



Ron van der Leeden
Rates, Revenues & Tariffs
8330 Century Park Court
San Diego, CA 92123-1548

Tel: 213-244-2009
Fax: 858.654.1788
RvanderLeeden@semprautilities.com

March 23, 2009

ADVICE LETTER 2070-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: Revisions to Street Lighting Schedule LS-2

San Diego Gas & Electric Company (SDG&E) hereby submits for approval the following revisions to its electric tariffs as shown in the enclosed attachment.

PURPOSE

The purpose of this Advice Letter is to seek approval from the California Public Utilities Commission (Commission) to revise SDG&E's Electric Rate Schedule LS-2, *Lighting - Street and Highway - Customer-Owned Installations* to implement a new Nonstandard Lamp Charge that will support the use of energy efficient street lighting emerging technologies and other potentially eligible lamps that are not currently listed in Schedule LS-2.

DISCUSSION

SDG&E is experiencing an increased number of inquiries from customers expressing interest in exploring the possibility of replacing current street lighting lamps with new, more energy efficient and longer lasting lighting technologies.

Presently, SDG&E's LS-2 lighting schedule provides rates for a limited number of very specific types of lighting and does not offer customers an option to install new lighting technologies as they become available. Therefore, in response to customers' requests for more lighting rate options, SDG&E proposes to add a Nonstandard Lamp rate to electric schedule LS-2 intended to potentially accommodate the various lamp alternatives available for existing street lighting installations. Furthermore, customers will be given the opportunity to test energy efficient lighting fixtures without having to install expensive metering equipment. The inclusion of the non-standard lamp rate option will potentially eliminate the future need for SDG&E to submit filings to the Commission in response to customer requests for rates that would be applicable to a specific type of street light lamp technology. Once customers have had the opportunity to test the effectiveness of select lighting technologies, SDG&E can then evaluate particular lamp rates for permanently incorporating into the tariffs.

Revisions to Schedule LS-2

SDG&E has added an energy charge for the calculation of monthly per lamp charges for nonstandard lamps and two new special conditions as follows:

11. **Lamp Loads:** The Utility may provide service under this Schedule to street light lamps which are not listed in this Schedule (nonstandard lamps) provided that a lamp load, including lamp wattage and ballast, as applicable, can be reliably established by the Utility.
12. **Charges for Nonstandard Lamps:** The Nonstandard lamp energy charge is used to calculate a monthly per lamp charge for nonstandard lamps. Nonstandard lamps are lamps for which a monthly charge is not listed in this Schedule. Where a lamp is not listed in this Schedule, the monthly charge is computed by first computing the applicable average monthly lamp load, in kWh, for the lamp.

The introduction of the charges for nonstandard lamps will not impact rates currently in effect.

EFFECTIVE DATE

SDG&E believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this advice letter be approved effective April 22, 2009, thirty days from 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:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Honesto Gatchalian (jni@cpuc.ca.gov) and Maria Salinas (mas@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: Todd Cahill
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1788
E-mail: tcahill@semprautilities.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1788 or by e-mail at SDG&ETariffs@semprautilities.com.

RON VAN DER LEEDEN
Director – Rates, Revenues & Tariffs

(cc list enclosed)

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: acarrillo@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2070-E

Subject of AL: Revisions to Street Lighting Schedule LS-2

Keywords (choose from CPUC listing): _____

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL N/A

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: _____

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: April 22, 2009

No. of tariff sheets: 4

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: See Table of Contents

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

San Diego Gas & Electric

Attention: Todd Cahill

8330 Century Park Ct, Room 32C

San Diego, CA 92123

tcahill@semprautilities.com

¹ Discuss in AL if more space is needed.

General Order No. 96-B
ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

DRA

D. Appling
S. Cauchois
J. Greig
R. Pocta
W. Scott

Energy Division

P. Clanon
S. Gallagher
H. Gatchalian
D. Lafrenz
M. Salinas

CA. Energy Commission

F. DeLeon
R. Tavares

Alcantar & Kahl LLP

K. Harteloo

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

CCSE

S. Freedman
J. Porter

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham
E. Hull

City of Poway

R. Willcox

City of San Diego

J. Cervantes
G. Lonergan
M. Valerio

Commerce Energy Group

V. Gan

Constellation New Energy

W. Chen

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill
J. Pau

Dept. of General Services

H. Nanjo
M. Clark

Douglass & Liddell

D. Douglass
D. Liddell
G. Klatt

Duke Energy North America

M. Gillette

Dynegy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell
M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg
J. Heather Patrick
J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard
R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

OnGrid Solar

Andy Black

Pacific Gas & Electric Co.

J. Clark
M. Huffman
S. Lawrie
E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

School Project for Utility Rate Reduction

M. Rochman
Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Sutherland Asbill & Brennan LLP

K. McCrea

Southern California Edison Co.

M. Alexander
K. Cini
K. Gansecki
H. Romero

TransCanada

R. Hunter

D. White

TURN

M. Florio
M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi
N. Furuta
L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

ATTACHMENT
ADVICE LETTER 2070-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 21124-E	SCHEDULE LS-2, LIGHTING - STREET AND HIGHWAY - CUSTOMER-OWNED INSTALLATIONS, Sheet 3	Revised 21067-E
Revised 21125-E	SCHEDULE LS-2, LIGHTING - STREET AND HIGHWAY - CUSTOMER-OWNED INSTALLATIONS, Sheet 6	Revised 19724-E
Revised 21126-E	TABLE OF CONTENTS, Sheet 1	Revised 21123-E
Revised 21127-E	TABLE OF CONTENTS, SCHEDULE OF RATES, Sheet 5	Revised 20892-E



SCHEDULE LS-2

LIGHTING - STREET AND HIGHWAY - CUSTOMER-OWNED INSTALLATIONS

RATES (Continued)

Description- LS-2	Transm	Distr	PPP	ND	CTC	RS	TRAC	UDC Total
<u>Incandescent Lamps</u>								
<u>Rate B</u>								
6000	1.13	6.93	(0.02)	0.06		0.07		8.17
<u>Metal Halide</u>								
<u>Rate A</u>								
100 8500	0.37	1.76	(0.01)	0.02		0.02		2.16
175 12000	0.58	2.76	(0.01)	0.03		0.04		3.40
250 18000	0.80	3.84	(0.01)	0.05		0.05		4.73
400 32000	1.23	5.92	(0.02)	0.07		0.08		7.28
<u>Rate B</u>								
100 8500	0.37	3.29	(0.01)	0.02		0.02		3.69
175 12000	0.58	4.29	(0.01)	0.03		0.04		4.93
250 18000	0.80	5.37	(0.01)	0.05		0.05		6.26
400 32000	1.23	7.45	(0.02)	0.07		0.08		8.81
<u>Induction</u>								
<u>Rate A - 5-Lamp</u>								
55 3500	0.76	3.67	(0.01)	0.04		0.05		4.51
85 6000	1.21	5.80	(0.02)	0.07		0.08		7.14
<u>Induction</u>								
<u>Rate A - 1-Lamp</u>								
55 3500	0.15	0.73	0.00	0.01		0.01		0.90
85 6000	0.24	1.13	0.00	0.01		0.01		1.39
165 12000	0.46	2.20	(0.01)	0.03		0.03		2.71
<u>Non-Standard Lamp</u>								
<u>Energy Charge</u>								
\$/kWh/Lamp/month	\$0.00801	\$0.03234	\$(0.00012)	\$0.00046		\$0.00050		\$0.04119

Notes: Transmission Energy charges include the Transmission Revenue Balancing Account Adjustment (TRBAA) of (\$.00070) per kWh and the Transmission Access Charge Balancing Account Adjustment (TACBAA) of (\$.00149) per kWh. PPP rate is composed of: Low Income PPP rate (LI-PPP) \$.00000/kWh, Non-low Income PPP rate (Non-LI-PPP) \$(.00231)/kWh (pursuant to PU Code Section 399.8, the Non-LI-PPP rate may not exceed January 1, 2000 levels), and Procurement Energy Efficiency Surcharge Rate of \$.00219/kWh.

Rate Components

The Utility Distribution Company Total Rates (UDC Total) shown above are comprised of the following components (if applicable): (1) Transmission (Trans) Charges, (2) Distribution (Distr) Charges, (3) Public Purpose Program (PPP) Charges, (4) Nuclear Decommissioning (ND) Charge, (5) Ongoing Competition Transition Charges (CTC), (6) Reliability Services (RMR), and (7) the Total Rate Adjustment Component (TRAC).

Utility Distribution Company (UDC) Total Rate shown above excludes any applicable commodity charges associated with Schedule EECC and Schedule DWR-BC (Department of Water Resources Bond Charge).

Certain Direct Access customers are exempt from the TRAC component, as defined in Rule 1 – Definitions.

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Advice Ltr. No. 2070-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Mar 23, 2009

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Resolution No. _____

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N
N



SCHEDULE LS-2

Sheet 6

LIGHTING - STREET AND HIGHWAY - CUSTOMER-OWNED INSTALLATIONS

SPECIAL CONDITIONS (Continued)

10. Billing: A customer's bill is first calculated according to the total rates and conditions listed above. The following adjustments are made depending on the option applicable to the customer:

- a. **UDC Bundled Service Customers** receive supply and delivery services solely from the Utility. The customer's bill is based on the Total Rates set forth above. The EECC component is determined by multiplying the EECC price for this schedule during the last month by the customer's total usage.
- b. **Direct Access (DA) and Community Choice Aggregation (CCA) Customers** purchase energy from a non-utility provider and continue to receive delivery services from the Utility. The bills for a DA and CCA Customer will be calculated as if they were a UDC Bundled Service Customer, then crediting the bill by the amount of the EECC component, as determined for a UDC Bundled Customer, including the appropriate Cost Responsibility Surcharge (CRS), if applicable.
- c. **Virtual Direct Access Customers** receive supply and delivery services solely from the Utility. A customer taking Virtual Direct Access service must have a real-time meter installed at its premises to record hourly usage, since EECC change hourly. The bill for a Virtual Direct Access Customer will be calculated as if it were a UDC Bundled Service Customer, then crediting the bill by the amount of the EECC component, as determined for a UDC Bundled Customer, then adding the hourly EECC component, which is determined by multiplying the hourly energy used in the billing period by the hourly cost of energy.

Nothing in this service schedule prohibits a marketer or broker from negotiating with customers the method by which their customer will pay the CTC charge.

- 11. Other Applicable Tariffs: Rules 21, 23 and Schedule E-Depart apply to customers with generators.
- 12. Lamp Loads: The Utility may provide service under this Schedule to street light lamps which are not listed in this Schedule (nonstandard lamps) provided that a lamp load, including lamp wattage and ballast, as application, can be reliably established by the Utility.
- 13. Charges for Nonstandard Lamps: The Nonstandard lamp energy charge is used to calculate a monthly per lamp charge for nonstandard lamps. Nonstandard lamps are lamps for which a monthly charge is not listed in this Schedule. The monthly charge for nonstandard lamps under this Schedule is computed by first computing the applicable average monthly lamp load, in kWh, for the lamp.

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The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

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Advice Ltr. No. 2070-E

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Sheet 5

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Regulatory Affairs

Resolution No. _____