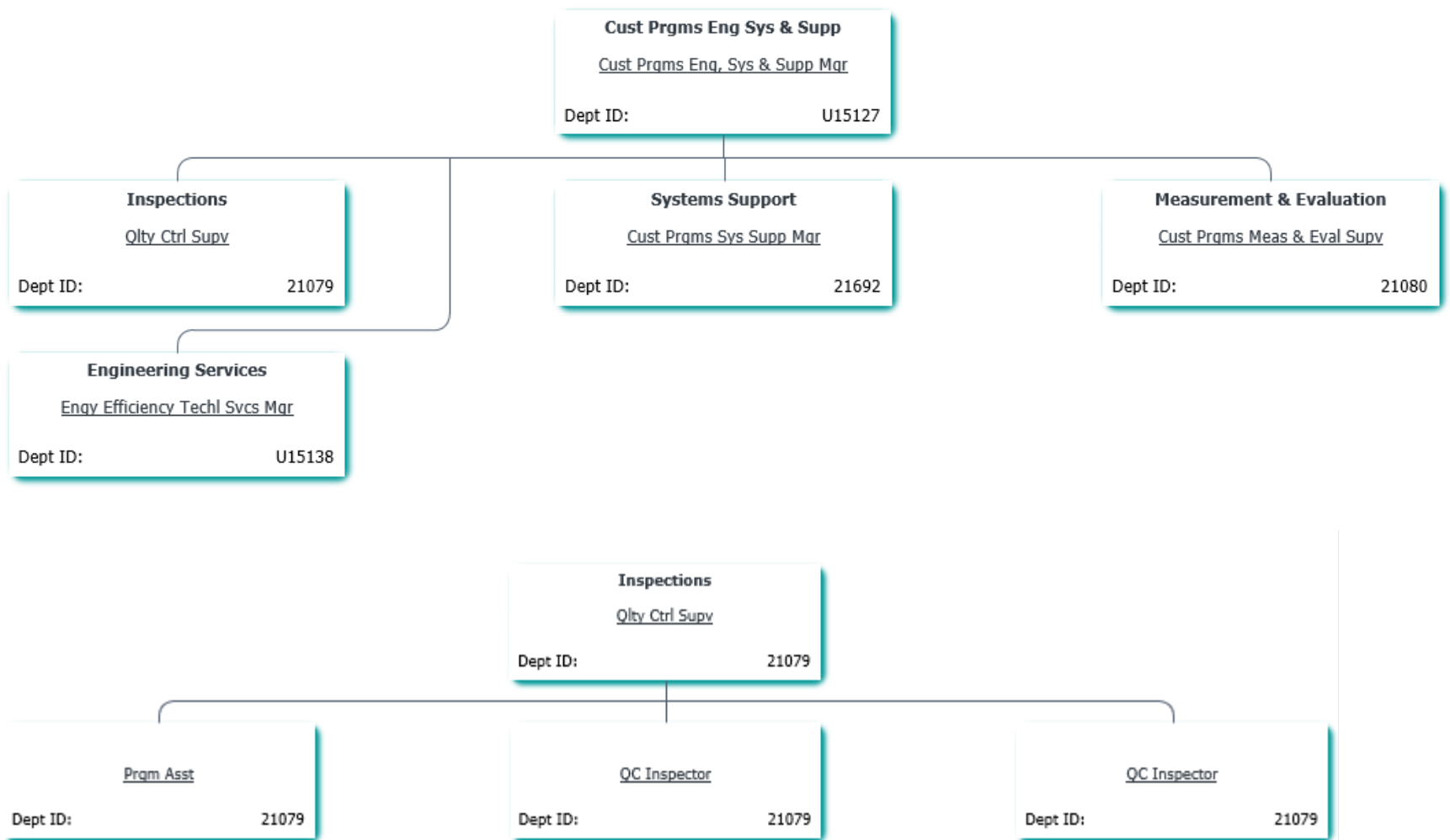


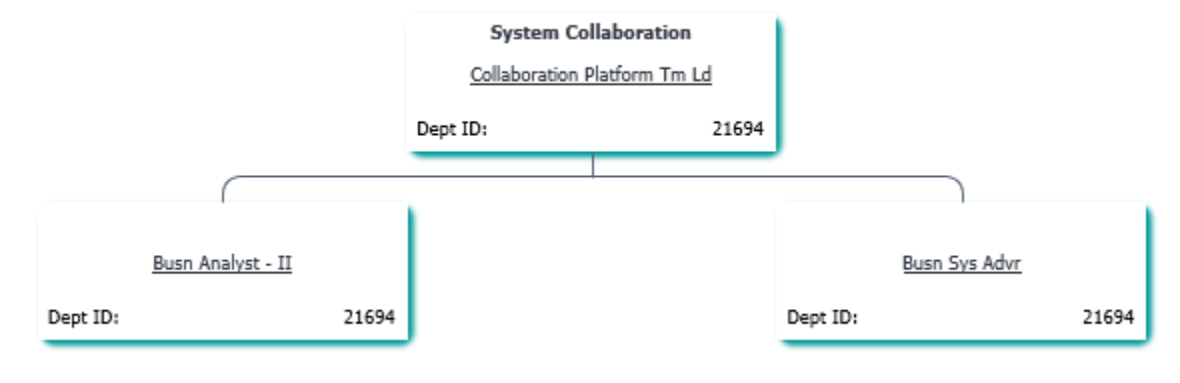
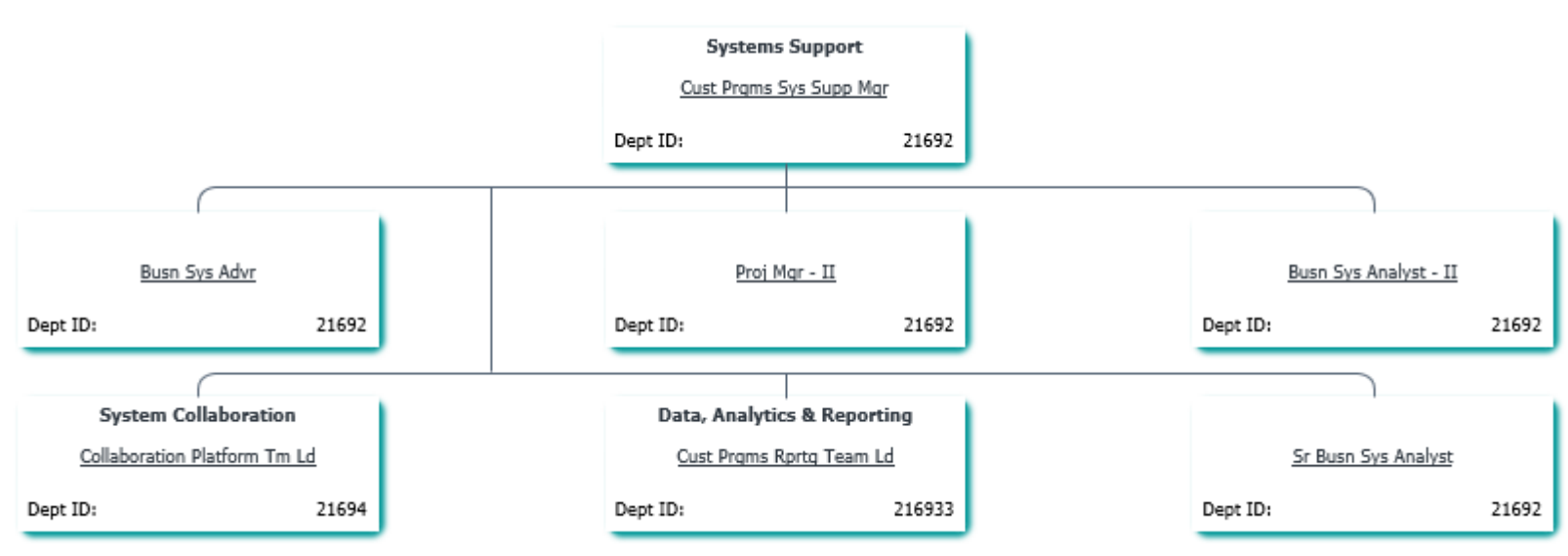


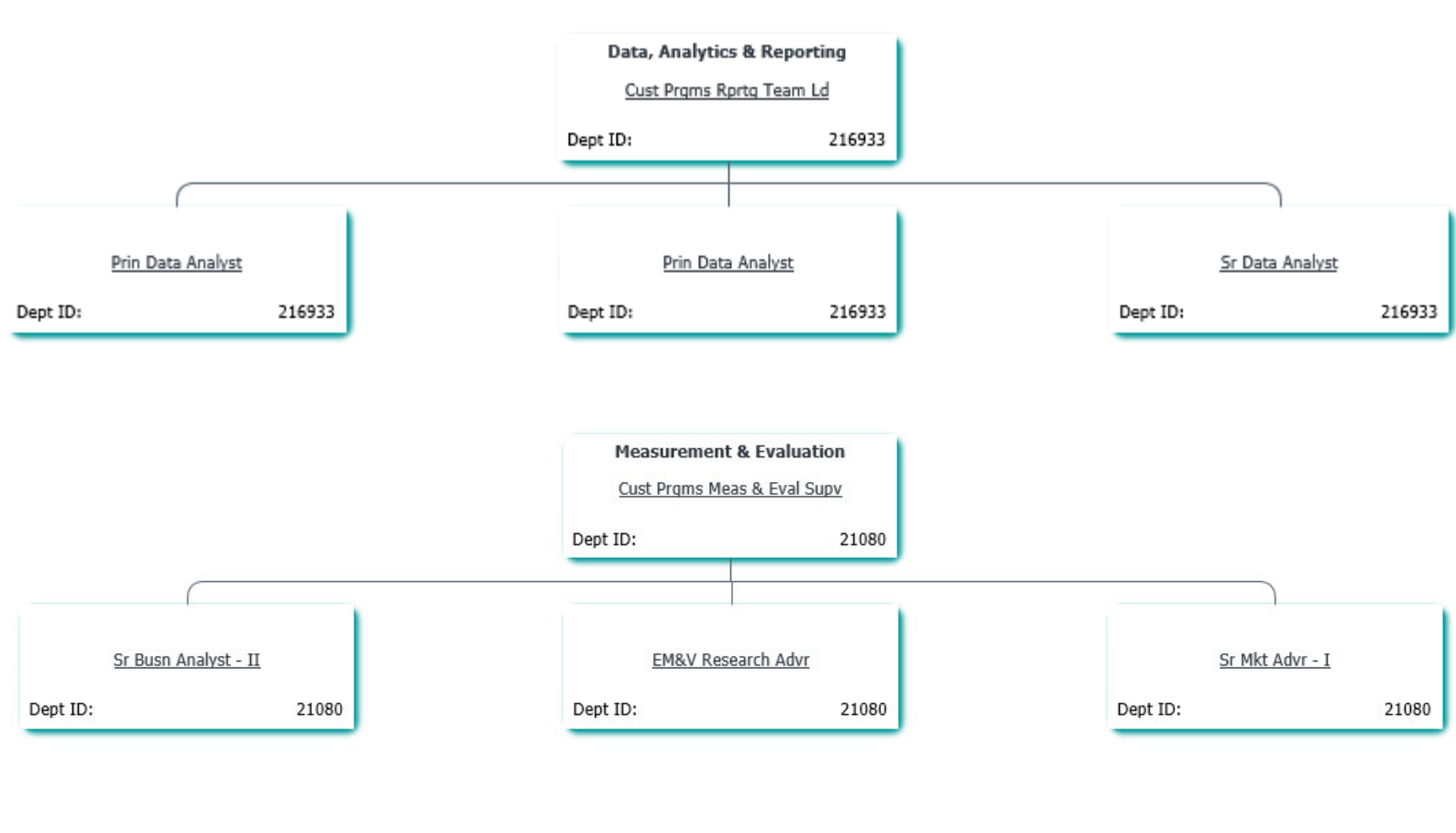


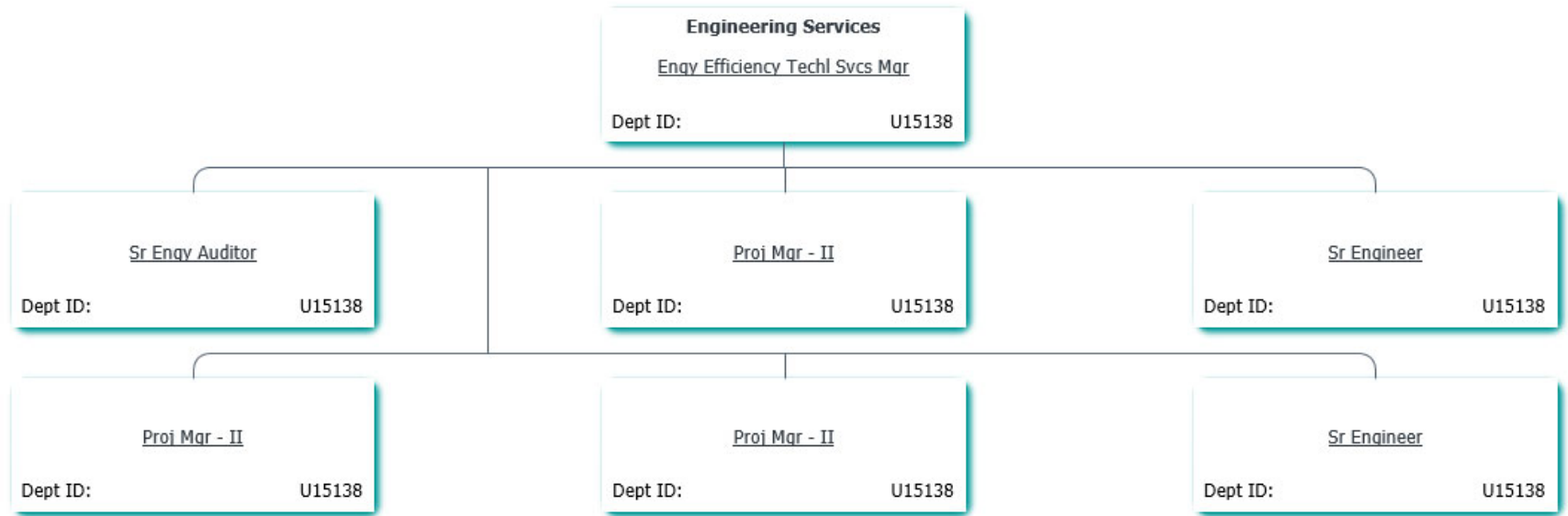


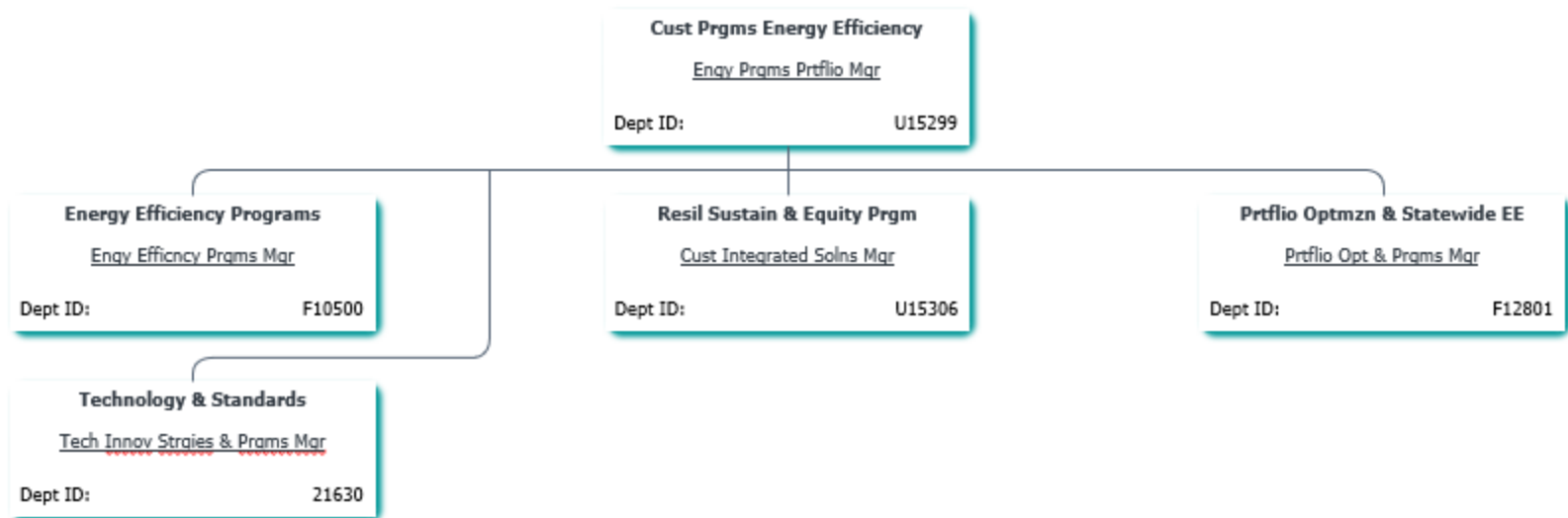






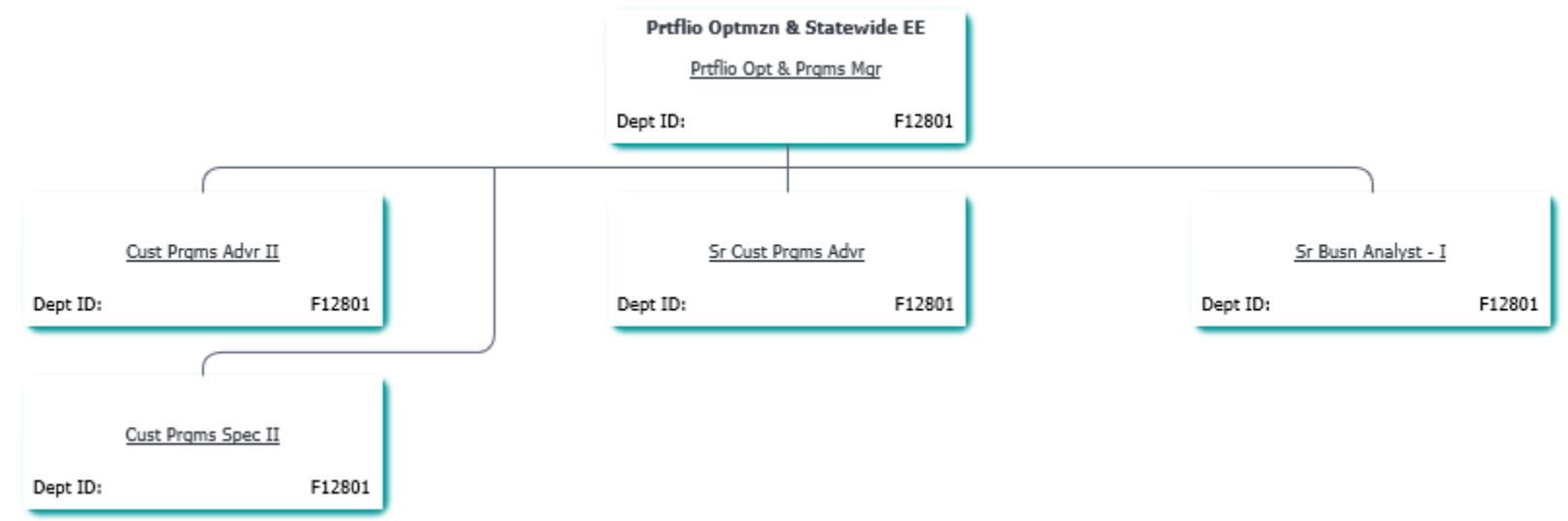
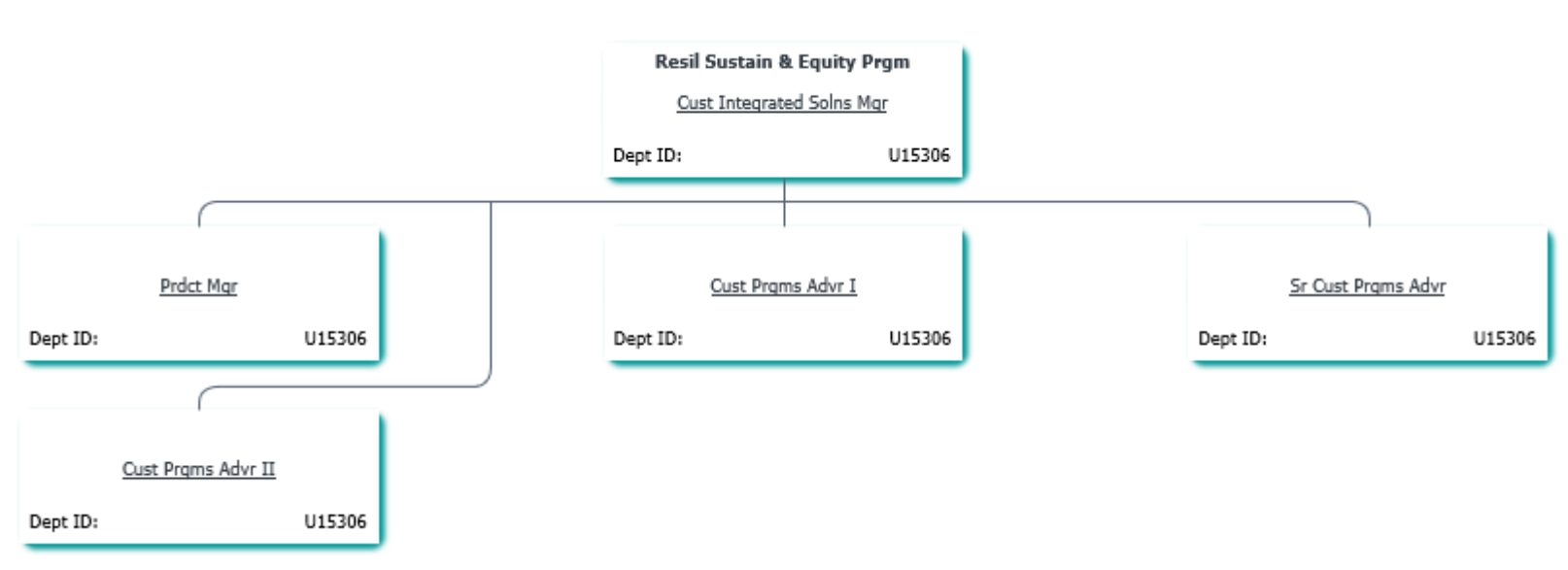




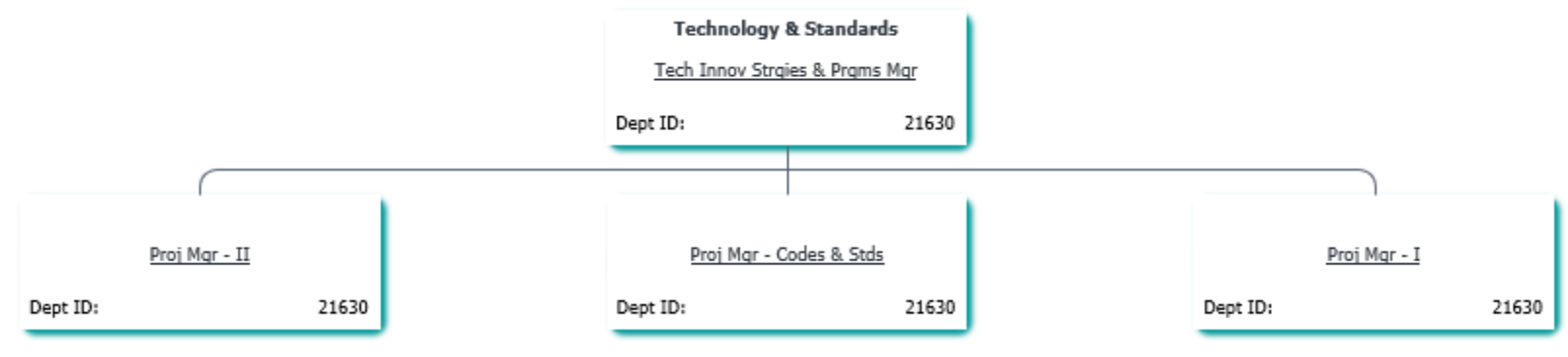












## CEDARS FILING SUBMISSION RECEIPT

The SDGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: San Diego Gas & Electric (SDGE)

Budget Filing Year: 2024

Submitted: 00:59:34 on 04 Mar 2022

By: Greg Green

Advice Letter Number: A.22-03-XXX

### \* Portfolio Budget Filing Summary \*

- TRC: 1.32
- PAC: 4.23
- TRC (no admin): 1.69
- PAC (no admin): 13.82
- RIM: 1.85
- Budget: \$79,664,685.43
- TotalSystemBenefit: \$332,876,872.68
- ElecBen: \$228,342,197.37
- GasBen: \$102,973,262.68
- OtherBen: \$1,720,823.16
- TRCCost: \$252,108,424.29
- PACCost: \$78,646,308.95

### \* Programs Included in the Budget Filing \*

- SDGE3251: SW C&S; - Compliance Enhancement
- SDGE3252: SW C&S; - Reach Codes
- SDGE3253: SW C&S; - Planning Coordination
- SDGE3262: SW-FIN-On-Bill Finance
- SDGE3280: 3P-IDEEA
- SDGE3281: EM&V-Evaluation; Measurement & Verification
- SDGE4001: Single Family Program
- SDGE4002: Multi Family Program
- SDGE4004: Commercial Large Customer Services (>20KW) Program
- SDGE4006: Industrial Sector Program

- SDGE4007: Industrial Port Tenant Customers Services Programs
- SDGE4009: Agricultural Growers Services Program
- SDGE4010: Local Government Customers Program
- SDGE4011: K-12 Customer Services Program
- SDGE4012: Federal Customer Services Program
- SDGE4040: IDSM Local Residential Behavioral Program (EE)
- SDGE4052: IDSM Commercial ME&O; - DR
- SDGE4056: IDSM Commercial - DR
- SDGE4057: IDSM Behavioral - DR
- SDGE4058: IDSM Non Res Audits - DR
- SDGE4173: Small Business Outreach
- SDGE4174: Workforce, Education & Training Programs
- SDGE4176: Residential Single Family Equity Program
- SDGE4177: Residential Multi Family Equity Program
- SDGE4184: Non-Residential Behavioral Program
- SDGE-ESAP: Energy Savings Assistance Program (ESA)
- SDGE-ESPI: ESPI
- SDGE-GRCL: GRC Labor Loaders
- SDGE\_SW\_CSA\_Appl: SW Codes & Standards Advocacy - State Appliance Standards
- SDGE\_SW\_CSA\_Appl\_PA: SW Codes & Standards Advocacy - State Appliance Standards (Utility)
- SDGE\_SW\_CSA\_Bldg: SW Codes & Standards Advocacy - State Building Codes
- SDGE\_SW\_CSA\_Bldg\_PA: SW Codes & Standards Advocacy - State Building Codes (Utility)
- SDGE\_SW\_CSA\_Natl: SW Codes & Standards Advocacy - National Codes & Standards Advocacy
- SDGE\_SW\_CSA\_Natl\_PA: SW Codes & Standards Advocacy - National Codes & Standards Advocacy (Utility)
- SDGE\_SW\_ETP\_Elec: SW Emerging Technologies - Electric
- SDGE\_SW\_ETP\_Elec\_PA: SW Emerging Technologies - Electric (Utility)
- SDGE\_SW\_ETP\_Gas: SW Emerging Technologies - Gas
- SDGE\_SW\_ETP\_Gas\_PA: SW Emerging Technologies - Gas (Utility)
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- SDGE\_SW\_FS\_PA: SW Foodservice Point of Sale Program (Utility)
- SDGE\_SW\_HVAC\_QIQM: SW HVAC QI/QM Program
- SDGE\_SW\_HVAC\_QIQM\_PA: SW HVAC QI/QM Program (Utility)
- SDGE\_SW\_HVAC\_Up\_Com: SW HVAC Upstream Commercial
- SDGE\_SW\_HVAC\_Up\_Com\_PA: SW HVAC Upstream Commercial (Utility)
- SDGE\_SW\_HVAC\_Up\_Res: SW HVAC Upstream Residential
- SDGE\_SW\_HVAC\_Up\_Res\_PA: SW HVAC Upstream Residential (Utility)
- SDGE\_SW\_IP\_Colleges: SW Higher Education
- SDGE\_SW\_IP\_Colleges\_PA: SW Higher Education (Utility)
- SDGE\_SW\_IP\_Gov: SW Institutional Partnerships: DGS & DoC
- SDGE\_SW\_IP\_Gov\_PA: SW Institutional Partnerships: DGS & DoC (Utility)
- SDGE\_SW\_MCWH: SW Midstream Commercial Water Heating
- SDGE\_SW\_MCWH\_PA: SW Midstream Commercial Water Heating (Utility)

- SDGE\_SW\_NC\_NonRes\_Ag\_electric: SW New Construction Non Residential - Agricultural - All Electric
- SDGE\_SW\_NC\_NonRes\_Ag\_electric\_PA: SW New Construction Non Residential - Agricultural - All Electric (Utility)
- SDGE\_SW\_NC\_NonRes\_Ag\_mixed: SW New Construction Non Residential - Agricultural - Mixed Fuel
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- SDGE\_SW\_NC\_Res\_electric\_PA: SW New Construction Residential - All Electric (Utility)
- SDGE\_SW\_NC\_Res\_mixed: SW New Construction Residential - Mixed Fuel
- SDGE\_SW\_NC\_Res\_mixed\_PA: SW New Construction Residential - Mixed Fuel (Utility)
- SDGE\_SW\_PLA: SW Plug Load and Appliances
- SDGE\_SW\_PLA\_PA: SW Plug Load and Appliances (Utility)
- SDGE\_SW\_UL: SW Lighting Program
- SDGE\_SW\_UL\_PA: SW Lighting Program (Utility)
- SDGE\_SW\_WET\_CC: SW WET Career Connections
- SDGE\_SW\_WET\_CC\_PA: SW WET Career Connections (Utility)
- SDGE\_SW\_WET\_Work: SW WE&T; Career & Workforce Readiness (CWR)
- SDGE\_SW\_WET\_Work\_PA: SW WE&T; Career & Workforce Readiness (CWR) (Utility)
- SDGE\_SW\_WP: SW Downstream Water/Wastewater Pumping Program
- SDGE\_SW\_WP\_PA: SW Downstream Water/Wastewater Pumping Program (Utility)

## CEDARS FILING SUBMISSION RECEIPT

The SDGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: San Diego Gas & Electric (SDGE)

Budget Filing Year: 2025

Submitted: 01:02:22 on 04 Mar 2022

By: Greg Green

Advice Letter Number: A.22-03-XXX

### \* Portfolio Budget Filing Summary \*

- TRC: 1.28
- PAC: 3.96
- TRC (no admin): 1.66
- PAC (no admin): 13.14
- RIM: 1.65
- Budget: \$83,915,516.19
- TotalSystemBenefit: \$327,163,978.91
- ElecBen: \$212,379,759.75
- GasBen: \$112,947,776.37
- OtherBen: \$1,989,668.26
- TRCCost: \$254,805,063.32
- PACCost: \$82,757,334.61

### \* Programs Included in the Budget Filing \*

- SDGE3251: SW C&S; - Compliance Enhancement
- SDGE3252: SW C&S; - Reach Codes
- SDGE3253: SW C&S; - Planning Coordination
- SDGE3262: SW-FIN-On-Bill Finance
- SDGE3280: 3P-IDEEA
- SDGE3281: EM&V-Evaluation; Measurement & Verification
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- SDGE4002: Multi Family Program
- SDGE4006: Industrial Sector Program
- SDGE4007: Industrial Port Tenant Customers Services Programs

- SDGE4009: Agricultural Growers Services Program
- SDGE4010: Local Government Customers Program
- SDGE4011: K-12 Customer Services Program
- SDGE4012: Federal Customer Services Program
- SDGE4040: IDSM Local Residential Behavioral Program (EE)
- SDGE4052: IDSM Commercial ME&O; - DR
- SDGE4056: IDSM Commercial - DR
- SDGE4057: IDSM Behavioral - DR
- SDGE4058: IDSM Non Res Audits - DR
- SDGE4168: Lodging (Hotels/Motels)
- SDGE4169: Groceries, Restaurants and Food Storage
- SDGE4170: Wholesale/Retail/Office, including Entertainment Services
- SDGE4171: Private Institutions/Healthcare
- SDGE4172: Property Management
- SDGE4173: Small Business Outreach
- SDGE4174: Workforce, Education & Training Programs
- SDGE4175: Local Residential Fuel-Substitution
- SDGE4176: Residential Single Family Equity Program
- SDGE4177: Residential Multi Family Equity Program
- SDGE4184: Non-Residential Behavioral Program
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## CEDARS FILING SUBMISSION RECEIPT

The SDGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: San Diego Gas & Electric (SDGE)

Budget Filing Year: 2026

Submitted: 01:05:59 on 04 Mar 2022

By: Greg Green

Advice Letter Number: A.22-03-XXX

### \* Portfolio Budget Filing Summary \*

- TRC: 1.28
- PAC: 3.87
- TRC (no admin): 1.67
- PAC (no admin): 13.58
- RIM: 1.63
- Budget: \$82,638,259.21
- TotalSystemBenefit: \$315,558,573.94
- ElecBen: \$207,178,740.50
- GasBen: \$106,423,639.97
- OtherBen: \$2,043,193.49
- TRCCost: \$247,112,836.77
- PACCost: \$81,572,039.21

### \* Programs Included in the Budget Filing \*

- SDGE3251: SW C&S; - Compliance Enhancement
- SDGE3252: SW C&S; - Reach Codes
- SDGE3253: SW C&S; - Planning Coordination
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- SDGE\_SW\_CSA\_Bldg\_PA: SW Codes & Standards Advocacy - State Building Codes (Utility)
- SDGE\_SW\_CSA\_Natl: SW Codes & Standards Advocacy - National Codes & Standards Advocacy
- SDGE\_SW\_CSA\_Natl\_PA: SW Codes & Standards Advocacy - National Codes & Standards Advocacy (Utility)
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- SDGE\_SW\_NC\_Res\_electric\_PA: SW New Construction Residential - All Electric (Utility)
- SDGE\_SW\_NC\_Res\_mixed: SW New Construction Residential - Mixed Fuel
- SDGE\_SW\_NC\_Res\_mixed\_PA: SW New Construction Residential - Mixed Fuel (Utility)
- SDGE\_SW\_PLA: SW Plug Load and Appliances
- SDGE\_SW\_PLA\_PA: SW Plug Load and Appliances (Utility)
- SDGE\_SW\_WET\_CC: SW WET Career Connections
- SDGE\_SW\_WET\_CC\_PA: SW WET Career Connections (Utility)
- SDGE\_SW\_WET\_Work: SW WE&T; Career & Workforce Readiness (CWR)
- SDGE\_SW\_WET\_Work\_PA: SW WE&T; Career & Workforce Readiness (CWR) (Utility)

- SDGE\_SW\_WP: SW Downstream Water/Wastewater Pumping Program
- SDGE\_SW\_WP\_PA: SW Downstream Water/Wastewater Pumping Program (Utility)

## CEDARS FILING SUBMISSION RECEIPT

The SDGE portfolio budget filing has been submitted and is now under review. A summary of the budget filing is provided below.

PA: San Diego Gas & Electric (SDGE)

Budget Filing Year: 2027

Submitted: 01:09:36 on 04 Mar 2022

By: Greg Green

Advice Letter Number: A.22-03-XXX

### \* Portfolio Budget Filing Summary \*

- TRC: 1.27
- PAC: 3.68
- TRC (no admin): 1.69
- PAC (no admin): 12.88
- RIM: 1.56
- Budget: \$85,940,882.55
- TotalSystemBenefit: \$312,128,656.32
- ElecBen: \$206,219,603.98
- GasBen: \$103,773,977.61
- OtherBen: \$2,206,854.59
- TRCCost: \$245,472,460.67
- PACCost: \$84,832,392.14

### \* Programs Included in the Budget Filing \*

- SDGE3251: SW C&S; - Compliance Enhancement
- SDGE3252: SW C&S; - Reach Codes
- SDGE3253: SW C&S; - Planning Coordination
- SDGE3262: SW-FIN-On-Bill Finance
- SDGE3280: 3P-IDEEA
- SDGE3281: EM&V-Evaluation; Measurement & Verification
- SDGE4001: Single Family Program
- SDGE4002: Multi Family Program
- SDGE4006: Industrial Sector Program
- SDGE4007: Industrial Port Tenant Customers Services Programs

- SDGE4009: Agricultural Growers Services Program
- SDGE4010: Local Government Customers Program
- SDGE4011: K-12 Customer Services Program
- SDGE4012: Federal Customer Services Program
- SDGE4040: IDSM Local Residential Behavioral Program (EE)
- SDGE4052: IDSM Commercial ME&O; - DR
- SDGE4056: IDSM Commercial - DR
- SDGE4057: IDSM Behavioral - DR
- SDGE4058: IDSM Non Res Audits - DR
- SDGE4168: Lodging (Hotels/Motels)
- SDGE4169: Groceries, Restaurants and Food Storage
- SDGE4170: Wholesale/Retail/Office, including Entertainment Services
- SDGE4171: Private Institutions/Healthcare
- SDGE4172: Property Management
- SDGE4173: Small Business Outreach
- SDGE4174: Workforce, Education & Training Programs
- SDGE4175: Local Residential Fuel-Substitution
- SDGE4176: Residential Single Family Equity Program
- SDGE4177: Residential Multi Family Equity Program
- SDGE4184: Non-Residential Behavioral Program
- SDGE-ESAP: Energy Savings Assistance Program (ESA)
- SDGE-ESPI: ESPI
- SDGE-GRCL: GRC Labor Loaders
- SDGE\_SW\_CSA\_Appl: SW Codes & Standards Advocacy - State Appliance Standards
- SDGE\_SW\_CSA\_Appl\_PA: SW Codes & Standards Advocacy - State Appliance Standards (Utility)
- SDGE\_SW\_CSA\_Bldg: SW Codes & Standards Advocacy - State Building Codes
- SDGE\_SW\_CSA\_Bldg\_PA: SW Codes & Standards Advocacy - State Building Codes (Utility)
- SDGE\_SW\_CSA\_Natl: SW Codes & Standards Advocacy - National Codes & Standards Advocacy
- SDGE\_SW\_CSA\_Natl\_PA: SW Codes & Standards Advocacy - National Codes & Standards Advocacy (Utility)
- SDGE\_SW\_ETP\_Elec: SW Emerging Technologies - Electric
- SDGE\_SW\_ETP\_Elec\_PA: SW Emerging Technologies - Electric (Utility)
- SDGE\_SW\_ETP\_Gas: SW Emerging Technologies - Gas
- SDGE\_SW\_ETP\_Gas\_PA: SW Emerging Technologies - Gas (Utility)
- SDGE\_SW\_FS: SW Foodservice Point of Sale Program
- SDGE\_SW\_FS\_PA: SW Foodservice Point of Sale Program (Utility)
- SDGE\_SW\_HVAC\_QIQM: SW HVAC QI/QM Program
- SDGE\_SW\_HVAC\_QIQM\_PA: SW HVAC QI/QM Program (Utility)
- SDGE\_SW\_HVAC\_Up\_Com: SW HVAC Upstream Commercial
- SDGE\_SW\_HVAC\_Up\_Com\_PA: SW HVAC Upstream Commercial (Utility)
- SDGE\_SW\_HVAC\_Up\_Res: SW HVAC Upstream Residential
- SDGE\_SW\_HVAC\_Up\_Res\_PA: SW HVAC Upstream Residential (Utility)
- SDGE\_SW\_IP\_Colleges: SW Higher Education

- SDGE\_SW\_IP\_Colleges\_PA: SW Higher Education (Utility)
- SDGE\_SW\_IP\_Gov: SW Institutional Partnerships: DGS & DoC
- SDGE\_SW\_IP\_Gov\_PA: SW Institutional Partnerships: DGS & DoC (Utility)
- SDGE\_SW\_MCWH: SW Midstream Commercial Water Heating
- SDGE\_SW\_MCWH\_PA: SW Midstream Commercial Water Heating (Utility)
- SDGE\_SW\_NC\_NonRes\_Ag\_electric: SW New Construction Non Residential - Agricultural - All Electric
- SDGE\_SW\_NC\_NonRes\_Ag\_electric\_PA: SW New Construction Non Residential - Agricultural - All Electric (Utility)
- SDGE\_SW\_NC\_NonRes\_Ag\_mixed: SW New Construction Non Residential - Agricultural - Mixed Fuel
- SDGE\_SW\_NC\_NonRes\_Ag\_mixed\_PA: SW New Construction Non Residential - Agricultural - Mixed Fuel (Utility)
- SDGE\_SW\_NC\_NonRes\_Com\_electric: SW New Construction Non Residential - Commercial - All Electric
- SDGE\_SW\_NC\_NonRes\_Com\_electric\_PA: SW New Construction Non Residential - Commercial - All Electric (Utility)
- SDGE\_SW\_NC\_NonRes\_Com\_mixed: SW New Construction Non Residential - Commercial - Mixed Fuel
- SDGE\_SW\_NC\_NonRes\_Com\_mixed\_PA: SW New Construction Non Residential - Commercial - Mixed Fuel (Utility)
- SDGE\_SW\_NC\_NonRes\_Ind\_electric: SW New Construction Non Residential - Industrial - All Electric
- SDGE\_SW\_NC\_NonRes\_Ind\_electric\_PA: SW New Construction Non Residential - Industrial - All Electric (Utility)
- SDGE\_SW\_NC\_NonRes\_Ind\_mixed: SW New Construction Non Residential - Industrial - Mixed Fuel
- SDGE\_SW\_NC\_NonRes\_Ind\_mixed\_PA: SW New Construction Non Residential - Industrial - Mixed Fuel (Utility)
- SDGE\_SW\_NC\_NonRes\_Pub\_electric: SW New Construction Non Residential - Public - All Electric
- SDGE\_SW\_NC\_NonRes\_Pub\_electric\_PA: SW New Construction Non Residential - Public - All Electric (Utility)
- SDGE\_SW\_NC\_NonRes\_Pub\_mixed: SW New Construction Non Residential - Public - Mixed Fuel
- SDGE\_SW\_NC\_NonRes\_Pub\_mixed\_PA: SW New Construction Non Residential - Public - Mixed Fuel (Utility)
- SDGE\_SW\_NC\_NonRes\_Res\_electric: SW New Construction NonResidential - Residential - All Electric
- SDGE\_SW\_NC\_NonRes\_Res\_electric\_PA: SW New Construction NonResidential - Residential - All Electric (Utility)
- SDGE\_SW\_NC\_NonRes\_Res\_mixed: SW New Construction NonResidential - Residential - Mixed Fuel
- SDGE\_SW\_NC\_NonRes\_Res\_mixed\_PA: SW New Construction NonResidential - Residential - Mixed Fuel (Utility)
- SDGE\_SW\_NC\_Res\_electric: SW New Construction Residential - All Electric
- SDGE\_SW\_NC\_Res\_electric\_PA: SW New Construction Residential - All Electric (Utility)
- SDGE\_SW\_NC\_Res\_mixed: SW New Construction Residential - Mixed Fuel
- SDGE\_SW\_NC\_Res\_mixed\_PA: SW New Construction Residential - Mixed Fuel (Utility)
- SDGE\_SW\_PLA: SW Plug Load and Appliances
- SDGE\_SW\_PLA\_PA: SW Plug Load and Appliances (Utility)
- SDGE\_SW\_WET\_CC: SW WET Career Connections
- SDGE\_SW\_WET\_CC\_PA: SW WET Career Connections (Utility)
- SDGE\_SW\_WET\_Work: SW WE&T; Career & Workforce Readiness (CWR)
- SDGE\_SW\_WET\_Work\_PA: SW WE&T; Career & Workforce Readiness (CWR) (Utility)

- SDGE\_SW\_WP: SW Downstream Water/Wastewater Pumping Program
- SDGE\_SW\_WP\_PA: SW Downstream Water/Wastewater Pumping Program (Utility)



**ATTACHMENT C**

**REDLINED PRELIMINARY STATEMENT STATEWIDE ENERGY EFFICIENCY  
BALANCING ACCOUNT**



## PRELIMINARY STATEMENT

Sheet 1

### II. BALANCING ACCOUNTS STATEWIDE ENERGY EFFICIENCY BALANCING ACCOUNT (SWEEBA)

#### 1. Purpose

The purpose of the SWEEBA is to record the difference between program funding and associated program expenses for statewide energy efficiency programs for which SDG&E is the Lead Program Administrator (PA). SDG&E's contribution to these statewide programs will be funded through transfers of the authorized revenue requirement from its existing Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA). ~~The SWEEBA will record expenses that will be incurred by SDG&E for the administration of these statewide programs as the Lead PA.~~ The SWEEBA will also record the contribution of each participating PA to be provided on monthly payment basis towards the annual approved statewide budget for each statewide program that SDG&E is the Lead PA.

~~The SWEEBA will have sub-accounts corresponding to the programs for which SDG&E is the Lead PA.~~

#### 2. Applicability

The SWEEBA shall apply to all customer classes, except for any classes that may be specifically excluded by the Commission.

#### 3. Rates

The SWEEBA has no impact on the Public Purposed Program surcharge rates.

#### 4. Accounting Procedure

The utility shall maintain the SWEEBA by making the following entries to each sub-account:

- a. Credit entries for funding from the other PAs for programs that SDG&E will be administering on their behalf.
- b. Credit entries to reflect the transfer from the PEEEBAs representing SDG&E's contribution to these statewide programs.
- ~~c. Debit entries to record expenses incurred by SDG&E for the administration of these statewide programs.~~
- d. Debit entries to record statewide energy efficiency program expenses.
- e. Debit entries to record annual true-up of the other PAs, including related interest.
- f. Debit or credit entries representing SDG&E's share of the annual true-up transferred back to the PEEEBAs, including related interest.
- g. Interest shall be calculated on the average of the balance at the beginning of the month and the balance after the above entries at a rate equal to one-twelfth of the interest rate on three-month nonfinancial Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15. or its successor.

(Continued)

1C14

Advice Ltr. No. 3266-E

Decision No. 18-05-041

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

Submitted Sep 4, 2018

Effective Oct 4, 2018

Resolution No.



San Diego Gas & Electric Company  
San Diego, California

Original Cal. P.U.C. Sheet No. 30895-E  
Canceling Cal. P.U.C. Sheet No.

## PRELIMINARY STATEMENT

Sheet 2

### II. BALANCING ACCOUNTS

#### STATEWIDE ENERGY EFFICIENCY BALANCING ACCOUNT (SWEEBA)

5. Disposition

At the end of each program year, SDG&E will do an annual true-up of each participating PA share, including interest. The annual true-up report will be submitted together with the EE annual report by May 1 of the following calendar year.

SDG&E's share of the program true-up will be transferred to its PEEEEBA.

The final disposition of the SWEEBA will be addressed through a Tier 2 advice letter or appropriate Energy Efficiency proceeding.

N  
|  
N

2C6

Advice Ltr. No. 3266-E

Decision No. 18-05-041

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

Submitted Sep 4, 2018  
Effective Oct 4, 2018  
Resolution No.

**ATTACHMENT D**

**REDLINED PRELIMINARY STATEMENT STATEWIDE ENERGY EFFICIENCY GAS  
BALANCING ACCOUNT**



## PRELIMINARY STATEMENT

Sheet 1

### IV. BALANCING ACCOUNTS

#### STATEWIDE ENERGY EFFICIENCY GAS BALANCING ACCOUNT (SWEEGA)

1. Purpose

The purpose of the SWEEGBA is to record the difference between program funding and associated program expenses for statewide energy efficiency programs for which SDG&E is the Lead Program Administrator (PA). SDG&E's contribution to these statewide programs will be funded through transfers of the authorized revenue requirement from its existing Post-2005 Gas Energy Efficiency Balancing Account (PGEEBA). ~~The SWEEGBA will record expenses that will be incurred by SDG&E for the administration of these statewide programs as the Lead PA.~~ The SWEEBA will also record the contribution of each participating PA to be provided on monthly payment basis towards the annual approved statewide budget for each statewide program that SDG&E is the Lead PA.

~~The SWEEGBA will have sub-accounts corresponding to the programs for which SDG&E is the Lead PA.~~

2. Applicability

The SWEEGBA shall apply to all customer classes, except for any classes that may be specifically excluded by the Commission.

3. Rates

The SWEEBA has no impact on the Public Purposed Program surcharge rates.

4. Accounting Procedure

The utility shall maintain the SWEEGBA by making the following entries to each sub-account:

- a. Credit entries for funding from the other PAs for programs that SDG&E will be administering on their behalf.
- b. Credit entries to reflect the transfer from the PGEEBA representing SDG&E's contribution to these statewide programs.
- c. ~~Debit entries to record expenses incurred by SDG&E for the administration of these statewide programs.~~
- d. Debit entries to record statewide energy efficiency program expenses.
- e. Debit or credit entries to record annual true-up of the other PAs, including related interest.
- f. Debit or credit entries representing SDG&E's share of the annual true-up transferred to the PGEEBA, including related interest.
- g. Interest shall be calculated on the average of the balance at the beginning of the month and the balance after the above entries at a rate equal to one-twelfth of the interest rate on three-month non-financial Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15. or its successor.

(Continued)



San Diego Gas & Electric Company  
San Diego, California

Original

Cal. P.U.C. Sheet No.

23417-G

Canceling

Cal. P.U.C. Sheet No.

## PRELIMINARY STATEMENT

Sheet 2

### IV. BALANCING ACCOUNTS

#### STATEWIDE ENERGY EFFICIENCY GAS BALANCING ACCOUNT (SWEEGA)

5. Disposition

At the end of each program year, SDG&E will do an annual true-up of each participating PA share, including interest. The annual true-up report will be submitted together with the EE annual report by May 1 of the following calendar year.

SDG&E's share of the program true-up will be transferred to its PGEEBA.

The final disposition of the SWEEGBA will be addressed through a Tier 2 advice letter or appropriate Energy Efficiency proceeding.

N  
|  
N

2C6

Advice Ltr. No. 2699-G

Decision No. 18-05-041

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

Submitted Sep 4, 2018

Effective Oct 4, 2018

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

## **APPENDIX A**

### **BALANCE SHEET, INCOME STATEMENT AND FINANCIAL STATEMENT**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**SEP 2021**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$	4,541,329,686
401	OPERATING EXPENSES	2,636,546,245		
402	MAINTENANCE EXPENSES	197,780,551		
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	644,821,578		
408.1	TAXES OTHER THAN INCOME TAXES	157,983,247		
409.1	INCOME TAXES	37,697,823		
410.1	PROVISION FOR DEFERRED INCOME TAXES	218,153,398		
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(90,333,766)		
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(349,111)		
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-		
	TOTAL OPERATING REVENUE DEDUCTIONS			<u>3,802,299,965</u>
	NET OPERATING INCOME			739,029,721

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-		
417	REVENUES OF NONUTILITY OPERATIONS	-		
417.1	EXPENSES OF NONUTILITY OPERATIONS	(7,597,419)		
418	NONOPERATING RENTAL INCOME	27,818		
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-		
419	INTEREST AND DIVIDEND INCOME	5,840,618		
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	62,813,700		
421	MISCELLANEOUS NONOPERATING INCOME	189,789		
421.1	GAIN ON DISPOSITION OF PROPERTY	2,015,252		
	TOTAL OTHER INCOME	<u>63,289,758</u>		
421.2	LOSS ON DISPOSITION OF PROPERTY	-		
425	MISCELLANEOUS AMORTIZATION	187,536		
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	25,962,785		
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 26,150,321</u>		
408.2	TAXES OTHER THAN INCOME TAXES	599,208		
409.2	INCOME TAXES	(2,402,854)		
410.2	PROVISION FOR DEFERRED INCOME TAXES	47,724,696		
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(42,253,172)		
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 3,667,878</u>		
	TOTAL OTHER INCOME AND DEDUCTIONS		\$	<u>33,471,559</u>
	INCOME BEFORE INTEREST CHARGES			772,501,280
	EXTRAORDINARY ITEMS AFTER TAXES			-
	NET INTEREST CHARGES*			<u>169,948,615</u>
	NET INCOME		\$	<u><u>602,552,665</u></u>

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$18,763,475)



**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**SEP 2021**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 6,079,146,682
NET INCOME (FROM PRECEDING PAGE)	602,552,665
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 6,681,699,347</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**SEP 2021**

**5. PROPRIETARY CAPITAL**

		2021
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	802,165,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	6,681,699,347
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>(9,329,502)</u>
	 TOTAL PROPRIETARY CAPITAL	 <u>\$ 8,332,670,946</u>

**6. LONG-TERM DEBT**

221	BONDS	\$ 6,417,859,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>(17,144,731)</u>
	 TOTAL LONG-TERM DEBT	 <u>\$ 6,400,714,269</u>

**7. OTHER NONCURRENT LIABILITIES**

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,308,169,764
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	26,724,300
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	67,215,598
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	14,375,694
230	ASSET RETIREMENT OBLIGATIONS	<u>873,398,302</u>
	 TOTAL OTHER NONCURRENT LIABILITIES	 <u>\$ 2,289,883,658</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**SEP 2021**

**8. CURRENT AND ACCRUED LIABILITIES**

	2021
231 NOTES PAYABLE	\$ 375,000,000
232 ACCOUNTS PAYABLE	661,866,975
233 NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234 ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	60,483,526
235 CUSTOMER DEPOSITS	42,938,542
236 TAXES ACCRUED	62,361,327
237 INTEREST ACCRUED	73,550,844
238 DIVIDENDS DECLARED	-
241 TAX COLLECTIONS PAYABLE	9,311,419
242 MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	289,927,697
243 OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	50,654,134
244 DERIVATIVE INSTRUMENT LIABILITIES	34,891,718
244 LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(14,375,694)
245 DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	<hr/>
TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 1,646,610,488

**9. DEFERRED CREDITS**

252 CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 120,477,963
253 OTHER DEFERRED CREDITS	455,598,366
254 OTHER REGULATORY LIABILITIES	2,230,131,650
255 ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	13,028,758
257 UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281 ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282 ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	1,901,002,349
283 ACCUMULATED DEFERRED INCOME TAXES - OTHER	389,807,172
	<hr/>
TOTAL DEFERRED CREDITS	5,110,046,258
	<hr/>
TOTAL LIABILITIES AND OTHER CREDITS	\$ 23,779,925,619

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**SEP 2021**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$	4,541,329,686
401	OPERATING EXPENSES	2,636,546,245		
402	MAINTENANCE EXPENSES	197,780,551		
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	644,821,578		
408.1	TAXES OTHER THAN INCOME TAXES	157,983,247		
409.1	INCOME TAXES	37,697,823		
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411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(90,333,766)		
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(349,111)		
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-		
	TOTAL OPERATING REVENUE DEDUCTIONS			<u>3,802,299,965</u>
	NET OPERATING INCOME			739,029,721

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-		
417	REVENUES OF NONUTILITY OPERATIONS	-		
417.1	EXPENSES OF NONUTILITY OPERATIONS	(7,597,419)		
418	NONOPERATING RENTAL INCOME	27,818		
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-		
419	INTEREST AND DIVIDEND INCOME	5,840,618		
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	62,813,700		
421	MISCELLANEOUS NONOPERATING INCOME	189,789		
421.1	GAIN ON DISPOSITION OF PROPERTY	2,015,252		
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426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	25,962,785		
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 26,150,321</u>		
408.2	TAXES OTHER THAN INCOME TAXES	599,208		
409.2	INCOME TAXES	(2,402,854)		
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411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(42,253,172)		
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 3,667,878</u>		
	TOTAL OTHER INCOME AND DEDUCTIONS		\$	<u>33,471,559</u>
	INCOME BEFORE INTEREST CHARGES			772,501,280
	EXTRAORDINARY ITEMS AFTER TAXES			-
	NET INTEREST CHARGES*			<u>169,948,615</u>
	NET INCOME		\$	<u><u>602,552,665</u></u>

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$18,763,475)

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**SEP 2021**

---

**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 6,079,146,682
NET INCOME (FROM PRECEDING PAGE)	602,552,665
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 6,681,699,347</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
September 30, 2021

<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 Decision Nos. 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, 15-08-011, 18-02-012, and 20-04-015 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 as of Q4' 2020
5.875% Series VV, due 2034	06-17-04	43,615,000	0	2,683,106
5.875% Series WW, due 2034	06-17-04	40,000,000	0	2,460,718
5.875% Series XX, due 2034	06-17-04	35,000,000	0	2,153,128
5.875% Series YY, due 2034	06-17-04	24,000,000	0	1,476,431
5.875% Series ZZ, due 2034	06-17-04	33,650,000	0	2,070,079
4.00% Series AAA, due 2039	06-17-04	75,000,000	0	3,891,667
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
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	0	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
1.9140% Series PPP, due 2022	03-12-15	250,000,000	9,794,167	1,538,062
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	12,500,000
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	15,000,000
4.15% Series SSS, due 2048	05-17-18	400,000,000	400,000,000	16,600,000
4.10% Series TTT, due 2049	05-31-19	400,000,000	400,000,000	16,400,000
3.32% Series UUU, due 2050	04-07-20	400,000,000	400,000,000	6,935,111
1.70% Series VVV, due 2030	09-22-20	800,000,000	800,000,000	-
2.95% Series WWW, due 2051	08-13-21	750,000,000	750,000,000	-
<b>Total First Mortgage Bonds:</b>			<b>6,409,794,167</b>	<b>228,595,802</b>
<b>Total Bonds:</b>				<b>228,595,802</b>

Line Of Credit Drawdown	03-16-20	0	0	1,056,694
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<b>TOTAL LONG-TERM DEBT</b>			<b>6,409,794,167</b>	
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1. Bond series PPP reduced by SONGS regulatory asset per 2014 SONGS settlement agreement.

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

September 30, 2021

Other Indebtedness	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2020
Commercial Paper & ST Bank Loans	Various	Various	Various	375,000,000	\$2,586,282

Amounts and Rates of Dividends Declared:

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

Preferred Stock	Shares Outstanding	2016	2017	2018	2019	2020
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
<b>Total</b>	-	-	-	-	-	-

Common Stock	2016	2017	2018	2019	2020
Dividend to Parent [1]	175,000,000	450,000,000	250,000,000	-	200,000,000

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

**APPENDIX B**  
**STATEMENT OF EFFECTIVE RATES**





San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35953-E  
Canceling Revised Cal. P.U.C. Sheet No. 35910-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
<b>TITLE PAGE</b> .....	16015-E
<b>TABLE OF CONTENTS</b> .....	35953, 35689, 35486, 35664, 34809, 35058-E 34811, 35954, 35022, 35665, 33383, 31804-E 31805, 31174, 35483, 31176, 31177-E
<b>PRELIMINARY STATEMENT:</b>	
<b>I. General Information</b> .....	8274, 30670, 34739-E
<b>II. Balancing Accounts</b>	
Description/Listing of Accounts	19402, 32302, 35010-E
California Alternate Rates for Energy (CARE) Balancing Acct	26553, 26554-E
Rewards and Penalties Balancing Account (RPBA).....	21929, 23295-E
Transition Cost Balancing Account (TCBA).....	31213, 31214, 31215, 31216, 31631, 31632-E
Post-1997 Electric Energy Efficiency Balancing Acct (PEEEBA)	22059, 30893-E
Tree Trimming Balancing Account (TTBA).....	27944, 19422-E
Baseline Balancing Account (BBA).....	35268, 35269-E
Energy Resource Recovery Account (ERRA).....	26358, 26359, 26360, 26361, 31631, 31632-E
Low-Income Energy Efficiency Balancing Acct (LIEEBA).....	19431, 19432-E
Non-Fuel Generation Balancing Account (NGBA).....	31217, 31218, 31219, 25575-E
Electric Procurement Energy Efficiency Balancing Account (EPEEBA)	30675-E
Common Area Balancing Account (CABA).....	28770-E
Nuclear Decommissioning Adjustment Mechanism (NDAM)...	30676-E
Pension Balancing Account (PBA).....	29835, 27949-E
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA)	29836, 27951-E
Community Choice Aggregation Implementation Balancing Account (CCAIBA).....	19445-E
Electric Distribution Fixed Cost Account (EDFCA).....	31453, 22813, 21116-E
Rate Design Settlement Component Account (RDSCA)	26555-E
California Solar Initiative Balancing Account (CSIBA)....	30647, 30648, 30649-E
SONGS O&M Balancing Account (SONGSBA).....	30998, 30999-E
On-Bill Financing Balancing Account (OBFBA).....	30677-E
Solar Energy Project Balancing Account (SEPBA)....	22078-E
Electric Program Investment Charge Balancing Acct (EPICBA)	35693, 30103, 27692-E
Tax Equity Investment Balancing Account (TEIBA)	22797-E
California Energy Systems 21 <sup>st</sup> Century Balancing Acct (CES-21BA)	30678-E
Greenhouse Gas Revenue Balancing Account (GHGRBA).	30820-E
Local Generation Balancing Account (LGBA).....	28765-E
New Environmental Regulatory Balancing Account (NERBA).....	27955, 27956-E
Master Meter Balancing Account (MMBA).....	31664, 31665-E
Smart Meter Opt-Out Balancing Account (SMOBA).....	26898, 26899-E

(Continued)

1C5

Advice Ltr. No. 3946-E

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35700-E  
Canceling Revised Cal. P.U.C. Sheet No. 35689-E

## TABLE OF CONTENTS

Sheet 2

### II. Balancing Accounts (Continued)

Low Carbon Fuel Standard Balancing Account (LCFSBA).....	26173-E
Green Tariff Shared Renewables Balancing Account (GTSRBA).....	28264, 28265-E
Cost of Financing Balancing Account (CFBA).....	26180-E
Family Electric Rate Assistance Balancing Account (FERABA).....	26631-E
Vehicle Grid Integration Balancing Account (VGIBA).....	30679-E
Demand Response Generation Balancing Account (DRGMA).....	28123-E
Incentive Pilot Contract Payment Balancing Account (IPCPBA).....	28919-E
Incentive Pilot Incentive Balancing Account (IPIBA).....	28920-E
Distribution Resources Plan Demonstration Balancing Acct (DRPDDBA)	28885-E
Food Bank Balancing Account (FBBA).....	29282-E
Clean Transportation Priority Balancing Account (CTPBA).....	30731-E
Solar on Multifamily Affordable Housing Balancing Acct (SOMAHBA)..	30099-E
Community Solar Green Tariff Balancing Account (CSGRBA).....	30811-E
Disadvantaged Communities Green Tariff Balancing Acct (DACGTBA)	30812-E
Disadvantaged Communities Single Family Solar Homes Balancing Account (DACSASHBA)	32383-E
Statewide Energy Efficiency Balancing Account (SWEEBA).....	30894, 30895-E
Customer Information System Balancing Account (CISBA).....	31042, 31043-E
Transition, Stabilization and OCM Balancing Account (TSOBA).....	31044-E
Net Energy Metering Measurement and Evaluation BA (NEMMEBA)	31181-E
Portfolio Allocation Balancing Account (PABA).....	32542, 31221, 32543, 31223, 32544-E
Tree Mortality Non-Bypassable Charge Balancing Account (TMNBCBA)	31587, 31588-E
Rule 21 Material Modifications Balancing Account (R21MMBA).....	32233-E
Essential Usage Study Balancing Account (EUSBA)	33636, 33637-E
School Energy Efficiency Stimulus Program Balancing Account (SEESPBA)....	34130, 3131-E
High Power Rate Balancing Account (HPRBA)	34161-E
High Power Interim Rate Waiver Balancing Account (HPWBA)	34163, 34164-E
Flex Alert Balancing Account (FABA)	34673, 34674-E
Power Your Drive 2 Balancing Account (PYD2BA)	34814, 34815-E
Rule 20 Balancing Account (R20BA)	35011, 35012-E
Microgrid Reservation Capacity Component-Standby Charge Suspension Account (MSSA).....	35302, 35303, 35304-E
Wildfire And Natural Disaster Resiliency Rebuild Balancing Account (WDRBA)	35686, 35687-E

### III. Memorandum Accounts

Description/Listing of Accounts.....	19451, 31002, 35697-E
Catastrophic Event Memorandum Account (CEMA).....	19453, 19454, 22814-E
Streamlining Residual Account (SRA).....	30680, 28771-E
Nuclear Claims Memorandum Account (NCMA).....	30681-E
Real-Time Energy Metering Memorandum Account (RTEMMA).....	19472-E
Net Energy Metering Memorandum Account (NEMMA).....	19473-E
Self-Generation Program Memorandum Acct (SGPMA).....	330900, 33091-E
Bond Payment Memorandum Account (BPMA).....	19481-E
Direct Access Cost Responsibility Surcharge Memo Acct (DACRSMA)	19576, 19577, 19578-E
Covid-19 Pandemic Protections Memorandum Account (CPPMA)	34957, 33403-E

(Continued)

2C5	Issued by	Submitted	Dec 28, 2021
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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35701-E  
Canceling Revised Cal. P.U.C. Sheet No. 35486-E

## TABLE OF CONTENTS

Sheet 3

### III. Memorandum Accounts (Continued)

Greenhouse Gas Admin Costs Memo Account (GHGACMA)	30684-E
Advanced Metering & Demand Response Memo Acct (AMDRMA)	34974, 34975, 34976, 34977-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
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
Fire Hazard Prevention Memorandum Account (FHPMA)...	26366, 26367-E
Dynamic Pricing Memorandum Account (DPMA).....	22248-E
El Dorado Transition Cost Memorandum Account (EDTCMA)	22408-E
Energy Savings Assistance Programs Memo Acct (ESAPMA)	28362-E
Greenhouse Gas Customer Outreach and Education Memorandum Account (GHGCOEMA).....	23428-E
Renewable Portfolio Standard Cost Memorandum Acct (RPSCMA)	24939-E
Alternative Fuel Vehicle Memorandum Account (AFVMA).....	28772-E
Net Energy Metering Aggregation Memorandum Acct (NEMAMA)	32648-E
Energy Data Request Memorandum Account (EDRMA).....	25177-E
Residential Disconnect Memorandum Account (RDMA).....	25227-E
SONGS 2&3 Permanent Closure Non-Investment Relates Expense (SPCEMA).....	30685-E
Marine Mitigation Memorandum Account (MMA).....	32091, 32092-E
Deductible Tax Repairs Benefits Memo Account (DTRBMA)....	27753-E
Green Tariff Shared Renewables Administrative Costs Memorandum Account (GTSRACMA).....	27434-E
Green Tariff Marketing, Edu & Outreach Memo Acct (GTME&OMA).	27435-E
Enhanced Community Renewables Marketing, Education & Outreach Memorandum Account (ECRME&OMA).....	27436-E
Direct Participation Demand Response Memo Acct (DPDRMA)	33277, 33278-E
Tax Memorandum Account (TMA).....	28101-E
Officer Compensation Memorandum Account (OCMA).....	27981-E
Rate Reform Memorandum Account (RRMA).....	26407-E
Assembly Bill 802 Memorandum Account (AB802MA).....	27395-E
California Consumer Privacy Act Memorandum Account (CCPAMA)	35484-E
Cost of Capital Memorandum Account (CCMA)	35698-E

N

(Continued)

3C5	Issued by	Submitted	Dec 28, 2021
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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35649-E  
Canceling Revised Cal. P.U.C. Sheet No. 35054-E

## TABLE OF CONTENTS

Sheet 4

### **III. Memorandum Accounts (Continued)**

Customer Information System Memorandum Account (CISMA)....	28971-E
Integration Capacity Analysis and Location Net Benefit Analysis	
Memorandum Account (ICLNBMA).....	30328, 30329-E
Wildfire Consumer Protections Memorandum Account (WCPMA)	30091-E
Medium-Large Commercial And Industrial COVID-19 Disconnection	
Moratorium Memorandum Account (CDMMA)	35050,35051-G
Adaptive Streetlight Implementation Memorandum Acct (ASLIMA)	30268-E
Adaptive Streetlight Maintenance Memorandum Acct (ASLMMA)	30269-E
Integrated Resource Plan Costs Memorandum Acct (IRPCMA)	30284-E
General Rate Case Memorandum Acct 2019 (GRCMA2019)	32404-E
Emergency Customer Protections Memorandum Acct (ECPMA)	30899-E
Disadvantaged Communities Single Family Solar Homes Memorandum	
Account (DACSASHMA).....	30817-E
Power Charge Indifference Adjustment Customer Outreach	
Memorandum Account (PCIACOMA).....	30856-E
Officer Compensation Memorandum Account 2019 (OCMA2019)	31239, 31240-E
Fire Risk Mitigation Memorandum Account (FRMMA)	31449-E
Working Group Facilitator Memorandum Account (WGFMA)	32228-E
Third-Party Claims Memorandum Account (TPCMA)...	32649, 32650-E
COVID-19 Pandemic Protections Memorandum Account (CPPMA)	33369, 33370-E
Climate Adaptation Assessment Vulnerability Memorandum Account	33498-E
Microgrid Memorandum Account (MGMA).....	34193, 34194-E
Voluntary Allocation and Market Offer Memorandum Account (VAMMA)	35646-E

### **IV. Electric Distribution and Gas Performance**

32405, 21378, 20738, 20739, 32406, 30688-E  
29481-E

### **VI. Miscellaneous**

Listing of Accounts	20158-E
Hazardous Substance Cleanup Cost Account (HSCCA)	19503,19504,25384,19506,19507,19508-E 19509,19510,19511,19512,19513-E
Income Tax Component of Contributions and Advances Provision (ITCCAP)	31209, 19501, 19502-E
Competition Transition Charge Responsibility (CTCR)	19514-E
Public Purpose Programs Adjustment Mechanism (PPPAM)	20610, 19516-E
Gain/Loss On Sale Mechanism (EGOS)	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)

4C6

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San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 34708-E

## TABLE OF CONTENTS

Sheet 5

### 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 .....	33092, 33093, 33094, 33095, 33096, 24223-E
DR-TOU	Domestic Time-of-Use Service .....	33097, 33098 33099, 33100, 33101, 33102-E 32662-E
TOU-DR	Residential – Time of Use Service	33103, 33104 33105, 33106, 32891, 30415-E 33107, 33108, 33109, 33110, 1826-E 33111, 26571, 30425, 30426, 33112-E
DR-SES	Domestic Households with a Solar Energy System	
E-CARE	California Alternate Rates for Energy .....	26573, 33113, 34683, 34684, 31779, 26578-79E
DM	Multi-Family Service .....	33114, 33115, 33116, 33117, 33118 24242-E
DS	Submetered Multi-Family Service .....	33119-22 32150, 33123, 32664, 31727, 24779-E
DT	Submetered Multi-Family Service Mobilehome Park	33124, 33125, 33126, 33127, 24455, 33128-E 24257, 24258, 24259-E
DT-RV	Submetered Service – Recreational Vehicle Parks and Residential Marinas	33129 33130, 33131, 33132, 24264, 33133-E 24789-E
EV-TOU	Domestic Time-of-Use for Electric Vehicle Charging	33134, 33135, 24270, 24271, 33136-E
EV-TOU-2	Domestic Time-of-Use for Households With Electric Vehicles	33137 33138, 24272, 24274, 24275, 33139-E
EV-TOU-5	Cost-Based Domestic Time-of-Use for Households with Electric Vehicles	35907, 35908, 35909, 35912, 32667, 30455-E 20017-E
DE	Domestic Service to Utility Employee .....	
FERA	Family Electric Rate Assistance .....	34685, 33372-E
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-DR1	Residential Time-of-Use DR1 (Experimental)	32929, 33144-47, 31770, 33148-E
TOU-DR2	Residential Time-of-Use DR2 (Experimental)	32933, 33149-51, 32751, 31774, 33152-E
DAC-GT	Disadvantage Communities Green Tariff .....	32247, 32248, 32249, 32250-E
CSGT	Community Solar Green Tariff .....	32251, 32252, 32253, 32254, 32255-E
	<u>Commercial/Industrial Rates</u>	
TOU-A	General Service – Time of Use Service .....	32937, 33153, 30458, 30459, 30460, 33154-E
TOU-A-2	Optional Cost-Based Service – Time of Use Service	32940, 33155, 30464, 30465, 30466-E
TOU-A-3	Optional 3-Period Time of Use Service	32942, 33156, 30499, 30500, 30501- 30504
A-TC	Traffic Control Service .....	33157, 24282, 24283-E
TOU-M	General Service - Small - Time Metered .....	33158, 33159, 30487, 30488, 33160, 30490-E
AL-TOU	General Service - Time Metered .....	32948, 30491, 33161, 33162, 29353, 29354-E 29355, 29356, 29357, 30494, 33163, 33164, 32680-E
AL-TOU-2	Optional Cost-Based Service – Time Metered	32953, 30498, 33165, 33166, 30501 – 30504, 32681-E
A6-TOU	General Service - Time Metered .....	33167, 33168, 25435, 20521, 29974, 30507, 33169, 32959-E 33170-E
DG-R	Distributed Generation Renewable –Time Metered	32960, 30509, 31869, 33171, 21059, 21060, 29979, 30512, 30513, 31870, 33172-E
OL-TOU	Outdoor Lighting – Time Metered .....	33173, 24302, 21448, 21449. 33174-E

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35920-E  
Canceling Revised Cal. P.U.C. Sheet No. 34708-E

## TABLE OF CONTENTS

Sheet 5

### SCHEDULE OF RATES

<u>SCHEDULE NUMBER</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>
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DR-SES	Domestic Households with a Solar Energy System	
E-CARE	California Alternate Rates for Energy .....	26573, 33113, 34683, 34684, 31779, 26578-79E
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DS	Submetered Multi-Family Service .....	33119-22 32150, 33123, 32664, 31727, 24779-E
DT	Submetered Multi-Family Service Mobilehome Park	33124, 33125, 33126, 33127, 24455, 33128-E 24257, 24258, 24259-E
DT-RV	Submetered Service – Recreational Vehicle Parks and Residential Marinas	33129 33130, 33131, 33132, 24264, 33133-E 24789-E
EV-TOU	Domestic Time-of-Use for Electric Vehicle Charging	33134, 33135, 24270, 24271, 33136-E
EV-TOU-2	Domestic Time-of-Use for Households With Electric Vehicles	33137 33138, 24272, 24274, 24275, 33139-E
EV-TOU-5	Cost-Based Domestic Time-of-Use for Households with Electric Vehicles	35907, 35908, 35909, 35912, 32667, 30455-E 20017-E
DE	Domestic Service to Utility Employee .....	
FERA	Family Electric Rate Assistance .....	34685, 33372-E
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-DR1	Residential Time-of-Use DR1 (Experimental)	32929, 33144-47, 31770, 33148-E
TOU-DR2	Residential Time-of-Use DR2 (Experimental)	32933, 33149-51, 32751, 31774, 33152-E
DAC-GT	Disadvantage Communities Green Tariff .....	32247, 32248, 32249, 32250-E
CSGT	Community Solar Green Tariff .....	32251, 32252, 32253, 32254, 32255-E
	<u>Commercial/Industrial Rates</u>	
TOU-A	General Service – Time of Use Service .....	32937, 33153, 30458, 30459, 30460, 33154-E
TOU-A-2	Optional Cost-Based Service – Time of Use Service	32940, 33155, 30464, 30465, 30466-E
TOU-A-3	Optional 3-Period Time of Use Service	32942, 33156, 30499, 30500, 30501- 30504
A-TC	Traffic Control Service .....	33157, 24282, 24283-E
TOU-M	General Service - Small - Time Metered .....	33158, 33159, 30487, 30488, 33160, 30490-E
AL-TOU	General Service - Time Metered .....	32948, 30491, 33161, 33162, 29353, 29354-E 29355, 29356, 29357, 30494, 33163, 33164, 32680-E
AL-TOU-2	Optional Cost-Based Service – Time Metered	32953, 30498, 33165, 33166, 30501 – 30504, 32681-E
A6-TOU	General Service - Time Metered .....	33167, 33168, 25435, 20521, 29974, 30507, 33169, 32959-E 33170-E
DG-R	Distributed Generation Renewable –Time Metered	32960, 30509, 31869, 33171, 21059, 21060, 29979, 30512, 30513, 31870, 33172-E
OL-TOU	Outdoor Lighting – Time Metered .....	33173, 24302, 21448, 21449. 33174-E
EV-HP	Electric Vehicle – High Power Rate	35671, 35917, 35790, 35674, 35675, 35676-E

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35478-E  
Canceling Revised Cal. P.U.C. Sheet No. 35066-E

## TABLE OF CONTENTS

Sheet 6

SCHEDULE NO.	SERVICE	CAL. P.U.C. SHEET NO.	
	<u>Lighting Rates</u>		
LS-1	Lighting - Street and Highway – Utility-Owned Installations .....	35393, 35394, 35395, 35396, 35397, 35398-E 35399, 35400, 35401-E	T T
LS-2	Lighting - Street and Highway – Customer-Owned Installations .....	35402, 35403, 35404, 35405, 35306, 22362-E 22363, 22364-E	T
LS-3	Lighting - Street and Highway -Customer-Owned Install	33411, 14943, 21441-E	T
OL-1	Outdoor Area Lighting Service .....	35412, 20280, 21442-E	T
OL-2	Outdoor Area Lighting Service Metered – Customer- Owned Installation .....	35314, 21444, 21445-E	T
DWL	Residential Walkway Lighting.....	35414, 21450-E	T
LS-2DS	Lighting - Street & Highway - Customer-Owned Dimmable Installations.....	30711, 35407, 35408, 35409, 31882, 30716-E 30717, 30718-E	T
LS-2AD	Lighting -Street & Highway - Customer-Owned Ancillary Device Installations.....	32982, 35410, 30721, 30722, 30723, 30724-E	T
	<u>Miscellaneous</u>		
PA	Power – Agricultural .....	29995, 29996, 26508-E	
TOU-PA	Power - Agricultural Time of Use (TOU) Service	32988, 35415, 30531, 32161, 32162, 35416-E 35417-E	T
TOU-PA-2	Power-Agricultural - Optional Cost Based TOU	32992, 35318, 30539, 30540, 30541-E	T
TOU-PA-3	Power - Agricultural Time of Use (TOU) Service	32994, 35419, 35420, 30545, 30546, 30547-E	T
PA-T-1	Power – Agricultural – Optional Time-of-Use .....	32997, 35421, 35422, 26516, 26517, 29593, 29667-E 35423, 35424-E	T
S	Standby Service .....	35425, 18256, 21453-E	T
S-I	Standby Service – Interruptible .....	17678, 6085, 6317-E	
SE	Service Establishment Charge .....	27816, 27817-E	
DA	Transportation of Electric Power for Direct Access Customers .....	17679, 14953, 14954, 21894, 15111, 32165-E 21454, 21895-E	
NDA	UDC Meter Services for Non-Direct Access Cust.	17892, 11850, 11851, 21455, 16427-E	
E-Depart	Departing Load Nonbypassable ND & PPP Charges ..	18385-E, 35055-E	
BIP	Base Interruptible Program .....	34918, 34919, 34920, 34921, 34922, 32623-E 32624, 32625, 32626-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	
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 .....	28166, 25273, 25274-75, 28167-68, 25278-79-E 28169, 25281-88, 33435, 28170-71, 28847-E	
NEM ST	Net Energy Metering Successor Tariff.....	28173, 27171-72, 27696-97, 28174-76, 27701-E 27179-95, 33436, 31808, 28848, 35062-E	
NEM-FC	Net Energy Metering for Fuel Cell Customer Generators.....	24910, 23437, 23438, 23439, 23440, 23441-E 23442, 23442-E	
E-PUC	Surcharge to Fund PUC Reimbursement Fee	29841-E	
DWR-BC	Department of Water Resources Bond Charge.....	32810-E	
DA-CRS	Direct Access Cost Responsibility Surcharge.....	21812, 33003, 33004, 27047, 32166-E	
CGDL-CRS	Customer Generation Departing Load Cost Responsibility Surcharge.....	30008, 19582, 35056, 18584, 18391-E	
CCA	Transportation of Electric Power, For Community Choice Aggregation Customers.....	19736, 19739, 32167, 19741, 19742-E 33005, 32168, 32169-E	
CCA-CRS	Community Choice Aggregation Cost Resp Surchrge...	35426, 33596, 20549, 35427-E	
UM	Unmetered Electric Service		T

(Continued)

6C7

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## TABLE OF CONTENTS

Sheet 7

### SCHEDULE OF RATES

<u>SCHEDULE NUMBER</u>	<u>SERVICE</u>	<u>CAL P.U.C. SHEET NO.</u>
	<u>Miscellaneous</u>	
CCA-INFO	Info Release to Community Choice Providers.....	22783, 26128, 22784, 17860-E
CBP	Capacity Bidding Program	31671, 31229, 31230, 30772, 31186-E 31231, 30361, 30698, 30699, 30363-E 30206, 30773, 30774, 30776, 32170-E
WATER	Water Agency Tariff for Eligible Renewables...	31897, 19337, 19338-E 20287, 19337, 19338, 20429, 20430-E
PTR	Peak Time Rebate ...	30564, 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, 30565-E
NEM-V-ST	Virtual Net Metering for Multi-Tenant and Meter Properties Successor Tariff....	27197-30566-E
VNM-A	Virtual Net Metering Multi-Family Affordable Housing	22385, 22402, 22403, 22404, 30567-E
VNM-A-ST	Virtual Net Metering for Multi-Family Affordable Housing Successor Tariff....	27209-27216, 30568-E
RES-BCT	Renewable Energy Self-Generation Bill Credit Trans	35611, 35612, 35613, 35614, 35629-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...	33007, 33008, 27052-E
BIOMAT	Bioenergy Market Adjusting Tariff...	33618, 33619, 33620-21, 28286, 33622-E 33623, 30060, 26836, 30400, 33264-E 33625-27, 28291-92, 33628, 30401-E
ECR	Enhanced Community Renewables...	33009, 33010, 29888, 28269, 33473-E 33474, 33475, 29889-E
GT	Green Tariff.....	33012, 33476, 33477, 33478, 33479-E 33480, 33481-E
ECR-PDT	Enhanced Community Renewables Project Development Tariff...	26860, 26861, 26862, 26863, 26864-E 26865, 26866, 26867, 26868, 26869-E 26870, 26871, 26872, 26873-E
AC SAVER	Air Conditioner (AC) Saver...	31672, 30069, 30070-E
VGI	Vehicle Grid Integration...	28860, 35428, 35429, 28863, 35430-E
AFP	Armed Forces Pilot...	30071, 30072, 30073, 32171, 32172-E 32173, 32174, 32175, 30780-E
Public GIR	Grid Integrated Rate	31014, 35431, 35432, 31017, 35433-E
Residential GIR	Residential Grid Integrated Rate	31162, 31455, 31164, 31165-E
BTMM	Behind-The Meter Microgrid	34677, 34678, 34679, 34680-E

(Continued)

7C11

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35921-E  
Canceling Revised Cal. P.U.C. Sheet No. 35300-E

## TABLE OF CONTENTS

Sheet 8

### COMMODITY RATES

<u>Schedule No.</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>
EECC	Electric Energy Commodity Cost	34859, 34860, 34861, 33216, 34862, 34863-E 34864, 34865, 34866, 33222, 33223, 33224-E 34801, 32176, 30588, 30589, 34867, 34868-E 34869, 34870, 34871, 33230, 33231, 32832-E 32832, 32833, 32834
EECC-TOU-DR-P	Electric Commodity Cost - Time of Use Plus	33232, 29436, 25548, 26613, 32177, 32178-E 33233, 29940-E
EECC-TOU-A-P	Electric Commodity Cost – Time of Use Plus	30597, 33234, 33235, 30600, 26537, 32179-E 33236, 29446-E
EECC-TOU-PA-P	Electric Commodity Cost – Time of Use Plus	33237, 33238, 32519, 30605, 30606, 32181-E 32520, 33239-E
EECC-TBS	EECC – Transitional Bundled Service	22903, 22904, 32183, 19750-E
EECC-CPP-D	EECC Critical Peak Pricing Default...	34872, 34873, 34874, 35918, 32185, 32186-E 32187, 32188, 32531, 34875, 34876, 32537-E
EECC-CPP-D-AG	EECC, Critical Peak Pricing Default Agricultural	33245, 33246, 33247, 30625, 32190, 30627-E 29462, 30184, 33248, 33249, 30630-E

T

### CONTRACTS & DEVIATIONS

23877, 5488, 5489, 6205, 6206, 5492, 16311-E  
22320, 5495, 6208, 6209, 8845, 6109, 5902-E  
5750, 8808, 8809, 6011, 8001, 8891, 35059-E  
28762, 35298-E

### RULES

<u>RULE NO.</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>
1	Definitions.....	20584, 20585, 32191, 32192, 20588, 27101, 22066, 18413-E 14584, 24475, 19394, 24671, 24476, 22068-E 15591-15600, 15601, 15602, 15603, 20415-E
2	Description of Service.....	
3	Applications for Service.....	15484, 15485-E
T4	Contracts.....	15488, 15489, 15490-E
5	Special Information Available for Customers.....	31461, 31462-E
6	Establishment & Re-establishment of Credit.....	20223, 25228-E
7	Deposits.....	33373, 20228-E
8	Notices.....	17405-E
9	Rendering and Payment of Bills.....	25230, 29075, 20142, 33374-E
10	Disputed Bills.....	31463, 31464-E
11	Discontinuance of Service.....	33375, 33376, 31645, 31467, 31646, 31469, 31470, 31680-E 30248, 32049-E
12	Rates and Optional Rates.....	23252-E
13	Temporary Service.....	19757-E
14	Shortage of Elec Supply/Interruption Delivery.....	4794-E
15	Distribution Line Extensions.....	33802-33816-E
16	Service Extensions.....	33817-33831-E
17	Meter Reading.....	26153, 24705-E
18	Meter Tests and Adjustment of Bills.....	16585, 22130, 22131-E

(Continued)

8C5

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San Diego, California

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## TABLE OF CONTENTS

Sheet 8

### COMMODITY RATES

<u>Schedule No.</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>
EECC	Electric Energy Commodity Cost	34859, 34860, 34861, 33216, 34862, 34863-E 34864, 34865, 34866, 33222, 33223, 33224-E 34801, 32176, 30588, 30589, 34867, 34868-E 34869, 34870, 34871, 33230, 33231, 32832-E 32832, 32833, 32834
EECC-TOU-DR-P	Electric Commodity Cost - Time of Use Plus	33232, 29436, 25548, 26613, 32177, 32178-E 33233, 29940-E
EECC-TOU-A-P	Electric Commodity Cost – Time of Use Plus	30597, 33234, 33235, 30600, 26537, 32179-E 33236, 29446-E
EECC-TOU-PA-P	Electric Commodity Cost – Time of Use Plus	33237, 33238, 32519, 30605, 30606, 32181-E 32520, 33239-E
EECC-TBS	EECC – Transitional Bundled Service	22903, 22904, 32183, 19750-E
EECC-CPP-D	EECC Critical Peak Pricing Default...	34872, 34873, 34874, 30613, 32185, 32186-E 32187, 32188, 32531, 34875, 34876, 32537-E
EECC-CPP-D-AG	EECC, Critical Peak Pricing Default Agricultural	33245, 33246, 33247, 30625, 32190, 30627-E 29462, 30184, 33248, 33249, 30630-E

### CONTRACTS & DEVIATIONS

23877, 5488, 5489, 6205, 6206, 5492, 16311-E  
22320, 5495, 6208, 6209, 8845, 6109, 5902-E  
5750, 8808, 8809, 6011, 8001, 8891, 35059-E  
28762, 35952-E

### RULES

<u>RULE NO.</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO.</u>
1	Definitions.....	20584, 20585, 32191, 32192, 20588, 27101, 22066, 18413-E 14584, 24475, 19394, 24671, 24476, 22068-E 15591-15600, 15601, 15602, 15603, 20415-E
2	Description of Service.....	
3	Applications for Service.....	15484, 15485-E
T4	Contracts.....	15488, 15489, 15490-E
5	Special Information Available for Customers.....	31461, 31462-E
6	Establishment & Re-establishment of Credit.....	20223, 25228-E
7	Deposits.....	33373, 20228-E
8	Notices.....	17405-E
9	Rendering and Payment of Bills.....	25230, 29075, 20142, 33374-E
10	Disputed Bills.....	31463, 31464-E
11	Discontinuance of Service.....	33375, 33376, 31645, 31467, 31646, 31469, 31470, 31680-E 30248, 32049-E
12	Rates and Optional Rates.....	23252-E
13	Temporary Service.....	19757-E
14	Shortage of Elec Supply/Interruption Delivery.....	4794-E
15	Distribution Line Extensions.....	33802-33816-E
16	Service Extensions.....	33817-33831-E
17	Meter Reading.....	26153, 24705-E
18	Meter Tests and Adjustment of Bills.....	16585, 22130, 22131-E

(Continued)

8C5

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San Diego, California

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## TABLE OF CONTENTS

Sheet 9

### RULES

<u>RULE NO.</u>	<u>SERVICE</u>	<u>CAL. P.U.C. SHEET NO</u>
19	Supply to Separate Premises and Resale	18704, 20591, 26879, 34663, 34664-E
20	Replace of OH w/ UG Elec Facilities	35013, 35014, 35015, 35016, 35017, 35018, 35019-E
21	Interconnection Standards for Non-Utility Owned Generation	28143, 28005-06, 30734-35, 29027, 30736, 28007-08-E 29798-800, 27218, 29028, 27220-22-E 27720, 27224-29, 28011, 28145-E 31037, 27722-27, 28013, 27729-34, 28014, 27736, 30737-38-E 29801, 28016-19, 28388, 28021-22, 27259-60, 28023-27, 27266-88-E 28028-30, 28389-30739, 28035-39, 28799-803, 28045-48, 28095, 28050-E 27312-19, 30740, 29029, 27322-29-E 29899-900, 31003-11, 31651, 29137-39-E 29802-03, 30741-42, 29806-08, 30743, 29810-15, 30744-48-E 29821, 30749, 29823, 30750-53, 29828-32-E
21.1	Final Standard Offer 4 Qualifying Facilities	7966-7976, 7977-7986, 7989-E
22	Special Service Charges	8713, 8714-E
23	Competition Transition Charge Responsibility	19760, 15189, 15190, 15191, 15192, 15123, 10623, 10624-E 10625, 12720, 12721, 12722, 12723, 12724-E
25	Direct Access Rules	22714, 23311, 21669-21671, 23312, 21673, 23313, 22715-16-E 23775-23780, 21683, 21691, 23316, 21693, 11915, 20294, 20295-E 11918-11920, 20296, 11922-11924, 20297-E 11926, 20298, 11928-11930-E
25.1	DA Switching Exemptions.....	32327, 32328, 32329, 32330, 32331, 33466, 32333, 32334, 32335, 33467-E 32337, 33468, 33469, 33470-E
25.2	DA Qualified Nonprofit Charitable Org	19818-E
27	Community Choice Aggregation.....	33857-19770, 20299, 21898, 19773-76, 33858-60, 33861, 33862, 19781, 26377, 22825, 19784-91, 20300, 22826, 33865-82-E
27.2	CCA Open Season	19799, 19800, 20466, 20467-E
28	Provision of Utility Right-of-Way Information	14167, 14168, 14169, 14170, 14171-E
29	Third-Party Marketers for BIP	22966, 22967, 30781, 30782, 30783, 30784, 30785, 30786, 30787, 30788, 30789-E
30	Capacity Bidding Program	19658, 19659, 30790, 30791, 30792, 30793, 30794, 30795, 30796-E
31	Participating Load Pilot	21265, 21266, 21267, 21268, 21269, 21270-E
31.1	Demand Response Wholesale Market Pilot	22041, 22042, 22043, 22044, 22045, 22046-E
32	Direct Participation Demand Response	24708, 27076, 30252, 27078, 27079, 27080, 30253, 27105, 27083-E 30254, 27085, 27086, 30255-30257, 27091, 27092, 30258, 27094-E 27095, 30259, 26386, 24731, 27096, 24733-E
33	Privacy & Security – Energy Use Data	23298, 23299, 23300, 23301, 23302, 23303, 23304, 23305-E
40	On-Bill Financing Program	20937-E
41	DR Multiple Program Participation	21501, 21502, 21503, 21504, 21505, 21506-E
43	On-Bill Repayment Pilots	26465, 23976, 26466, 26467, 26468, 26469, 26470-E
44	Mobilehome Park Utility Upgrade Program	31666, 29472, 29473, 29474, 25471- 25474-E
45	Electric Vehicle Infrastructure	35651, 35652, 35653, 35654, 35655, 35656, 35657, 35658, 35659, 45660E 35661, 35662-E

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 31945-E

## TABLE OF CONTENTS

Sheet 10

### SAMPLE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>
101-663A	10-68	Agreement - Bills/Deposits...	2497-E
101-4152G	6-69	Sign Up Notice for Service....	1768-E
106-1202	6-96	Contract for Special Facilities...	9118-E
106-1502C	5-71	Contract for Agricultural Power Service...	1919-E
106-1959A	5-71	Absolving Service Agreement, _____ Service from Temporary Facilities...	1921-E
106-2759L	4-91	Agreement for Replacement of Overhead with Underground Facilities...	7063-E
106-3559	- - -	Assessment District Agreement...	6162-E
106-3559/1	- - -	Assessment District Agreement...	6202-E
106-3859	01-01	Request for Service at Secondary/Primary Substation Level Rates...	14102-E
106-3959	6-96	Contract for Special Facilities Refund...	9120-E
106-4059	6-96	Contract for Buyout Special Facilities...	9121-E
106-5140A	10-72	Agreement for _____ Service...	2573-E
106-15140	5-71	Agreement for Temporary Service...	1920-E
106-21600	08-19	Agreement for the Purchase of Electrical Energy...	32352-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 Streetlight ...	25464-E
106-43140	11-85	Overhead Line Extension General Conditions...	5548-E
106-44140	5-19	Agreement for Extension and Construction of _____	31943-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

(Continued)

10C7

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San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 34180-E

## TABLE OF CONTENTS

Sheet 11

### SAMPLE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>
117-2160	06-17	Generating Facility Interconnection Agreement (NEM/Non-NEM Generating Facility Export)...	29046-E
117-2160-A	06-17	Generating Facility Interconnection Agreement (NEM/Non-NEM Generating Facility Export) Federal Government Only..	29047-E
117-2259	8-95	Electronic Data Interchange (EDI) and Funds Transfer Agreement....	8802-E
117-2300	4-21	Generating Facility Material Modification Notifications Worksheet	34660-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
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	02-21	Medical Baseline Allowance Application.....	34178-E
132-150/1	07-02	Medical Baseline Allowance Self-Certification.....	32879-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
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....	26474
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

(Continued)

11C7

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Decision No. 19-03-013

Issued by  
**Dan Skopec**  
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Submitted Apr 8, 2021

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 34709-E  
Canceling Revised Cal. P.U.C. Sheet No. 33316-E

## TABLE OF CONTENTS

Sheet 12

### SAMPLE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>	
142-732	05/21	Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program...	34686-E	T
142-732/1	05/21	Residential Rate Assistance Application (IVR/System-Gen...	34687-E	T
142-732/2	05/21	Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program...	34688-E	T
142-732-3	05/21	CARE Program Recertification Application & Statement of Eligibility...	34689-E	T
142-732/4	05/21	CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers...	34690-E	T
142-732/5	05/21	CARE Post Enrollment Verification...	34691-E	T
142-732/6	05/21	Residential Rate Assistance Application (Vietnamese)...	34692-E	T
142-732/8	05/21	Residential Rate Assistance Application (Direct Mail)...	34693-E	T
142-732/10	05/21	Residential Rate Assistance Application (Mandarin Chinese)...	34694-E	T
142-732/11	05/21	Residential Rate Assistance Application (Arabic)...	34695-E	T
142-732/12	05/21	Residential Rate Assistance Application (Armenian)...	34696-E	T
142-732/13	05/21	Residential Rate Assistance Application (Farsi)...	34697-E	T
142-732/14	05/21	Residential Rate Assistance Application (Hmong)...	34698-E	T
142-732/15	05/21	Residential Rate Assistance Application (Khmer)...	34699-E	T
142-00832	05/21	Application for CARE for Qualified Nonprofit Group Living Facilities	34705-E	T
142-732/16	05/21	Residential Rate Assistance Application (Korean)	34700-E	T
142-732/17	05/21	Residential Rate Assistance Application (Russian)	34701-E	T
142-732/18	05/21	Residential Rate Assistance Application (Tagalog)...	34702-E	T
142-732/19	05/21	Residential Rate Assistance Application (Thai)...	34703-E	T
142-740	05/21	Residential Rate Assistance Application (Easy/App)	34704-E	T
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	
142-2760	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	

(Continued)

12C6

Advice Ltr. No. 3747-E

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Regulatory Affairs

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35025-E  
Canceling Revised Cal. P.U.C. Sheet No. 34668-E

## TABLE OF CONTENTS

Sheet 13

### SAMPLE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>
142-02762	01-13	Fuel Cell Generating Facility NEM and Interconnection Agreement	23444-E
142-02763	10-12	NEM/VNM-A Inspection Report...	23234-E
142-02765	01-15	NEM Application & Interconnection Agreement for Customers with Solar and/or Wind Electric Generating Facilities of 30 kW or Less...	26168-E
142-02766	01-15	NEM Application & Interconnection Agreement for Solar and/or Wind Electric Generating Facilities Greater than 30 kW or up to 1000 kW...	26169-E
142-02768	02-09	Photovoltaic Generation Allocation Request Form...	21148-E
142-02769	07-14	NEM Aggregation Form...	25293-E
142-02770	12-12	Generation Credit Allocation Request Form...	23288-E
142-02771	08-16	Rule 21 Generator Interconnection Agreement (GIA)...	28051-E
142-02772	06-14	Rule 21 Detailed Study Agreement...	25065-E
142-02773	08-16	Interconnection App for Solar and/or Wind ONLY >30 Kw...	29492-E
142-02774	08-16	Interconnection App for Solar and/or Wind ONLY <30 Kw...	29493-E
142-02775	07-20	Net Energy Metering Non-Export / Non-Import Power Control Based Equipment Attestation	33417-E
142-02776	04/21	Emergency Standby Generator Installation Request	34665-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	05-20	Application for California Alternate Rates for Energy (CARE) Program for Qualified Agricultural Employee Housing Facilities...	33313-E
142-4035	06-05	Application for California Alternate Rates for Energy (CARE) Program for Migrant Farm Worker Housing Centers...	18415-E
142-05200	08-16	Generator Interconnection Agreement for Fast Track Process...	28054-E
142-05201	08-16	Exporting Generating Facility Interconnection Request...	28055-E
142-05202	01-01	Generating Facility Interconnection Application Agreement...	14152-E
142-05203	07-21	Generating Facility Interconnection Application...	35023-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	06-19	Base Interruptible Program Contract...	32132-E
142-05209	06-19	No Insurance Declaration...	32133-E
142-05210	06-04	Rolling Blackout Reduction Program Contract...	18273-E
142-05211	06-04	Bill Protection Application...	18273-E
142-05213	07-03	Technical Incentive Program Application...	30079-E
142-05215	06-19	Third Party Marketer Agreement for BIP...	32134-E
142-05216	06-19	Notice by Aggregator to Add, Change or Delete Customers for BIP...	32135-E
142-05217	06-19	Notice by Customer to Add, Change, or Terminate Aggregator for BIP...	32136-E
142-05219	01-18	Technical Incentive Program Agreement...	30080-E
142-05219/1	01-18	Customer Generation Agreement	15384-E
142-05220	07-18	Armed Forces Pilot Contract...	30800-E
142-05300	07-18	Capacity Bidding Program Customer Contract...	30801-E
142-05301	07-18	Aggregator Agreement for Capacity Bidding Program (CBP)...	30802-E
142-05302	02-18	Notice to Add, Change, or Terminate Aggregator for Capacity Bidding...	30210-E

(Continued)

13C5

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Decision No. D. 21-06-002

Issued by  
**Dan Skopec**  
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Regulatory Affairs

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35619-E  
Canceling Revised Cal. P.U.C. Sheet No. 32143-E

## TABLE OF CONTENTS

Sheet 14

### SAMPLE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>
142-05303	07-18	Technical Assistance Incentive Application...	16568-E
142-05304	06-19	Prohibited Resources Attestation.....	32137-E
142-0541	06-02	Generating Facility Interconnection Agreement	29058-E
142-0542	06-17	(3 <sup>rd</sup> Party Inadvertent Export)	29059-E
		Generating Facility Interconnection Agreement	
142-0543	06-17	(3 <sup>rd</sup> Party Non-Exporting)	29060-E
		Generating Facility Interconnection Agreement	
142-0544	06-17	(Inadvertent Export)	19323-E
		Generating Facility Interconnection Agreement (Continuous Export)	
142-0545	06-06	Generation Bill Credit Transfer Allocation Request Form	21852-E
142-0546	11-21	Local Government – Generation Bill Credit Transfer Allocation Request Form (RES-BCT)	35617-E
142-0600	06-13	SDG&E's Final Standard Form Re-Mat PPA	23604-E
143-359		Service Agreement between the Customer and SDG&E for Optional UDC Meter Services	
143-00212		Resident's Agreement for Water Heater Switch Credit	
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...	3545-E
143-659		Owner's Agreement for Air Conditioner Switch Payment...	3699-E
143-759	12-97	Occupant's Agreement for Air Conditioner Switch Payment...	3700-E
143-01212	1-99	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	11007-E
143-02459	12-97	ESP Request for SDG&E to Perform ESP Meter Services...	11008-E
143-02659	3-98	ESP Request to Receive Meter Installation/Maintenance Charges	11175-E
143-02759	12-17	Direct Access Customer Relocation Declaration....	29838-E
143-02760	12-12	Six Month Notice to Return to Direct Access Service...	23319-E
143-02761	01-12	Six Month Notice to Return to Bundled Portfolio Service...	22730-E
143-02762	02-13	Direct Access Customer Assignment Affidavit...	23432-E
143-02763	04-10	Notice of Intent to Transfer to DA During OEW	21709-E

(Continued)

14C12

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Submitted

Nov 24, 2021

Advice Ltr. No. 3893-E

**Dan Skopec**

Effective

Dec 24, 2021

Vice President

Decision No. Senate Bill  
No. 479

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Resolution No.





San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35483-E  
Canceling Revised Cal. P.U.C. Sheet No. 34962-E

## TABLE OF CONTENTS

Sheet 15

### SAMPE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.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	04-18	CISR-DRP.....	30366-E
144-0821	01-16	DRP Service Agreement.....	27107-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	10-21	Mobilehome Park Utility Upgrade Agreement.....	35481-E
189-2000	06-21	Mobilehome Park Utility Conversion Application.....	34960-E
190-1000	10-15	Bioenergy Market Adjusting Tariff Power Purchase Agreement	26846-E
190-2000	10-15	Green Tariff Shared Renewables (GTSR) Enhanced Community Renewables (ECR) Program Project Development Tariff Rider and Amendment	26874-E
195-1000	05-17	Station Power -Agreement for Energy Storage Devices	28966-E
200-1000	09-17	Declaration of Eligibility for Foodbank Discount	32193-E
205-1000	12-20	Eligible Economic Development Rate Customer Application	33854-E

(Continued)

15C5

Advice Ltr. No. 3859-E

Decision No. D.21-08-025

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

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Resolution No.



San Diego Gas & Electric Company  
San Diego, California

Original Cal. P.U.C. Sheet No. 31176-E  
Canceling Cal. P.U.C. Sheet No.

## TABLE OF CONTENTS

Sheet 16

<u>FORM NO.</u>	<u>DATE</u>	<u>DEPOSITS, RECEIPTS AND GUARANTEES</u>	<u>CAL C.P.U.C. SHEET NO.</u>
144-0812	03-09	Critical Peak Pricing - Event Notification Information Form	21134-E
144-0813	03-09	Critical Peak Pricing - Future Communications Contact Information Form	21135-E
155-100	03-06	Application and Contract for Unmetered Service.....	30273-E
160-2000	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

## BILLS AND STATEMENTS

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)

16C15

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

Submitted Nov 1, 2018

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 34139-E  
Canceling Revised Cal. P.U.C. Sheet No. 33465-E

## TABLE OF CONTENTS

Sheet 17

### COLLECTION NOTICES

<u>FORM NO.</u>	<u>DATE</u>		<u>CAL C.P.U.C. SHEET NO.</u>
101-00751	02-21	Final Notice Before Disconnect (MDTs).....	34134-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	02-21	Reminder Notice – Payment Request for Past Due Bill	34135-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	24581-E
101-01072	02-21	Notice of Disconnect (delivered).....	34136-E
101-01073	02-21	Notice of Shut-off (Mailed).....	34137-E
101-02171	05-10	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units)	21885-E
101-02172	03-14	Notice of Disconnect (MDTs).....	24582-E
101-2452G	02-04	Notice to Tenants - Request for Termination of Gas and Electric Service Customer Payment Notification.....	16959-E

### OPERATIONS NOTICES

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

17C6

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Regulatory Affairs

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San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	25816-G
Canceling	Revised	Cal. P.U.C. Sheet No.
		25812-G

## 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.....	12805-G	
TABLE OF CONTENTS.....	25816, 25972, 25813, 25817, 24787-G 24258, 25599, 25180, 19182-G	T
<b>PRELIMINARY STATEMENT</b>		
I. General Information.....	7270, 19259-G	
II. Statement of Rates.....	11981, 25810, 25814, 25708, 25709, 16688-G	T
III. Cost Allocation and Revenue Requirement.....	20597, 23749, 24446, 24447, 14249, 7281-G	
IV. <u>Balancing Accounts</u>	7489, 14250, 14251, 14252, 7493, 7494-G	P
Description/Listing of Accounts.....	15671, 25782-G	
Curtailment Penalty Funds Account (CPFA).....	20599-G	
California Alternate Rates for Energy (CARE)		
Balancing Account.....	15681, 15682-G	
Gas Energy Efficiency Balancing Account (GEEBA)	19260, 19261-G	
Rewards & Penalties Balancing Account (RPBA)....	19262, 19510-G	
Pension Balancing Account (PBA).....	22923, 17754-G	
Post-Retirement Benefits Other Than Pensions		
Balancing Account (PBOPBA).....	22924, 17755-G	
Core Fixed Cost Account (CFCA).....	24614, 24449, 24615, 24616-G	
Noncore Fixed Cost Account (NFC A).....	24451, 20603, 19269-G	
Post-2005 Gas Energy Efficiency Balancing		
Account (PGEEBA).....	18442, 18443-G	
Post-2005 Gas Low Income Energy Efficiency		
Balancing Account (PGLIEEBA).....	15710, 15711-G	
Integrated Transmission Balancing Account (ITBA)	24617, 24618-G	
Advanced Metering Infrastructure Account (AMIBA)	16271, 17757, 16273-G	
Hazardous Substance Cleanup Cost Acct (HSCCA)...	15741, 15742, 17651, 15744, 15745, 15746-G 15747, 19270, 15749, 15750, 15751-G	
Distribution Integrity Management Program		
Balancing Account (DIPMBA).....	17172-G	
On-Bill Financing Balancing Account (OBFBA).....	18444-G	
Post-2011 Distribution Integrity Management Program		
Balancing Account (P-11 DIMPBA).....	19974-G	
Transmission Integrity Management Program		
Balancing Account (TIMPBA).....	19975-G	
New Environmental Regulatory Balancing Account		
(NERBA).....	21026, 21027-G	
Master Meter Balancing Account (MMBA).....	21026-G, 21027-G	
Safety Enhancement Capital Cost Balancing Account		
(SECCBA).....	22098-G	
Safety Enhancement Expense Balancing Account		
(SEEBA).....	22099-G	
Greenhouse Gas Balancing Account (GHGBA).....	24592, 24593-G	
Smart Meter Opt-Out Balancing Account (SMOBA)....	21113, 21114-G	
Low Carbon Fuel Standard Balancing Account (LCFSBA)	21124-G	
Biomethane Cost Incentive Program Balancing Account		
(BCIPBA).....	22429-G	

(Continued)

1C6	Issued by	Submitted	Feb 28, 2022
Advice Ltr. No. 3068-G	<b>Dan Skopec</b>	Effective	Feb 28, 2022
Decision No.	Vice President Regulatory Affairs	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	25832-G
Canceling	Revised	Cal. P.U.C. Sheet No.
		25819-G

## 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.....	12805-G	
TABLE OF CONTENTS.....	25832, 25972, 25833, 25834, 24787-G 24258, 25599, 25180, 19182-G	T
<b>PRELIMINARY STATEMENT</b>		
I. General Information.....	7270, 19259-G	
II. Statement of Rates.....	11981, 25821, 25822, 25708, 25709, 16688-G	T
III. Cost Allocation and Revenue Requirement.....	20597, 23749, 24446, 24447, 14249, 7281-G	
IV. <u>Balancing Accounts</u>	7489, 14250, 14251, 14252, 7493, 7494-G	P
Description/Listing of Accounts.....	15671, 25782-G	
Curtailment Penalty Funds Account (CPFA).....	20599-G	
California Alternate Rates for Energy (CARE)		
Balancing Account.....	15681, 15682-G	
Gas Energy Efficiency Balancing Account (GEEBA)	19260, 19261-G	
Rewards & Penalties Balancing Account (RPBA)....	19262, 19510-G	
Pension Balancing Account (PBA).....	22923, 17754-G	
Post-Retirement Benefits Other Than Pensions		
Balancing Account (PBOPBA).....	22924, 17755-G	
Core Fixed Cost Account (CFCA).....	24614, 24449, 24615, 24616-G	
Noncore Fixed Cost Account (NFCA).....	24451, 20603, 19269-G	
Post-2005 Gas Energy Efficiency Balancing		
Account (PGEEBA).....	18442, 18443-G	
Post-2005 Gas Low Income Energy Efficiency		
Balancing Account (PGLIEEBA).....	15710, 15711-G	
Integrated Transmission Balancing Account (ITBA)	24617, 24618-G	
Advanced Metering Infrastructure Account (AMIBA)	16271, 17757, 16273-G	
Hazardous Substance Cleanup Cost Acct (HSCCA)...	15741, 15742, 17651, 15744, 15745, 15746-G 15747, 19270, 15749, 15750, 15751-G	
Distribution Integrity Management Program		
Balancing Account (DIPMBA).....	17172-G	
On-Bill Financing Balancing Account (OBFBA).....	18444-G	
Post-2011 Distribution Integrity Management Program		
Balancing Account (P-11 DIMPBA).....	19974-G	
Transmission Integrity Management Program		
Balancing Account (TIMPBA).....	19975-G	
New Environmental Regulatory Balancing Account		
(NERBA).....	21026, 21027-G	
Master Meter Balancing Account (MMBA).....	21026-G, 21027-G	
Safety Enhancement Capital Cost Balancing Account		
(SECCBA).....	22098-G	
Safety Enhancement Expense Balancing Account		
(SEEBA).....	22099-G	
Greenhouse Gas Balancing Account (GHGBA).....	24592, 24593-G	
Smart Meter Opt-Out Balancing Account (SMOBA)....	21113, 21114-G	
Low Carbon Fuel Standard Balancing Account (LCFSBA)	21124-G	
Biomethane Cost Incentive Program Balancing Account		
(BCIPBA).....	22429-G	

(Continued)



San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	25706-G
Canceling	Revised	Cal. P.U.C. Sheet No.
		25486-G

## TABLE OF CONTENTS

Sheet 2

Natural Gas Leak Abatement Program Balancing Account (NGLAPBA) .....	22691-G
Statewide Energy Efficiency Gas Balancing Account (SWEEGA) .....	23416, 23417-G
Customer Information System Balancing Account (CISBA) .....	23435, 23436-G
Transition Stabilization and OCM Balancing Account (TSOBA) .....	23437-G
Liability Insurance Premium Balancing Account (LIPBA) Port Energy Management Plan Balancing Account (PEMPBA) .....	24215, 24216, 24217-G
School Energy Efficiency Stimulus Program Balancing Account (SEESPBA).....	24354, 24355-G 25322, 25209-G
 V. <u>Memorandum Accounts</u> .....	22100, 25703-G
Description/Listing of Accounts.....	15716, 15717, 15718-G
Catastrophic Event Memorandum Account (CEMA) Core Reclassification Shortfall Memorandum Account (CRSMA).....	15719-G
Liquefied Natural Gas Service Tracking Account (LNGSTA).....	15723, 15724-G 24419, 24420-G
Self-Generation Program Memo Acct (SGPMA) FERC Settlements Proceeds Memorandum Account (FSPMA).....	23294-G 16402-G
Gain/Loss On Sale Memo Acct (GLOSMA).....	17287-G
Energy Efficiency 2009-2011 Memo Acct (EEMA)	18350-G
Wildfire Expense Memorandum Account (WEMA)...	22101-G
Pipeline Safety & Reliability Memo Acct (PSRMA)....	
California Solar Initiative Thermal Program Memorandum Account (CSITPMA).....	23795-G
2012-2014 Energy Savings Assistance Programs Memorandum Account (ESAPMA).....	22347-G 20646-G
Residential Disconnect Memo Account (RDMA)....	
Greenhouse Gas Administrative Costs Memorandum Account (GHGACMA).....	21520-G
Deductible Tax Repairs Benefits Memorandum Account (DTRBMA).....	21937-G 24196-G
Tax Memorandum Account (TMA).....	
General Rate Case Memorandum Account 2016 (GRCMA2016).....	21938-G 21728-G
Assembly Bill 802 Memorandum Account (AB802MA)..	
Pipeline Safety Enhancement Plan – Phase 2 Memorandum Account (PSEP-P2MA).....	22102-G
Avoided Cost Calculator Update Memorandum Account (ACCUMA).....	22454-G
Customer Information System Memorandum Account (CISMA).....	23796-G 22997-G
Wildfire Consumer Protections Memo Acct (WCPMA)	
Emergency Customer Protections Memorandum Account (ECPMA).....	23411-G 24040-G
Core Gas Balancing Memorandum Account (CGBMA)	24116-G
General Rate Case Memorandum Account 2019 COVID-19 Protections Memorandum Account (CPPMA)	25408, 24668-G
Cost of Capital Memorandum Account (CCMA)	25704-G

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 25805-G  
Canceling Revised Cal. P.U.C. Sheet No. 25793-G

## TABLE OF CONTENTS

Sheet 3

V. <u>Memorandum Accounts (continued)</u>		
Percentage of Income Payment Plan Memorandum Account (PIPPMA)		25786, 25787-G
VI. Electric Distribution and Gas Performance Based Ratemaking (PBR) Mechanism.....	23295, 17776-77, 17178, 22839, 23296, 22841G	
VII. Gas Procurement Performance-Based Ratemaking Mechanism Procedure.....	20206, 15056, 15057, 13262, 13263, 13264-G	
VII. Miscellaneous		
Listing of Accounts.....		
California Public Utilities Commission Mobilehome Park Gas Safety Inspection and Enforcement		
Program Surcharge (PUCMPGS).....		16680-G
Income Tax Component of Contributions and Advances Provisions.....	23549, 15739, 15740-G	
Gain/Loss on Sale Mechanism (GLOSM).....	16404, 16405, 16406, 16407, 16408-G	
Consolidated Gas Portfolio.....		16681-G
IX. Cost of Capital Mechanism (CCM).....		24509-G

### SCHEDULE OF RATES

<u>Schedule Number</u>	<u>Core Services</u>	<u>Cal. P.U.C. Sheet No.</u>
GR	Domestic Natural Gas Service.....	25796, 24328, 17885-G
G-CARE	California Alternate Rates for Energy (CARE) Program.....	15429, 24520, 24521, 14756, 15119-G
GM	Multi-Family Natural Gas Service.....	15897, 25797, 24329-G
GS/GT	Submetered Multi-Family Natural Gas Service.....	25798, 25072, 24330, 16873, 16874-G
G-NGVR	Natural Gas Service for Home refueling of Motor Vehicles	25776, 16668, 16878-G
GN-3	Natural Gas Service for Core Commercial Customers.....	18496, 25799, 25714, 21524, 21525-G 21526-G
G-NGV	Sale of Natural Gas for Motor-Vehicle Fuel.....	25800, 25801, 21779, 21529, 21530-G
GPC	Gas Procurement for Core Customers.....	25803, 19545, 17893-G
G-SMOP	Gas Smart Meter Opt Out Program	21116, 21117-G
<u>Noncore Services</u>		
GTNC	Natural Gas Transmission Service for Noncore Customers..	25718, 25719, 18453, 18454, 18455-G
EG	Natural Gas Interstate Transportation Service for Electric Generation Customers.....	25720, 25721, 21534, 21535, 21536-G
TLS	Intrastate Transportation Service for Transmission Level Customers.....	17903, 25722, 25723, 25724, 25725-G 17908, 17909, 17910, 17911, 17912-G 17913, 17914, 17915-G

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 25833-G  
Canceling Revised Cal. P.U.C. Sheet No. 25813-G

## TABLE OF CONTENTS

Sheet 3

V. <u>Memorandum Accounts (continued)</u>		
Percentage of Income Payment Plan Memorandum Account (PIPPMA)		25786, 25787-G
VI. Electric Distribution and Gas Performance Based Ratemaking (PBR) Mechanism.....	23295, 17776-77, 17178, 22839, 23296, 22841G	
VII. Gas Procurement Performance-Based Ratemaking Mechanism Procedure.....	20206, 15056, 15057, 13262, 13263, 13264-G	
VII. Miscellaneous		
Listing of Accounts.....		
California Public Utilities Commission Mobilehome Park Gas Safety Inspection and Enforcement		
Program Surcharge (PUCMPGS).....		16680-G
Income Tax Component of Contributions and Advances Provisions.....	23549, 15739, 15740-G	
Gain/Loss on Sale Mechanism (GLOSM).....	16404, 16405, 16406, 16407, 16408-G	
Consolidated Gas Portfolio.....		16681-G
IX. Cost of Capital Mechanism (CCM).....		24509-G

### SCHEDULE OF RATES

<u>Schedule Number</u>	<u>Core Services</u>	<u>Cal. P.U.C. Sheet No.</u>	
GR	Domestic Natural Gas Service.....	25823, 24328, 17885-G	T
G-CARE	California Alternate Rates for Energy (CARE) Program.....	15429, 24520, 24521, 14756, 15119-G	
GM	Multi-Family Natural Gas Service.....	15897, 25824, 24329-G	T
GS/GT	Submetered Multi-Family Natural Gas Service.....	25825, 25072, 24330, 16873, 16874-G	T
G-NGVR	Natural Gas Service for Home refueling of Motor Vehicles	25829, 16668, 16878-G	T
GN-3	Natural Gas Service for Core Commercial Customers.....	18496, 25826, 25714, 21524, 21525-G 21526-G	T
G-NGV	Sale of Natural Gas for Motor-Vehicle Fuel.....	25827, 25828, 21779, 21529, 21530-G	T
GPC	Gas Procurement for Core Customers.....	25830, 19545, 17893-G	T
G-SMOP	Gas Smart Meter Opt Out Program	21116, 21117-G	
	<u>Noncore Services</u>		
GTNC	Natural Gas Transmission Service for Noncore Customers..	25718, 25719, 18453, 18454, 18455-G	
EG	Natural Gas Interstate Transportation Service for Electric Generation Customers.....	25720, 25721, 21534, 21535, 21536-G	
TLS	Intrastate Transportation Service for Transmission Level Customers.....	17903, 25722, 25723, 25724, 25725-G 17908, 17909, 17910, 17911, 17912-G 17913, 17914, 17915-G	

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 25817-G  
Canceling Revised Cal. P.U.C. Sheet No. 25809-G

## TABLE OF CONTENTS

Sheet 4

<u>Schedule Number</u>	<u>Other Services</u>	<u>Cal. P.U.C. Sheet No.</u>
G-90	Service to Utility Employees.....	3386-G
G-91	Service Establishment Charge.....	15124, 9930-G
GL-1	Service from Liquefied Natural Gas Facilities (Borrego Territory).....	12004, 3464-G
G-PUC	Surcharge to Fund PUC Reimbursement Fee.....	23718-G
G-MHPS	Surcharge to Fund PUC Master-Metered Mobilehome Park Gas Safety Inspection and Enforcement Program.....	11242-G
GP-SUR	Customer-procured Gas Franchise Fee Surcharge.....	25778, 6859-G
G-IMB	Transportation Imbalance Service.....	25060, 25807, 25815-G 24382, 21297, 21298-G
G-PPPS	Surcharge to Fund Public Purpose Programs.....	25653, 15006, 15007-G
G-CBS	Utility Distribution Company (UDC) Consolidated Billing Service.....	23066, 12258, 23067-G
G-CCC	Greenhouse Gas California Climate Credit.....	25727-G
LIST OF CONTRACTS AND DEVIATIONS.....		4092, 3812, 3813, 4562-G 4562, 5717, 19711, 18531-G

T

(Continued)

4C6

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San Diego Gas & Electric Company  
San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 25820-G

## TABLE OF CONTENTS

Sheet 4

<u>Schedule Number</u>	<u>Other Services</u>	<u>Cal. P.U.C. Sheet No.</u>
G-90	Service to Utility Employees.....	3386-G
G-91	Service Establishment Charge.....	15124, 9930-G
GL-1	Service from Liquefied Natural Gas Facilities (Borrego Territory).....	12004, 3464-G
G-PUC	Surcharge to Fund PUC Reimbursement Fee.....	23718-G
G-MHPS	Surcharge to Fund PUC Master-Metered Mobilehome Park Gas Safety Inspection and Enforcement Program.....	11242-G
GP-SUR	Customer-procured Gas Franchise Fee Surcharge.....	25831, 6859-G
G-IMB	Transportation Imbalance Service.....	25060, 25807, 25815-G 24382, 21297, 21298-G
G-PPPS	Surcharge to Fund Public Purpose Programs.....	25653, 15006, 15007-G
G-CBS	Utility Distribution Company (UDC) Consolidated Billing Service.....	23066, 12258, 23067-G
G-CCC	Greenhouse Gas California Climate Credit.....	25727-G
LIST OF CONTRACTS AND DEVIATIONS.....		4092, 3812, 3813, 4562-G 4562, 5717, 19711, 18531-G

T

(Continued)

4C8

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Revised Cal. P.U.C. Sheet No. 25291-G  
Canceling Revised Cal. P.U.C. Sheet No. 25180-G

## TABLE OF CONTENTS

Sheet 5

<u>RULE NO.</u>	<u>RULES</u>	<u>CAL. P.U.C. SHEET NO.</u>
1	Definitions.....	11616, 17921, 20903, 24383, 20904, 17925-G 21652, 17927, 17928, 17929, 17930, 18559-G 18560, 17933-G
2	Description of Service.....	19179, 17586, 17587, 17764, 17934-G
3	Application for Service.....	12377, 12378-G
4	Contracts.....	12381, 12382-G
5	Special Information Required on Forms.....	23628, 23629-G
6	Establishment and Re-establishment of Credit.....	16447, 20647-G
7	Deposits.....	20648, 16452-G
8	Notices.....	13909-G
9	Rendering and Payment of Bills.....	20649, 22696, 16395, 16396-G
10	Disputed Bills.....	23630, 23631-G
11	Discontinuance of Service.....	23721, 23790, 23723, 23634, 23724, 23636-G 23637, 23791, 15926-G
12	Rates and Optional Rates.....	22205-G
13	Temporary Service.....	9595-G
14	Shortage of Gas Supply, Interruption of Delivery and Priority of Service.....	22206, 22207, 22208, 22209, 22210, 22211-G 22212, 22213, 22214-G
15	Gas Main Extensions.....	9596, 9597, 20023, 10878, 10879, 10566-G 13682, 13683, 20024, 20025, 13686 -G
16	Gas Service Extensions.....	9606, 9607, 20023, 9609, 9610, 9611-G 9612, 9613, 20024, 20025, 9616-G
17	Meter Reading.....	21118, 20471-G
18	Meter Tests and Adjustment of Bills.....	13151, 18563, 18564, 13154-G
19	Supply to Separate Premises and Resale.....	14922, 14923, 14924-G
22	Interstate Capacity Brokering.....	13359-G
25	Gas Transportation Rules for Noncore Customers	22215, 22216, 22217, 22218, 22219-G
27	Automatic Meter Reading.....	11191, 11192-G
28	Provision of Utility Right-of-Way Information.....	11505, 11506, 11507, 11508, 11509-G
30	Transportation of Customer-Owned Gas.....	18869, 24775, 23988, 21848, 21968, 24776-G 24777, 24778, 24779, 24780, 24781, 24782-G 24783, 24784, 24785, 24786, 24787, 24788-G 24789, 24790, 24791, 24792, 24793, 24794-G 24795, 24796, 24797-G
32	Core Aggregation Transportation.....	23068, 23069, 23070, 20908, 20909, 23071-G 23072, 23073, 23074, 23075, 23076, 23077-G 23078, 23079, 23080, 23081, 23082, 23083-G 23084, 23085-G
33	Privacy & Security for Energy Use Data.....	19626, 19627, 19628, 19629, 19630, 19631-G 19632, 19633, 20688, 20689, 20690, 20691-G
35	Contracted Marketer Transportation.....	12819, 12165, 12166, 13114, 12168, 13115-G 12170-G
39	Access to the SDG&E Pipeline System.....	22430, 22431, 22432, 22433-G
40	On-Bill Financing.....	17357-G
43	On-Bill Repayment Pilots.....	21388, 20816, 21389, 21390, 21391, 21392-G 21393-G
44	Mobilehome Park Utility Upgrade Program.....	23766, 22833, 22834, 22835, 20777, 20778-G
45	Standard Renewable Gas Interconnections to the Utility's Pipeline System	20779, 20780-G 24885-24905, 25171-73, 24909-11, 25287-G 24913-15-G, 25288-89, 24917-24-G

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 25242-G  
Canceling Revised Cal. P.U.C. Sheet No. 24609-G

## TABLE OF CONTENTS

Sheet 6

### SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements &amp; Contracts</u>	<u>Cal. P.U.C. Sheet No.</u>
65502	05-04	Statement Of Applicant's Contract Anticipated Cost For Applicant Installation Project.....	13751-G
65503	12-05	Gas Rule 2 - Special Facilities Contract.....	15246-G
101-663A	10-68	Agreement - Bills/Deposits.....	1915-G
101-4152G	06-69	Sign Up Notice for Service.....	1124-G
106-1959A	05-71	Abolving Service Agreement, Service from Temporary Facilities.....	1255-G
106-2659	06-68	Contract for Natural Gas Service Supplied by a Liquefied Natural Gas Installation, (Borrego Springs).....	1082-G
106-3359	---	Contract for Extension of Gas Facilities for Gas Cogeneration.....	3228-G
106-3559		Assessment District Agreement.....	4503-G
106-3559/1		Assessment District Agreement.....	4559-G
106-5140A	---	Agreement for _____ Service.....	2097-G
106-8140	05-71	Contract for _____ Gas Service from Existing Main and Service Pipe.....	1252-G
106-9140	05-71	Agreement for _____ Gas Service and Extension / Enlargement.....	1253-G
106-15140	05-71	Agreement for Temporary Service.....	1254-G
106-42140	11-85	Agreement for Extension and Construction of.....	3758-G
106-42140/1	11-85	General Conditions and Specifications for Applicant Gas Extensions Construction.....	7947-G
106-44140	05-19	Agreement for Extension and Construction of _____.....	23902-G
107-00559	03-98	Proposal to Purchase and Agreement for Transfer Of Ownership of Distribution Systems.....	9470-G
117-13A	07-92	Assignment of Accounts Payable.....	5978-G
117-32	04-92	Billing Credit Pass Through Agreement.....	5879-G
117-186A	07-92	Spot Natural Gas Sales and Purchase Agreement.....	5979-G
117-659	06-91	Imbalance Trading Agreement.....	5623-G
117-2259	08-95	Electronic Data Interchange (EDI) and Funds Transfer Agreement... ..	8041-G
122-1003	10-03	Contract for Fiber Optic Cable in Gas Pipelines Services.....	13311-G
124-363	---	Declaration of Eligibility for Lifeline Rates.....	2336-G
124-463	07-07	Continuity of Service Agreement.....	16354-G
124-463/1	07-07	Continuity of Service Agreement Change Request.....	16355-G
124-4152E	08-73	Application for Gas Service.....	1913-G
124-5152F	08-73	Application for Gas/Electric Service.....	1914-G
132-150	02-21	Medical Baseline Allowance Application.....	25240-G
132-150/1	07-02	Medical Baseline Allowance Self-Certification.....	24332-G
132-01199	02-99	Historical Energy Usage Information Release (English).....	10150-G
132-01199/1	02-99	Historical Energy Usage Information Release (Spanish).....	10151-G
132-6263	06-07	On-Bill Financing Loan Agreement.....	17453-G
132-6263/1	06-07	On-Bill Financing Loan Agreement for Self Installers .....	17454-G
132-6263/2	11-12	On-Bill Financing Loan Agreement for California State Government Customers.....	19589-G
132-6264	08-15	Authorization to Add Charges to Utility Bill.....	21394-G
132-7151	09-92	CAT Program - Historical Gas Usage Information Release Form.....	6188-G
132-122010	12-10	Small Business Affidavit Form.....	18565-G
135-659	10-92	Annual Certification Form - Master Metered Accounts.....	6302-G
135-1559	10-92	Annual Certification Form - Gas Residential Common Use Service... ..	6301-G
139-0001	02-07	Energy Payment Deferral Plan for Citrus & Agricultural Growers.....	16143-G
141-100	01-06	NGV Home Refueling Authorization Agreement.....	15343-G

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 25599-G  
Canceling Revised Cal. P.U.C. Sheet No. 25431-G

## TABLE OF CONTENTS

Sheet 7

### SAMPLE FORMS (Continued)

<u>Form No.</u>	<u>Date</u>	<u>Applications, Agreements &amp; Contracts</u>	<u>Cal. P.U.C. Sheet No.</u>
142-732	05-20	Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program.....	24522-G
142-732/1	05-20	Residential Rate Assistance Application (IVR/SYS-Gen).....	24523-G
142-732/2	05-20	Submetered Household Application and Statement of Eligibility for (CARE) Program.....	24524-G
142-732/3	05-20	CARE Program Recertification - Application and Statement of Eligibility.....	24525-G
142-732/4	05-20	CARE Program Recertification - Application and Statement of Eligibility for Submetered Customers.....	24526-G
142-732/5	05-20	CARE Post Enrollment Verification.....	24527-G
142-732/6	05-20	Residential Rate Assistance Application (Vietnamese).....	24528-G
142-732/8	05-20	Residential Rate Assistance Application (Direct Mail).....	24529-G
142-732/10	05-20	Residential Rate Assistance Application (Mandarin Chinese).....	24530-G
142-732/11	05-20	Residential Rate Assistance Application (Arabic).....	24531-G
142-732/12	05-20	Residential Rate Assistance Application (Armenian).....	24532-G
142-732/13	05-20	Residential Rate Assistance Application (Farsi).....	24533-G
142-732/14	05-20	Residential Rate Assistance Application (Hmong).....	24534-G
142-732/15	05-20	Residential Rate Assistance Application (Khmer).....	24535-G
142-732/16	05-20	Residential Rate Assistance Application (Korean).....	24536-G
142-732/17	05-20	Residential Rate Assistance Application (Russian).....	24537-G
142-732/18	05-20	Residential Rate Assistance Application (Tagalog).....	24538-G
142-732/19	05-20	Residential Rate Assistance Application (Thai).....	24539-G
142-740	05-20	Residential Rate Assistance Application (Easy/App).....	24540-G
142-00832	05-20	Application for California Alternate Rates for Energy (CARE) Program for Qualifying Nonprofit Group Living Facilities.....	24541-G
142-1259	11-16	Noncore Gas Transportation Service Contract.....	22221-G
142-1265	11-16	Transmission Level Service Rate Selection Form (Sched. TLS).....	22222-G
142-1270	12-09	Report of Exemption From Surcharge to Fund CA Public Utilities Commission (Schedule G-PUC).....	17952-G
142-1859	10-13	Request for Core Transportation-Only Services.....	20167-G
142-2000	12-06	Scheduled Quantity Contract.....	15983-G
142-2010	11-16	Curtailment Trading Agreement.....	22223-G
142-4032	05-20	Application for CARE Program for Qualified Agricultural Employee Housing Facilities.....	24542-G
142-4035	06-05	Application for CARE Program for Migrant Farm Worker Housing Centers.....	14858-G
143-002	04-17	Consulting Services Agreement.....	22556-G
143-003	10-05	Collectible System Upgrade Agreement.....	15093-G
143-004	10-05	Confidentiality Agreement.....	15094-G
143-005	06-07	Interconnection Agreement.....	16332-G
143-006	11-06	Interconnect Collectible System Upgrade Agreement.....	15882-G
143-007	11-06	Operational Balancing Agreement.....	15883-G
180-100	12-12	Authorization or Revocation to Receive Customer Usage Information.....	19634-G
185-1000	02-14	Customer Information Service Request Form (CISR).....	20356-G
185-2000	02-16	Energy Efficiency Financing Pilot Programs Authorization or Revocation of Authorization to Release Customer Information.....	21691-G
187-1000	07-14	Rule 33 Standard Non-Disclosure Agreement (NDA).....	21177-G
187-2000	07-14	Rule 33 Terms of Service Acceptance Form.....	21178-G
189-1000	10-21	Mobilehome Park Utility Upgrade Program Agreement.....	25597-G
189-2000	06-21	Mobilehome Park Utility Conversion Program Application.....	25429-G

(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 25217-G  
Canceling Revised Cal. P.U.C. Sheet No. 23644-G

## TABLE OF CONTENTS

Sheet 8

### SAMPLE FORMS

(Continued)

<u>Form No.</u> <u>No.</u>	<u>Date</u>	<u>Bills and Statements</u>	<u>CPUC</u> <u>Sheet</u>	
143-1559	08-86	Gas Cooling Agreement.....	15883-G	
143-1560	02-03	Contracted Marketer Agreement.....	12172-E	
143-1561	02-03	Notice by Contracted Marketer to Add or Delete Customers.....	12173-E	
143-1562	02-03	Notice to Add or Change Contracted Marketer.....	12174-E	
143-1563	02-03	Notice to Terminate a Contracted Marketer.....	12175-E	
143-1659	04-88	Cogeneration Standby Equipment Affidavit.....	4491-G	
143-02059	12-99	Direct Access Service Request (DASR).....	10846-G	
		<u>Deposit Receipts and Guarantees</u>		
101-00197		Payment Receipt for Meter Deposit.....	9550-G	
101-363	04-98	Guarantor's Statement.....	8558-G	
103-1750E	10-96	Return of Customer Deposit.....	1917-G	
108-01214	- - -	Residential Meter Re-Read Verification.....	11536-G	
110-00432	02-19	Form of Bill - Gas Service - Opening, Closing and Regular Monthly Statements.....	23638-G	
110-00432/2	02-19	Form of Bill - Gas Service - Pink Past Due Format.....	23639-G	
		<u>Collection Notices</u>		
101-00751	02-21	Final Notice Before Disconnect (MDTs).....	25212-G	T
101-00753	02-19	Back of Urgent Notice Applicable to Forms 101-00753/1 through 101-00753/11.....	23640-G	
101-00753/1	02-04	Urgent Notice Payment Request Security Deposit to Establish Credit.....	18764-G	
101-00753/2	04-11	Urgent Notice Payment Request Security Deposit to Re-establish Credit..	14443-G	
101-00753/3	03-05	Urgent Notice Payment Request for Past Due Security Deposit.....	18765-G	
101-00753/4	04-11	Urgent Notice Payment Request for Past Due Bill.....	18766-G	
101-00753/5	04-11	Urgent Notice Payment Request for Returned Payment.....	13557-G	
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill.....	13558-G	
101-00753/7	02-04	Urgent - Sign up Notice for Service - Final Bill.....	13559-G	
101-00753/8	02-21	Reminder Notice - Payment Request for Past Due Bill.....	25213-G	T
101-00753/9	02-04	Closing Bill Transfer Notification.....	13561-G	
101-00753/10	03-14	Payment Agreement Confirmation.....	20447-G	
101-00753/11	04-11	ESP Reminder Notice - Payment Request for Past Due Bill.....	13563-G	
101-00754	02-19	Final Notice Before Disconnection (mailed), Notice of Past Due Closing Bill, and Notice of Past Due Closing Bill Final Notice.....	23641-G	
101-01072	02-21	Notice of Disconnect (MDTs).....	25214-G	T
101-01073	02-21	Notice of Shut-off (Mailed).....	25215-G	T
101-02171	08-10	Notice to Tenants -Termination of Gas/Electric Service (two or more units)	18367-G	
101-02172	03-14	Notice to Tenants - Request for Termination of Gas and Electric Service..	20449-G	
101-2452G	02-04	Customer Payment Notification.....	13567-G	

(Continued)

8C6	Issued by	Submitted	Feb 5, 2021
Advice Ltr. No. 2951-G	<b>Dan Skopec</b>	Effective	Mar 7, 2021
Decision No. 20-06-003	Vice President Regulatory Affairs	Resolution No.	



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 19182-G  
Canceling Revised Cal. P.U.C. Sheet No. 15760-G

## TABLE OF CONTENTS

Sheet 9

### SAMPLE FORMS (Continued)

<u>Form No.</u>	<u>Date</u>	<u>Operation Notices</u>	<u>Cal. P.U.C. Sheet No.</u>
101-15152B	---	Door Knob Meter Reading Card.....	1939-G
101-3052B	3-69	Temporary "After Hour" Turn On Notice.....	1930-G
108-2132D	---	Notice of Faulty Equipment.....	1933-G
108-4132B	---	Caution Unvented Heater.....	1938-G
108-4213/4C	6-70	Shut Off Notice for Work on Gas Service Line.....	1936-G
108-5132A	---	Notice of Potentially Unsafe Gas Appliance.....	1937-G
108-8213	---	Interruption of Service Notice.....	1932-G
115-00363/2	9-00	Sorry We Missed You.....	11342-G
115-01363	9-00	Gas Outage.....	11343-G
115-7152A	---	Access Problem Notice.....	2950-G
124-00020	3-01	Houseline Gas Leak Detection Doorhanger.....	11553-G
124-70A		No Service Tag.....	1935-G

### INDEX OF AREA MAPS

Map 1 – Territory Served.....	17583-G
Map 2 – Thermal Zones.....	19178-G

T

9C7

Advice Ltr. No. 2087-G

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

Issued by  
**Lee Schavrien**  
Senior Vice President

Date Filed Jan 19, 2012

Effective Feb 15, 2012

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

## **APPENDIX C**

### **STATEMENT OF ORIGINAL COST AND DEPRECIATION RESERVES**



**SAN DIEGO GAS & ELECTRIC COMPANY**

**COST OF PROPERTY AND  
DEPRECIATION RESERVE APPLICABLE THERETO  
AS OF SEPTEMBER 30, 2021**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>ELECTRIC DEPARTMENT</b>			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	192,327,420.84	171,034,561.64
	Intangible Contra Accounts	(979,446.23)	(587,459.08)
	<b>TOTAL INTANGIBLE PLANT</b>	<b>191,570,815.97</b>	<b>170,650,002.86</b>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	91,430,413.60	54,402,794.78
312	Boiler Plant Equipment	164,294,063.74	98,489,639.43
314	Turbogenerator Units	133,511,708.78	67,093,555.55
315	Accessory Electric Equipment	86,961,890.56	53,264,204.79
316	Miscellaneous Power Plant Equipment	65,539,111.21	22,233,277.51
		0.00	0.00
	Palomar Contra E-316	(1,621,911.83)	(662,489.89)
	<b>TOTAL STEAM PRODUCTION</b>	<b>554,641,794.35</b>	<b>294,867,500.46</b>
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	24,895,662.62	12,636,003.96
342	Fuel Holders, Producers & Accessories	21,651,513.75	10,850,150.29
343	Prime Movers	94,499,877.71	56,380,689.16
344	Generators	327,198,489.71	161,912,072.04
345	Accessory Electric Equipment	32,888,863.01	19,299,032.92
346	Miscellaneous Power Plant Equipment	70,851,153.92	22,205,192.17
	<b>TOTAL OTHER PRODUCTION</b>	<b>572,212,357.59</b>	<b>283,285,568.50</b>
	<b>TOTAL ELECTRIC PRODUCTION</b>	<b>1,126,854,151.94</b>	<b>578,153,068.96</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	80,294,985.16	0.00
350.2	Land Rights	172,455,914.38	29,633,543.03
352	Structures and Improvements	706,003,961.59	118,657,536.60
353	Station Equipment	2,106,461,888.07	515,287,726.96
354	Towers and Fixtures	926,884,636.77	248,242,430.28
355	Poles and Fixtures	956,300,281.08	168,440,655.57
355	Pole retirement error correction-top side	0.00	0.00
356	Overhead Conductors and Devices	853,407,343.78	282,952,061.15
357	Underground Conduit	559,305,264.60	99,888,512.76
358	Underground Conductors and Devices	569,020,673.87	99,670,302.70
359	Roads and Trails	367,439,469.20	53,894,978.18
	<b>TOTAL TRANSMISSION</b>	<b>7,297,574,418.50</b>	<b>1,616,667,747.23</b>
360.1	Land	17,456,813.30	0.00
360.2	Land Rights	96,511,119.82	50,070,190.41
361	Structures and Improvements	13,236,811.29	2,570,178.84
362	Station Equipment	657,037,773.13	275,678,574.88
363	Storage Battery Equipment	182,731,559.20	65,241,994.65
364	Poles, Towers and Fixtures	1,000,351,878.74	304,778,859.42
364	Pole retirement error correction-top side	0.00	0.00
365	Overhead Conductors and Devices	1,090,919,285.34	261,880,584.50
366	Underground Conduit	1,668,114,261.48	603,455,151.51
367	Underground Conductors and Devices	1,917,294,487.64	1,054,322,882.93
368.1	Line Transformers	755,096,036.54	266,808,817.66
368.2	Protective Devices and Capacitors	34,983,785.45	16,529,976.32
369.1	Services Overhead	269,854,564.48	105,088,422.99
369.2	Services Underground	403,963,883.17	280,430,467.49
370.1	Meters	213,371,428.79	138,892,998.89
370.2	Meter Installations	71,563,863.68	37,699,560.30
371	Installations on Customers' Premises	74,699,165.46	29,041,635.55
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	35,215,448.94	23,536,837.53
		0.00	(4,709,476.00)
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>8,502,402,166.45</b>	<b>3,511,317,657.87</b>
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	45,469,034.54	29,424,683.73
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	25,722.82
393	Stores Equipment	46,031.37	5,930.79
394.1	Portable Tools	39,900,796.35	12,536,701.36
394.2	Shop Equipment	278,147.42	232,240.02
395	Laboratory Equipment	5,336,019.09	1,631,293.84
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	403,747,284.81	168,140,441.98
398	Miscellaneous Equipment	3,283,046.75	1,393,600.90
	<b>TOTAL GENERAL PLANT</b>	<b>505,491,177.47</b>	<b>213,558,001.32</b>
101	<b>TOTAL ELECTRIC PLANT</b>	<b>17,623,892,730.33</b>	<b>6,090,346,478.24</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>GAS PLANT</b>			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,168,803.11	1,471,715.53
	TOTAL STORAGE PLANT	2,168,803.11	1,471,715.53
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,514,781.26	1,691,753.71
366	Structures and Improvements	22,250,754.97	12,030,326.82
367	Mains	450,224,142.81	99,856,426.68
368	Compressor Station Equipment	104,685,773.36	76,470,191.94
369	Measuring and Regulating Equipment	29,126,273.69	19,089,713.13
371	Other Equipment	2,820,111.41	363,671.65
	TOTAL TRANSMISSION PLANT	617,270,981.25	209,502,083.93
374.1	Land	1,514,272.84	0.00
374.2	Land Rights	8,519,345.65	7,579,540.27
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,477,730,230.05	463,090,475.99
378	Measuring & Regulating Station Equipment	21,137,579.33	10,111,008.47
380	Distribution Services	485,564,860.58	309,778,418.30
381	Meters and Regulators	186,872,108.16	83,063,663.88
382	Meter and Regulator Installations	121,313,422.45	49,724,752.09
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,342,306.73
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,397,017.90	6,937,352.36
	TOTAL DISTRIBUTION PLANT	2,315,609,094.57	931,688,771.19

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	0.00	0.13
394.1	Portable Tools	22,140,750.53	5,052,769.83
394.2	Shop Equipment	63,820.21	32,499.57
395	Laboratory Equipment	0.00	(7,344.15)
396	Power Operated Equipment	0.00	(1,088.04)
397	Communication Equipment	2,256,363.98	1,087,252.25
398	Miscellaneous Equipment	465,787.29	186,473.37
	TOTAL GENERAL PLANT	24,926,722.01	6,376,065.96
101	TOTAL GAS PLANT	2,960,061,705.14	1,149,124,740.81
<b>COMMON PLANT</b>			
303	Miscellaneous Intangible Plant	2,555,893.38	470,502.07
303	Miscellaneous Intangible Plant	836,984,980.23	426,952,034.83
	Common Contra Account	(4,128,951.21)	(1,838,550.83)
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,796.01	0.00
389.2	Land Rights	27,776.34	27,776.34
390	Structures and Improvements	552,264,123.35	190,338,360.05
391.1	Office Furniture and Equipment - Other	40,879,114.82	14,622,572.63
391.2	Office Furniture and Equipment - Computer E	123,742,408.14	55,570,698.61
	Common Contra Account	(19,579.43)	(12,491.14)
392.1	Transportation Equipment - Autos	406,252.33	276,038.77
392.2	Transportation Equipment - Trailers	107,977.72	17,640.12
392.3	Transportation Equipment - Aviation	12,139,287.63	4,352,100.81
393	Stores Equipment	332,982.68	68,530.04
394.1	Portable Tools	1,520,840.18	660,471.37
394.2	Shop Equipment	142,759.33	98,192.92
394.3	Garage Equipment	1,837,003.62	645,724.12
395	Laboratory Equipment	1,731,094.98	998,373.00
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	346,325,548.22	126,216,365.21
398	Miscellaneous Equipment	3,585,062.47	774,810.60
118.1	TOTAL COMMON PLANT	1,927,929,370.79	820,046,170.42
	TOTAL ELECTRIC PLANT	17,623,892,730.33	6,090,346,478.24
	TOTAL GAS PLANT	2,960,061,705.14	1,149,124,740.81
	TOTAL COMMON PLANT	1,927,929,370.79	820,046,170.42
101 & 118.1	TOTAL	22,511,883,806.26	8,059,517,389.47
101	PLANT IN SERV-SONGS FULLY RECOVERE	0.00	0.00
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	0.00	0.00
		0.00	0.00

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CLOUD CONTRA		
	Electric	0.00	0.00
	Common	(2,555,893.38)	(470,502.06)
		<u>(2,555,893.38)</u>	<u>(470,502.06)</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,494,846.06)	(1,494,846.06)
		<u>(1,494,846.06)</u>	<u>(1,494,846.06)</u>
101	Accrual for Retirements		
	Electric	(16,389,520.96)	(16,389,520.96)
	Gas	(119,197.76)	(119,197.76)
		<u>(119,197.76)</u>	<u>(119,197.76)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(16,508,718.72)</u>	<u>(16,508,718.72)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	112,194,000.02	30,318,362.01
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT LEASED TO OTHERS	<u>112,194,000.02</u>	<u>30,318,362.01</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,168,688,168.80	
	Gas	171,619,306.46	
	Common	309,576,400.23	
		<u>309,576,400.23</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,649,883,875.49</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	<u>0.00</u>	<u>1,002,372,872.27</u>
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0.00</u>	<u>1,002,372,872.27</u>
101.1	ELECTRIC CAPITAL LEASES	1,307,422,019.46	84,718,944.73
118.1	COMMON CAPITAL LEASE	<u>76,864,671.05</u>	<u>21,200,581.63</u>
		1,384,286,690.51	105,919,526.36
143	FAS 143 ASSETS - Legal Obligation	40,223,457.08	(994,022,774.29)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	139,869,876.96	52,285,977.05
143	FAS 143 ASSETS - Legal Obligation	<u>0.00</u>	<u>(1,975,708,388.95)</u>
	TOTAL FAS 143	180,093,334.04	(2,917,445,186.19)
	UTILITY PLANT TOTAL	<u>25,817,782,248.16</u>	<u>6,262,208,897.08</u>

**APPENDIX D**  
**SUMMARY OF EARNINGS**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**SUMMARY OF EARNINGS**  
**SEP 2021**  
**(\$ IN MILLIONS)**

Line No.	Item	Amount
1	Operating Revenue	\$ 4,541
2	Operating Expenses	<u>3,802</u>
3	Net Operating Income	<u>\$ 739</u>
4	Weighted Average Rate Base	\$ 12,099
5	Rate of Return*	7.55%
	*Authorized Cost of Capital	



**APPENDIX E**  
**NOTICE LIST**

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

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

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

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

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

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

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

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

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

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

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

Alpine County  
Attn. County Clerk  
99 Water Street, P.O. Box 158  
Markleeville, CA 96120

City of Carlsbad  
Attn. Office of the County Clerk  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Coronado  
Attn. Office of the City Clerk  
1825 Strand Way  
Coronado, CA 92118

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

City of El Cajon  
Attn. City Clerk  
200 Civic Way  
El Cajon, CA 92020

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

City of Fallbrook  
Chamber of Commerce  
Attn. City Clerk  
111 S. Main Avenue  
Fallbrook, CA 92028

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

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

Department of U.S. Administration  
General Services Administration  
300 N. Los Angeles St. #3108  
Los Angeles, CA 90012

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

City of Chula Vista  
Attn: Office of the City Clerk  
276 Fourth Avenue  
Chula Vista, California 91910-2631

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

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

City of El Cajon  
Attn. City Attorney  
200 Civic Way  
El Cajon, CA 92020

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

City of Fallbrook  
Chamber of Commerce  
Attn. City Attorney  
111 S. Main Avenue  
Fallbrook, CA 92028

Julian Chamber of Commerce  
P.O. Box 1866  
2129 Main Street  
Julian, CA

City of Laguna Niguel  
Attn. City Attorney  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Laguna Niguel  
Attn. City Clerk  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

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

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

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

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

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

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

City of Mission Viejo  
Attn: City Attorney  
200 Civic Center  
Mission Viejo, CA 92691

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

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

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

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

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

County of Orange  
Attn. County Clerk  
12 Civic Center Plaza, Room 101  
Santa Ana, CA 92701

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

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

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

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

City of San Diego  
Attn. Mayor  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

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

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

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

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

City of San Diego  
Attn. City Attorney  
1200 Third Ave.  
Suite 1620  
San Diego, CA 92101

City of San Diego  
Attn. City Clerk  
202 C Street, 2<sup>nd</sup> Floor  
San Diego, CA 92101

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

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

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

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

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

Spring Valley Chamber of  
Commerce  
Attn. City Clerk  
3322 Sweetwater Springs Blvd,  
Ste. 202  
Spring Valley, CA 91977-3142

Valley Center Chamber of  
Commerce  
Attn. City Clerk  
P.O. Box 8  
Valley Center, CA 92082

City of Vista  
Attn. City Attorney  
200 Civic Center Drive, Bldg. K  
Vista, CA 92084

City of Vista  
Attn. City Clerk  
200 Civic Center Drive  
Vista, CA 92084

City of Aliso Viejo  
12 Journey  
Aliso Viejo, CA 92656

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

Application of San Diego Gas & Electric Company  
(U 902 M) to Adopt 2024-2031 Energy Efficiency  
Rolling Portfolio Business Plan Pursuant to  
D.21-05-031

Application 22-03-\_\_\_\_\_

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)  
NOTICE OF AVAILABILITY OF APPLICATION TO ADOPT 2024-2031 ENERGY  
EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN PURSUANT TO  
D.21-05-031**

Erica L. Martin  
8330 Century Park Court, CP32B  
San Diego, CA 92123  
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Counsel for:  
SAN DIEGO GAS & ELECTRIC COMPANY

March 4, 2022

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

Application of San Diego Gas & Electric Company  
(U 902 M) to Adopt 2024-2031 Energy Efficiency  
Rolling Portfolio Business Plan Pursuant to  
D.21-05-031

Application 22-03-\_\_\_\_\_

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)  
NOTICE OF AVAILABILITY OF APPLICATION TO ADOPT 2024-2031 ENERGY  
EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN PURSUANT TO  
D.21-05-031**

Pursuant to Rule 1.9(d) of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), San Diego Gas & Electric Company (“SDG&E”) hereby provides notice that it has electronically filed with the Commission’s docket office its **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) TO ADOPT 2024-2031 ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN PURSUANT TO D.21-05-031.**

The Application and its supporting material would exceed 3.5 megabytes in size. The supporting materials include separately bound testimony, which SDG&E intends to offer into evidence. SDG&E’s workpapers supporting its application will be available upon request, following the filing of the Application.

This Notice of Availability is being served on all parties listed on the official service lists for (R.) 13-11-005 Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues and the Application of Southern California Edison Company (U 338-E) for Approval of Energy Efficiency Rolling Portfolio Business Plan A. 17-01-013, et al.

The Application, along with the supporting material, is available on SDG&E’s website at the following link: <https://www.sdge.com/rates-and-regulations/regulatory-filing/914/energy-efficiency-filings>

The Application may also be obtained by contacting:

Geneveve Buscit  
Regulatory Case Manager  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 Century Park Court  
San Diego, CA 92123  
Phone: 858-654-8991  
Email: gbucsit@sdge.com

In addition, pursuant to the Administrative Law Judge's Procedural Email Providing Guidance on Spreadsheets to be Included in Portfolio Applications sent on February 14, 2022 in R.13-11-005 (ALJ Email), SDG&E presents its Energy Efficiency 2024-2031 application data tables in spreadsheets form. Pursuant to the ALJ Email, SDG&E (1) files these spreadsheets via archival grade DVD to the CPUC Docket Office, and (2) serves these publicly available spreadsheets as uploaded to the California Energy Data and Reporting System (CEDARS) here <https://cedars.sound-data.com/filings/dashboard/SDGE/2024/>.

SDG&E will not provide hard copies of the Application, testimony or workpapers to parties at this time as service of hard copies of tendered documents are temporarily suspended per the COVID-19 Temporary Filing and Service Protocol for Formal Proceedings: <https://www.cpuc.ca.gov/COVID19practitioneralert/>.

DATED at San Diego, California, this 4<sup>th</sup> day of March 2022.

Respectfully submitted,

By:       /s/ Erica L. Martin        
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