



Regulatory Affairs  
8330 Century Park Ct. CP32F  
San Diego, CA 92123-1530

REG 10-12  
Resolution E-4874

January 24, 2018

Edward Randolph  
Energy Division Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**RE: SDG&E Q4 2017 Quarterly IMD Funding Report**

Mr. Randolph:

In compliance with California Public Utilities Commission (Commission) Resolution E-4874 approved on August 18, 2016, this report includes the following pursuant to ordering paragraph twelve, restated herein:

12. Pursuant to Community Choice Aggregation Code of Conduct Rule 4, San Diego Gas and Electric Company shall file a quarterly report with the Energy Division and make it available on its website. This report shall be filed no later than one month after the end of each quarter. These reports shall be required as long as the Independent Marketing Division exists.

The Community Choice Aggregation (CCA) Code of Conduct (COC) Rule 4 states:

The cost of an electrical corporation's independent marketing division's use of support services from the electrical corporation's ratepayer-funded divisions shall be allocated to the independent marketing division on a fully allocated embedded cost basis, supported by detailed public reports of such use. For this purpose, fully allocated embedded cost basis means a fully loaded cost basis (i.e., the sum of all direct costs and all appropriately allocated indirect costs and overhead costs; transfers from the utility to its independent marketing division of goods and services not produced, purchased or developed for sale by the utility will be priced at fully loaded costs plus 5% of direct labor cost). These calculations shall be supported by public reports of such use. These reports shall be filed quarterly with the Commission's Energy Division as an information only filing, no later than one month after the end of each quarter, and shall be made available on the utility's website at the same time. (See § 707(a)(2), D.97-12-088, App. A, Part V.H.5.).

This report is being sent on behalf of all of SDG&E, in compliance with Resolution E-4874.

SDG&E has no “Independent Marketing Division” within SDG&E that engages in lobbying or marketing with respect to CCA. Section 707 of the Public Utilities Code used “Independent Marketing Division” to refer to a division within the utility through which the utility could market on CCA related issues, subject to a code of conduct.

In response to ordering paragraph twelve of Resolution E-4874, SDG&E has no Independent Marketing Division. Additionally, SDG&E has not been allocated any costs for our affiliate, Sempra Services Corporation, for the reporting period.

SDG&E has an Application for Rehearing (AFR) pending that addresses the status of the affiliate and limits to the Commission’s jurisdiction over the affiliate. Nothing here is intended to waive any points made by SDG&E in that AFR.

If you have any questions regarding this information, please contact me.

Kind Regards,

/s/ SDG&E Regulatory Affairs

cc: SDG&E  
Central Files