

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

Application of San Diego Gas & Electric Company
(U 902-E) for Approval of SB 350 Transportation
Electrification Proposals.

Application 17-01-020
(Filed January 20, 2017)

And Related Matters.

Application 17-01-021
Application 17-01-022

**PREPARED REBUTTAL TESTIMONY OF
MICHAEL A. CALABRESE
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

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

September 5, 2017



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**PREPARED REBUTTAL TESTIMONY OF
MICHAEL A. CALABRESE**

I. PURPOSE AND SUMMARY

The purpose of my rebuttal testimony is to show the costs associated with San Diego Gas & Electric’s (“SDG&E’s”) modified Residential Charging Program.¹ These costs are based on a scenario where 100% of the participants in the program choose the utility ownership option, resulting in the installation of 90,000 utility-owned electric vehicle chargers (a.k.a. “EVSEs”), consistent with SDG&E’s original application. I will also update the requested revenue requirement based on this 100% utility ownership scenario.² Additionally, I will show for illustrative purposes only costs and revenue requirement figures based on a scenario where 50% of the participants choose the utility ownership option and 50% choose the customer ownership option (“Illustrative Case”).

In sum, SDG&E is requesting that the Commission approve in this proceeding (for the years 2019-2025): (1) direct capital and O&M costs of \$241.8 million (as shown in Table MAC-3 and loaded and escalated to \$341.6 million as shown in Table MAC-6) and (2) the associated revenue requirement currently estimated to be \$211.7 million (as shown in Appendix A). As explained in the Rebuttal Testimony of Norma Jasso, the direct costs (loaded and escalated) and associated revenue requirement for the 100% utility ownership scenario will be tracked through a one-way balancing account. SDG&E is also proposing to incorporate a rolling balancing

¹ Amounts reflected throughout the tables and appendices of this rebuttal testimony may not add to the exact sum totals shown due to rounding associated with supporting spreadsheets.

² The revenue requirement methodology presented in this rebuttal testimony has not been modified from what was presented in my direct testimony for the original Residential Charging Program. It should also be noted that the modified Residential Charging Program, similar to the original Residential Charging Program, includes services and capital costs above and beyond those authorized by the Commission in SDG&E’s most recent general rate case (“GRC”). All costs associated with this program are incremental and thus additive to any currently authorized levels of revenue requirement.

1 account that will be trued up at the end of the installation period (covering years 2019-2025 with
 2 some potential carryover into 2026 due to late customer sign ups), after which time the
 3 remaining undepreciated plant balances will be included in SDG&E's next General Rate Case.

4 **II. COSTS ASSOCIATED WITH SDG&E'S MODIFIED RESIDENTIAL**
 5 **CHARGING PROGRAM**

6 SDG&E's revised capital and O&M program costs for the modified Residential Charging
 7 Program are presented in more detail in the Rebuttal Testimony of Randy Schimka.

8 **A. Modified Residential Charging Program Capital Costs**

9 Table MAC-1 below identifies the capital costs for the modified Residential Charging
 10 Program for the years 2019-2025, prior to adjustments for overheads and escalation factors.

Table MAC-1 SB350 Programs - Modified Residential Charging Program Capital Costs (Excludes escalation and loaders; Includes sales tax)									
(in \$000)									
Modified Residential Charging Program									
Capital Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Transformer & Install Cost	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Electrical Service	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
EVSE Costs	\$0	\$34,832	\$34,832	\$34,832	\$34,832	\$34,832	\$34,832	\$0	\$208,993
Purchased & SD Software	\$7,730	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,730
Total Capital Costs	\$7,730	\$34,832	\$34,832	\$34,832	\$34,832	\$34,832	\$34,832	\$0	\$216,723

11
 12 **B. Modified Residential Charging Program O&M Costs**

13 Table MAC-2 below identifies the O&M costs for the modified Residential Charging
 14 Program, prior to any adjustments for overheads and escalation factors. O&M consists of
 15 ongoing service costs which will be provided by either third party vendors (non-labor) or
 16 SDG&E internal labor for customer support, measurement evaluations, advertising, billing
 17 support, and equipment maintenance. O&M costs included in Table MAC-2 beyond 2025 are
 18 for continued maintenance.

Table MAC-2									
SB350 Programs - Modified Residential Charging Program									
O&M Costs									
(Excludes escalation and loaders; Includes sales tax)									
(in \$000)									
Modified Residential Charging Program									
O&M Expenses	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Non-Labor: Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$350	\$350	\$350	\$350	\$350	\$350	\$36,000	\$38,100
Labor: Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$3,825	\$3,825	\$3,825	\$3,825	\$3,825	\$3,825	\$0	\$22,950
Total O&M Expenses	\$0	\$4,175	\$4,175	\$4,175	\$4,175	\$4,175	\$4,175	\$36,000	\$61,050
Total O&M Costs Years 2019-2025							\$25,050		

C. Modified Residential Charging Program Total Costs Before Adjustments

Table MAC-3 below identifies the total capital and O&M costs for the modified Residential Charging Program before adjustments for loaders and escalation.

Table MAC-3									
SB350 Programs - Modified Residential Charging Program									
Summary of Total Costs									
(Excludes escalation and loaders; Includes sales tax)									
(in \$000)									
Modified Residential Charging Program									
Total Program Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Capital Costs	\$7,730	\$34,832	\$34,832	\$34,832	\$34,832	\$34,832	\$34,832	\$0	\$216,723
O&M Costs	\$0	\$4,175	\$4,175	\$4,175	\$4,175	\$4,175	\$4,175	\$36,000	\$61,050
Total Program Costs	\$7,730	\$39,007	\$39,007	\$39,007	\$39,007	\$39,007	\$39,007	\$36,000	\$277,773
Total Program Costs Years 2019-2025							\$241,773		

D. Modified Residential Charging Program Adjustments to Capital and O&M Costs

The same methodology for overhead loaders and escalation, and applicable percentages, as explained in my direct testimony for the original Residential Charging Program is applied to the modified Residential Charging Program capital & O&M costs. Overhead loaders used to develop the revenue requirement for the modified Residential Charging Program are for

1 illustrative purposes and are subject to change.³ The overhead loader values adhere to the
 2 methodology proposed by the Federal Energy Regulatory Commission (“FERC”)⁴ and were
 3 derived using the same methodology used in SDG&E’s most recent GRC filing.

4 SDG&E’s escalation costs were derived using IHS/Market Global Insight’s 3rd Quarter
 5 2016 utility cost forecast, which was published in late October 2016.

6 Table MAC-4 shows the capital costs for the modified Residential Charging Program
 7 adjusted for SDG&E overhead loaders and cost escalation.

Table MAC-4 SB350 Programs - Modified Residential Charging Program Capital Costs (Includes escalation, loaders, and sales tax)									
(in \$000)									
Modified Residential Charging Program									
Capital Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Transformer & Install Cost	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Electrical Service	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
EVSE Costs	\$0	\$43,703	\$45,003	\$46,356	\$47,753	\$49,180	\$50,646	\$0	\$282,642
Purchased & SD Software	\$14,961	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$14,961
Total Capital Costs	\$14,961	\$43,703	\$45,003	\$46,356	\$47,753	\$49,180	\$50,646	\$0	\$297,603

8
 9 Table MAC-5 shows the O&M costs for the modified Residential Charging Program
 10 adjusted for SDG&E overhead loaders and cost escalation.

³ The Commission-approved overhead loaders in effect at the time of the program’s approval will be used.

⁴ FERC guidelines reference the Statement of Federal Financial Accounting Standards 4: Managerial Cost Accounting Standards and Concepts.

Table MAC-5									
SB350 Programs - Modified Residential Charging Program									
O&M Costs									
(Includes escalation, loaders, and sales tax)									
(in \$000)									
Modified Residential Charging Program									
O&M Expenses	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Non-Labor: Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$424	\$433	\$442	\$450	\$459	\$467	\$55,362	\$58,037
Labor: Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$6,412	\$6,604	\$6,793	\$6,983	\$7,178	\$7,379	\$0	\$41,349
Total O&M Expenses	\$0	\$6,836	\$7,037	\$7,234	\$7,433	\$7,637	\$7,846	\$55,362	\$99,385
Total O&M Costs Years 2019-2025							<u>\$44,023</u>		

E. Total Modified Residential Charging Program Costs After Adjustments

After updating the capital and O&M costs with the appropriate adjustment factors noted above, the modified Residential Charging Program total costs for purposes of calculating the revenue requirement are shown in Table MAC-6 below.

Table MAC-6									
SB350 Programs - Modified Residential Charging Program									
Summary of Total Costs									
(Includes escalation, loaders, and sales tax)									
(in \$000)									
Modified Residential Charging Program									
Total Program Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Capital Costs	\$14,961	\$43,703	\$45,003	\$46,356	\$47,753	\$49,180	\$50,646	\$0	\$297,603
O&M Costs	\$0	\$6,836	\$7,037	\$7,234	\$7,433	\$7,637	\$7,846	\$55,362	\$99,385
Total Program Costs	\$14,961	\$50,539	\$52,040	\$53,591	\$55,186	\$56,817	\$58,492	\$55,362	\$396,988
Total Program Period Costs Years 2019-2025							<u>\$341,626</u>		

III. MODIFIED RESIDENTIAL CHARGING PROGRAM REVENUE REQUIREMENT

The revenue requirement represents the total dollars that need to be collected each year in order to cover the costs and the returns associated with the modified Residential Charging Program. The following components and percentages remain unchanged from the original

1 Residential Charging Program: (1) Depreciable lives of EVSEs and IT related equipment; (2)
2 SDG&E’s weighted average cost of capital of 7.79%, and return on equity of 10.3%⁵; (3) self-
3 developed software benefits associated with IT costs; and (4) federal, state, and property taxes,
4 and franchise fees and uncollectable rates. The modified Residential Charging Program revenue
5 requirement is broken out by component and presented in Appendix A.

6 In addressing SDG&E’s original Residential Charging Program, The Utility Reform
7 Network (“TURN”) states that “[t]he revenue requirement for the program is over \$700 million
8 through 2030.”⁶ In fact, the revenue requirement for SDG&E’s original Residential Charging
9 Program through 2030 was \$429 million.⁷ The “over \$700 million” amount that TURN refers to
10 was actually the total revenue requirement for SDG&E’s original Residential Charging Program
11 through 2067.⁸

12 **IV. MODIFIED RESIDENTIAL CHARGING PROGRAM ILLUSTRATIVE CASE**

13 Since the modified Residential Charging Program gives participants the option of
14 choosing a utility ownership model (where SDG&E owns and maintains the EVSE) or a
15 customer ownership model (where the customer owns and maintains the EVSE), an Illustrative
16 Case has been created, which assumes SDG&E ownership of 45,000 (50% of the planned
17 90,000) EVSEs and customer ownership of the remaining 45,000 EVSEs. The following

⁵ A settlement decision D.17-07-005 was issued July 13, 2017, lowering SDG&E’s Cost of Capital to be implemented January 1, 2018. SDG&E will be issuing an Advice Letter on or before September 29, 2017 to announce the adjusted Cost of Capital. The adjusted Cost of Capital was not available at the time this rebuttal testimony was submitted.

⁶ TURN Testimony (Borden) at 1:6-7 (citing SDG&E’s response to DR TURN-01, question 5, “Residential Program Rev Req.”). It appears TURN may have misinterpreted SDG&E’s response.

⁷ Residential Charging Revenue Requirement Workpaper, SDG&E Response to data request TURN-01, Question 5.

⁸ Residential Charging Revenue Requirement Workpaper, SDG&E Response to data request TURN-01, Question 5.

sections provide revised capital and O&M costs for the Illustrative Case. The capital and O&M costs are also discussed in more detail in the Rebuttal Testimony of Randy Schimka.

A. Illustrative Case Capital Costs

Table MAC-7 below identifies the capital costs for the Illustrative Case for the years 2019-2025, prior to adjustments for overheads and escalation factors.

Table MAC-7 SB350 Programs - Illustrative Case Capital Costs (Excludes escalation and loaders; Includes sales tax)										
(in \$000)	Illustrative Case									
	Program Period							Out-Years		
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total	
Transformer & Install Cost	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Electrical Service	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
EVSE Costs	\$0	\$30,580	\$30,580	\$30,580	\$30,580	\$30,580	\$30,580	\$0	\$183,478	
Purchased & SD Software	\$7,730	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,730	
Total Capital Costs	\$7,730	\$30,580	\$30,580	\$30,580	\$30,580	\$30,580	\$30,580	\$0	\$191,208	

B. Illustrative Case O&M Costs

Table MAC-8 below identifies the O&M costs for the Illustrative Case, prior to any adjustments for overheads and escalation factors. O&M consists of ongoing service costs which will be provided by either third party vendors (non-labor) or SDG&E internal labor for customer support, measurement evaluations, advertising, billing support, and equipment maintenance. Additional O&M costs have been included for warranty costs that would be paid directly to Electric Vehicle Service Providers (EVSP's), and contribution/allowances made by SDG&E for customers choosing to purchase and own 45,000 (50%) of EVSEs. O&M costs included in Table MAC-8 beyond 2025 are for continued maintenance.

Table MAC-8									
SB350 Programs - Illustrative Case									
O&M Costs									
(Excludes escalation and loaders; Includes sales tax)									
(in \$000)									
Illustrative Case									
O&M Expenses	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Non-Labor: * Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$4,663	\$4,663	\$4,663	\$4,663	\$4,663	\$4,663	\$32,400	\$60,375
Labor: Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$3,450	\$3,450	\$3,450	\$3,450	\$3,450	\$3,450	\$0	\$20,700
Total O&M Expenses	\$0	\$8,113	\$8,113	\$8,113	\$8,113	\$8,113	\$8,113	\$32,400	\$81,075
Total O&M Costs Years 2019-2025							<u>\$48,675</u>		
* Non-Labor expenses also includes SDG&E warranty costs paid to EVSP's, and Contributions/Allowances paid toward customer owned EVSE's.									

C. Illustrative Case Total Costs Before Adjustments

Table MAC-9 below identifies the total capital and O&M costs for the Illustrative Case before adjustments for loaders and escalation.

Table MAC-9									
SB350 Programs - Illustrative Case									
Summary of Total Costs									
(Excludes escalation and loaders; Includes sales tax)									
(in \$000)									
Illustrative Case									
Total Program Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Capital Costs	\$7,730	\$30,580	\$30,580	\$30,580	\$30,580	\$30,580	\$30,580	\$0	\$191,208
O&M Costs	\$0	\$8,113	\$8,113	\$8,113	\$8,113	\$8,113	\$8,113	\$32,400	\$81,075
Total Program Costs	\$7,730	\$38,692	\$38,692	\$38,692	\$38,692	\$38,692	\$38,692	\$32,400	\$272,283
Total Program Costs Years 2019-2025							<u>\$239,883</u>		

D. Illustrative Case Adjustments to Capital and O&M Costs

The same methodology for overhead loaders and escalation and applicable percentages, as explained above in Section II.D, is applied to the Illustrative Case capital & O&M costs.

1 Table MAC-10 shows the capital costs for the Illustrative Case adjusted for SDG&E
 2 overhead loaders and cost escalation.

Table MAC-10 SB350 Programs - Illustrative Case Capital Costs (Includes escalation, loaders, and sales tax)									
(in \$000)									
Illustrative Case									
Capital Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Transformer & Install Cost	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Electrical Service	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
EVSE Costs	\$0	\$36,945	\$38,043	\$39,188	\$40,369	\$41,575	\$42,814	\$0	\$238,934
Purchased & SD Software	\$14,961	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$14,961
Total Capital Costs	\$14,961	\$36,945	\$38,043	\$39,188	\$40,369	\$41,575	\$42,814	\$0	\$253,895

3
 4 Table MAC-11 shows the O&M costs for the Illustrative Case adjusted for SDG&E
 5 overhead loaders and cost escalation.

Table MAC-11 SB350 Programs - Illustrative Case O&M Costs (Includes escalation, loaders, and sales tax)									
(in \$000)									
Illustrative Case									
O&M Expenses	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Non-Labor: * Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$5,654	\$5,770	\$5,885	\$5,996	\$6,108	\$6,218	\$49,826	\$85,458
Labor: Customer Support, Meas. & Eval., Billing, and Maintenance	\$0	\$5,783	\$5,957	\$6,127	\$6,298	\$6,474	\$6,656	\$0	\$37,295
Total O&M Expenses	\$0	\$11,437	\$11,727	\$12,012	\$12,295	\$12,582	\$12,874	\$49,826	\$122,753
Total O&M Costs Years 2019-2025							\$72,927		
* Non-Labor expenses also includes SDG&E warranty costs paid to EVSP's, and Contributions/Allowances paid toward customer owned EVSE's.									

6

1 **E. Total Illustrative Case Costs After Adjustments**

2 After updating the capital and O&M costs with the appropriate adjustment factors, the
3 total costs for the Illustrative Case are shown in Table MAC-12 below.

Table MAC-12									
SB350 Programs - Illustrative Case									
Summary of Total Costs									
(Includes escalation, loaders, and sales tax)									
(in \$000)									
Illustrative Case									
Total Program Costs	Program Period							Out-Years	
	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
Capital Costs	\$14,961	\$36,945	\$38,043	\$39,188	\$40,369	\$41,575	\$42,814	\$0	\$253,895
O&M Costs	\$0	\$11,437	\$11,727	\$12,012	\$12,295	\$12,582	\$12,874	\$49,826	\$122,753
Total Program Costs	\$14,961	\$48,382	\$49,771	\$51,200	\$52,663	\$54,157	\$55,688	\$49,826	\$376,648
Total Program Period Costs Years 2019-2025							<u>\$326,822</u>		

4
5 **V. MODIFIED PROGRAM ILLUSTRATIVE CASE REVENUE REQUIREMENT**

6 The revenue requirement for the Illustrative Case is shown in Appendix B. The
7 components that make up the Illustrative Case revenue requirement are identical to those
8 presented in my direct testimony for the original Residential Charging Program as well as the
9 modified Residential Charging Program in Appendix A of this rebuttal testimony.

10 This concludes my Rebuttal testimony.

1 **VI. STATEMENTS OF QUALIFICATIONS**

2 My name is Michael A. Calabrese. My business address is 8330 Century Park Court, San
3 Diego, California 92123. I am employed by SDG&E as the Business Planning Manager for
4 Clean Transportation. In my current role, I am responsible for managing, directing and
5 coordinating financial analysis and revenue requirements for Electric Transportation projects.

6 I received a Bachelor of Science degree in Accounting and Management (double major)
7 from California State University, Northridge, in 1981. I am a Certified Public Accountant and a
8 member of the American Institute of Certified Public Accountants and the California Society of
9 Certified Public Accountants. I continue to maintain my license with practice rights by adhering
10 to continuing professional education requirements. I began my employment in June 1981 in the
11 Internal Audit Department of Pacific Lighting Corporation, the then parent company of the
12 Southern California Gas Company. In 1982, I joined Pacific Interstate Company, a regulated
13 subsidiary of Pacific Lighting Corporation, and held various levels of increasing responsibility,
14 including Supervisor of Fixed Assets, Budgeting and Payroll. In February 1994, I joined
15 Southern California Gas Company as a Senior Depreciation Analyst in support of the company's
16 GRC. Since that time, I have held various areas of increasing responsibility and most recently
17 Director of Accounting Operations before transferring to SDG&E.

APPENDIX A

APPENDIX A

**San Diego Gas & Electric
SB350 Programs - Modified Residential Charging Program
Annual Revenue Requirement**

(000's)

	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total	
								(1)		
FF&U:	(388)	655	892	1,198	1,496	1,780	1,907	19,362	26,902	
O&M:	-	6,836	7,037	7,234	7,433	7,637	7,846	55,362	99,385	
Working Capital:	-	-	-	-	-	-	-	-	-	
Depreciation:	-	4,110	6,911	9,798	12,771	15,835	15,909	236,919	302,252	
Return on Common	-	1,608	3,709	5,729	7,663	9,515	11,365	92,334	131,924	
Return on Preferred:	-	51	118	183	245	304	363	2,949	4,213	
Return on Debt:	-	679	1,567	2,420	3,237	4,019	4,801	39,004	55,728	
Federal Taxes:	(9,219)	4,257	3,822	5,031	6,121	6,893	6,358	50,041	73,304	
State Taxes:	(2,328)	864	1,057	1,385	1,713	1,976	1,913	13,731	20,310	
Property Taxes:	-	-	332	951	1,513	2,052	2,567	28,834	36,248	
Total	(11,935)	19,060	25,446	33,928	42,194	50,010	53,029	538,535	750,266	
	Revenue Requirement Total Years 2019-2025							<u>\$211,731</u>		

(1) The amounts in this column extend beyond 2050 due to the impact of assets book and tax lives on rate base.

APPENDIX B

APPENDIX B

San Diego Gas & Electric SB 350 - Illustrative Case

Annual Revenue Requirement

(000's)

	2019	2020	2021	2022	2023	2024	2025	2026-2050	Total
FF&U:	(388)	809	1,003	1,265	1,519	1,760	1,844	16,481	24,293
O&M:	-	11,437	11,727	12,012	12,295	12,582	12,874	49,826	122,753
Working Capital:	-	-	-	-	-	-	-	-	-
Depreciation:	-	3,951	6,318	8,759	11,273	13,862	13,448	200,282	257,894
Return on Common	-	1,474	3,225	4,907	6,516	8,056	9,608	78,055	111,842
Return on Preferred:	-	47	103	157	208	257	307	2,493	3,572
Return on Debt:	-	623	1,362	2,073	2,753	3,403	4,058	32,972	47,244
Federal Taxes:	(9,219)	4,170	3,518	4,541	5,448	6,043	5,339	42,304	62,146
State Taxes:	(2,328)	843	975	1,250	1,524	1,733	1,614	11,608	17,218
Property Taxes:	-	-	295	829	1,297	1,745	2,174	24,375	30,714
Total	(11,935)	23,355	28,527	35,791	42,833	49,442	51,266	458,396	677,675
								<u>\$219,279</u>	
								<u>Revenue Requirement Total Years 2019-2025</u>	

(1) The amounts in this column extend beyond 2050 due to the impact of assets book and tax lives on rate base.