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December 22, 2003

ADVICE LETTER 1547-E/1424-G
(U902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: USE OF PROGRAM YEAR 2001 LOAD IMPACT STUDY FOR SDG&E PY 2004
LOW-INCOME ENERGY EFFICIENCY (LIEE) PROGRAM**

San Diego Gas & Electric Company (SDG&E) hereby submits for filing with the California Public Utilities Commission (Commission) its 2004 budget and goals, updated measure costs and estimates of bill savings associated with its Program Year (PY) 2004 Low Income Energy Efficiency (LIEE) Program, as shown in Attachment A.

PURPOSE

SDG&E has used the PY 2001 Load Impact Study entitled "Impact Evaluation of the 2001 Statewide Low-Income Energy Efficiency (LIEE) Program" prepared by Kema-Xenergy, which was filed with the Commission on April 18, 2003, in determining the energy savings associated with its PY 2004 LIEE programs.

BACKGROUND

In D.01-05-033, the Commission ordered an LIEE Impact Evaluation Plan be conducted to assess the impacts of the new energy efficiency measures that were implemented under rapid deployment. The Reporting Requirements Manual Working Group (RRMWG) submitted a 2001 LIEE Impact Evaluation Plan to the Commission on July 3, 2001, and a revised LIEE Impact Evaluation Plan was submitted to the Commission on September 24, 2001. The 2001 LIEE Impact Evaluation Plan was approved by the Commission in a November 20, 2001 Assigned Commissioner Ruling. The 2001 impact evaluation was to quantify first year savings impacts on a per measure and per dwelling basis for each utility.¹

On April 18, 2003, Southern California Edison, on behalf of the four major investor-owned utilities, filed with the Commission the Notice of Availability of the "Impact Evaluation of the 2001 Statewide Low-Income Energy Efficiency Program" (Final Xenergy Report: Study ID 577). This document was submitted to all members of the California Demand-Side Management Measurement Advisory Commission, all parties to the AEAP (A.01-05-003), and all parties to Rulemaking 01-08-027.

¹ The current measurement protocols would typically allow 2001 as a "skip" year for a load impact study; however, in D.01-06-082 (p.19), the Commission further determined that a PY 2001 load impact study was required due to the significant changes in program scope and design between PY 2000 and PY 2001.

The 2001 load impact report reflects updated estimates over the 2000 load impact study (also conducted by Kema-Xenergy) and is an improvement over the 2000 load impact study in that it provides estimates of load impacts for individual measures compared to the 2000 load impact study that estimated load impacts at the program level. One of the primary purposes of conducting load impact studies is to update program load impacts that can be utilized in future programs so that the information used in the forecast is always the most recent study results to estimate energy benefits on a prospective basis. As such, SDG&E plans to utilize the 2001 load impact study (Study ID 577) to calculate 2004 program accomplishments (forecasted and achieved). In Attachment A, SDG&E provides its updated 2004 program forecast that is expected to be realized in 2004 based on this study.

This filing will not increase any rates or charges, conflict with any schedules or rules, nor cause the withdrawal of service.

EFFECTIVE DATE

In accordance with Section V.A. of General Order 96-A, SDG&E respectfully requests that this filing become effective on January 31, 2004, which is 40 calendar days after the date filed.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

Energy Division - IMC Branch
California Public Utilities Commission
505 Van Ness Avenue, Room 4002
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Jerry Royer (jrr@cpuc.ca.gov) and to Honesto Gatchalian (jnj@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Monica Wiggins
Regulatory Tariff Manager
8330 Century Park Court, Room 32D
San Diego, CA 92123-1548
Facsimile No. (858) 654-1788
E-mail: mwiggin@semprautilities.com

NOTICE

In accordance with Section III-G of General Order 96-A, a copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties in

R.01-08-027, by either providing them a copy electronically or by mailing them a copy hereof properly stamped and addressed.

Address changes should be directed to Susanne Schmelter by facsimile at (858) 654-1788 or by e-mail to sschmelter@semprautilities.com.

J. STEVE RAHON
Director – Tariffs & Regulatory Accounts

SAN DIEGO GAS & ELECTRIC COMPANY

ADVICE LETTER 1547-E/1424-G

ATTACHMENT A

SDG&E'S 2004 BUDGET AND GOALS FOR LOW INCOME ENERGY EFFICIENCY PROGRAMS

LIEE Program	BUDGET (2004 \$)	GOALS
<u>LIEE Services</u>		
Weatherization and Energy Efficiency Installations	\$13,734,934	Weatherize 12,000 Units, Educate 14,500, Repair/Replace 1278 furnaces, Install 6300 refrigerators, Install 100 water heaters
Energy Education for Low Income	\$268,107	Educate 20,000 to 30,000 customers
Total Program	\$14,003,041	
<u>Regulatory Oversight</u>		
Measurement & Evaluation	\$50,000	
Energy Division Staff Support	\$47,200	
Total Regulatory Oversight	\$97,200	
Performance Incentive (Electric Only)	\$125,852	
TOTAL	\$14,226,093	

**San Diego Gas & Electric Company
 Cost Effectiveness Summary**

Utility Cost Test

NPV of Total Life-Cycle Energy Savings	NPV of Total Life-Cycle Non-Energy Dollar Savings	NPV of Total Life-Cycle Savings (Energy + Non-Energy)	Total Program Costs	Benefit / Cost Ratio without NEB	Benefit / Cost Ratio with NEB	NPV without Energy Benefits - Total Program Costs	NPV with Energy Benefits - Total Program Costs
\$15,831,173	\$3,164,798	\$18,995,971	\$14,226,093	1.11	1.34	\$1,605,080	\$4,769,878

Participant Cost Test

NPV of Total Life-Cycle Energy Savings	NPV of Total Life-Cycle Non-Energy Dollar Savings	NPV of Total Life-Cycle Savings (Energy + Non-Energy)	Total Program Costs	Benefits without NEB / Program Costs	Benefits with NEB / Program Costs
\$8,972,307	\$4,538,532	\$13,510,839	\$14,226,093	0.63	0.95

Bill Savings to Cost Ratio

NPV of Total Life-Cycle Energy Savings	NPV of Total Life-Cycle Non-Energy Dollar Savings	NPV of Total Life-Cycle Savings (Energy + Non-Energy)	Total Program Costs	Bill Savings / Cost Ratio	Per Home Average Life Cycle Bill Savings
\$8,972,307	\$4,538,532	\$13,510,839	\$14,226,093	0.63	618.78

San Diego Gas & Electric Company
Measure Assumptions

Energy Efficient Measure	Number of Measures Installed	Incremental Cost - (\$ Per Unit)	Total Cost per Measure	First Year Annualized Savings - per Measure in Therms	First Year Annualized Savings for Space Heat and Other - per Measure in kWh	First Year Annualized Savings for Air Conditioning Only - per Measure in kWh	Total First Year Dollar Savings	Effective Useful Life (EUL) in Years	NPV of Total Life-Cycle Dollar Savings - Over EUL of the Measures	Participant Cost Test		Utility Cost Test	
										Per Measure NPV Benefit-Cost (B/C) Ratio, excluding Non-energy benefits	Per Measure NPV Benefit-Cost (B/C) Ratio, including Non-energy benefits	Per Measure NPV Benefit-Cost (B/C) Ratio, excluding Non-energy benefits	Per Measure NPV Benefit-Cost (B/C) Ratio, including Non-energy benefits
Permanent Evaporative Coolers	4	\$ 903.89	\$ 3,616		157.1		\$ 81	15	\$ 879	0.24	0.34	0.44	0.53
Compact Fluorescents (inc. porchlights) MF	18360	\$ 17.77	\$ 326,247		16.4		\$ 38,627	9	\$ 288,285	0.88	1.20	1.59	1.92
Compact Fluorescents (inc. porchlights) MH	2160	\$ 17.77	\$ 38,382		16.4		\$ 4,544	9	\$ 33,916	0.88	1.20	1.59	1.92
Compact Fluorescents (inc. porchlights) SF	15480	\$ 17.77	\$ 275,071		23.7		\$ 47,065	9	\$ 351,257	1.28	1.73	2.30	2.77
Porchlights MF	18775	\$ 53.13	\$ 9,975		24.2		\$ 583	20	\$ 7,627	0.76	1.04	1.38	1.66
Porchlights SF	534,36538	\$ 53.13	\$ 28,391		35.6		\$ 2,440	20	\$ 31,934	1.12	1.53	2.03	2.44
Refrigerators MF	3026	\$ 638.47	\$ 1,932,013		665.1		\$ 258,188	15	\$ 2,813,896	1.46	2.04	2.63	3.16
Refrigerators MH	590	\$ 698.94	\$ 412,372		665.1		\$ 50,341	15	\$ 548,645	1.33	1.87	2.40	2.89
Refrigerators SF	2684	\$ 714.15	\$ 1,916,787		794.8		\$ 273,666	15	\$ 2,982,583	1.56	2.18	2.80	3.38
Air Conditioner Replacement - Room	56	\$ 778.47	\$ 43,594		128.7		\$ 925	11	\$ 8,064	0.18	0.26	0.33	0.40
Sub-total for Electric Appliances			\$ 4,986,449				\$ 676,459		\$ 7,067,084				
Repair - Gas MF	386.1	\$ 156.82	\$ 60,550	26.2			\$ 8,782	10	\$ 71,205	1.18	5.39	1.86	2.24
Repair - Gas MH	69.3	\$ 156.82	\$ 10,868	26.7			\$ 1,606	10	\$ 13,024	1.20	3.04	1.90	2.28
Repair - Gas SF	534.6	\$ 156.82	\$ 83,838	25			\$ 11,603	10	\$ 94,076	1.12	2.84	1.77	2.14
Replacement - Gas SF	278	\$ 1,997.23	\$ 555,229	38.7			\$ 9,340	22	\$ 129,094	0.23	0.59	0.37	0.44
Gas Appliance Inspections	9000	\$ 51.34	\$ 462,023				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Water Heater Replacement	100	\$ 648.68	\$ 64,868	19			\$ 1,650	15	\$ 17,978	0.28	1.38	0.44	1.21
Sub-total for Gas Appliances			\$ 1,237,375				\$ 32,982		\$ 325,377				
Cover Plates/Gaskets	41000	\$ 1.51	\$ 61,822	0	0	0	\$ -	15	\$ -	0.00	0.00	0.00	0.00
Evaporative Cooler Covers (Gas)	85	\$ 47.62	\$ 4,047	6.3	0	0	\$ 465	3	\$ 1,329	0.33	0.55	0.52	0.63
Evaporative Cooler Covers (Electric)	15	\$ 47.62	\$ 714	0	3.6	0	\$ 7	3	\$ 20	0.03	0.05	0.05	0.06
Attic Insulation - SF (Gas)	340	\$ 1,031.32	\$ 350,647	26			\$ 7,675	25	\$ 113,574	0.32	0.55	0.51	0.62
Attic Insulation - SF (Electric)	60	\$ 1,031.32	\$ 61,879		157.3	49.7	\$ 1,593	25	\$ 23,579	0.38	0.64	0.69	0.83
Water Heater Blanket MF (Gas)	158.95	\$ 32.93	\$ 5,235	9.2			\$ 1,270	5	\$ 5,771	1.10	1.86	1.74	2.10
Water Heater Blanket MF (Electric)	28.05	\$ 32.93	\$ 924		88.5		\$ 318	5	\$ 1,448	1.57	2.64	2.82	3.40
Water Heater Blanket MH (Gas)	84.15	\$ 32.93	\$ 2,771	9.2			\$ 672	5	\$ 3,055	1.10	1.86	1.74	2.10
Water Heater Blanket MH (Electric)	14.85	\$ 32.93	\$ 489				\$ -	5	\$ -	0.00	0.00	0.00	0.00
Water Heater Blanket SF (Gas)	691.9	\$ 32.93	\$ 22,787	11.3			\$ 6,788	5	\$ 30,857	1.35	2.28	2.14	2.58
Water Heater Blanket SF (Electric)	122.1	\$ 32.93	\$ 4,021		145.3		\$ 2,276	5	\$ 10,346	2.57	4.34	4.64	5.58
Low Flow Showerhead MF (Gas)	4820.35	\$ 42.76	\$ 206,141	7.2			\$ 30,131	10	\$ 244,299	1.19	2.00	1.87	2.26
Low Flow Showerhead MF (Electric)	850.65	\$ 42.76	\$ 36,378		66.6		\$ 7,288	10	\$ 58,926	1.62	2.20	2.92	2.92
Low Flow Showerhead MH (Gas)	545.7	\$ 42.76	\$ 23,337	7.2			\$ 3,411	10	\$ 27,656	1.19	1.61	1.87	1.87
Low Flow Showerhead MH (Electric)	96.3	\$ 42.76	\$ 4,118		66.6		\$ 823	10	\$ 6,671	1.62	2.20	2.92	2.92
Low Flow Showerhead SF (Gas)	3728.95	\$ 42.76	\$ 159,667	8.2			\$ 26,546	10	\$ 215,234	1.35	1.83	2.13	2.13
Low Flow Showerhead SF (Electric)	658.05	\$ 42.76	\$ 28,141		108.7		\$ 9,176	10	\$ 74,400	2.64	4.46	4.77	5.74
Weatherstripping -MF (Gas)	4590	\$ 75.44	\$ 346,275	2.7			\$ 10,759	5	\$ 48,911	0.14	0.24	0.22	0.27
Weatherstripping -MF (Electric)	810	\$ 75.44	\$ 61,107		11.1	1.1	\$ 1,268	5	\$ 5,763	0.09	0.16	0.17	0.20
Weatherstripping -MH (Gas)	297,50459	\$ 61.08	\$ 18,170	5.1			\$ 1,317	5	\$ 5,988	0.33	0.56	0.52	0.63
Weatherstripping -MH (Electric)	52,50081	\$ 61.08	\$ 3,207		10.9	1.1	\$ 81	5	\$ 367	0.11	0.19	0.21	0.25
Weatherstripping -SF (Gas)	3952,4954	\$ 134.40	\$ 531,201	4.7			\$ 16,128	5	\$ 73,316	0.14	0.23	0.22	0.26
Weatherstripping -SF (Electric)	697,49919	\$ 134.40	\$ 93,741		10.7	2.6	\$ 1,190	5	\$ 5,410	0.06	0.10	0.10	0.13
Caulking - MF (Gas)	4335	\$ 38.12	\$ 165,270	2			\$ 7,527	5	\$ 34,218	0.21	0.35	0.33	0.39
Caulking - MF (Electric)	765	\$ 38.12	\$ 29,165		7.3	1.1	\$ 824	5	\$ 3,748	0.13	0.22	0.23	0.28
Caulking - MH (Gas)	554,08799	\$ 134.20	\$ 74,358	4.4			\$ 2,117	5	\$ 9,622	0.13	0.22	0.20	0.25
Caulking - MH (Electric)	97,780233	\$ 134.20	\$ 13,122		6.9	1.2	\$ 102	5	\$ 462	0.04	0.06	0.06	0.08
Caulking - SF (Gas)	3695,912	\$ 67.60	\$ 249,840	4.6			\$ 14,760	5	\$ 67,098	0.27	0.45	0.42	0.51
Caulking - SF (Electric)	652,21977	\$ 67.60	\$ 44,089		10.7	2.6	\$ 1,113	5	\$ 5,059	0.11	0.19	0.21	0.25
Minor Home Repairs MF (Gas)	1591.2	\$ 125.90	\$ 200,326	3.5			\$ 4,835	10	\$ 39,201	0.20	0.33	0.31	0.37
Minor Home Repairs MF (Electric)	280.8	\$ 125.90	\$ 35,352		18.4	6.4	\$ 893	10	\$ 7,243	0.20	0.35	0.37	0.44
Minor Home Repairs MH (Gas)	244.8	\$ 125.90	\$ 30,819	5.1			\$ 1,084	10	\$ 8,788	0.29	0.48	0.45	0.54
Minor Home Repairs MH (Electric)	43.2	\$ 125.90	\$ 5,439		17.1	6.8	\$ 132	10	\$ 1,074	0.20	0.33	0.36	0.43
Minor Home Repairs SF (Gas)	2244	\$ 125.90	\$ 282,512	7			\$ 13,637	10	\$ 110,568	0.39	0.66	0.62	0.74
Minor Home Repairs SF (Electric)	396	\$ 125.90	\$ 49,855		27.4	7.8	\$ 1,788	10	\$ 14,498	0.29	0.49	0.52	0.63
Water Heater Pipe Wrap MF (Gas)	209,94872	\$ 4.00	\$ 840	3.6			\$ 656	15	\$ 7,151	8.52	14.37	13.47	16.21
Water Heater Pipe Wrap MF (Electric)	37,049773	\$ 4.00	\$ 148		35.4		\$ 168	15	\$ 1,834	12.37	20.88	22.31	26.85
Water Heater Pipe Wrap MH (Gas)	389,90476	\$ 4.00	\$ 1,560	3.6			\$ 1,219	15	\$ 13,281	8.52	14.37	13.47	16.21
Water Heater Pipe Wrap MH (Electric)	68,806722	\$ 4.00	\$ 275				\$ -	15	\$ -	0.00	0.00	0.00	0.00
Water Heater Pipe Wrap SF (Gas)	899,78021	\$ 4.00	\$ 3,599	4.6			\$ 3,593	15	\$ 39,163	10.88	18.36	17.21	20.71
Water Heater Pipe Wrap SF (Electric)	158,78474	\$ 4.00	\$ 635		58.1		\$ 1,183	15	\$ 12,898	20.31	34.27	36.61	44.06
Faucet Aerators MF (Gas)	4706,5024	\$ 13.40	\$ 63,066	2.6			\$ 10,624	5	\$ 48,295	0.77	1.29	1.21	1.46
Faucet Aerators MF (Electric)	830,55925	\$ 13.40	\$ 11,129		26.5		\$ 2,824	5	\$ 12,836	1.15	5.23	2.08	2.50
Faucet Aerators MH (Gas)	532,81159	\$ 13.40	\$ 7,140	2.6			\$ 1,203	5	\$ 5,467	0.77	3.47	1.21	1.46
Faucet Aerators MH (Electric)	94,025575	\$ 13.40	\$ 1,260		26.5		\$ 320	5	\$ 1,453	1.15	1.95	2.08	2.50
Faucet Aerators SF (Gas)	3640,8792	\$ 13.40	\$ 48,787	3.6			\$ 11,379	5	\$ 51,730	1.06	1.79	1.68	2.02
Faucet Aerators SF (Electric)	642,5081	\$ 13.40	\$ 8,609		43.4		\$ 3,577	5	\$ 16,262	1.89	3.19	3.40	4.10
Attic Ventilation	150	\$ 69.33	\$ 10,399				\$ -	25	\$ -	0.00	0.00	0.00	0.00
Auto Sweep	50	\$ 52.00	\$ 2,600				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Door Replacement	2550	\$ 130.01	\$ 331,534				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Door Threshold	3800	\$ 34.66	\$ 131,725				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Glass Replacement	12000	\$ 12.13	\$ 145,515				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Jamb Replacement	150	\$ 34.66	\$ 5,200				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Door Shoe	100	\$ 50.00	\$ 5,000				\$ -	1	\$ -	0.00	0.00	0.00	0.00
Duct register Sealing - MH (Gas)	2550	\$ 20.00	\$ 50,997	1.8			\$ 3,985	5	\$ 18,115	0.36	0.60	0.56	0.68
Duct register Sealing - MH (Electric)	450	\$ 20.00	\$ 8,999		13.4	7.3	\$ 1,195	5	\$ 5,432	0.60	1.02	1.09	1.31
In-Home Education	14500	\$ 66.87	\$ 969,611	0	47	0	\$ 87,427	1	\$ 87,427	0.09	0.15	0.16	0.20
Sub-total for Weatherization Measures			\$ 5,015,396				\$ 307,328		\$ 1,579,845				
Total of All Measures			\$ 11,239,220				\$ 1,016,769		\$ 8,972,307				

San Diego Gas & Electric Company
Electric and Gas Rate Forecast for Use in the Utility Cost Test

Year Number	Year	Utility Electric Cost - \$/kWh ¹	Utility Gas Cost - \$/Therm ¹
1	2004	\$ 0.2312	\$ 1.3730
2	2005	\$0.2382	\$1.4142
3	2006	\$0.2453	\$1.4566
4	2007	\$0.2527	\$1.5003
5	2008	\$0.2603	\$1.5453
6	2009	\$0.2681	\$1.5916
7	2010	\$0.2761	\$1.6394
8	2011	\$0.2844	\$1.6886
9	2012	\$0.2929	\$1.7392
10	2013	\$0.3017	\$1.7914
11	2014	\$0.3108	\$1.8452
12	2015	\$0.3201	\$1.9005
13	2016	\$0.3297	\$1.9575
14	2017	\$0.3396	\$2.0163
15	2018	\$0.3498	\$2.0767
16	2019	\$0.3603	\$2.1390
17	2020	\$0.3711	\$2.2032
18	2021	\$0.3822	\$2.2693
19	2022	\$0.3937	\$2.3374
20	2023	\$0.4055	\$2.4075
21	2024	\$0.4177	\$2.4797
22	2025	\$0.4302	\$2.5541
23	2026	\$0.4431	\$2.6308
24	2027	\$0.4564	\$2.7097
25	2028	\$0.4701	\$2.7910
26	2029	\$0.4842	\$2.8747
27	2030	\$0.4987	\$2.9609
28	2031	\$0.5137	\$3.0498
29	2032	\$0.5291	\$3.1413
30	2033	\$0.5450	\$3.2355

¹ Source: Avoided Costs used are from the 2002 Energy Efficiency Policy Manual

Real Discount Rate	5.00%
Inflation Rate	3.00%
Nominal Discount Rate	8.15%
Energy Escalator Rate	3.00%

San Diego Gas & Electric Company
Electric and Gas Rate Forecast for Use in the Participant Test and Bill Savings Estimates

Year Number	Year	Utility Electric Cost - \$/kWh ¹	Utility Gas Cost - \$/Therm ¹
1	2004	\$ 0.1283	\$ 0.8682
2	2005	\$0.1321	\$0.8942
3	2006	\$0.1361	\$0.9210
4	2007	\$0.1402	\$0.9487
5	2008	\$0.1444	\$0.9771
6	2009	\$0.1487	\$1.0064
7	2010	\$0.1532	\$1.0366
8	2011	\$0.1578	\$1.0677
9	2012	\$0.1625	\$1.0998
10	2013	\$0.1674	\$1.1328
11	2014	\$0.1724	\$1.1668
12	2015	\$0.1776	\$1.2018
13	2016	\$0.1829	\$1.2378
14	2017	\$0.1884	\$1.2749
15	2018	\$0.1940	\$1.3132
16	2019	\$0.1999	\$1.3526
17	2020	\$0.2059	\$1.3932
18	2021	\$0.2120	\$1.4350
19	2022	\$0.2184	\$1.4780
20	2023	\$0.2250	\$1.5223
21	2024	\$0.2317	\$1.5680
22	2025	\$0.2387	\$1.6151
23	2026	\$0.2458	\$1.6635
24	2027	\$0.2532	\$1.7134
25	2028	\$0.2608	\$1.7648
26	2029	\$0.2686	\$1.8178
27	2030	\$0.2767	\$1.8723
28	2031	\$0.2850	\$1.9285
29	2032	\$0.2935	\$1.9863
30	2033	\$0.3023	\$2.0459

¹Source: Joint Utility Report on the Low Income Energy Efficiency Program 2001 Costs and Bill Savings Standardization Report, April 30, 200

Real Discount Rate	5.00%
Inflation Rate	3.00%
Nominal Discount Rate	8.15%
Energy Escalator Rate	3.00%