

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

Application of San Diego Gas & Electric
Company (U 902 E) for Authority to Update Electric Rate
Design Regarding Residential Default Time-Of-Use Rates
and Fixed Charges

Application 17-12-_____

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
FOR AUTHORITY TO UPDATE ELECTRIC RATE DESIGN REGARDING
RESIDENTIAL DEFAULT TIME-OF-USE RATES AND FIXED CHARGES**

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I. INTRODUCTION

Pursuant to Ordering Paragraph (“OP”) 10 of Decision (“D.”) 15-07-001 (“Rate Reform Decision”), Resolution E-4769 (“SDG&E Opt-In Pilot Resolution”), Resolution E-4848 (“SDG&E Default Pilot Resolution”), D.17-09-036 (“Section 745 Decision”), D.17-09-035 (“Fixed Charge Decision”), and the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), San Diego Gas & Electric Company (“SDG&E”) hereby submits its Rate Design Window (“RDW”) Application, seeking the following: (1) approval of SDG&E’s proposed residential default time-of-use (“TOU”) rates, effective January 1, 2019; (2) approval of SDG&E’s proposed residential fixed charges and higher minimum bill, effective January 1, 2020; and (3) approval of SDG&E’s default TOU migration plan, including its operational and marketing, education and outreach (“ME&O”) approach. These proposals provide a framework for the direction of SDG&E’s residential rates going forward and through the various changes related to imposition of default TOU rates generally.

II. BACKGROUND

A. Events Leading Up to R.12-06-013

To protect customers in response to the 2000-2001 energy crisis, Assembly Bill (“AB”) 1X (2001) capped residential electricity rates for usage up to 130% of baseline at the then-current 2001 rate levels, meaning that rates up to this usage level could not be increased, although cost of service increased over time. As part of implementing the AB 1X rate cap, the Commission replaced the then-existing two-tiered rate structure with a multi-tiered rate structure on October 1, 2001, pursuant to D.01-09-059.¹ Over time, however, the rates under this tiered structure increasingly departed from cost basis, resulting in rates that did not fairly reflect the cost to serve customers or provide useful price signals.

Specifically, electric rates for usage up to 130% of baseline (Tiers 1 and 2) were priced below cost and electric rates for usage above 130% of baseline (Tiers 3-5)² were priced above cost, meaning that higher-usage customers were subsidizing lower-usage customers. From January 1, 2001 to January 1, 2009, the differential between the lowest and highest non-California Alternate Rates for Energy (“CARE”) tier rates increased from approximately 20% to 155%. On January 1, 2009, the lowest tier rate was approximately 30% below the residential class average rate while the highest tier rate was approximately 80% above the residential class average rate.

Recognizing a need for change, the California State Legislature enacted Senate Bill (“SB”) 695 in 2009, which created a path for the Commission to examine residential electric rate design, including transitioning residential customers from tiered rates to TOU rates.

¹ Interim Opinion Adopting Rate Increases To Implement The Department Of Water Resources’ Revenue Requirement (September 20, 2001).

² SDG&E’s tiered rate structure changed from five tiers to four tiers on May 1, 2008, pursuant to D.08-02-034.

Subsequently, on June 21, 2012, Order Instituting Rulemaking (“R.”) 12-06-013³ was opened to examine and reform the investor-owned-utilities’ (“IOUs”) residential electric rates and transition to TOU rates.

Within R.12-06-013, the Commission adopted ten Rate Design Principles (“RDPs”).⁴

Table 1 below presents the RDPs in four categories (consistent with D.15-07-001): (1) cost of service; (2) affordable electricity; (3) conservation; and (4) customer acceptance.

TABLE 1: RATE DESIGN PRINCIPLES

Cost of Service RDP	Affordable Electricity RDP	Conservation RDP	Customer Acceptance RDP
(2) Rates should be based on marginal cost; (3) Rates should be based on cost-causation principles; (7) Rates should generally avoid cross-subsidies, unless the cross-subsidies appropriately support explicit state policy goals; (8) Incentives should be explicit and transparent; (9) Rates should encourage economically efficient decision-making.	(1) Low-income and medical baseline customers should have access to enough electricity to ensure basic needs (such as health and comfort) are met at an affordable cost.	(4) Rates should encourage conservation and energy efficiency; (5) Rates should encourage reduction of both coincident and non-coincident peak demand.	(6) Rates should be stable and understandable and provide customer choice; (10) Transitions to new rate structures should emphasize customer education and outreach that enhances customer understanding and acceptance of new rates, and minimizes and appropriately considers the bill impacts associated with such transitions.

³ Order Instituting Rulemaking on the Commission’s Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities’ Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations (R.12-06-013).

⁴ D.15-07-001 at 27-28.

These principles reflect the need for Commission flexibility to approve balanced, unbundled rate design that accurately reflects how costs are incurred and through incentives that are addressed in a transparent manner.

B. R.12-06-013 to Date

In response to R.12-06-013, the IOUs and other parties submitted Residential Rate Reform proposals on May 29, 2013. In its proposal, SDG&E submitted an optimal residential rate design structure, adhering to the Commission’s foregoing rate design principles. Ultimately, on July 13, 2015, the Commission issued D.15-07-001, outlining Residential Rate Reform for the IOUs. The decision adopted Phase 1 rate changes that reflect long-term residential electric rate reform, directed the IOUs to plan and implement TOU pilots, and set forth a glidepath for residential rate changes from 2015 through 2019. For 2015, D.15-07-001 allowed SDG&E to consolidate its four tiers into three. For 2016, D.15-07-001 also approved the following glidepath for residential rates: (1) further consolidation from three tiers to two, which included a redefinition of Tier 1 and Tier 2 usage; (2) reduction in tier differentials; (3) reduction in baseline allowances; and (4) reduction in the CARE discount based on a glidepath that would reduce the effective discount to 35% by 2020. In 2017, SDG&E implemented the next step in the glidepath by further reducing the differential between the tiers and implementing the high usage charge (“HUC”).

C. Residential Fixed Charges

California Public Utilities (“P.U.”) Code §739.9 provided the Commission with authority to approve “new, or expand existing, fixed charges for the purpose of collecting a reasonable portion of the fixed costs of providing electric service to residential customers.”⁵ In D.15-07-

⁵ P.U. Code §739.9(e).

001, the Commission considered IOU proposals for new or increased fixed charges designed to collect certain fixed costs of providing service to all residential customers.⁶ The Commission unanimously concluded that “[a] well-designed fixed charge representing a portion of the fixed customer-related costs to serve the individual residential customer could be reasonable,”⁷ but that “[a]dopting a fixed charge at the same time as customers are also facing significant rate impacts associated with tier flattening would be inconsistent with our statutory duty to ensure reasonable rates.”⁸ Ultimately, the Commission determined that “[a] fixed charge should not be implemented until after the tier collapse is complete and after default TOU has been implemented.”⁹

Subsequently, the Commission concluded that the determination of categories of fixed costs eligible for inclusion in a proposed fixed charge should be legislated within the Pacific Gas and Electric Company (“PG&E”) General Rate Case GRC Phase 2 (“GRC P2”) proceeding (A.16-06-013). As stated in D.15-07-001, the appropriateness and approval of any proposed fixed charges would then be considered in the IOUs’ consolidated 2018 Residential RDW proceeding, along with the implementation of default residential TOU.

In 2017, the Commission issued D.17-09-035,¹⁰ which determined “that a fixed charge should include revenue cycle services costs with certain exclusions, all meter capital costs, and minimum service drop and final line transformer costs calculated by using the minimum observed cost for the residential class.”¹¹ P.U. Code Section 739.9(e) limited fixed charges at \$10 per month for residential customers not enrolled in the CARE program and at \$5 per month

⁶ D.15-07-001 at 189.

⁷ *Id.* at Conclusion of Law (“COL”) 16.

⁸ *Id.* at COL 17.

⁹ *Id.* at COL 18.

¹⁰ Decision Identifying Fixed Cost Categories to be Included in a Fixed Charge (September 28, 2017).

¹¹ D.17-09-035 at 2.

for customers enrolled in the CARE program and authorizes the Commission to adjust this maximum allowable fixed charge no more than the annual percentage increase in the Consumer Price Index for the prior calendar year. P.U. Code Section 739.9(f) states that “[t]his subdivision applies to any default rate schedule, at least one optional tiered rate schedule, and at least one optional time variant rate schedule.”¹² Per D.17-09-035, SDG&E is required to include calculations of these costs under four different methodologies.

D. Residential TOU Pilots

Pursuant to D.15-07-001, SDG&E began two pilots: (1) the Opt-In TOU Pilot was approved by Resolution E-4769 and began on June 1, 2016; and (2) the Default TOU Pilot Plan was approved, with modifications, by Resolution E-4848 and will begin in March of 2018. The Opt-In TOU Pilot tested customer response to and acceptance of two TOU rates – a 3-period and a 2-period TOU rate. The Default TOU Pilot will test two default TOU rates, similar in structure to those tested in its Opt-In Pilot, and will focus on testing SDG&E’s operational readiness for the full rollout of Default TOU, the impacts of different forms of ME&O on customers’ awareness and engagement, as well as customer acceptance of the pilot rates.¹³

E. P.U. Code §745

P.U. Code §745 excludes certain classes of customers from default TOU, and requires the IOUs to determine whether other classes would experience “unreasonable hardship”¹⁴ because of default TOU. On January 23, 2017, an Assigned Commissioner and Administrative Law Judge Ruling Amending Scoping Memorandum and Ruling (“January 23, 2017 Ruling”) was issued in R.12-06-013, seeking comments on a series of questions pertaining to TOU rates and P.U. Code

¹² P.U. Code § 739.9(f).

¹³ Resolution E-4848 at 3.

¹⁴ PU Code §745(c)(1), §745(c)(2), §745(d).

§745. Parties submitted testimony in response to these questions, and workshops, which included limited evidentiary hearings, were held on May 18 and 22, 2017. On September 28, 2017, the Commission adopted D.17-09-036, which set forth guidelines around who is eligible to be transitioned onto the Default TOU Pilot rates in 2018. This Decision determined, among other things, that “economically vulnerable customers in hot climate zones should be excluded from the default time-of-use pilots scheduled to begin in March 2018”¹⁵ but that as a part of the 2018 Residential RDW applications, “the Commission will further consider whether economically vulnerable customers in hot climate zones should be excluded from the full rollout of default time-of-use rates.”¹⁶ Accordingly, SDG&E’s Default TOU Pilot will comply with the requirements outlined in D.17-09-036, including but not limited to the exclusion of CARE and Family Electric Rate Assistance (“FERA”) customers within SDG&E’s Hot Climate Zones.¹⁷

III. SUMMARY OF RATE DESIGN PROPOSALS

This RDW Application is seeking approval of SDG&E’s proposed residential default TOU rates, effective January 1, 2019; and residential fixed charges and higher minimum bill, effective January 1, 2020 (as noted below, the CARE discounts applicable under each proposal should be reflected in a line-item discount, consistent with D.15-07-001 and subject to certain exceptions). In conjunction with these specific rate design requests, SDG&E is also seeking approval of its default TOU migration plan, including its operational and ME&O approach. Each of these proposals is summarized below and further detailed in the Direct Testimony of SDG&E’s witnesses.

¹⁵ D.17-09-036 at 2.

¹⁶ *Id.*

¹⁷ SDG&E’s Hot Climate Zone is defined as SDG&E’s Desert and Mountain climate zones.

A. 2019 Residential Default TOU Rates

TOU pricing provides customers with a commodity price signal that informs customers of when the high cost hours for commodity services occur, and incentivizes changes in behavior that conserve or shift energy use. Due to SDG&E's system load shape, where the utility's commodity portfolio includes substantial solar generation in the local reliability area, energy is most expensive in the afternoon and evenings when fewer solar renewables are available and the majority of SDG&E's large residential population is at home. SDG&E's TOU periods were realigned in its recent GRC P2¹⁸ to ensure that time differentiated price signals are occurring at the right times and are sending customers the right price signals. Accurately defined TOU periods will provide the right incentives to all customers, including those considering technology investments, whether it be investments in energy efficiency ("EE"), demand response ("DR"), or distributed energy resources ("DER").

For 2019, SDG&E proposes to offer a 3-Period Default TOU rate, which is a more cost-based rate and provides more accurate price signals.¹⁹ Customers will be able to opt out of Mass TOU Default, should they wish to do so. As alternatives, SDG&E plans to offer a simpler 2-Period Opt-Out TOU rate and continue to have a Tiered Opt-Out rate available. SDG&E residential customers' default to TOU rates include bill protection to provide customers with a "risk-free" experience as they migrate to TOU rates. Accordingly, for 2019, SDG&E proposes the following rate options:

- A 3-Period tiered Default TOU rate as the Mass TOU Default rate: SDG&E's Mass TOU Default rate (3-Period Default TOU rate) will be the same as its

¹⁸ D.17-08-030.

¹⁹ As described below, in 2020, SDG&E proposes to add a fixed charge to the 3-Period Default TOU rate, one year after the implementation of Mass TOU Default. See D.15-07-001 at 193.

Default Pilot Rate 1 in its TOU period definitions. SDG&E’s Mass TOU Default rate will also include a Tier 1 adjustment credit, as the Commission has found “that the baseline credit...is an essential element of wide-scale TOU adoption for residential customers” and “that a SUE [Super User Electric] Surcharge should not be part of default TOU rates, but may be included in some optional TOU rates.”²⁰ SDG&E’s baseline adjustment credit included in these TOU rates is set equal to the Tier 1 to Tier 2 differential of the effective tiered rates. This essentially eliminates the impact of a customer transitioning from SDG&E’s tiered rates, and minimizes structural impacts to customers.

- A 2-Period tiered Opt-Out TOU rate as a simpler TOU rate option: As noted above, SDG&E will offer a 2-Period Opt-Out TOU rate for customers who do not wish to be on the 3-Period Default TOU rate and would prefer a simpler TOU rate option. The 2-Period Opt-Out TOU rate will be structurally the same in its TOU periods as Rate 2 in SDG&E’s Opt-in and Default Pilots but with milder TOU differentials as reflected in the 2-Period Default Pilot rate. This simpler TOU rate will have two periods: on-peak and off-peak. It will also have reduced peak-to-off-peak differentials compared to the 3-Period Default rate, and will include a baseline credit. The rate is seasonally designed the same way as the 3-Period Default rate.
- A Tiered Opt-Out rate option: SDG&E will continue to offer its current tiered rate schedules as a Tiered Opt-Out rate for customers who do not wish to be on a TOU rate. This offering will be a two-tiered rate and include the HUC.²¹

²⁰ D.15-07-001 at 140.

²¹ HUC is also commonly referred to as the Super User Electric Surcharge (“SUE”).

In addition, based on the alignment of TOU periods ordered by D.17-08-030, there is minimal difference between Schedule DR-SES (Domestic Time-Of-Use For Households With A Solar Energy System) and Schedule EV-TOU-2 (Electric Time-Of-Use For Electric Vehicle Charging). Accordingly, SDG&E proposes to close Schedule DR-SES to new customers and open the applicability of Schedule EV-TOU-2, making it available to all residential customers, to be renamed Schedule TOU-D, thus providing all residential customers with an option to select an un-tiered TOU rate. At a future date, SDG&E will seek the elimination of Schedule DR-SES, at which time these customers would be migrated to the new Schedule TOU-D. Grandfathered versions of all of SDG&E's existing rate schedules will remain available for eligible customers, in accordance with D.17-08-030.

B. 2020 Residential Fixed Charges

Currently, for SDG&E's residential customers, the costs of utility services are recovered through an "all-in" energy, or volumetric, rate. While moving to TOU rates is a step in the right direction to provide customers with correct price signals, this all-volumetric rate structure allows some customers to bypass virtually all costs, which are shifted to other customers through an increase in rates. A residential fixed charge would promote fairness in rates, and is a critical step to provide some relief to SDG&E's high energy (cents/kWh) rates. A fixed charge may also increase the stability of many customers' bills, ensuring that each customer pays equitably for the service SDG&E provides with the benefit of reducing bill volatility. SDG&E believes it is important to note that a residential fixed charge would not be incremental; it would result in an offset in the reduction of energy (cents/kWh) rates. This is especially important for SDG&E's customers who continue to experience extremely high energy rates. Phase 1 of Residential Rate Reform was supposed to provide relief for these customers through tier consolidation and the glidepath, but SDG&E's residential population continues to experience these high rates. The

introduction of a residential fixed charge should help to provide some relief from these energy rates, where the current summer Tier 2 rate is 47 cents per kWh.²²

D.15-07-001 concluded that a fixed charge or minimum bill that recovers customer-related costs would result in a more equitable rate for low usage customers such as vacation homeowners and some NEM customers,²³ and that a fixed charge to reflect fixed costs would send a more accurate price signal to customers.²⁴ Moving toward a more equitable system is imperative; SDG&E's customers who do not pay their fair cost of service have shifted costs to other ratepayers, increasing their rates and bills. If more balance is not introduced into SDG&E's rate structure, this inequity will persist and grow within default TOU rates as customers continue to move toward new technologies and energy production sources.

It should be noted that fixed charges are a component of many utility rates across the nation, as demonstrated in the Direct Testimony of Cynthia Fang. Indeed, in a survey of national electric IOUs, 96% have a basic residential service rate schedule that includes a fixed charge. Moreover, in California, 77% of IOUs have a basic residential service rate schedule that includes a fixed charge rate component as of October 2017, and the average Fixed Charge was \$10.22.

1. Customer Survey

SDG&E recognizes that customer acceptance and understanding is a fundamental underpinning to the successful implementation of a residential fixed charge. D.15-07-001 found that "...it is very clear that customers are unlikely to understand or accept the need for fixed charges without customer education."²⁵ The Commission also stated that "[a]lthough we agree...it is beyond dispute that the record in this proceeding shows substantial customer

²² Summer Tier 2 rate for Schedule DR effective December 1, 2017 per AL 3130-E/E-A/E-B.

²³ D.15-07-001, FOF 163.

²⁴ D.15-07-001, FOF 175.

²⁵ D.15-07-001 at 216.

hostility to fixed charges on residential bills, we disagree with CforAT's [Center for Accessible Technology] contention that customer hostility cannot be cured with customer education."²⁶ Per D.17-09-035, "[t]he Commission expects a showing on the plans for marketing, education, and outreach efforts with respect to the proposed fixed charges in relation to the TOU rates and in compliance with the directives of D.15-07-001, if and when, a utility files a proposal for a fixed charge."²⁷ SDG&E agrees that without adequate, clear communication, customers are likely to believe that a fixed charge is an incremental charge on their bills when, in reality, a residential fixed charge is designed to decrease energy rates. These issues and the results of SDG&E's customer survey are discussed in greater detail in the Direct Testimony of witness Horace Tantum.

2. Fixed Charge Cost Calculation

The distribution infrastructure components that would be recovered in SDG&E's proposed residential fixed charge would include categories of eligible customer-related fixed costs ("Eligible Fixed Costs"), as approved in D.17-09-035.²⁸ Eligible Fixed Costs include the costs of ensuring that customers are ready to receive services from the utility before they even begin to use electricity, also described as "curb to meter" services. These costs include: the cost of the meter (which provides the ability to measure a customer's energy and load); the cost of the services lines (which connect individual customers to their service transformer); the cost of the final line transformer (which steps down voltage to levels that are usable and safer); and the cost of customer services (which represents costs for such activities as customer service field, advanced metering, billing, credit and collections, branch office, customer contact center,

²⁶ D.15-07-001 at 226 (internal footnote omitted).

²⁷ D.17-09-035 at 52.

²⁸ D.17-09-035 at 33.

residential customer services, commercial and industrial services, communications, and customer programs).

Pursuant to D.17-09-035, the Eligible Fixed Costs calculated by SDG&E are based on the costs and methodologies presented in SDG&E's most recent GRC P2 proceeding. SDG&E proposes to use the final rental economic carrying charge ("RECC") Method costs from its Test Year ("TY") 2016 GRC P2 proceeding, escalated to the year of implementation. As shown in Attachment B of the Direct Testimony of William Saxe, the total Eligible Fixed Costs for SDG&E calculated by this method total \$10.02, when illustratively escalated to 2020 dollars. Recognizing the AB 327 limit of \$10 for the implementation of a residential fixed charge, SDG&E proposes a residential fixed charge of \$10 for non-CARE customers and \$5 for CARE, FERA and medical baseline customers as presented in the Direct Testimony of Jeffrey Shaughnessy.

3. Minimum Threshold of Service

As an IOU, SDG&E is the provider of last resort. This means that the utility is required to provide a minimum level of service to every customer, regardless of whether that customer actually uses energy provided by SDG&E. Although the recent decision about fixed charges determined that limited categories of customer costs are eligible for recovery in a fixed charge, SDG&E's infrastructure investment required to provide a minimum level of service to its customers runs the entire length of the grid, from the most direct customer-based costs, where customers receive electricity from the wires connected to their houses, to its generation capacity costs, built to meet SDG&E's system needs in a reliable and safe way. Without each of these classes of assets, SDG&E would not be able to provide service to its customers. Moreover, in

D.15-07-001, the Commission also stated: “We therefore find that the fixed charge caps do not apply to minimum bills.”²⁹ The Commission also stated that:

...it follows that Section 739.9(a) refers exclusively to non-volumetric charges that apply based on demand or the mere existence of a customer account. A minimum bill is neither. Rather, a minimum bill is “based on the applicable volumetric rate,” unless “volumetric usage is so low that the resulting bill would be less than the minimum bill.”³⁰

Accordingly, as explained in the Direct Testimony of Mr. Shaughnessy, SDG&E proposes the implementation of a higher minimum bill amount based on a minimum level of service requirement: \$37.25 for non-CARE and \$18.62 for CARE, FERA, and medical baseline customers. SDG&E defines the minimum level of service requirement as the minimum observable value for customer related costs and a 1kW equivalent for all costs not driven by energy usage. The minimum bill would ensure that all customers pay for their minimum threshold of service provided by SDG&E, even if they are departing load or DER customers.

4. Composite Tier Methodology

D.15-07-001 determined that the IOUs must utilize the composite tier methodology (i.e., including the fixed charge amount as part of the Tier 1 rate for purposes of calculating the tier differential) when proposing a fixed charge in order to establish an appropriate gradual differential between rates for the respective blocks of usage.³¹ Under this methodology, all revenues collected from the fixed charge must be used to reduce Tier 1 rates. Because of this requirement, the introduction of a fixed charge will provide no real relief for upper tier rates. Accordingly, SDG&E seeks reconsideration of the requirement that the composite tier methodology be used when calculating the tier differential in conjunction with a fixed charge.

²⁹ D.15-07-001 at 225.

³⁰ D.15-07-001 at 222.

³¹ D.15-07-001 COL 11.

5. Higher Fixed Charge Option

Under the current tiered rate structure, residential customers can see significant bill volatility from changes in energy usage from month to month. Even with a flat energy rate, customers can still see significant bill volatility from a rate design that recovers the majority of costs through energy rates. An optional rate with higher fixed charge and lower energy rates will provide an option for customers who value predictability and are seeking greater monthly bill stability. Based on D.17-08-030's approval of a higher fixed charge un-tiered TOU optional rate for residential customers,³² SDG&E is proposing a higher fixed charge option to recover the average residential costs that are unrelated to energy usage and make this rate available to non-Master Meter residential customers. As explained in the Direct Testimony of Ms. Fang, this higher fixed charge option would be based on the total calculated fixed costs for the average residential service, which is \$67.30.

C. Discounts for CARE Customers

D.15-07-001 adopted SDG&E's proposal to move its CARE discount out of volumetric rates and into a line-item discount, with the exception of the exemption from the Department of Water Resources Bond Charge ("DWR-BC"), California Solar Initiative ("CSI") and CARE Discount charges.³³ In addition, beginning on January 1, 2017, CARE customers are also exempt from paying Vehicle Grid Integration ("VGI") program costs.³⁴ In approving this approach, D.15-07-001 noted that parties are encouraged to "consider this approach for the other utilities in Phase 3 or in future proceedings."³⁵ SDG&E continues to feel that a line-item discount is the best approach for providing customers with the CARE discount, as it is simple for

³² D.17-08-030 at 34.

³³ D.15-07-001 at 237.

³⁴ D.16-01-045, COL 38.

³⁵ D.15-07-001 at 237.

SDG&E to explain, easy for customers to understand, and an equitable method for providing a discount to all of SDG&E's CARE-enrolled customers. As such, SDG&E supports the Commission's prior recommendation that this discount structure be considered for implementation by PG&E and Southern California Edison Company ("SCE").

D. Mass TOU Default Migration Plan

SDG&E's Mass TOU Default will result in the migration of approximately 750,000 eligible residential customers onto TOU rates over a ten-month period in 2019. In the Direct Testimony of Chris Bender and Horace Tantum, SDG&E presents its migration plan, including its operational and ME&O approach to implementing this plan. Such planning is critical to ensuring a successful roll out of Mass TOU Default. Among other things, the migration plan builds upon findings in two residential TOU pilots designed to assess customer experience, evaluate a variety of rate designs, and test operational readiness.

IV. SUMMARY OF DIRECT TESTIMONY

This RDW Application, including the foregoing proposals is supported by the Direct Testimony of the following SDG&E witnesses.

- **Chapter 1: Policy – Cynthia Fang**

Ms. Fang presents background information regarding Residential Rate Reform issues and explains how SDG&E's proposals are consistent with Commission policy and recent decisions related to residential rate design.

- **Chapter 2: Rate Design – Jeffrey Shaughnessy**

Mr. Shaughnessy presents the details of SDG&E's electric rate design proposals and the customer bill impacts of these proposals, as well as various PU Code Section 745 requirements.

- **Chapter 3: GHG Compliance Requirement – Ben Montoya**

Mr. Montoya presents GHG reduction analysis and potential energy savings.

- **Chapter 4:** Pilot Results – Leslie Willoughby

Ms. Willoughby presents the load impact results of SDG&E’s Opt-In TOU Pilot.

- **Chapter 5:** Marginal Distribution Customer Costs – William Saxe

Mr. Saxe presents distribution customer cost study analysis to support SDG&E’s proposal to introduce a residential fixed charge.

- **Chapter 6:** Implementation Plan – Chris Bender

Mr. Bender presents SDG&E’s Mass TOU Default migration plan.

- **Chapter 7:** ME&O – Horace Tantum

Mr. Tantum presents SDG&E’s intentions for ME&O related to SDG&E’s Mass TOU Default and other residential rate proposals in this filing.

V. STATUTORY AND PROCEDURAL REQUIREMENT

A. Rule 2.1 (a) – (c)

In accordance with Rule 2.1 (a) – (c) of the Commission’s Rules of 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. SDG&E’s principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E’s attorney in this matter is John A. Pacheco.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application, including discovery requests, should be addressed to:

Michelle Somerville
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP 32
San Diego, California 92123
Telephone: (858) 654-6356
Facsimile: (858) 654-1879
msomerville@semprautilities.com

with copies to:

John A. Pacheco
Attorney for:
San Diego Gas & Electric Company
8330 Century Park Court, CP32
San Diego, CA 92123
Telephone: (858) 654-1761
Facsimile: (619) 699-5027
jpacheco@semprautilities.com

3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting because the rate design changes that are the subject of this RDW Application will impact the rates of certain customer groups.

b. Need for Hearings

SDG&E does not believe that approval of this Application will require hearings. SDG&E has provided ample supporting testimony, analysis and documentation that provide the Commission with a sufficient record upon which to grant the relief requested.

c. Issues to be Considered

The issues to be considered are described in this Application and the accompanying Direct Testimony, including the attached appendices. Regarding safety considerations, based on current information, SDG&E's rate design proposals will not result in any adverse safety impacts on the facilities or operations of SDG&E.

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
Application filed	December 13, 2017
ORA/Intervenor Testimony	May 2018
SDG&E Rebuttal Testimony	June 2018
Hearings (if necessary)	July 2018
Concurrent Briefs	August 2018
ALJ Proposed Decision	October 2018
Final Decision	December 2018

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 filed with the Commission on September 10, 2014 in connection with SDG&E’s Application No. 14-09-008, and is incorporated herein by reference.

C. Rule 3.2 (a) – (d) – Authority to Change Rates³⁶

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

1. Rule 3.2 (a) (1) – balance sheet

SDG&E’s financial statement, balance sheet and income statement for the nine-month period ending June 30, 2017 are included with this Application as Appendix A.

³⁶ Note Rule 3.2(a) (9) is not applicable to this application.

2. Rule 3.2 (a) (2) – statement of effective rates

Appendix B to this Application is a statement (i.e., Table of Contents) of all of SDG&E's presently effective electric rates, which can also be viewed on SDG&E's website.

3. Rule 3.2 (a) (3) – statement of proposed changes

A statement of proposed rate changes is attached as Appendix C.

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, 2016, is shown on the statement of Original Cost and Depreciation Reserve attached as Appendix D.

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 the nine-month period ending June 30, 2017, is included as Appendix E to this Application.

6. Rule 3.2 (a) (7) – statement re 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 24, 2017, was mailed to the Commission on April 10, 2017, and is incorporated herein by reference.

8. Rule 3.2 (a) (10) – statement re pass through to customers

The rate changes that SDG&E seeks in this Application reflect estimated costs to SDG&E, and SDG&E proposes to pass through to customers only costs that SDG&E incurs for the proposed rate design changes.

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 F 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, within twenty days after the filing of this Application, will post in its offices and 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, within 45 days of the filing of this Application, will 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 revenue requirement 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 on all parties to the service lists of Order Instituting Rulemaking on the Commission’s Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities’ Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations (R.12-06-013). Hard copies will be sent by overnight mail to the Assigned Administrative Law Judges in R.12-06-013, Jeanne McKinney (Assigned Dec. 18, 2015), S. Pat Tsen (Assigned June 21, 2017) and Sophia Park (Assigned Feb. 7, 2017), and the Interim Chief Administrative Law Judge, Anne Simon.

VII. REQUESTED RELIEF

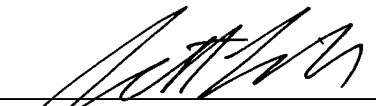
WHEREFORE, SAN DIEGO GAS & ELECTRIC COMPANY requests that the Commission:

1. Approve SDG&E's proposed residential default TOU rates, effective January 1, 2019;
2. Approve SDG&E's proposed residential fixed charges and higher minimum bill, effective January 1, 2020; and
3. Approve SDG&E's proposed default TOU migration plan, including its operational and ME&O approach.

Respectfully submitted,

By: /s/ JOHN A. PACHECO
John A. Pacheco
Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY
8330 Century Park Court, CP32
San Diego, CA 92123
Telephone: (858) 665-1761
Facsimile: (619) 699-5027
E-mail: jpacheco@semprautilities.com

SAN DIEGO GAS & ELECTRIC COMPANY

By: 
Scott B. Crider
San Diego Gas & Electric Company
Vice President – Customer Services

DATED at San Diego, California, this 20th day of December 2017

OFFICER VERIFICATION

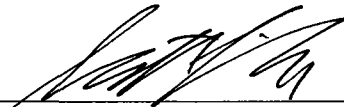
OFFICER VERIFICATION

Scott B. Crider declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR AUTHORITY TO UPDATE ELECTRIC RATE DESIGN REGARDING RESIDENTIAL DEFAULT TIME-OF-USE RATES AND FIXED CHARGES** 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 on December 20, 2017 at San Diego, California.



Scott B. Crider
San Diego Gas & Electric Company
Vice President – Customer Services

APPENDIX A

Financials, Balance Sheet, Income Statement

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
June 30, 2017

		2017
1. UTILITY PLANT		
101	UTILITY PLANT IN SERVICE	\$ 16,513,440,119
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	5,302,629
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,209,833,401
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,077,315,986)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(706,634,782)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,375,264)
118	OTHER UTILITY PLANT	1,232,930,800
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(288,724,048)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	\$ 12,976,401,591
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	\$ 5,790,994
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(364,300)
158	NON-CURRENT PORTION OF ALLOWANCES	189,839,827
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,028,081,830
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	74,288,025
	TOTAL OTHER PROPERTY AND INVESTMENTS	\$ 1,297,636,376

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
June 30, 2017

3. CURRENT AND ACCRUED ASSETS		2017
131	CASH	\$ 2,274,181
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	310,617,726
143	OTHER ACCOUNTS RECEIVABLE	19,948,089
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,501,255)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	8,573
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,586,259
151	FUEL STOCK	525,924
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	123,461,757
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	206,101,784
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(189,839,827)
163	STORES EXPENSE UNDISTRIBUTED	306,762
164	GAS STORED	306,473
165	PREPAYMENTS	128,057,507
171	INTEREST AND DIVIDENDS RECEIVABLE	716,315
173	ACCRUED UTILITY REVENUES	60,828,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,294,000
175	DERIVATIVE INSTRUMENT ASSETS	102,790,995
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(74,288,025)
	TOTAL CURRENT AND ACCRUED ASSETS	\$ 692,195,738
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	\$ 34,594,708
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,925,428,704
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	338,964
184	CLEARING ACCOUNTS	(294,187)
185	TEMPORARY FACILITIES	20
186	MISCELLANEOUS DEFERRED DEBITS	23,171,630
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	10,395,430
190	ACCUMULATED DEFERRED INCOME TAXES	318,703,002
	TOTAL DEFERRED DEBITS	\$ 3,312,338,271
	TOTAL ASSETS AND OTHER DEBITS	\$ 18,278,571,976

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
June 30, 2017

5. PROPRIETARY CAPITAL

		2017
201	COMMON STOCK ISSUED	\$ 291,458,395
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	591,282,978
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	479,665,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	4,439,320,726
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(7,260,582)
	TOTAL PROPRIETARY CAPITAL	\$ 5,769,861,245

6. LONG-TERM DEBT

221	BONDS	\$ 4,591,077,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(12,072,563)
	TOTAL LONG-TERM DEBT	\$ 4,579,004,437

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,059,813,950
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	23,454,995
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	247,807,441
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	174,994,502
230	ASSET RETIREMENT OBLIGATIONS	839,206,532
	TOTAL OTHER NONCURRENT LIABILITIES	\$ 2,345,277,420

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
June 30, 2017

8. CURRENT AND ACCRUED LIABILITES

		2017
231	NOTES PAYABLE	\$ 4,599,706
232	ACCOUNTS PAYABLE	473,954,108
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	26,226,170
235	CUSTOMER DEPOSITS	77,486,341
236	TAXES ACCRUED	1,536,337
237	INTEREST ACCRUED	45,728,091
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	2,776,345
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	111,890,445
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	50,892,477
244	DERIVATIVE INSTRUMENT LIABILITIES	223,733,662
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(174,994,502)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 843,829,180

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 58,925,476
253	OTHER DEFERRED CREDITS	381,335,924
254	OTHER REGULATORY LIABILITIES	1,018,973,062
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	16,797,674
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	2,366,486,504
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	898,081,054
	TOTAL DEFERRED CREDITS	\$ 4,740,599,694

TOTAL LIABILITIES AND OTHER CREDITS \$ 18,278,571,976

\$4,740,599,694

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
June 30, 2017

(a) Amounts and Kinds of Stock Authorized:			
Common Stock	255,000,000	shares	Without Par Value
Amounts and Kinds of Stock Outstanding:			
Common Stock	116,583,358	shares	291,458,395

(b) Brief Description of Mortgage:
Full information as to this item is given in Application Nos. 93-09-069,04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, and 15-08-011 to which references are hereby made.

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

First Mortgage Bonds:	Nominal	Par Value		Interest Paid (updated in Q4' 20xx) as of Q4' 2016
	Date of Issue	Authorized and Issued	Outstanding	
Var% Series OO, due 2027	12-01-92	0	0	2,625,000
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,346
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,250
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,938
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	3,000,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	2,660,460
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
Variable Series OOO, due 2017	03-12-15	0	0	1,210,959
1.9140% Series PPP, due 2022	03-12-15	66,600,519	66,600,519	4,272,326
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	6,111,111
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	-
Total 1st. Mortgage Bonds:			4,479,105,519	175,122,889
Total Bonds:				175,122,889

TOTAL LONG-TERM DEBT			4,479,105,519	
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**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT**

June 30, 2017

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2017
Commercial Paper & ST Bank	Various	Various	Various	4,599,706	\$1,149,047

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	2013	2014	2015	2016	2017
5.00%	-	\$281,250	-	-	-	-
4.50%	-	202,500	-	-	-	-
4.40%	-	214,500	-	-	-	-
4.60%	-	257,901	-	-	-	-
1.70%	-	1,785,000	-	-	-	-
1.82%	-	873,600	-	-	-	-
Total	-	\$3,614,751	-	-	-	-

Common Stock	2013	2014	2015	2016	2017
[1]	-	\$200,000,000	300,000,000	175,000,000	175,000,000

NOTE 11 PREFERRED STOCK 10K:

On October 15, 2013, SDG&E redeemed all six series of its outstanding shares of contingently redeemable preferred stock for \$82 million, including a \$3 million early call premium.

A balance sheet and a statement of income and retained earnings of applicant for the six months ended June 30, 2017 are attached hereto.

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

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Six Months Ended June 30, 2017

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$ 2,299,314,811
401	OPERATING EXPENSES	\$ 1,345,039,484	
402	MAINTENANCE EXPENSES	71,067,061	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	314,453,375	
408.1	TAXES OTHER THAN INCOME TAXES	64,105,315	
409.1	INCOME TAXES	45,744,462	
410.1	PROVISION FOR DEFERRED INCOME TAXES	108,315,692	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(14,216,365)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	762,402	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>\$ 1,935,271,426</u>
	NET OPERATING INCOME		\$ 364,043,385

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	\$ 14,588	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	16,448	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	3,757,665	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	30,734,726	
421	MISCELLANEOUS NONOPERATING INCOME	158,110	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>\$ 34,681,537</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	\$ -	
425	MISCELLANEOUS AMORTIZATION	125,024	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	1,725,364	
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 1,850,388</u>	
408.2	TAXES OTHER THAN INCOME TAXES	\$ 326,971	
409.2	INCOME TAXES	362,641	
410.2	PROVISION FOR DEFERRED INCOME TAXES	24,402,273	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(21,440,137)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 3,651,748</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>\$ 29,179,401</u>
	INCOME BEFORE INTEREST CHARGES		393,222,786
	EXTRAORDINARY ITEMS AFTER TAXES		233,112
	NET INTEREST CHARGES*		<u>89,272,789</u>
	NET INCOME		<u><u>\$ 304,183,109</u></u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$9,812,680)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Six Months Ended June 30, 2017

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 4,310,137,617
NET INCOME (FROM PRECEDING PAGE)	304,183,109
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	0
DIVIDENDS DECLARED - COMMON STOCK	(175,000,000)
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 4,439,320,726</u>

APPENDIX B

Statement of Presently Effective Electric Rates



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.

	<u>Cal. P.U.C. Sheet No</u>
TITLE PAGE.....	16015-E
TABLE OF CONTENTS.....	29795, 28123, 27839, 29796, 28371, 27929, 28120-E 27993, 28372, 28373, 27995, 28247, 26298-E
PRELIMINARY STATEMENT:	
I. General Information.....	8274, 26126, 22140-E
II. <u>Balancing Accounts</u>	
Description/Listing of Accounts	19402, 28122-E
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Vice President

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Regulatory Affairs

Resolution No.



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182-1000	11-13	Renewable Energy Credits Compensation Agreement.....	23970-E
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187-2000	04-15	Rule 33 Terms of Service Acceptance Form.....	26295-E
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190-1000	10-15	Bioenergy Market Adjusting Tariff Power Purchase Agreement.....	26846-E
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APPENDIX C

Statement of Proposed Rate Increases

SAN DIEGO GAS & ELECTRIC 2018 RATE DESIGN WINDOW APPLICATION

RULE 3.2(A)(3) STATEMENT OF PROPOSED RATE CHANGES

This application complies with CPUC's requirement that all three major gas and electric utilities in California (PG&E, Southern California Edison and San Diego Gas & Electric) propose a plan for transitioning to Time-of-Use rate plans. Additionally, this application will include several residential rate options designed to be more energy efficient and have less impact on the environment.

In 2015, the CPUC launched its residential rate reform efforts to address concerns about customer bill impacts and volatility caused by the five-tiered rate structure that was put into place after the California Energy Crisis. This 2018 RDW proceeding is the next step in the CPUC's process of residential electric rate reform for all of California's major utilities.

The State of California is taking steps to create a cleaner and more reliable energy grid by encouraging energy usage when demand is lower and renewable energy is more plentiful. Based on lessons learned from other customer classes (such as commercial and agricultural) being on Time-of-Use rate plans, the CPUC has determined that more residential customers should be moved to Time-of-Use rate plans. Time-of-Use rate plans can help bring down the overall cost of electricity, make better use of clean renewable energy such as solar, and support the needs of the electric grid. Customers will always have a choice of rate plans, meaning Time-of-Use is not mandatory.¹ The first year will be risk-free, with bill protection, and an individualized rate comparison for all customers.²

This application includes the following:

- Plan to transition many residential customers to a Time-of-Use rate plan, meaning the cost of electricity depends on the time of day it is used.
- Options of three core rate plans for customers to choose from, designed to meet a variety of customer needs.
- Future fixed monthly charge to reduce bill volatility and better align customer bills with cost of service. Implementing a fixed charge will decrease the price per kilowatt hour and helps reduce the impact of customer bill volatility.

The transition to Time-of-Use rate plans is being piloted statewide to gain important lessons before full transition. SDG&E's application proposes to start this transition on January 1, 2019, after all pilots are complete and lessons learned from pilot programs have been reflected in implementation plans.

¹ Cal. Pub. Util. Code Section 745 (b).

² Cal. Pub. Util. Code Section 745 (c)(4).

IMPACT ON RATES

There is no direct request to increase rates in this application. However, the proposed implementation plan will eventually impact rates as rate design changes are implemented. Specific impacts to rates have not been determined at this time. Requests to increase rates will be made in future rate increase applications and information about rate impacts will be provided at that time. This application is intended to give customers more control over their bill amounts. The majority of customers will either see a reduction in their total bill amount or see a small annual increase, depending on how much energy they are able to shift to off-peak hours when prices are lower.

APPENDIX D

Original Cost and Depreciation

SAN DIEGO GAS & ELECTRIC COMPANY

**COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF JUNE 30, 2017**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	156,628,784.90	94,800,672.81
	TOTAL INTANGIBLE PLANT	156,851,626.26	95,003,573.11
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	96,334,558.86	44,862,417.28
312	Boiler Plant Equipment	169,331,217.70	75,963,449.80
314	Turbogenerator Units	138,276,524.45	52,081,765.18
315	Accessory Electric Equipment	85,742,414.73	37,651,783.18
316	Miscellaneous Power Plant Equipment	47,957,663.34	12,032,960.20
	Steam Production Decommissioning	0.00	0.00
	TOTAL STEAM PRODUCTION	552,168,897.37	222,638,893.93
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	27,285,711.08	2,658,162.87
322	Boiler Plant Equipment	243,225,717.06	21,662,290.99
323	Turbogenerator Units	26,982,364.66	2,370,893.39
324	Accessory Electric Equipment	10,878,214.63	1,458,232.53
325	Miscellaneous Power Plant Equipment	166,754,468.81	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	(475,126,476.33)	(76,957,383.29)
	TOTAL NUCLEAR PRODUCTION	(0.09)	0.00
340.1	Land	224,368.91	0.00
340.2	Land Rights	56,032.61	10,212.85
341	Structures and Improvements	22,998,121.16	7,679,414.56
342	Fuel Holders, Producers & Accessories	21,324,500.79	7,007,859.59
343	Prime Movers	94,574,417.87	36,327,625.63
344	Generators	362,782,673.34	140,496,193.64
345	Accessory Electric Equipment	32,510,919.85	13,289,015.40
346	Miscellaneous Power Plant Equipment	26,443,313.62	13,771,538.14
	TOTAL OTHER PRODUCTION	560,914,348.15	218,581,859.81
	TOTAL ELECTRIC PRODUCTION	1,113,083,245.43	441,220,753.74

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	72,524,698.96	0.00
350.2	Land Rights	160,619,278.55	21,371,427.72
352	Structures and Improvements	488,608,585.04	68,304,700.17
353	Station Equipment	1,510,349,481.65	291,715,644.87
354	Towers and Fixtures	895,095,669.89	166,170,633.30
355	Poles and Fixtures	471,267,279.29	101,037,242.10
356	Overhead Conductors and Devices	579,975,944.07	228,020,077.14
357	Underground Conduit	357,850,703.14	57,184,149.68
358	Underground Conductors and Devices	375,148,181.36	56,371,465.21
359	Roads and Trails	310,745,361.46	30,776,041.82
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	TOTAL TRANSMISSION	5,222,185,183.41	1,020,951,382.01
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	85,981,546.92	41,657,301.79
361	Structures and Improvements	4,650,797.97	1,797,870.83
362	Station Equipment	502,258,710.13	176,956,070.89
363	Storage Battery Equipment	114,543,154.82	11,035,235.80
364	Poles, Towers and Fixtures	689,774,048.87	270,474,444.15
365	Overhead Conductors and Devices	643,306,044.00	208,629,931.03
366	Underground Conduit	1,195,423,500.04	475,715,123.40
367	Underground Conductors and Devices	1,502,679,315.60	901,240,612.16
368.1	Line Transformers	609,320,047.17	150,126,700.43
368.2	Protective Devices and Capacitors	35,444,236.93	5,627,535.11
369.1	Services Overhead	153,915,548.66	119,842,009.73
369.2	Services Underground	346,628,155.70	245,380,312.12
370.1	Meters	191,398,908.77	83,779,656.60
370.2	Meter Installations	56,021,946.63	21,923,796.19
371	Installations on Customers' Premises	8,963,349.06	10,328,326.53
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	29,842,566.03	18,963,966.64
	TOTAL DISTRIBUTION PLANT	6,186,328,105.10	2,743,478,893.40
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	34,826,629.88	24,572,335.14
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	14,831.41
393	Stores Equipment	8,545.97	8,372.62
394.1	Portable Tools	26,342,331.91	9,121,753.55
394.2	Shop Equipment	341,135.67	259,010.20
395	Laboratory Equipment	5,152,106.01	589,188.43
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	277,874,435.92	110,051,000.90
398	Miscellaneous Equipment	6,863,576.90	1,180,137.60
	TOTAL GENERAL PLANT	358,839,579.40	145,964,015.73
101	TOTAL ELECTRIC PLANT	13,037,287,739.60	4,446,618,617.99

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
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	2,242,164.87	1,129,198.45
	TOTAL STORAGE PLANT	2,242,164.87	1,129,198.45
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,408,195.74
366	Structures and Improvements	19,284,359.93	10,217,949.22
367	Mains	233,085,256.00	78,458,425.07
368	Compressor Station Equipment	90,673,807.33	69,389,421.99
369	Measuring and Regulating Equipment	23,190,739.00	16,900,829.84
371	Other Equipment	1,611,054.80	15,869.43
	TOTAL TRANSMISSION PLANT	374,726,652.61	176,390,691.29
374.1	Land	1,083,616.95	0.00
374.2	Land Rights	8,331,367.27	6,986,721.45
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,025,192,779.17	377,126,261.81
378	Measuring & Regulating Station Equipment	18,068,909.71	8,243,192.81
380	Distribution Services	274,810,914.16	296,901,174.40
381	Meters and Regulators	157,350,344.06	57,747,725.22
382	Meter and Regulator Installations	102,672,813.04	40,996,390.21
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,215,753.05
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	9,870,474.80	4,973,947.02
	TOTAL DISTRIBUTION PLANT	1,598,941,476.77	794,252,419.07

<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	44,627.10	44,627.23
394.1	Portable Tools	10,602,158.47	4,271,614.92
394.2	Shop Equipment	76,864.06	53,082.43
395	Laboratory Equipment	283,093.66	275,636.66
396	Power Operated Equipment	16,162.40	9,556.29
397	Communication Equipment	2,705,551.88	1,178,868.93
398	Miscellaneous Equipment	473,379.95	85,252.34
	TOTAL GENERAL PLANT	<u>14,201,837.52</u>	<u>5,944,141.80</u>
101	TOTAL GAS PLANT	<u>1,990,198,235.97</u>	<u>977,802,554.81</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	411,631,992.20	276,570,546.85
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,168,914.56	0.00
389.2	Land Rights	857,384.59	27,776.34
390	Structures and Improvements	389,278,337.16	153,210,933.62
391.1	Office Furniture and Equipment - Other	38,312,019.80	15,961,577.19
391.2	Office Furniture and Equipment - Computer E	52,514,351.92	34,696,791.01
392.1	Transportation Equipment - Autos	406,418.22	(285,191.36)
392.2	Transportation Equipment - Trailers	12,195.98	5,418.78
393	Stores Equipment	380,636.01	47,513.07
394.1	Portable Tools	1,454,417.13	396,222.44
394.2	Shop Equipment	191,385.80	135,484.56
394.3	Garage Equipment	1,626,443.82	284,576.94
395	Laboratory Equipment	2,095,455.34	1,031,661.54
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	188,431,411.62	82,628,661.10
398	Miscellaneous Equipment	2,464,827.17	548,065.59
118.1	TOTAL COMMON PLANT	<u>1,096,826,191.32</u>	<u>565,067,058.57</u>
	TOTAL ELECTRIC PLANT	13,037,287,739.60	4,446,618,617.99
	TOTAL GAS PLANT	1,990,198,235.97	977,802,554.81
	TOTAL COMMON PLANT	<u>1,096,826,191.32</u>	<u>565,067,058.57</u>
101 & 118.1	TOTAL	<u>16,124,312,166.89</u>	<u>5,989,488,231.37</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	(7,887,821.95)	(2,272,753.20)
		<u>(7,887,821.95)</u>	<u>(2,272,753.20)</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-ASSETS HELD FOR SALE		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</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	(1,627,745.96)	(1,627,745.96)
		<u>(1,627,745.96)</u>	<u>(1,627,745.96)</u>
101	Accrual for Retirements		
	Electric	(5,196,343.24)	(5,196,343.24)
	Gas	(175,218.45)	(175,218.45)
		<u>(5,371,561.69)</u>	<u>(5,371,561.69)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(5,371,561.69)</u>	<u>(5,371,561.69)</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	85,194,000.02	15,679,524.03
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>15,679,524.03</u>
	TOTAL PLANT LEASED TO OTHERS	<u>85,194,000.02</u>	<u>15,679,524.03</u>
105	Plant Held for Future Use		
	Electric	5,302,629.50	0.00
	Gas	0.00	0.00
		<u>5,302,629.50</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>5,302,629.50</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,080,338,361.09	
	Gas	129,495,039.49	
	Common	139,684,928.07	
		<u>1,349,518,328.65</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,349,518,328.65</u>	<u>0.00</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0.00	0.00
		<u>0.00</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	0.00	1,027,607,504.49
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,027,607,504.49
101.1	ELECTRIC CAPITAL LEASES	1,352,823,281.00	242,820,238.00
118.1	COMMON CAPITAL LEASE	21,349,549.44	20,646,165.53
		1,374,172,830.44	263,466,403.53
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	<u>(62,963,775.37)</u>	<u>(40,861,208.00)</u>
143	FAS 143 ASSETS - Legal Obligation	17,240,858.67	(1,023,385,718.05)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	84,742,931.67	35,884,951.13
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,522,144,031.35)
	TOTAL FAS 143	101,983,790.34	(2,509,644,798.27)
	UTILITY PLANT TOTAL	<u>19,025,596,616.24</u>	<u>4,777,324,804.30</u>

APPENDIX E

Summary of Earnings

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
Six Months Ended June 30, 2017
(\$ IN MILLIONS)

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$ 2,299
2	Operating Expenses	<u>1,935</u>
3	Net Operating Income	<u><u>\$ 364</u></u>
4	Weighted Average Rate Base	\$ 8,232
5	Rate of Return*	7.79%

*Authorized Cost of Capital

APPENDIX F

Service List

Notice to State, Cities, and Counties

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, 11th 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, 2nd 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