

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

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least Cost Dispatch and Power Procurement Activities in 2011, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2011 and (iii) Costs Recorded in Related Regulatory Accounts in 2011

Application 12-06-xxx
(Filed June 1, 2012)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF ERRA COMPLIANCE FOR 2011 AND
RATE RECOVERY OF ERRA-RELATED ACCOUNTS**

John A. Pacheco
Sempra Energy
101 Ash Street, HQ12
San Diego, California 92101-3017
Telephone: (619) 699-5130
Facsimile: (619) 699-5027
Email: jpacheco@semprautilities.com

Attorney for: SAN DIEGO GAS & ELECTRIC
COMPANY

June 1, 2012

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I. INTRODUCTION

In compliance with California Public Utilities Code (“P.U. Code”) Section 454.5, relevant Decisions (“D.”) of the California Public Utilities Commission (“Commission” or “CPUC”), including, but not limited to, D.02-10-062, D.02-12-074, D.05-01-054, and D.05-04-036, and the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby submits its Application for approval of: (i) contract administration, least cost dispatch and power procurement activities in 2011, (ii) costs related to those activities recorded to the Energy Resource Recovery Account (“ERRA”) and Transition Cost Balancing Account (“TCBA”) in 2011 and (iii) costs recorded in related regulatory accounts in 2011, including the Market Redesign and Technology Upgrade Memorandum Account (“MRTUMA”) and Independent Evaluator Memorandum Account (“IEMA”). With respect to the ERRA, among other items, SDG&E is including for review entries for in-lieu gas franchise fees. As explained below and in more detail in the Direct Testimony of Ms. Amanda Jenison, these entries include costs and annual true-up entries for in-lieu gas franchise fees related to the Palomar Energy Center (“Palomar”), Miramar Energy Facility (“Miramar”), and the Otay Mesa Energy Center (“OMEC”). With respect to the MRTUMA and IEMA, SDG&E is requesting approval to increase its revenue requirement by \$2.9 million for recovery of the 2011 entries in these accounts.

Based on SDG&E’s requested revenue requirement of \$2.9 million, if approved as proposed, a typical monthly summer electric bill (based on 500 kilowatt-hours (“kWh”) of electricity) will increase from approximately \$81.32 to \$81.36 (or 0.05 percent) for inland customers and from approximately \$88.10 to \$88.17 (or 0.08 percent) for coastal customers. A typical monthly bill for residential customers who use 1,000 kWh per month will increase from approximately \$216.28 to \$216.58 (or 0.14 percent) for inland customers and from approximately \$224.98 to \$225.31 (or 0.15 percent) for coastal customers. SDG&E’s small commercial customers will see an increase of approximately \$0.31 on their monthly summer electric bill (or 0.11 percent), based on 1,500 kWh of electricity for secondary service.¹

II. BACKGROUND

A. SCOPE OF ERRA COMPLIANCE REVIEW

The ERRA balancing account mechanism was established in D.02-10-062 to track fuel and purchased power billed revenues against actual recorded costs. That decision also required the electric utilities to establish a fuel and purchased power revenue requirement forecast, a trigger mechanism, and a schedule for semiannual ERRA proceedings. The first semiannual proceeding (the forecast application) consists of an application by the utility to establish annual fuel and purchased power forecasts for the upcoming 12 months. During the second semiannual proceeding, a compliance review of the utility’s prior period energy resource contract administration, least cost dispatch, and ERRA balancing account is conducted.

In D.02-10-062, the Commission adopted minimum standards of conduct the utilities must follow in performing their procurement responsibilities. Standard of Conduct #4 (“SOC 4”) describes the compliance review criteria for contract administration and economic dispatch of generation resources on which the utilities will be evaluated: “The utilities shall prudently administer all contracts and generation resources and dispatch the energy in a least cost manner. Our definitions of prudent contract administration and least cost dispatch are the same as our existing standard.”²

The scope of compliance review described in D.02-10-062 and D.02-12-074 includes Commission review of utility retained electric generation (“URG”) fuel expenses, contract administration, including administration of the California Department of Water Resources

¹ Customers’ actual bill impacts will vary with usage per month, by season and by climate zone.

² D.02-10-062, Conclusion of Law 11.

(“CDWR”) contracts allocated to SDG&E in D.02-09-053, California Independent System Operator (“CAISO”)-related costs, existing Qualified Facilities (“QF”) contracts, other power purchase agreements (including renewable resource contracts) and economic dispatch of electric generation resources (including Miramar, Palomar, Desert Star Energy Center [“Desert Star”] and the San Onofre Nuclear Generating Station [“SONGS”]).

The Commission further stated in D.03-06-067 that in determining whether the utilities complied with the requirement to “dispose of economic long power and purchase economic short power in a manner that minimizes ratepayer costs,”³ the Commission would examine “the prudence of each utility’s decision to dispatch resources contained in the integrated CDWR-IOU portfolio and execute market transactions for economic purposes”⁴ Accordingly, the Commission’s annual compliance review focuses on prudent contract administration, least cost dispatch and URG fuel procurement activities.

The appropriate scope and standard of review for these ERRA applications have also been addressed in D.05-04-036 and D.05-01-054. According to those decisions and pertinent to the scope of review of the utility’s least cost dispatch obligation, the Commission will consider those decisions to dispatch the resources in the daily, hourly, and real-time markets. As for the standard of review of the utility’s least cost dispatch, contract administration, and URG costs, the Commission reiterated in D.05-04-036 that its review is not a “reasonableness review,” but is instead a “compliance review:”

We [the Commission] went on to state that the least cost dispatch review process is a compliance review, and that there are no ranges of possible outcomes. (D.05-01-054, pp. 13-14.) Instead, we stated in pertinent part that:

“The outcome or standard for review has been predetermined – that is the lowest cost. ***SCE must demonstrate that it has complied with this standard, by providing sufficient information and/or analysis in order for the Commission to verify that SCE’s dispatch resulted in the most cost-effective mix of total resources, thereby minimizing the cost of delivering electric services.*** Based on analyses of SCE’s showing and subsequent discovery, ORA or any other party may take the position that SCE did not fully comply with SOC 4. In such cases, we will judge the merits of the parties’ positions and may impose disallowances and/or penalties.... This compliance

³ D.02-12-074 at 52-53.

⁴ D.03-06-067 at 10.

process encompasses much more than that characterized by ORA. Imposing a compliance process for least-cost dispatch under SOC 4, rather than a reasonableness review process, does not diminish our ability to ensure just and reasonable rates.” (D.05-01-054, pp. 14-15.)⁵

In this same decision, the Commission goes on to say that:

D.05-01-054 did not adopt specific criteria for determining “what constitutes least-cost dispatch compliance or what the utility needs to provide to meet its burden to prove such compliance.” (D.05-01-054, p. 15.) Instead, we stated that if ORA or another party can demonstrate that the utility “has not dispatched resources in a least-cost manner, the Commission will review that evidence and make appropriate adjustments for non-compliance.” (D.05-01-054, p. 16.)⁶

Finally, the Commission stated that “if specific criteria for determining what constitutes least-cost dispatch compliance are needed, that such criteria “should be developed in a generic proceeding where all affected utilities, as well as interested parties, could participate. (D.05-01-054, p. 15.)”⁷

B. ERRA

As noted above, the purpose of the ERRA is to provide full recovery of SDG&E’s energy procurement costs associated with serving SDG&E’s bundled service customers. Accordingly, SDG&E’s ERRA revenue requirement includes specific recovery of CAISO energy and ancillary services load charges, contract costs, generation fuel costs, CAISO-related costs, hedging costs and previously approved equity rebalancing costs related to the financial statement consolidation of OMEC under Accounting Standards Codification 810 (“ASC 810”), formerly referred to as FASB Interpretation No. 46 (R) or “Fin 46 (R)”.⁸ Pursuant to Section 5(d) of SDG&E’s ERRA Tariff, the ERRA also includes “in lieu payments payable to communities where SDG&E-owned power plants are located pursuant to D.05-08-005 or other applicable Commission decisions.” The ERRA also includes revenues from SDG&E’s Electric Energy Commodity Cost (“EECC”) rate schedule adjusted to exclude CDWR revenues for energy provided by CDWR to SDG&E

⁵ D.05-04-036 at 26 (emphasis added).

⁶ *Id.* at 27 (internal footnote omitted) (emphasis added).

⁷ *Id.* at fn. 13.

⁸ SDG&E Balancing Accounts: Energy Resource Recovery Account (ERRA) Tariff, Sections 1 (“Purpose”) & 5 (“Accounting Procedures”) (effective April 29, 2012) (“ERRA Tariff”); *see also* Advice Letter 1778-E; regarding equity rebalancing costs related to OMEC, *see* D.11-07-041, Ordering Paragraph 2.

customers and non-fuel generation revenues allocated to the Non-Fuel Generation Balancing Account (“NGBA”).

On a monthly basis, the ERRA compares the energy procurement costs described above with the revenue from Schedule EECC (excluding CDWR and NGBA revenue). Interest is applied to any over or under collection balance at the three-month Commercial Paper rate. SDG&E’s adopted ERRA tariff describes the entries that are made to the account on a monthly basis. SDG&E believes that the costs and expenses recorded to the ERRA are appropriate, correctly stated and recoverable in accordance with applicable Commission policy and decisions. The ERRA balance as of December 31, 2011 was a \$14.8 million overcollection.

C. TCBA

In D.06-12-019, the Commission determined that SDG&E’s annual TCBA review should be included as part of the annual ERRA compliance review. The ERRA compliance review is the appropriate forum to review the TCBA because the costs that are recovered in the TCBA generally related to the above-market portion of certain QF and purchase power costs eligible for recovery under Assembly Bill (“AB”) 1890. Specifically, the TCBA records the eligible above-market power costs and the revenues received from SDG&E’s Competition Transition Charge (“CTC”) rate. The TCBA balance as of December 31, 2011 was a \$9.1 undercollection.

D. MRTUMA

SDG&E filed Advice Letter 1867-E dated January 29, 2007 to request authority from the Commission to establish the MRTUMA to record costs associated with implementing the CAISO’s Market Redesign Technology Upgrade (“MRTU”) tariff. All market participants were required to comply with the CAISO’s MRTU Tariff. The purpose of the MRTUMA is to record the incremental operation and maintenance and capital-related costs associated with implementing CAISO’s MRTU tariff. Interest is applied to any over or under collection balance at the three-month Commercial Paper rate.

As explained in the Direct Testimony of Ms. Jenison, on June 1, 2011, SDG&E filed Application (“A.”) 11-06-003 (ERRA Compliance Application for 2010) for, among other things, review and approval of its MRTU-related costs through December 31, 2010. A ruling issued on June 23, 2011 granted a motion to bifurcate and consolidate MRTU issues into a separate proceeding for 2010. As a result, Pacific Gas & Electric Company (“PG&E”), Southern

California Edison Company (“SCE”) and SDG&E (collectively, the “Joint Utilities”) filed joint application A.12-01-014 on January 31, 2012 for the adoption of electric revenue requirements and rates associated with the MRTU initiative. In that application, SDG&E requested Commission adoption of MRTU-related electric revenue requirement of \$1.6 million associated with cost undercollections recorded in 2010 in its MRTUMA, as originally presented in A.11-06-003. The Division of Ratepayer Advocates (“DRA”), the only intervening party to file comments, did not contest SDG&E’s 2010 request for cost recovery, reasonableness review or to transfer the balance per the tariff disposition. As of this date, a final decision in A.12-01-014 has not been issued. However, the Joint Utilities did receive guidance from the Assigned Commissioner and Administrative Law Judge (“ALJ”) at the MRTU Implementation Best Practices workshop, held on March 12, 2012 in A.12-01-014, to include SDG&E’s 2011 MRTUMA cost recovery and reasonableness requests in its 2011 ERRA Compliance proceeding. Therefore, in this application, SDG&E’s MRTU-related request is limited to 2011 activity. Specifically, SDG&E requests a reasonableness finding as to total MRTU-related costs and expenditures during the 2011 record period of \$2.839, as explained in Mr. Choi’s Direct Testimony, and recovery of the net costs of \$2.312 million (incremental O&M and capital revenue requirement-related expenses) entered into the MRTUMA in 2011, as described in Ms. Jenison’s Direct Testimony.

E. IEMA

In compliance with Senate Bill (“SB”) 1078, D.03-06-071 and the requirements of Rulemaking (“R.”) 01-10-024, SDG&E was required to implement Renewable Portfolio Standards (“RPS”) programs. SDG&E’s solicitations for the RPS programs required bidders to provide both turnkey or buyout options with purchase power agreements. In D.04-12-048, dated December 16, 2004, the Commission adopted a variety of safeguards and procedures that required the utilities to use independent evaluators if affiliated entities bid in a procurement solicitation or if the utility sought turnkey proposals. The Commission extended the requirement to use independent evaluators for SDG&E’s RPS solicitations, in D.05-07-039 dated July 21, 2005.

The purpose of the IEMA is to record third party costs associated with the use of independent evaluators in the Utility’s long-term procurement activities and RPS programs. Interest is applied to any over or under collection balance at the three-month Commercial Paper

rate. The disposition of the IEMA, as approved in SDG&E's tariff, requires SDG&E to seek recovery of the balance in its ERRA proceeding. SDG&E believes that the costs and expenses recorded to the IEMA in 2011 were both accurate and reasonable. Accordingly, SDG&E requests recovery of the 2011 net costs entered into the IEMA of \$0.6 million undercollected.⁹

III. SUMMARY OF PREPARED TESTIMONY

In support of this Application, SDG&E provides the testimony of three witnesses. As SDG&E's testimony demonstrates, in 2011, SDG&E has fully complied with its Commission-approved electric procurement plans,¹⁰ all relevant contract terms and conditions, SOC 4 and applicable Commission decisions. The testimony also shows the accuracy and reasonableness of SDG&E's 2011 ERRA, TCBA MRTUMA, and IEMA accounting entries. The testimony of SDG&E's witnesses, and the issues they address, are summarized below and incorporated by reference herein:

- **Mr. Tony Choi**

Mr. Choi's testimony describes the various energy resources in SDG&E's electricity portfolio and addresses the manner in which SDG&E complied during the Record Period with its obligation to dispatch its energy portfolio in a least cost manner consistent with SDG&E's Commission-approved LTPP. As explained by Mr. Choi, for purposes of the Commission's review and the compliance findings requested herein, the relevant LTPP was approved in D.07-12-052 and Resolution E-4189.¹¹ This testimony also addresses SDG&E's 2011 MRTU-related O&M costs and capital expenditures..

- **Ms. Amanda Jenison**

Ms. Jenison's testimony provides a description of the transactions and cost recovery for the 2011 entries to SDG&E's ERRA, TCBA, MRTUMA, and IEMA, as well as the basis for the requested disposition of those accounts. Ms. Jenison also describes SDG&E's

⁹ For the period prior to 2010, SDG&E sought approval for recovery of costs entered into the IEMA in last year's ERRA compliance Application (A.11-06-003). At the time of the instant Application, a decision in A.11-06-003 was still pending.

¹⁰ For purposes of the Commission's review and the compliance findings requested herein, the relevant Long-Term Procurement Plan ("LTPP") is SDG&E's 2006 LTPP, originally approved in D.07-12-052. The currently effective LTPP for the record period reflects updates which were approved in D.08-11-008 (effective November 6, 2008), and AL-2067-E (effective March 22, 2009).

¹¹ SDG&E's LTPP was subsequently modified in two Advice Letters ("AL"), AL 2061-E, and AL 2067-E in early 2009 both of which were approved by the Energy Division.

ERRA entries for in-lieu gas franchise fees. These entries include costs and annual true-up entries for in-lieu gas franchise fees related to the Palomar, Miramar, and OMEC. SDG&E seeks confirmation that its application of Commission-approved treatment of in-lieu franchise fees for the Palomar plant is appropriate for the similarly-situated Miramar and OMEC facilities.

- **Ms. Sally Chen**

Ms. Chen's testimony describes the expenses that were recorded to SDG&E's ERRA and TCBA accounts and explains the contract administration activities associated with SDG&E's power purchase agreements during 2011.

IV. REQUESTED RELIEF AND ISSUES TO BE CONSIDERED

The issues to be considered and the relief requested are contained in this Application, supporting testimony and related exhibits. In submitting this Application and supporting testimony, SDG&E demonstrates and requests express Commission findings that:

1. during 2011, SDG&E prudently administered and dispatched its URG resources and portfolio of contracts, including SONGS, Miramar, Palomar, allocated CDWR contracts, power purchase agreements, QFs, non-QF resources, and renewable energy resources, in compliance with SDG&E's Commission-approved procurement plan;
2. all 2011 entries and costs recorded in SDG&E's ERRA (including in lieu gas franchise fees), TCBA, MRTUMA, and IEMA are appropriate and correctly stated;
3. rate recovery for 2011 costs entered in SDG&E's MRTUMA is authorized and SDG&E's other 2011 MRTU-related costs are reasonable;
4. rate recovery for 2011 costs entered in SDG&E's IEMA is authorized; and
5. confidential treatment of the unredacted versions of the testimony, as requested in the declarations accompanying the testimony, is appropriate and authorized.

V. STATUTORY AND PROCEDURAL REQUIREMENTS

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 should be addressed to:

Jamie York
Regulatory Case Administrator
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, California 92123
Telephone: (858) 654-1739
Facsimile: (858) 654-1788
JYork@semprautilities.com

with copies to:

John A. Pacheco
Attorney for:
San Diego Gas & Electric Company
101 Ash Street
San Diego, CA 92101-3017
Telephone: (619) 699-5130
Facsimile: (619) 699-5027
JPacheco@semprautilities.com

3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1 of the Commission's Rules of Practice and Procedure, SDG&E requests that this Application be categorized as ratesetting because the activities and costs that are the subject of this Application involve a review of costs that are included in customer rates and because SDG&E is seeking rate recovery for 2011 costs entered in SDG&E's MRTUMA and IEMA.

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 testimony and exhibits (see Summary of Application and Summary of Testimony, above).

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
Application filed	June 1, 2012
Prehearing Conference	July 17, 2012
Intervener Testimony	August 7, 2012
Rebuttal Testimony	September 11, 2012
Hearings (if necessary)	October 11, 2012
Opening Briefs	October 25, 2012
Reply Briefs	November 6, 2012
ALJ Proposed Decision	December 6, 2012
Comments on Proposed Decision	December 16, 2012
Reply Comments	December 22, 2012
Commission Approval	January of 2013

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 August 31, 2009 in connection with SDG&E's Application No. 09-08-019, and is incorporated herein by reference.

C. Rule 3.2 – Rate Increase Notice

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.¹²

1. Rule 3.2 (a) (1) – balance sheet

SDG&E’s financial statement, balance sheet and income statement for the twelve-month period ending December 31, 2011 are included with this Application as Attachment A.

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

A statement of all of SDG&E’s presently effective electric rates can be viewed electronically by accessing: <http://www.sdge.com/regulatory/currentEffectiveTariffs.shtml>. Attachment B to this Amendment provides the current table of contents from SDG&E’s electric tariffs on file with the Commission.

3. Rule 3.2 (a) (3) – statement of proposed rate change

A statement of proposed increases is attached as Attachment C.

4. Rule 3.2 (a) (4) – description of property and equipment

A general description of SDG&E’s property and equipment was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve for the twelve-month period ending December 31, 2011 is attached as Attachment 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 twelve month period ending December 31, 2011, is included as Attachment E to this Amendment.

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

¹² Note Rule 3.2(a) (9) is not applicable to SDG&E.

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 SDG&E’s most recent proxy statement, dated April 27, 2012, was mailed to the Commission on May 2, 2012 and is incorporated herein by reference.

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

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

9. Rule 3.2 (b) – notice to state, cities and counties

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within ten days after the filing this Amendment, 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 Attachment F to this Amendment.

10. Rule 3.2 (c) – newspaper publication

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

11. Rule 3.2 (d) – bill insert notice

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

VI. CONFIDENTIAL INFORMATION

SDG&E is submitting the testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E's declarations of confidential treatment attached to the witnesses' testimony and submitted in conformance with D.06-06-066 and D.08-04-023. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E's electric procurement resources and strategies) that SDG&E witnesses must identify to support this Application.

VII. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, testimony and related exhibits on parties to the service list for A.11-06-003 (last year's SDG&E ERRA compliance proceeding) and R.12-03-014 (OIR to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans). Hard copies will be sent by overnight mail to the Assigned ALJ in R.12-03-014 and Chief ALJ Karen Clopton.

VIII. CONCLUSION

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

- (1) find that in 2011 SDG&E prudently administered its generation resources and portfolio of contracts and dispatched energy in a least cost manner, in compliance with SDG&E's Commission-approved procurement plan;
- (2) find that SDG&E's 2011 entries in its ERRA (including in-lieu gas franchise fees), TCBA, MRTUMA, and IEMA were accurate and reasonable;
- (3) grant authority to increase rates by approving cost recovery of 2011 amounts entered in SDG&E's MRTUMA and approve as reasonable SDG&E's other MRTU-related costs incurred in 2011;
- (4) grant authority to increase rates by approving cost recovery of 2011 amounts entered in SDG&E's IEMA; and
- (5) grant such additional relief as the Commission believes is just and reasonable.

SDG&E is ready to proceed with its showing in this Application.

Respectfully submitted,

By: _____/s/ John A. Pacheco
John A. Pacheco

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY
101 Ash Street
San Diego, CA 92101
Telephone: (619) 699-5130
Facsimile: (619) 699-5027
E-mail: jpacheco@semprautilities.com

SAN DIEGO GAS & ELECTRIC COMPANY

By: _____/s/ Robert M. Schlax
Robert M. Schlax
San Diego Gas & Electric Company
Southern California Gas Company
Vice President – Controller and Chief Financial Officer

DATED at San Diego, California, this 1st day of June 2012

OFFICER VERIFICATION

OFFICER VERIFICATION

Robert M. Schlax 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 APPROVAL OF ERRA COMPLIANCE FOR 2011 AND RATE RECOVERY OF ERRA-RELATED ACCOUNTS** 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 May 25, 2012 at San Diego, California.

/s/ Robert M. Schlax
Robert M. Schlax
San Diego Gas & Electric Company
Southern California Gas Company
Vice President-Controller and Chief Financial Officer

Attachment A

**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
DECEMBER 31, 2011**

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000	shares	Par Value \$27,500,000
Preferred Stock	10,000,000	shares	Without Par Value
Preferred Stock	Amount of shares not specified		\$80,000,000
Common Stock	255,000,000	shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK

5.0%	375,000	shares	\$7,500,000
4.50%	300,000	shares	6,000,000
4.40%	325,000	shares	6,500,000
4.60%	373,770	shares	7,475,400
\$1.70	1,400,000	shares	35,000,000
\$1.82	640,000	shares	16,000,000

COMMON STOCK

116,583,358 shares 291,458,395

(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009, 06-05-015 and 10-10-023 to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application Nos. 08-07-029 and 10-10-023 to which references are hereby made.

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

<u>First Mortgage Bonds:</u>	Nominal Date of Issue	Par Value Authorized and Issued	<u>Outstanding</u>	Interest Paid in 2011
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,373
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,349,999
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,249
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,409,999
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,936
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	134,561
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	324,863
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	08-15-10	500,000,000	500,000,000	21,812,500
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	0
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	0
 <u>Unsecured Bonds:</u>				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
DECEMBER 31, 2011

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2011</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$0

Amounts and Rates of Dividends Declared:

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

<u>Preferred Stock</u>	<u>Shares Outstanding</u>	<u>Dividends Declared</u>				
	<u>12-31-11</u>	2007	2008	2009	2010	2011
5.0%	375,000	\$375,000	\$375,000	\$375,000	\$375,000	\$375,000
4.50%	300,000	270,000	270,000	270,000	270,000	270,000
4.40%	325,000	286,000	286,000	286,000	286,000	286,000
4.60%	373,770	343,868	343,868	343,868	343,868	343,868
\$ 1.7625	0	969,375	242,344	0	0	0
\$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000	2,380,000	2,380,000
\$ 1.82	640,000	1,164,800	1,164,800	1,164,800	1,164,800	1,164,800
	<u>3,413,770</u>	<u>\$5,789,043</u>	<u>\$5,062,012</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>

Common Stock

Dividend to Parent	\$0	\$0	\$150,000,000	[2]
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A balance sheet and a statement of income and retained earnings of Applicant for the twelve months ended December 31, 2011 are attached hereto.

[1] Includes \$242,344 of interest expense related to redeemable preferred stock.

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

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
DECEMBER 31, 2011**

1. UTILITY PLANT		<u>2011</u>
101	UTILITY PLANT IN SERVICE	\$11,473,464,003
102	UTILITY PLANT PURCHASED OR SOLD	23,628
105	PLANT HELD FOR FUTURE USE	72,657,994
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,881,155,766
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,668,702,166)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(207,174,288)
118	OTHER UTILITY PLANT	686,452,522
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(180,442,429)
120	NUCLEAR FUEL - NET	<u>85,150,655</u>
TOTAL NET UTILITY PLANT		<u>9,142,585,685</u>
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	5,134,697
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(563,398)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>804,052,604</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>808,623,903</u>

Data from SPL as of April 18, 2012

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
DECEMBER 31, 2011**

3. CURRENT AND ACCRUED ASSETS		2011
131	CASH	2,559,656
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	13,884,234
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	14,000,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	201,962,791
143	OTHER ACCOUNTS RECEIVABLE	23,148,423
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,606,250)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	8
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	64,640,130
151	FUEL STOCK	6,113,859
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	73,377,571
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	5,945
164	GAS STORED	311,252
165	PREPAYMENTS	136,953,363
171	INTEREST AND DIVIDENDS RECEIVABLE	4,038,243
173	ACCRUED UTILITY REVENUES	60,831,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	13,430,767
175	DERIVATIVE INSTRUMENT ASSETS	33,398,839
TOTAL CURRENT AND ACCRUED ASSETS		645,050,331
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	33,297,650
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,346,413,370
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	4,546,570
184	CLEARING ACCOUNTS	330,310
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	22,249,416
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	19,627,244
190	ACCUMULATED DEFERRED INCOME TAXES	212,020,753
TOTAL DEFERRED DEBITS		2,638,485,313
TOTAL ASSETS AND OTHER DEBITS		13,234,745,232

Data from SPL as of April 18, 2012

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
DECEMBER 31, 2011

5. PROPRIETARY CAPITAL

	<u>2011</u>
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	(78,475,400)
207 PREMIUM ON CAPITAL STOCK	(592,222,753)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(479,672,485)
214 CAPITAL STOCK EXPENSE	25,688,571
216 UNAPPROPRIATED RETAINED EARNINGS	(2,412,437,103)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>10,484,701</u>
TOTAL PROPRIETARY CAPITAL	<u>(3,818,092,864)</u>

6. LONG-TERM DEBT

221 BONDS	(3,286,905,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(253,720,000)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>11,024,429</u>
TOTAL LONG-TERM DEBT	<u>(3,529,600,571)</u>

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(702,255,240)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(51,806,170)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(350,773,481)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	<u>(696,986,890)</u>
TOTAL OTHER NONCURRENT LIABILITIES	<u>(1,801,821,781)</u>

Data from SPL as of April 18, 2012

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
DECEMBER 31, 2011**

8. CURRENT AND ACCRUED LIABILITES		2011
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	(404,688,334)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(14,213,562)
235	CUSTOMER DEPOSITS	(61,588,110)
236	TAXES ACCRUED	(1,533,340)
237	INTEREST ACCRUED	(38,983,651)
238	DIVIDENDS DECLARED	(1,204,917)
241	TAX COLLECTIONS PAYABLE	(4,689,426)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(748,127,176)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(35,165,036)
244	DERIVATIVE INSTRUMENT LIABILITIES	(217,397,394)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,527,590,946)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(15,219,412)
253	OTHER DEFERRED CREDITS	(144,677,073)
254	OTHER REGULATORY LIABILITIES	(943,419,991)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(25,802,894)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	(5,201,256)
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,082,826,482)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(340,491,962)
TOTAL DEFERRED CREDITS		(2,557,639,070)
TOTAL LIABILITIES AND OTHER CREDITS		(\$13,234,745,232)

Data from SPL as of April 18, 2012

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2011

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$3,920,072,346
401	OPERATING EXPENSES	\$2,548,420,220	
402	MAINTENANCE EXPENSES	169,100,350	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	400,326,063	
408.1	TAXES OTHER THAN INCOME TAXES	78,842,822	
409.1	INCOME TAXES	11,668,040	
410.1	PROVISION FOR DEFERRED INCOME TAXES	436,912,279	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(161,242,554)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	777,249	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	<u>(104,354)</u>	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>3,484,700,115</u>
	NET OPERATING INCOME		435,372,231

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(35,466)	
418	NONOPERATING RENTAL INCOME	425,858	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	3,105,382	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	79,674,257	
421	MISCELLANEOUS NONOPERATING INCOME	1,434,240	
421.1	GAIN ON DISPOSITION OF PROPERTY	<u>289,569</u>	
	TOTAL OTHER INCOME	<u>84,893,840</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>2,726,802</u>	
	TOTAL OTHER INCOME DEDUCTIONS	<u>2,726,802</u>	
408.2	TAXES OTHER THAN INCOME TAXES	503,107	
409.2	INCOME TAXES	(64,618,213)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	13,349,882	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	<u>0</u>	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>(50,765,224)</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>132,932,262</u>
	INCOME BEFORE INTEREST CHARGES		568,304,493
	NET INTEREST CHARGES*		<u>132,203,104</u>
	NET INCOME		<u><u>\$436,101,389</u></u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (10,071,740)

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2011**

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$1,981,155,383
NET INCOME (FROM PRECEDING PAGE)	436,101,389
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(4,819,669)
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$2,412,437,103</u>

Attachment B



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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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Advice Ltr. No. 2342-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Date Filed Mar 30, 2012

Effective Apr 29, 2012

Resolution No. _____



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Date Filed

Jan 10, 2012

Advice Ltr. No. 2322-E-A

Lee Schavrien

Effective

Jan 10, 2012

Senior Vice President

Decision No. 11-12-018

Resolution No. _____

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101-00753/5	02-04	Urgent Notice Payment Request for Returned Payment.....	16948-E
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill.	16949-E
101-00753/7	02-04	Urgent - Sign Up Notice for Service	16950-E
101-00753/8	02-04	Reminder Notice – Payment Request for Past Due Bill	16951-E
101-00753/9	02-04	Closing Bill Transfer Notification	16952-E
101-00753/10	04-11	Payment Agreement Confirmation	22328-E
101-00753/11	02-04	ESP Reminder Notice – Payment Request for Past Due Bill	16954-E
101-00754	04-11	Final Notice Before Disconnection (mailed), Notice of Past Due Closing Bill, and Notice of Past Due Closing Bill Final Notice	22329-E
101-01071	04-11	Bill, and Notice of Past Due Closing Bill Final Notice	22330-E
101-01072	04-11	Notice of Disconnect (delivered).....	22331-E

(Continued)

12C8

Issued by

Date Filed

Dec 6, 2011

Advice Ltr. No. 2310-E

Lee Schavrien

Effective

Jan 3, 2012

Senior Vice President

Decision No. _____

Resolution No.

E-4442

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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 22055-E

Canceling Revised Cal. P.U.C. Sheet No. 21529-E

TABLE OF CONTENTS

Sheet 13

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>		<u>Cal. P.U.C. Sheet No.</u>	
<u>Collection Notices (Continued)</u>				
101-02171	05-10	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units).....	21885-E	L
101-02172	03-09	Notice of Disconnect (MDTs).....	21139-E	
101-2452G	02-04	Notice to Tenants - Request for Termination of Gas and Electric Service Customer Payment Notification	16959-E	L
<u>Operation Notices</u>				
101-2371	11-95	No Access Notice.....	8826-E	
101-3052B	3-69	Temporary "After Hour" Turn On Notice.....	2512-E	
101-15152B		Door Knob Meter Reading Card.....	2515-E	
107-04212	4-99	Notice of Temporary Electric Service Interruption (English & Spanish).....	12055-E	
115-00363/2	9-00	Sorry We Missed You.....	13905-E	
115-002363	9-00	Electric Meter Test.....	13906-E	
115-7152A		Access Problem Notice.....	3694-E	
124-70A		No Service Tag.....	2514-E	

13C6

Advice Ltr. No. 2177-E-A

Decision No. 10-06-002

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Sep 23, 2010

Effective Oct 23, 2010

Resolution No. _____

Attachment C

ATTACHMENT C

ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

If the CPUC approves SDG&E's request in this Application for recovery of the costs accrued during 2011 in the Market Redesign and Technology Upgrade Memorandum Account ("MRTUMA") and Independent Evaluator Memorandum Account ("IEMA"), a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours per month could see a monthly summer bill increase of 0.05%, or \$0.04. A typical monthly electric bill could increase from \$81.32 to \$81.36. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

SAN DIEGO GAS & ELECTRIC COMPANY[®] —ELECTRIC DEPARTMENT ILLUSTRATIVE ELECTRIC RATE IMPACT

	03/01/12 Class Average Rates	Class Average Rates Reflecting Proposed Revenue Changes	Total Rate Change	Percentage Rate Change
	(¢/kWh)	(¢/kWh)	(¢/kWh)	%
Residential	17.591	17.607	0.016	0.09%
Small Commercial	17.020	17.038	0.018	0.11%
Medium and Large C&I*	13.626	13.643	0.017	0.12%
Agricultural	16.537	16.554	0.017	0.10%
Lighting	14.634	14.646	0.012	0.08%
System Total	15.429	15.446	0.017	0.11%

* C&I stands for Commercial and Industrial

Attachment D

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF DECEMBER 31, 2011

<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	\$ 202,900
303	Misc. Intangible Plant	10,063,087	3,216,144
	TOTAL INTANGIBLE PLANT	10,285,928	3,419,044
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	80,889,335	26,031,715
312	Boiler Plant Equipment	162,934,540	43,962,897
314	Turbogenerator Units	112,737,442	28,996,670
315	Accessory Electric Equipment	80,702,642	23,040,463
316	Miscellaneous Power Plant Equipment	23,790,110	4,907,181
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	475,580,588	126,985,445
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	275,548,378	270,229,567
322	Boiler Plant Equipment	553,558,481	409,330,027
323	Turbogenerator Units	142,362,919	136,764,746
324	Accessory Electric Equipment	173,081,736	167,279,092
325	Miscellaneous Power Plant Equipment	311,721,011	232,885,231
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,456,556,203	1,216,772,341
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	18,531,032	2,805,878
342	Fuel Holders, Producers & Accessories	19,764,808	3,648,913
343	Prime Movers	72,001,094	15,773,097
344	Generators	318,922,349	71,029,156
345	Accessory Electric Equipment	30,834,379	5,858,522
346	Miscellaneous Power Plant Equipment	22,723,544	8,534,385
	TOTAL OTHER PRODUCTION	482,923,110	107,652,379
	TOTAL ELECTRIC PRODUCTION	2,415,059,900	1,451,410,164

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 40,781,313	\$ 0
350.2	Land Rights	63,342,464	11,860,192
352	Structures and Improvements	114,209,757	34,347,361
353	Station Equipment	717,546,009	151,782,177
354	Towers and Fixtures	110,186,988	84,637,349
355	Poles and Fixtures	232,493,071	45,936,707
356	Overhead Conductors and Devices	287,571,913	166,382,164
357	Underground Conduit	136,727,462	22,233,764
358	Underground Conductors and Devices	125,792,671	24,474,578
359	Roads and Trails	34,042,577	6,502,048
	TOTAL TRANSMISSION	1,862,694,225	548,156,340
360.1	Land	16,176,228	0
360.2	Land Rights	73,872,149	31,984,962
361	Structures and Improvements	3,492,046	1,457,238
362	Station Equipment	392,072,128	78,100,654
364	Poles, Towers and Fixtures	496,208,352	215,921,468
365	Overhead Conductors and Devices	390,477,539	149,705,076
366	Underground Conduit	925,223,489	357,158,542
367	Underground Conductors and Devices	1,227,074,157	715,839,455
368.1	Line Transformers	476,182,642	80,064,706
368.2	Protective Devices and Capacitors	15,609,706	(8,073,777)
369.1	Services Overhead	117,828,925	122,271,469
369.2	Services Underground	300,988,925	206,300,184
370.1	Meters	196,182,798	(19,211,649)
370.2	Meter Installations	41,941,738	(28,508,768)
371	Installations on Customers' Premises	6,410,699	10,964,753
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	24,426,008	17,480,374
	TOTAL DISTRIBUTION PLANT	4,704,167,527	1,931,454,688
389.1	Land	7,523,627	0
389.2	Land Rights	0	0
390	Structures and Improvements	30,909,097	17,374,499
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	58,146	609
393	Stores Equipment	19,150	17,279
394.1	Portable Tools	18,923,448	5,881,422
394.2	Shop Equipment	336,798	187,138
395	Laboratory Equipment	320,845	44,926
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	145,058,548	63,914,193
398	Miscellaneous Equipment	456,067	119,809
	TOTAL GENERAL PLANT	203,697,887	87,738,895
101	TOTAL ELECTRIC PLANT	9,195,905,467	4,022,179,131

<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	\$ 86,104
303	Miscellaneous Intangible Plant	0	0
	TOTAL INTANGIBLE PLANT	86,104	86,104
360.1	Land	0	0
361	Structures and Improvements	43,992	43,992
362.1	Gas Holders	0	0
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	0
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	2,052,614	609,435
	TOTAL STORAGE PLANT	2,096,606	653,427
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,185,799
366	Structures and Improvements	11,548,563	9,212,762
367	Mains	127,037,835	58,774,009
368	Compressor Station Equipment	77,622,210	54,184,859
369	Measuring and Regulating Equipment	17,746,259	14,024,850
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	240,821,196	137,382,278
374.1	Land	102,187	0
374.2	Land Rights	8,108,775	5,871,225
375	Structures and Improvements	43,447	61,253
376	Mains	542,247,078	312,442,494
378	Measuring & Regulating Station Equipment	13,415,668	6,543,045
380	Distribution Services	240,194,839	276,806,639
381	Meters and Regulators	135,350,074	34,586,537
382	Meter and Regulator Installations	86,034,140	24,206,913
385	Ind. Measuring & Regulating Station Equipm	1,516,811	978,655
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,234,851	4,527,697
	TOTAL DISTRIBUTION PLANT	1,032,247,869	666,024,459

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	\$ 0	\$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	7,147,205	2,918,169
394.2	Shop Equipment	84,181	31,350
395	Laboratory Equipment	283,094	214,578
396	Power Operated Equipment	162,284	77,359
397	Communication Equipment	1,693,847	1,172,098
398	Miscellaneous Equipment	243,605	100,503
	TOTAL GENERAL PLANT	<u>9,688,717</u>	<u>4,614,061</u>
101	TOTAL GAS PLANT	<u>1,284,940,492</u>	<u>808,760,330</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	171,087,039	85,454,781
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,612,511	0
389.2	Land Rights	1,080,961	27,275
390	Structures and Improvements	222,262,727	94,792,863
391.1	Office Furniture and Equipment - Other	22,520,261	12,453,754
391.2	Office Furniture and Equipment - Computer E	54,844,563	25,186,387
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(12,547)
393	Stores Equipment	144,926	61,321
394.1	Portable Tools	1,216,895	116,238
394.2	Shop Equipment	284,834	165,789
394.3	Garage Equipment	1,231,487	128,526
395	Laboratory Equipment	2,392,911	949,607
396	Power Operated Equipment		(192,979)
397	Communication Equipment	91,490,227	45,840,831
398	Miscellaneous Equipment	2,230,094	768,918
118.1	TOTAL COMMON PLANT	<u>576,466,749</u>	<u>265,401,834</u>
	TOTAL ELECTRIC PLANT	9,195,905,467	4,022,179,131
	TOTAL GAS PLANT	1,284,940,492	808,760,330
	TOTAL COMMON PLANT	<u>576,466,749</u>	<u>265,401,834</u>
101 & 118.1	TOTAL	<u>11,057,312,708</u>	<u>5,096,341,296</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>\$ (1,164,131,236)</u>	<u>\$ (1,164,131,236)</u>
101	PLANT IN SERV-ELECTRIC NON-RECON Common	<u>\$ 0</u>	<u>\$ (1,982,000)</u>
101	PLANT IN SERV-LEGACY METER RECLASS Electric	<u>\$ (22,682,664)</u>	<u>\$ 67,966,251</u>
118	PLANT IN SERV-COMMON NON-RECON Common - Transferred Asset Adjustment	<u>\$ (3,960,652)</u>	<u>\$ (3,960,652)</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	Accrual for Retirements		
	Electric	\$ (5,956,750)	\$ (5,956,750)
	Gas	(81,280)	(81,280)
	TOTAL PLANT IN SERV-NON RECON ACC1	<u>(6,038,030)</u>	<u>(6,038,030)</u>
102	Electric	23,628	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	<u>23,628</u>	<u>0</u>
105	Plant Held for Future Use		
	Electric	72,657,994	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	<u>72,657,994</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	1,915,034,172	
	Gas	28,131,060	
	Common	109,205,321	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>2,052,370,553</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	221,468
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	0
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	721,378,466
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0</u>	<u>721,378,466</u>
101.1	ELECTRIC CAPITAL LEASES	778,390,265	54,226,689
118.1	COMMON CAPITAL LEASE	25,982,293	12,725,592
		<u>804,372,558</u>	<u>66,952,281</u>
120	NUCLEAR FUEL FABRICATION	<u>62,963,775</u>	<u>39,822,587</u>
143	FAS 143 ASSETS - Legal Obligation	116,491,281	(610,135,470)
	FIN 47 ASSETS - Non-Legal Obligation	72,534,657	28,884,654
143	FAS 143 ASSETS - Legal Obligation	0	(1,278,616,385)
	TOTAL FAS 143	<u>189,025,938</u>	<u>(1,859,867,202)</u>
	UTILITY PLANT TOTAL	<u>\$ 13,041,914,573</u>	<u>\$ 2,956,703,229</u>

Attachment E

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2011
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,920
2	Operating Expenses	<u>3,485</u>
3	Net Operating Income	<u><u>\$435</u></u>
4	Weighted Average Rate Base	\$5,071
5	Rate of Return*	8.40%

*Authorized Cost of Capital

Attachment F

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
Attn. City Clerk
233 E. Mission Road
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

United States Government
General Services Administration
300 N. Los Angeles
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
Attn. City Attorney
233 E. Mission Road
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 Rancho San Diego - Jamul
Attn. City Clerk
3855 Avocado Blvd.
Suite 230
La Mesa, CA 91941

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

City of San Diego
Attn. Mayor
202 C Street, 11th Floor
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

County of San Diego
Attn. County Counsel
1600 Pacific Hwy
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 Clerk
1 Civic Center Dr.
San Marcos, CA 92069

City of San Marcos
Attn. City Attorney
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