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November 16, 2009

ADVICE LETTER 2126-E
(U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: ANNUAL NON-FUEL GENERATION BALANCING ACCOUNT UPDATE

PURPOSE

The purpose of this Advice Letter is to request California Public Utilities Commission (Commission) approval of SDG&E's 2010 Non-Fuel Generation Balancing Account (NGBA) revenue requirement, reflecting updates to the San Onofre Nuclear Generating Station (SONGS) and SDG&E's Generation Plants (Miramar Combustion Turbine (CT) facility, Miramar Energy Facility II (MEF II) and Palomar Energy Center). Additionally, this advice letter updates SDG&E's NGBA tariff for SONGS refueling revenue requirements in accordance with Southern California Edison's AL 2336-E approved by the Commission on June 26, 2009.

DISCUSSION

The NGBA applies to SDG&E's bundled service customers and provides recovery of approved electric generation non-fuel costs not being recovered by another component of SDG&E's electric commodity rates. Currently, SDG&E has ownership interest in SONGS, the Miramar CT facility, MEF II and the Palomar Energy Center facility, of which the non-fuel revenue requirement for each is reflected in the NGBA. The generation non-fuel revenue requirement adjustments presented in this advice letter have received prior Commission authorization, and are consolidated to produce an NGBA revenue requirement effective January 1, 2010.¹

As part of this advice letter, SDG&E proposes to adjust electric commodity rates to reflect the updated NGBA revenue requirement effective January 1, 2010. The NGBA change will be included in the advice letter consolidating all Commission-authorized changes in SDG&E's revenue requirements, and related changes to its rates, filed at least three days prior to the January 1, 2010 effective date of such rates. A summary of the NGBA revenue requirement for 2010 and a summary of present and proposed rates are both included herein as Attachments B, C, D and E (confidential) respectively.

The following adjustments to SDG&E's NGBA, resulting in a \$36.4 million increase to the 2010 NGBA revenue requirement, are therefore effective January 1, 2010:

¹ D. 06-11-026 in SONGS Steam Generator Replacement Proceeding A.06-04-018, D.08-07-046 in SDG&E's 2008 General Rate Case Proceeding A.06-12-009 and D.09-03-025 in Southern California Edison's 2009 General Rate Case Proceeding A.07-11-011.

SAN ONOFRE NUCLEAR GENERATING STATION (SONGS)

The 2010 SONGS revenue requirement includes \$96.3 million for operations & maintenance (O&M) costs, \$23.2 million for capital-related costs and \$13.8 million for refueling outage amounts as approved in the Southern California Edison's AL 2336-E². The amounts include a 4.25% post-test year ratemaking increase from the 2009 revenue requirement. Furthermore, the 2010 SONGS revenue requirement includes \$1.3 million representing SDG&E's ownership share of the removal and disposal costs of the original steam generators related to the Steam Generator Replacement Program (SGRP) as approved in Decision (D.) 06-11-026. As such, the total 2010 SONGS non-fuel revenue requirement is \$134.6 million.

MIRAMAR CT & PALOMAR

The 2010 Miramar CT and Palomar revenue requirement is \$117.4 million, a \$3.9 million increase over the 2009 revenue requirement due to attrition in the SDG&E generation revenue requirement as approved in SDG&E most recent GRC, D.08-07-046.

MIRAMAR ENERGY FACILITY II (MEF II)**Background**

On January 30, 2009, the Commission issued D.09-01-008, approving SDG&E's application for the MEF II project including an Engineering, Procurement, and Construction contract with Wellhead Services, Inc. and a contract with General Electric for the supply of a simple cycle gas-fired combustion turbine with a capacity of approximately 46.5 megawatts to provide peaking energy and capacity for SDG&E's service territory. This facility is complete and operational. It is owned and operated by SDG&E. As such, D.09-01-008 authorizes SDG&E to recover in rates the cost of constructing and operating MEF II consistent with the approved construction-related risk and reward incentive mechanism described in detail below.

The MEF II Application projected the total cost of the facility at \$56.5 million. The Commission acknowledged SDG&E's need for additional generation to service its bundled customers and approved MEF II as a reasonable option to meet this need. This advice letter provides an update of the final construction costs and associated revenue requirements as required to be filed with the Commission when MEF II is complete.

Discussion

The MEF II was ready for commercial operation August 1, 2009, but not recognized by the CAISO until August 8, 2009 as they awaited confirmation of air quality test results. In Advice Letter 2099-E, in compliance with Commission D.09-01-008, SDG&E requested approval for the updated 2009 revenue requirement associated with MEF II's completion based on its most current total cost projection. SDG&E did not adjust its retail electric rates at that time but requested that once all of the final costs were accumulated, SDG&E would update its cost projection and associated revenue requirement in the NGBA update advice letter for inclusion in rates January 1, 2010. MEF II's final cost is \$51.8 million and requires a 2010 revenue

² Southern California Edison Application 07-11-011 / Decision 09-03-025.

requirement of \$8.9 million³ (excluding Franchise Fees & Uncollectibles). Attachments D and E provides details of the 2010-2013 revenue requirements and MEF II total costs along with explanations for variances between the original filed and final plant costs. This revenue requirement reflects changes to the following revenue requirement inputs filed in the application as summarized further below.

Capital Construction Costs

Total project costs are \$51.8 million, or \$4.7 million lower than the original filing. SDG&E submits Attachment E as confidential information per Section 583 of the Public Utilities Code and/or General Order 66-C. Attachment E breaks these costs down by the major categories of equipment, engineering/procurement/construction, generation interconnection, AFUDC, and other SDG&E costs that include items such as labor, start-up fuel, Owner's engineer, and materials/supplies. A comparison is provided between costs filed in the original Application and final cost along with a variance explanation.

Construction-Related Risk/Reward Mechanism

D.09-01-008 approved SDG&E's proposed construction risk/reward mechanism in which: (1) shareholders take no construction risk (and have no reward opportunities) for construction costs within 5% of the \$56.5 million project cost estimate (the "deadband"), (2) shareholders take 10% of the construction risk/reward for the band that is 5% over (or under) to 15% over (or under) the estimated project cost, and (3) cost overruns in excess of 15% of the estimated project cost are subject to recovery through a regulatory review process (and shareholders have no reward opportunities for savings resulting from actual costs being greater than 15% below the estimated project cost).

The total cost for constructing MEF II is \$51.8 million (8.3% below the approved projection of \$56.5 million) which falls within the benefit sharing portion of the approved mechanism. As enumerated in Attachment E, SDG&E customers saved \$4.5 million and SDG&E shareholders are eligible for a \$184,699 reward.

AMORTIZATION OF DECEMBER 31, 2009 BALANCES

The projected NGBA balance as of December 31, 2009 is a \$17.3 million undercollection and will be amortized over the next 12 months beginning January 1, 2010. The projected amount includes the balance of the SONGS O&M Balancing Account (SONGSBA), which is transferred annually to the NGBA.

This filing will not create any deviations from SDG&E's tariffs, cause withdrawal of service from any present customers, or impose any more restrictive conditions.

³ Revenue Requirement including Franchise Fees & Uncollectibles (FF&U) is \$9.2 million (\$8.9 million plus \$.322 million of FF&U).

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 (inj@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: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1748
E-mail: mcaulson@semprautilities.com

EFFECTIVE DATE

SDG&E believes 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 filing be approved effective December 16, 2009, 30 days from the date filed.

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) 654-1748 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: Joff Morales

Phone #: (858) 650-4098

E-mail: jmorales@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) #: 2126-E

Subject of AL: Annual Non-Fuel Generation Balancing Account Update

Keywords (choose from CPUC listing): Balancing Account, Compliance, Tariff

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: None

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

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

Yes. Includes confidential information in regards to Miramar II project costs.

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 12/16/2009

No. of tariff sheets: 2

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: None

Service affected and changes proposed¹: None

Pending advice letters that revise the same tariff sheets: None

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: Megan Caulson

8330 Century Park Ct, Room 32C

San Diego, CA 92123

mcaulson@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

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

Pacific Gas & Electric Co.

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

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

San Diego Regional Energy Office

S. Freedman
J. Porter

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 A
ADVICE LETTER 2126-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 21499-E	PRELIMINARY STATEMENT, II. BALANCING ACCOUNTS, NON-FUEL GENERATION BALANCING ACCOUNT (NGBA), Sheet 1	Revised 21128-E
Revised 21500-E	TABLE OF CONTENTS, Sheet 1	Revised 21374-E



PRELIMINARY STATEMENT

Sheet 1

II. BALANCING ACCOUNTS
NON-FUEL GENERATION BALANCING ACCOUNT (NGBA)

1. **Purpose:** The purpose of the NGBA is to provide recovery of approved electric generation non-fuel costs not being recovered by another component of SDG&E's rates. Currently, the Utility has ownership interest in the following plants in operation: San Onofre Nuclear Generating Station (SONGS) the Miramar Combustion Turbine (CT) facility and the Palomar Energy Center facility.
2. **Applicability:** The NGBA shall be applied only to the Utility's bundled service customers.
3. **Generation Non-fuel Revenue Requirement:**

SONGS:

The generation non-fuel revenue requirement shall consist of the SONGS operating & maintenance and capital-related costs approved for SDG&E in the Southern California Edison (SCE) General Rate Case (D.09-03-025) and the SDG&E General Rate Case (D.08-07-046). The 2009 revenue requirement authorized in D.09-03-025 shall be adjusted in future years pursuant to the PYTR mechanism adopted in the proceeding. Year 2010 and 2011 revenue requirements shall be subject to increases of 4.25% and 4.35% respectively, consistent with the PTYR mechanism adopted in D.09-03-025. Pursuant to D.09-03-025, the utility is authorized to recover \$13.36 million (2009 dollars), \$13.92 million (2010 dollars), and \$14.53 million (2011 dollars) for each SONGS 2&3 refueling and maintenance outage that occurs in 2009 through 2011 respectively. If the actual number of SONGS 2&3 refueling and maintenance outages in 2009 through 2011 is different than the number of outages in SDG&E's 2009 through 2011 generation revenue requirement, the difference will be addressed via an advice letter submitted to the Commission by February 15, 2010 (for the 2009 difference), 2011 (for the 2010 difference) and 2012 (for the 2011 difference). The resulting adjustment will be made as an entry to the NGBA. Pursuant to D. 06-11-026, beginning in January 2007 and ending in 2011, the utility is authorized to recover through depreciation expense, 20% of its ownership share of the removal and disposal costs of the original steam generators related to the Steam Generator Replacement Project (SGRP).

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Miramar CT:

The generation non-fuel revenue requirement shall consist of the operating and maintenance and capital-related costs approved in SDG&E's General Rate Case (D.08-07-046). The revenue requirement for 2009, 2010, and 2011 shall be adjusted pursuant to the Post-Test Year Ratemaking settlement adopted in D.08-07-046. The fuel costs of the Miramar CT shall be recorded in the Energy Resource Recovery Account (ERRA). Any revenues received from the Independent System Operator (ISO) under the reliability-must run (RMR) contract shall be credited to the NGBA.

(Continued)

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Advice Ltr. No. 2126-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Nov 16, 2009

Effective _____

Resolution No. _____



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.

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II. <u>Balancing Accounts</u>	
Description/Listing of Accounts	19402, 20706-E
California Alternate Rates for Energy (CARE) Balancing Account.....	19406, 19407-E
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(Continued)

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Advice Ltr. No. 2126-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Nov 16, 2009

Effective Dec 16, 2009

Resolution No. _____

ATTACHMENT B
SAN DIEGO GAS & ELECTRIC COMPANY
ADVICE LETTER 2126-E

2010 NGBA REVENUE REQUIREMENT
(\$ In Thousands)

	Proposed 2010 ^{1/}	Authorized 2009 ^{1/}
SONGS		
Non-fuel Operations & Maintenance Revenue Requirement ^{2/}	96,301	92,375
Non-fuel Capital-related Revenue Requirement ^{2/}	23,190	22,245
Refueling - 1 Outage ^{2/}	13,760	13,199
Steam Generation Replacement Program (SGRP) Removal & Disposal Costs ^{3/}	1,318	1,310
SONGS Total	134,569	129,129
SDG&E Generation		
SDG&E Generation - Miramar & Palomar ^{4/}	117,367	113,517
SDG&E Generation - Miramar II ^{5/}	8,862	-
SDG&E Generation Total	126,229	113,517
2010 Authorized NGBA Revenue Requirement	260,798	242,646
December 31, 2009 Balances ^{6/}		
NGBA ^{7/}	6,987	50
SONGS O&M ^{7/ 8/}	10,268	(1,000)
Amortization of 12/31/09 Balances	17,255	(950)
NGBA Revenue Requirement effective 1/1/10 ^{9/}	278,053	241,696

Notes:

^{1/} Dollar amounts exclude FF&U.

^{2/} 2009 revenue requirement approved in Southern California Edison's (SCE's) 2009 GRC A.07-11-011/D.09-03-025 as implemented in SCE's AL 2336-E. 2010 revenue requirement includes a 4.25% post-test year ratemaking increase adopted in D.09-03-025.

^{3/} Revenue requirement approved in A.06-04-018/D.06-11-026, SONGS Steam Generator Replacement Project proceeding including escalation.

^{4/} Authorized 2009 dollars reflect amounts as approved in Advice Letter 2043-E and D.08-07-046 (including fixed attrition for SDG&E Generation). 2010 revenue requirement includes fixed attrition for SDG&E Generation approved in D.08-07-046.

^{5/} Miramar II, approved in D.09-01-008, had a commercial operation date of August 8, 2009.

^{6/} Year-end balances reflect actual data through September 2009 and forecasted amounts for October through December 2009.

^{7/} 2009 amortization approved in Advice Letter 2043-E.

^{8/} Under SDG&E's tariffs, the balance in the SONGSBA is transferred annually to the Non-fuel Generation Balancing Account.

^{9/} Amount including FF&U is \$281,336,071. Franchise fee factor is 1.028% and uncollectible factor is .141% which computes to a 1.012 gross-up factor $1/(1-.01028-.00141)$.

ATTACHMENT C
SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
ADVICE LETTER 2126-E

CLASS AVERAGE RATES

Based on Rates Effective 9/1/09
(AL 2103-E)

Proposed
NGBA

	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)	Total Rate Change (¢/KWhr)	Total Rate Change (%)
Residential	8.695	9.305	18.000	8.695	9.450	18.145	0.145	0.81%
Small Commercial	8.190	10.031	18.221	8.190	10.187	18.377	0.156	0.86%
Med. & Large C&I	5.102	10.190	15.292	5.102	10.346	15.448	0.156	1.02%
Agriculture	8.160	9.506	17.666	8.160	9.654	17.814	0.148	0.84%
Lighting	8.900	6.899	15.799	8.900	7.007	15.907	0.108	0.68%
System Total	6.784	9.756	16.540	6.784	9.907	16.691	0.151	0.91%

Notes:

DWR-BC is included in Current and Proposed Total UDC Rate

ATTACHMENT D
SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2126-E
MEF-II
Annual Revenue Requirement

Table I

<u>Electric Plant</u>		2009	2010	2011	2012	2013
Franchise Fees & Uncollectibles	3.64%	141	322	306	294	283
O&M expenses*		532	223	228	233	239
Property Taxes	1.25%	239	610	574	540	508
Preferred Equity Interest	7.25%	80	204	192	181	170
Interest Expense	5.62%	488	1,246	1,173	1,103	1,037
Depreciation Expense		848	2,036	2,036	2,036	2,036
Federal Tax Expense		633	1,686	1,507	1,423	1,340
State Tax Expense		16	190	201	218	232
Return on Equity	11.10%	1,043	2,666	2,508	2,360	2,218
Revenue Requirement		4,019	9,184	8,726	8,389	8,063
Return on Ratebase (ROR)		1,610	4,116	3,874	3,644	3,425

*2009 includes one time charges of \$440.4 for property taxes during construction