

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2017 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 16-04-____
(Filed April 15, 2016)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF ITS 2017 ELECTRIC PROCUREMENT REVENUE
REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS**

PUBLIC VERSION

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I. INTRODUCTION

In compliance with California Public Utilities Commission (“Commission”) Decisions (“D.”) 02-10-062, D.02-12-074, D.04-01-050, D.13-09-003, and D.14-10-033, as well as the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby submits this Application for Approval of its 2017 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Competition Transition Charge (“CTC”) revenue requirement; (3) the Local Generation (“LG”) revenue requirement; (4) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement; and (5) the GHG allowance revenues and return allocations (“Application”). In this Application, SDG&E also requests approval to recover undercollected balances recorded to the (1) Local Generating Balancing Account (“LGBA”) and (2) the Market Redesign and Technology Upgrade Memorandum Account (“MRTUMA”). Lastly, SDG&E requests approval for its proposed 2017 (1) Local Generation Charge (“LGC”) rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables Program.

SDG&E respectfully requests that the Commission approve the forecasts and proposals in this Application for recovery in rates beginning January 1, 2017.

As discussed in greater detail below and in the testimony accompanying this Application, SDG&E hereby requests approval of a total 2017 forecasted revenue requirement of \$ 1,298.475 million.¹ This total forecast is comprised of 2017 forecasts of the following:

- (1) the ERRA revenue requirement – \$1,295.038 million (includes 2017 forecast GHG costs of \$56.918 million);
- (2) the CTC revenue requirement– \$22.662 million;
- (3) the LG revenue requirement – \$60.255 million;
- (4) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – \$1.035 million; and
- (5) the following GHG allowance revenue return allocations:
 - (a) \$0.909 million for energy-intensive trade-exposed (“EITE”) customers;
 - (b) \$4.446 million for small businesses; and
 - (c) \$80,877 million for residential California Climate Credit (“CCC”).²

Those GHG allowance revenue return allocations are based on the following 2017 forecasts of GHG revenues and expenses, for which SDG&E also requests approval:

- (1) the GHG allowance revenues – \$87,727.369 million;

¹ This forecasted revenue requirement includes Franchise Fees and Uncollectibles (“FF&U”). The EITE return allocation is also included in this amount since it is part of the 2017 forecast revenue requirement, although it is not returned to customers in rates.

² The residential California Climate Credit is the semi-annual line item credit that goes to residential customers. It was previously referred to as the “climate dividend.” Pursuant to D.14-01-012, the Energy Division issued a letter on January 27, 2014 notifying the electric utilities that “California Climate Credit” will be used as the name for all on-bill credits of GHG allowance revenues that small businesses and residential customers receive.

- (2) the GHG allowance revenue set aside for clean energy/energy efficiency programs of \$1.316 million;
- (3) the GHG administration, customer education and outreach plan costs of \$187,500.

The total 2017 forecasted revenue requirement also includes the outstanding balances of \$5.449 million and \$266,277 in SDG&E's LGBA and MRTUMA, respectively.

The 2017 revenue requirement forecasts for ERRA, CTC, LG, SONGS Unit 1 Offsite Spent Fuel Storage Costs, the GHG allowance revenue return, the outstanding LGBA and MRTUMA balances result in a total revenue requirement increase of \$7.187 million compared to the amounts currently effective in rates.³ These components are shown in detail in Table 1, below.

³ On December 24, 2015, the Commission approved SDG&E's "Application of San Diego Gas & Electric Company (U 902-E) for Approval of its 2016 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts" (A.15-04-014) ("2016 Application"), as updated on November 6, 2015 in "San Diego Gas & Electric Company's (U 902-E) November Update to Application." *See* D.15-12-032. SDG&E implemented its approved forecasts in rates in Advice Letter 2840-E, approved January 27, 2016 and effective January 1, 2016.

TABLE 1
ERRA, CTC, LG, SONGS, and GHG Revenue Requirements Included in Rates
(\$000)

Line	Description	Currently effective 1/1/16 Revenue Requirement	2017 Revenue Requirement		Change from Current
1	ERRA	\$ 1,308,712	\$ 1,295,038		\$ (13,674)
2	CTC	\$ 24,466	\$ 22,662		\$ (1,804)
3	LG	\$ 7,160	\$ 60,255		\$ 53,095
4	SONGS Unit 1 Spent Fuel	\$ 1,077	\$ 1,035		\$ (41)
5	GHG Small Business	\$ (3,648)	\$ (4,446)		\$ (798)
6	GHG CCC	\$ (45,570)	\$ (80,877)		\$ (35,306)
7	Subtotal	\$ 1,292,196	\$ 1,293,668		\$ 1,472
8	LGBA Undercollection	\$ -	\$ 5,449		\$ 5,449
9	MRTUMA Undercollection	\$ -	\$ 266		\$ 266
10	Total ⁴	\$ 1,292,196	\$ 1,299,383		\$ 7,187

In total, this would increase the current system average rates by 0.022 cents per kilowatt hours, or 0.11%. A typical non-CARE residential customer in the inland climate zone using 500 kilowatt-hours could see a monthly summer bill increase of 0.9%, or \$0.96 (from \$110.08 to \$111.04).⁵

The key drivers underlying the changes in the forecast 2017 ERRA revenue requirement (as compared to the 2016 revenue requirement) is lower natural gas prices. In addition, the 2017 LGBA revenue requirement forecast increased due to the fact that SDG&E entered into two new

⁴ The total 2017 forecasted revenue of \$1,299.383 shown in this Table 1 is slightly greater than the total 2017 forecasted revenue requirement of \$1,298.475 million referenced on page 2 because the EITE return allocation (\$0.909 million) is not included in rates, and Table 1 compares 2017 forecasts with amounts currently effective in rates. The sums in Table 1 may not equal due to rounding.

⁵ Customers' actual bill impacts will vary with usage per month, by season and by climate zone.

generation resources (the Pio Pico Energy Center and Carlsbad Energy Center), which will provide additional local generation in 2017.

Section VII below summarizes the relief SDG&E requests from the Commission in this Application.

II. BACKGROUND

SDG&E's 2017 forecasts and proposals in this Application contain several categories of electric procurement activities, each of which is discussed below. Prior to 2016, SDG&E had filed an annual application seeking approval of its forecast revenue requirements for ERRA, CTC and LG – as well as approval of its proposed LGC rates and vintage PCIA rates – and a separate application regarding GHG-related forecasts. In accordance with D.14-10-033, in which the Commission directed the utilities to incorporate GHG-related forecasts and proposals into their annual ERRA forecast applications, SDG&E began including its GHG-related forecasts in its 2016 Application and is following that approach in this Application.⁶ Likewise, as in its 2016 Application, SDG&E is again proposing to incorporate its 2017 forecast of its SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – formerly an element of its General Rate Cases (“GRC”) – in this Application. This approach was approved in D.15-12-032.

This Application also contains two proposals that were not included in the 2016 Application. First, SDG&E seeks to recover outstanding LGBA and MRTUMA balances, as discussed further in subsection II.C below. Second, SDG&E has included 2017 proposed rate components for the Green Tariff Shared Renewables Program, as discussed further in subsection II.G below.

⁶ See A.15-04-014.

A. ERRA

In D.02-10-062, the Commission established the ERRA balancing account – the power procurement balancing account required by Public Utilities (“P.U.”) Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities (“IOUs”) with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator-related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers.⁷

The ERRA regulatory process consists of (1) an annual forecast proceeding to adopt a forecast of the utility’s electric procurement cost revenue requirement and electricity sales for upcoming year; and (2) an annual compliance proceeding to review the utility’s compliance in the preceding year regarding energy resource contract administration, least cost dispatch, fuel procurement, and the ERRA balancing account. There is also an update process for fuel and purchased power forecasts and the ERRA mechanism, which takes place in November of each year (“November Update”).

P.U. Code Section 454.5(d)(3) also specified that the balance of the ERRA was not to exceed 5% of the IOUs actual recorded generation revenues for the prior calendar year, excluding revenues collected for the California Department of Water Resources (“DWR”).⁸ Accordingly, in D.02-10-062, the Commission established a trigger mechanism designed to avoid the 5% threshold point, pursuant to which IOUs must file an expedited application for approval to adjust rates in 60 days from the filing date when their ERRA balance reaches an

⁷ See D.02-10-062 at 60.

⁸ See D.02-10-062 at 62; *see also* D.11-05-005.

undercollection or overcollection of 4% and is projected to exceed the 5% trigger.⁹ As currently implemented, the trigger process exists independently of, but in conjunction with, the forecast process used for this Application. Thus, SDG&E does not currently include the prior year-end ERRA balance in its forecast applications as it is addressed via an ERRA trigger application or year-end consolidated advice letter filing.

B. CTC

The Transition Cost Balancing Account (“TCBA”), which is also reviewed in ERRA forecast proceedings, is designed to accrue all ongoing Competition Transition Charge (“CTC”) revenues and recover all ongoing CTC-eligible generation-related costs.¹⁰ In accordance with D.02-12-074 and D.02-11-022, payments to Qualifying Facilities (“QFs”) that are above the market benchmark proxy price (*i.e.*, above-market QF power costs) are charged to the TCBA. Eligible ongoing CTC expenses reflect the difference between the market benchmark proxy price and the costs associated with QF contracts.

C. LG

The Local Generation Balancing Account (“LGBA”) is designed to record the costs and revenues of Local Generation where the Commission has determined that the generation resource is subject to the Cost Allocation Mechanism (“CAM”).¹¹ Such generation may take the form of power purchase agreements, company-owned generation units associated with new generation resources, or any other resources approved by the Commission for CAM treatment. In D.13-03-

⁹ In D.07-05-008, the Commission modified D.02-10-062 by adding a new rule to the trigger procedures, pursuant to which SDG&E is permitted to file an advice letter seeking to maintain rates when it expects an undercollection or overcollection above the 4% trigger will self-correct within 120 days.

¹⁰ Assembly Bill 1890 established the expenses that are eligible for CTC recovery.

¹¹ The Commission adopted its CAM policy in D.06-07-029, which it later modified in D.11-05-005. The basic purpose of the CAM is to allow the advantages and costs of new generation to be shared by all benefiting customers in an IOU’s service territory.

029, the Commission authorized SDG&E to record costs associated with the Escondido Energy Center Purchase Power Tolling Agreement in the LGBA, with the balance to be reviewed in ERRA forecast proceedings.¹² In D.14-02-016, the Commission authorized SDG&E to record costs associated with the Pio Pico Energy Center, LLC Purchase Power Tolling Agreement in the LGBA, with the balance to be reviewed in ERRA forecast proceedings.¹³ In D.15-05-051, the Commission authorized SDG&E to record costs associated with the Carlsbad Energy Center, LLC Purchase Power Tolling Agreement in the LGBA, with the balance to be reviewed in ERRA forecast proceedings.¹⁴ The costs recorded in the LGBA are recovered via the Local Generation Charge (“LGC”), a rate component.

As noted above, SDG&E is also seeking recovery of an outstanding LGBA balance of \$5.384 million (through 2014) in this Application. Similarly, SDG&E is seeking recovery of an outstanding MRTUMA balance of \$266,277. The MRTUMA is an account designed to record the incremental operating and maintenance and capital-related costs associated with implementing the CAISOs MRTU initiative, and the costs were authorized in SDG&E’s GRC in D.13-05-010.¹⁵ SDG&E previously explained these requests for recovery in its June 15, 2016 “Application of SDG&E (U 902-E) for Approval of ERRA Compliance for 2014” (A.15-06-002) (“2014 Compliance Application”), in which SDG&E noted that it “is deferring cost recovery of these undercollections to SDG&E’s next-filed ERRA Forecast Proceeding for year 2017, which will be filed on April 15, 2016” in order to “assist its electricity customers by avoiding a further

¹² D.13-03-029 at 20-21.

¹³ D.14-02-016 at 16.

¹⁴ D.15-05-051 at 36.

¹⁵ As explained in the Prepared Direct Testimony of Ms. Jenny Phan, which accompanied the 2014 Compliance Application, a tax-related prior period adjustment of \$260,002 did not fall under the GRC revenue requirement approval, and so comprised an undercollection.

rate increase for a relatively small amount and thereby promote rate stability.”¹⁶ With respect to both outstanding balances, SDG&E further noted that it sought the Commission’s review and approval of the outstanding costs, as well as authorization to recover them in the instant Application.¹⁷ The April 12, 2016 Proposed Decision on the 2014 Compliance Application authorized this approach.¹⁸ While the Commission has not yet issued its decision, SDG&E is including the undercollected costs in this Application, as indicated in the 2014 Compliance Application, to be collected in rates beginning January 1, 2017. If the Commission’s decision on SDG&E’s 2014 Compliance Application ultimately does not permit SDG&E to fully recover these costs, SDG&E will remove them in its November Update to this Application.

D. PCIA

The Power Charge Indifference Amount is another rate component of this Application. In D.06-07-030, as modified by D.07-01-030, the Commission resolved various issues relating to the cost responsibility surcharge applicable to Direct Access (“DA”) and Municipal Departing Load customers¹⁹ within the service territories of the IOUs. The PCIA component of the cost responsibility surcharge is intended to preserve bundled customer indifference to customers that migrate from bundled to DA load by ensuring that departing load customers pay their share of the cost responsibility associated with the above-market-costs of the utilities’ total procurement

¹⁶ See 2014 Compliance Application at 2.

¹⁷ *Id.* at 7-8.

¹⁸ See Conclusion of Law 11.

¹⁹ As noted in D.06-07-030, Direct Access load customers purchase electricity from an independent electric service provider and receive only distribution and transmission service from the utility, whereas bundled customers rely on the utility for all these services. Thus, distribution and transmission charges are “bundled” with a charge for the procurement of energy supplies. Departing Load generally refers to retail customers who were formerly IOU customers but now receive energy, transmission and distribution services from publicly owned utilities, self-generation, or other means. Municipal Departing Load refers to departing load served by municipal utilities and irrigation districts, for which a cost responsibility surcharge applies.

portfolio. Under the methodology adopted by the Commission in D.08-09-012, the Commission refined the indifference amount methodology by introducing the requirement to vintage departing load customers, based on their departure date, when assigning responsibility for the total portfolio of resources. The 2017 vintage PCIA rates will be based on applicable costs from SDG&E's total portfolio of resources, including its forecasted ERRA and CTC revenue requirements, as well as its authorized 2017 Non-Fuel Generation Balancing Account ("NGBA") revenue requirement and authorized 2017 DWR costs allocated to SDG&E. Although SDG&E proposes to update the currently effective vintage PCIA rates in this Application, it will not be able to provide final vintage 2017 PCIA rates until the 2017 NGBA and DWR revenue requirements (and certain market price information) become available, which is anticipated to be in the second half of 2017. Once the necessary information becomes available, SDG&E will update its proposed 2017 PCIA rates in the November Update.

E. SONGS Unit 1 Offsite Spent Fuel Storage Costs

In the past, the CPUC has approved recovery of SDG&E's portion of SONGS Unit 1 Offsite Spent Fuel Storage Costs in the context of SDG&E's GRC, and SDG&E tracks the authorized revenue requirement in its Nuclear Decommissioning Adjustment Mechanism ("NDAM") account. Southern California Edison Company – the majority owner of SONGS – has historically sought approval of its portion of SONGS Unit 1 Offsite Spent Fuel Storage costs in its annual ERRA forecast proceeding. SDG&E has recently determined that it is more appropriate to seek recovery of these costs through the ERRA forecast application process, and it is thus seeking authorization of the forecast 2017 revenue requirement for SONGS Unit 1 Offsite Spent Fuel Costs in this Application, as it did in its 2016 Application.

F. GHG Costs and Allowance Revenues

Pursuant to the California Global Warming Solutions Act of 2006, Assembly Bill (“AB”) 32, the California Air Resources Board (“ARB”) designed a statewide GHG cap-and-trade program in which certain utilities are required to participate. The cap-and-trade program creates a cap on major sources of GHG emissions – including power plants, fuel suppliers and industrial facilities – to achieve GHG reduction goals.

Under the cap-and-trade program, utilities must forecast both GHG costs and allowance revenues. Utilities incur costs both by purchasing allowances for their own compliance obligation under the cap-and-trade program and, indirectly, through GHG costs embedded in the wholesale price of electricity. These GHG costs are incorporated into the generation component of electricity rates through the ERRA process in the same manner as other procurement-related costs, and they result in a carbon price signal intended to incent an overall reduction in GHG emission. The state allocates GHG allowances to ratepayers with the utilities acting as an intermediary to hold and then sell the allowances for ratepayer benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that results from GHG compliance.

On December 28, 2012, the Commission issued D.12-12-033 in Rulemaking (“R.”) 11-03-012. In D.12-12-033, the Commission required utilities to file applications for approval of forecast GHG costs and revenues, including administrative and customer outreach expenses, sufficient to calculate the amount of GHG allowance revenue that should be returned to the

different customer classes in 2014.²⁰ While recognizing that ERRA forecast proceedings²¹ already examine the utilities' forecast procurement costs for the purpose of ensuring recovery of costs associated with fuel and purchased power, the Commission required that GHG-related forecasts be filed separately so that it could take a "more comprehensive and detailed approach" to evaluating GHG costs and allowance revenues.²² The Commission directed the utilities to file these applications annually, with the forecasts to be included in the next year's rates, and to include in the application a reconciliation²³ of recorded costs and allowance revenues with forecasts from prior years. Further, the Commission directed the utilities to file an application setting forth their proposed customer outreach plans for 2014 and 2015.

In compliance with these directives, SDG&E filed its 2014 GHG Revenue Forecast Application (A.13-08-005) on August 1, 2013, setting forth its forecasted GHG costs for 2014, a forecast of administrative and outreach expenses for 2014 and an estimate of the GHG revenues to be distributed by eligible customer classes in 2014. SDG&E filed its Customer Outreach Plan for 2014-2015 (A.13-08-026) on August 30, 2013.

In response to the utilities' 2014 GHG Revenue Forecast Application filings, the assigned Commissioner and assigned Administrative Law Judge issued a Scoping Memo and Ruling that

²⁰ The Commission directed utilities to distribute GHG allowance revenues to customers using the following hierarchy: (1) emissions-intensive and trade-exposed ("EITE") entities; (2) offset cap-and-trade program rate impacts for small business; (3) neutralize cap-and-trade program rate impacts for residential customers; and (4) semi-annual residential California Climate Credit. This hierarchy was recently revised in D.15-07-001 such that the revenue return allocated to residential customers now consists solely of the semi-annual California Climate Credit.

²¹ SDG&E included its initial (2013) GHG cost forecasts in its 2013 ERRA Forecast Application (A.12-10-002), but it ultimately requested to defer inclusion of GHG costs in rates and record the costs in a new GHG sub-balancing account until such time as the Commission finalized implementation of its GHG methodologies. The Commission approved this approach in D.13-10-053.

²² D.12-12-033 at 147.

²³ This reconciliation refers to a true-up performed for the purpose of incorporating the revenue return (including California Climate Credit) into rates.

consolidated the utilities' applications into a single proceeding (A.13-08-002) and divided the proceeding into two phases. Phase 1 focused on adopting GHG program forecast costs and revenues for 2014. Phase 2 was to focus on standardizing procedures for future GHG Revenue Forecast Applications.

The Commission issued its Phase 1 decision (D.13-12-041) on December 27, 2013. In that decision, the Commission authorized the utilities to incorporate GHG-related forecasts of costs and allowance revenues into 2014 rates. It also authorized the forecast amounts of the California Climate Credit to be returned to residential customers for the first time in 2014. Additionally, in D.13-12-041, the Commission ordered the utilities to true-up the 2013 forecasts against the 2013 actuals in connection with the filing of GHG Forecast Revenue and Reconciliation Applications later in 2014, and noted that this process would be repeated for 2014 forecasts in 2015.²⁴ In compliance with D.13-12-041, SDG&E filed its 2015 GHG Forecast Revenue and Reconciliation Application (A.14-04-018) concurrently with its 2015 ERRR Forecast Application (A.14-04-015) on April 15, 2014. SDG&E subsequently filed supplemental data on September 29, 2014; provided a fourth quarter update to this application on October 31, 2014; and submitted an amendment on January 16, 2015 to reflect updated information through the third quarter of 2014.

The Commission issued its Phase 2 decision (D.14-10-033) on October 22, 2014. In that decision, the Commission adopted methodologies for calculating forecast GHG allowance revenue and GHG costs, as well as recorded GHG allowance revenue and GHG costs. In so doing, the Commission indicated that utilities should use Attachments C and D to D.14-10-033, as corrected by D.14-10-055 and D.15-01-024, to provide the required information. The

²⁴ D.13-12-041 at 3, 7.

decision further adopted Confidentiality Protocols for cap-and-trade related data and required the utilities to use a proxy price in their forecasts. Lastly, the decision required the utilities to file GHG Forecast Revenue and Reconciliation Applications annually as part of their ERRRA forecast applications.

On March 27, 2015, the Commission issued D.15-03-019 (as later corrected by D.15-04-005) in which it approved SDG&E's 2015 GHG Forecast Revenue and Reconciliation Application (as amended and updated).

In accordance with D.14-10-033, SDG&E incorporated its 2016 GHG-related forecasts and proposals in its 2016 Application, and SDG&E updated the information in November 2015, as directed by that decision and to reflect changes to the structure of GHG allowance revenue return to residential customers authorized by the Commission in D.15-07-001 (Residential Rate Reform) and to reflect the updated sales forecast pursuant to D.15-08-040 (2015 Rate Design Window). These GHG-related forecasts and proposals were approved in D.15-12-032.

As noted above, SDG&E is again incorporating its 2017 GHG-related forecasts and proposals in this Application, and it will further update the information in its forthcoming November Update. Attachment G to this Application contains the information that the Commission directed the utilities to use in D.14-10-033.

G. Proposed Rate Components for the Green Tariff and Enhanced Community Renewables Program

In 2013, California enacted the Green Tariff Shared Renewables Program, established in Senate Bill 43. That legislation intended to promote renewable energy by expanding access to renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation (*e.g.*, residential customers who could not install onsite solar panels). In D.15-01-051 – implementing Senate Bill 43 – the Commission required the three large California

IOUs to establish the Green Tariff Shared Renewables Program. This program has two features administered by the utilities: (1) a Green Tariff component, which allows customers to purchase energy with a greater share of renewables; and (2) an Enhanced Community Renewables component, which allows customers to purchase renewable energy from community-based projects. In its decision, the Commission directed the utilities to procure renewable energy resources, subject to certain limitations. The Commission also made numerous determinations regarding rate design. SDG&E customers who elect into the Green Tariff Renewables program will pay a subset of SDG&E's renewable energy procurement costs (which costs are in turn a subset of the total ERRA costs), and SDG&E has thus developed 2017 forecasts of customer usage and related procurement expenses under this program, as well as 2017 rate proposals for the various rate components of the Green Tariff Shared Renewables Program.

III. SUMMARY OF APPLICATION AND PREPARED TESTIMONY

In this Application,²⁵ SDG&E identifies the forecast of its load, the resources available to meet the load, fuel costs, GHG costs, and costs for SDG&E's various energy resources for 2017. SDG&E used these forecasts to develop its 2017 forecast of its ERRA revenue requirement, CTC revenue requirement, and LG revenue requirement forecasts. SDG&E also forecasts the SONGS Unit 1 Offsite Spent Fuel Storage Costs revenue requirement. SDG&E seeks approval of each of these 2017 forecast revenue requirements.

In addition, SDG&E requests approval of its 2017 forecast of allowance revenues resulting from the consignment and sale of allowances in ARB's quarterly auctions. SDG&E has allocated the allowance revenues to various customer classes, and it seeks approval of these allocations.

²⁵ SDG&E notes that it has had preliminary discussions with the other California IOUs with respect to developing and standardizing common templates in future ERRA forecast proceedings.

SDG&E further requests approval to recover the undercollections recorded to its LGBA and MRTUMA.

Lastly, SDG&E requests approval of its proposed 2017 LGC rates; its proposal to update the currently-effective PCIA rates and to provide vintage 2017 PCIA rates; and its proposed 2017 Green Tariff Shared Renewables Program rate components.

In support of this Application, SDG&E provides the testimony of six witnesses. That testimony is summarized below and incorporated herein by reference:

A. Mr. Benjamin A. Montoya

Mr. Montoya's testimony describes the resources that SDG&E expects to use in 2017 to meet its forecast bundled customer load. Mr. Montoya then forecasts the procurement costs that SDG&E expects to record in 2017 to the ERRA, TCBA, and LGBA (including procurement costs related to the Green Tariff Shared Renewables program). In addition, Mr. Montoya provides a forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. Montoya also presents SDG&E's forecast of 2017 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which (as noted below) Ms. Jasso uses in her 2017 forecast of the ERRA revenue requirement. Lastly, Mr. Montoya provides a 2017 forecast of GHG allowance revenues, the amount of revenue available for energy efficiency and clean energy investments in 2017, and the magnitude of the allowance revenues to be set aside for EITE customers.

B. Ms. Norma Jasso

Ms. Jasso's testimony describes the purpose of the ERRA, TCBA, and LGBA. Using cost information provided by Mr. Montoya, Ms. Jasso then presents SDG&E's 2017 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue

requirement; and (3) the LG revenue requirement. Ms. Jasso also presents the undercollected balances recorded to the LGBA and MRTUMA that SDG&E seeks to recover in this Application. Additionally, Ms. Jasso compares the 2015 year-end recorded balances with the 2015 year-end actual balances in the GHG balancing accounts used for GHG expenses (GHG Customer Outreach and Education Memorandum Account and GHG Administrative Costs Memorandum Account) and GHG allowance revenues (GHG Revenue Balancing Account). Finally, Ms. Jasso presents SDG&E's 2017 forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement.

C. Ms. Yvonne M. Le Mieux

Ms. Le Mieux's testimony presents the rate and bill impacts associated with the cost recovery of SDG&E's 2017 forecast of its (1) ERRA revenue requirement; (2) CTC revenue requirement; (3) LG revenue requirement; (4) SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement; (5) GHG allowance revenue return, (6) undercollected LGBA balance, and (7) undercollected MRTUMA balance. Ms. Le Mieux proposes rates for non-bypassable charges, including the (1) 2017 PCIA component of the cost responsibility surcharge applicable to departing load customers and (2) the Local Generation Charge applicable to all benefiting customers. Further, Ms. Le Mieux presents the methodology for the GHG allowance revenue returns, which involves (1) identifying the 2017 forecast GHG allowance revenue return allocation amounts (including the California Climate Credit); and (2) supporting the 2017 forecast GHG Revenue Returned to Eligible Customers and California Climate Credit information in Templates D-1 and D-4 of Attachment G to this Application. Lastly, Ms. Le Mieux proposes the 2017 rate components associated with the Green Tariff Shared Renewables program.

D. Mr. Rick Janke

Mr. Janke's testimony describes the overall approach that SDG&E proposes to employ to support ongoing customer awareness about the purpose and value of the GHG allowance revenues that will be credited to the bills of residential, small business and EITE customers. In addition, the testimony forecasts the costs of ongoing customer education and outreach as well as the ongoing administrative and billing costs associated with the return of allowance revenue to customers.

E. Ms. Ana Garza-Beutz

Ms. Garza-Beutz's testimony presents SDG&E's 2015 costs for GHG compliance instruments used to satisfy obligations under the ARB's cap-and-trade program. Additionally, Ms. Garza-Beutz provides the 2015 revenues. Ms. Garza-Beutz's testimony also describes the cap-and-trade program and details the methodology behind SDG&E's calculation of its unadjusted 2015 actual revenues and estimated costs. These costs and revenues are adjusted to recorded numbers by Ms. Vazquez Chihwaro for the purposes of the reconciliation performed by Ms. Le Mieux.

F. Ms. Monica Vazquez Chihwaro

Ms. Vazquez Chihwaro's testimony presents the accounting procedures that are used to record the GHG costs described in Ms. Garza-Beutz's testimony.

IV. 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 Christopher M. Lyons.

2. Rule 2.1 (b) Correspondence

Correspondence or communications regarding this Application should be addressed to:

Kellen Gill
Regulatory Case Administrator
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, California 92123
Telephone: (619) 696-2972
Fax: (858) 654-1788
KGill@semprautilities.com

with copies to:

Christopher M. Lyons
San Diego Gas & Electric Company
8330 Century Park Court, #CP32D
San Diego, CA 92123
Telephone: (858) 654-1559
Fax: (619) 699-5027
clyons@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 SDG&E proposes to recover the forecasted revenue requirements described in this Application from its ratepayers, and the costs will thus influence SDG&E's rates.

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. SDG&E does not believe there are any issues related to safety considerations that need to be considered in this Application.

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
Application filed	April 15, 2016
Approx. End of Response Period (including Applicant Reply)	May 30, 2016
Prehearing Conference	June 10, 2016
ORA and Intervener Testimony	July 11, 2016
Concurrent Rebuttals	August 5, 2016
Proposed Decision	November 2016 (after SDG&E's November 2016 update)
Comments on Proposed Decision	November 21, 2016
Reply Comments on Proposed Decision	November 23, 2016
Commission Decision Adopted	No later than December 2016

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 previously filed with the Commission on September 10, 2014 in connection with SDG&E Application 14-09-008, and is incorporated herein by reference.

C. Rule 3.2 – Authority to Change Rates

In accordance with Rule 3.2 (a) – (d) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.²⁶

1. Rule 3.2 (a) (1) – Balance Sheet

SDG&E's financial statement, balance sheet and income statement for the nine-month period ending September 30, 2015 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/rates-regulations/current-and-effective-tariffs/current-and-effective-tariffs>.

Attachment B to this Application 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 rate 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

²⁶ Note Rule 3.2(a) (9) is not applicable to SDG&E.

herein by reference. A statement of Original Cost and Depreciation Reserve for the nine-month period ending September 30, 2015 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 nine-month period ending September 30, 2015, is included as Attachment E to this Application.

6. Rule 3.2 (a) (7) – Statement Regarding 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 26, 2015, was mailed to the Commission on April 28, 2015, and is incorporated herein by reference.

8. Rule 3.2 (a) (10) – Statement re Pass Through to Customers

The rate increase reflected in this Application 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 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 Attachment 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 will, within twenty days after the filing of this Application, 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 will, within 45 days after the filing of this Application, 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 rate changes addressed in this Application.

V. 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 each of the witnesses' testimonies 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 SDG&E's revenue requirements forecasts for 2017. SDG&E is contemporaneously filing a motion for leave to file this confidential information under seal.

VI. 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 its 2016 Application (A.15-04-014). Hard copies will be sent via FedEx to Chief ALJ Karen Clopton and ALJ Gerald F. Kelly.

VII. CONCLUSION AND SUMMARY OF RELIEF REQUESTED

WHEREFORE, San Diego Gas & Electric Company requests that the Commission:

(1) grant authority to change rates by approving as reasonable SDG&E's 2017 forecast of its ERRA revenue requirement pertaining to SDG&E's load, the resources available to meet SDG&E's load, and various input assumptions regarding fuel costs, GHG costs, and costs for SDG&E's various electric resources;

(2) grant authority to increase rates by approving as reasonable SDG&E's 2017 forecast of its CTC revenue requirement;

(3) grant authority to increase rates by approving as reasonable SDG&E's 2017 forecast of its LG revenue requirement;

(4) grant authority to increase rates by approving as reasonable SDG&E's 2017 forecast of its SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement;

(5) approve SDG&E's 2017 forecast of its GHG allowance revenues;

(6) approve SDG&E's 2017 forecast for its GHG administration, customer education and outreach activities;

(7) adopt SDG&E's 2017 forecast of its GHG allowance revenue return allocations, including reconciliation adjustments, for EITE, small businesses, and residential California Climate Credit; and

(8) grant authority to increase rates by approving the collection in rates of the outstanding balances of \$5.384 million and \$260,002 in SDG&E's LGBA MRTUMA, respectively;

(9) adopt SDG&E's proposed 2017 LGC rates, as proposed in Attachment A to the Direct Testimony of Ms. Yvonne M. Le Mieux;

(10) adopt SDG&E's proposed vintage 2017 PCIA rates, as will be provided in SDG&E's forthcoming November Update to this Application;

(11) adopt SDG&E's proposed 2017 rate components for the Green Tariff Shared Renewables Program; and

(12) 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/ Christopher M. Lyons
Christopher M. Lyons
San Diego Gas & Electric Company
8330 Century Park Court, #CP32D
San Diego, CA 92123
Telephone: (858) 654-1559
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Email: clyons@semprautilities.com

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

By: 
Dan Skopec
San Diego Gas & Electric Company
Vice President –Regulatory Affairs

DATED at San Diego, California, this 15th day of April 2016

OFFICER VERIFICATION

OFFICER VERIFICATION

Dan Skopec 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 ITS 2017 ELECTRIC PROCUREMENT REVENUE REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS** 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 April 15, 2016 at San Diego, California.

A handwritten signature in blue ink that reads "Dan Skopec". The signature is written in a cursive, flowing style.

Dan Skopec
San Diego Gas & Electric Company
Vice President – Regulatory Affairs

ATTACHMENT A

BALANCE SHEET, INCOME STATEMENT AND
FINANCIAL STATEMENT

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
SEPTEMBER 30, 2015

1. UTILITY PLANT		<u>2015</u>
101	UTILITY PLANT IN SERVICE	\$14,367,101,567
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	11,307,728
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	711,880,011
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,492,473,352)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(510,032,224)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(937,680)
118	OTHER UTILITY PLANT	1,002,944,475
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(249,922,068)
120	NUCLEAR FUEL - NET	-
TOTAL NET UTILITY PLANT		<u>10,928,813,179</u>
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	5,946,616
122	ACCUMULATED PROVISION FOR DEPRECIATION AND 0	(364,300)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>1,060,280,100</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>1,065,862,416</u>

Data from SPL as of September 30, 2015

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
SEPTEMBER 30, 2015

3. CURRENT AND ACCRUED ASSETS		<u>2015</u>
131	CASH	3,030,462
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	346,797,616
143	OTHER ACCOUNTS RECEIVABLE	26,817,735
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,707,704)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	1,040
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,408,885
151	FUEL STOCK	3,260,510
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	102,483,040
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	211,964,533
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	363,740
165	PREPAYMENTS	213,745,858
171	INTEREST AND DIVIDENDS RECEIVABLE	30,284,804
173	ACCRUED UTILITY REVENUES	68,396,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,294,000
175	DERIVATIVE INSTRUMENT ASSETS	<u>110,421,434</u>
TOTAL CURRENT AND ACCRUED ASSETS		<u>1,117,562,453</u>
 4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	32,258,871
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,459,221,656
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	4,935,394
184	CLEARING ACCOUNTS	87,898
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	38,117,572
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	12,970,940
190	ACCUMULATED DEFERRED INCOME TAXES	<u>622,871,848</u>
TOTAL DEFERRED DEBITS		<u>4,170,464,179</u>
TOTAL ASSETS AND OTHER DEBITS		<u><u>17,282,702,227</u></u>

Data from SPL as of September 30, 2015

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
SEPTEMBER 30, 2015

5. PROPRIETARY CAPITAL

	<u>2015</u>
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	(3,901,431,394)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>11,616,701</u>
 TOTAL PROPRIETARY CAPITAL	 <u>(5,227,615,794)</u>

6. LONG-TERM DEBT

221 BONDS	(4,239,648,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	-
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>9,859,819</u>
 TOTAL LONG-TERM DEBT	 <u>(4,229,788,181)</u>

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(626,930,962)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(28,972,084)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(231,530,674)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	<u>(846,331,644)</u>
 TOTAL OTHER NONCURRENT LIABILITIES	 <u>(1,733,765,364)</u>

Data from SPL as of September 30, 2015

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
SEPTEMBER 30, 2015

8. CURRENT AND ACCRUED LIABILITIES

	<u>2015</u>
231 NOTES PAYABLE	(44,200,000)
232 ACCOUNTS PAYABLE	(443,436,444)
233 NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234 ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(21,881,544)
235 CUSTOMER DEPOSITS	(70,845,796)
236 TAXES ACCRUED	(195,083,388)
237 INTEREST ACCRUED	(54,123,252)
238 DIVIDENDS DECLARED	-
241 TAX COLLECTIONS PAYABLE	(8,891,671)
242 MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(264,593,044)
243 OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(39,463,611)
244 DERIVATIVE INSTRUMENT LIABILITIES	(188,147,705)
245 DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	<hr/>
TOTAL CURRENT AND ACCRUED LIABILITIES	<u>(1,330,666,455)</u>

9. DEFERRED CREDITS

252 CUSTOMER ADVANCES FOR CONSTRUCTION	(38,572,657)
253 OTHER DEFERRED CREDITS	(348,878,514)
254 OTHER REGULATORY LIABILITIES	(1,361,255,774)
255 ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(19,477,103)
257 UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281 ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282 ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,848,041,128)
283 ACCUMULATED DEFERRED INCOME TAXES - OTHER	(1,144,641,257)
	<hr/>
TOTAL DEFERRED CREDITS	<u>(4,760,866,433)</u>

TOTAL LIABILITIES AND OTHER CREDITS	<u><u>(\$17,282,702,227)</u></u>
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Data from SPL as of September 30, 2015

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2015

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$3,613,174,322
401	OPERATING EXPENSES	\$2,237,186,073	
402	MAINTENANCE EXPENSES	100,481,589	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	426,951,749	
408.1	TAXES OTHER THAN INCOME TAXES	93,356,007	
409.1	INCOME TAXES	73,433,119	
410.1	PROVISION FOR DEFERRED INCOME TAXES	348,097,607	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(204,682,441)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(2,138,062)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		3,072,685,641
	NET OPERATING INCOME		540,488,681

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	4,707	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	60,372	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	33,332,508	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	26,911,290	
421	MISCELLANEOUS NONOPERATING INCOME	288,227	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	60,597,104	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	3,744,872	
	TOTAL OTHER INCOME DEDUCTIONS	3,932,408	
408.2	TAXES OTHER THAN INCOME TAXES	468,992	
409.2	INCOME TAXES	1,577,334	
410.2	PROVISION FOR DEFERRED INCOME TAXES	43,664,994	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(21,961,887)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	23,749,433	
	TOTAL OTHER INCOME AND DEDUCTIONS		32,915,263
	INCOME BEFORE INTEREST CHARGES		573,403,944
	EXTRAORDINARY ITEMS AFTER TAXES		12,557,074
	NET INTEREST CHARGES*		142,704,795
	NET INCOME		\$443,256,223

**NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$10,183,597)*

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2015

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,608,175,171
NET INCOME (FROM PRECEDING PAGE)	443,256,223
DIVIDEND TO PARENT COMPANY	(150,000,000)
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$3,901,431,394</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
Sep 30, 2015

(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. 08-07-029,10-10-023 and 12-03-005 to which references are hereby made.

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

Number and Amount of Bonds Authorized and Issued:						
	Nominal Date of Issue		Par Value Authorized and Issued	Outstanding		Interest Paid in 2014
First Mortgage Bonds:						
6.80% Series KK, due 2013	12-01-91		14,400,000	0		0
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	0		0
5.875% Series VV, due 2034	06-17-04		43,615,000	43,615,000		2,562,373
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
5.30% Series CCC, due 2015	11-15-05		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
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
.4677% Series OOO, due 2017	03-12-15		140,000,000	140,000,000		-
1.9140% Series PPP, due 2022	03-12-15		39,112,892	48,490,631		-
Total 1st. Mortgage Bonds:						181,766,020
Unsecured Bonds:						
5.30% CV96A, due 2021	08-02-96		38,900,000	38,900,000		2,061,700
5.50% CV96B, due 2021	11-21-96		60,000,000	60,000,000		3,300,000
4.90% CV97A, due 2023	10-31-97		25,000,000	25,000,000		1,225,000
Total Unsecured Bonds						6,586,700
Total Bonds:						188,352,720

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
Sep 30, 2015

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2015
Commercial Paper & ST Bank Loans	Various	Various	Various	44,200,000	\$157,004

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 12-31-14					
		2011	2012	2013	2014	2015
5.0%	-	\$375,000	\$375,000	\$281,250	-	-
4.50%	-	270,000	270,000	202,500	-	-
4.40%	-	286,000	286,000	214,500	-	-
4.60%	-	343,868	343,868	257,901	-	-
\$ 1.70	-	2,380,000	2,380,000	1,785,000	-	-
\$ 1.82	-	1,164,800	1,164,800	873,600	-	-
Total	-	\$4,819,668	\$4,819,668	\$3,614,751	-	-

Common Stock	2011	2012	2013	2014	2015
Dividend to Parent [1]	-	-	-	\$200,000,000	150,000,000

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 (pg 9.1).

A balance sheet and a statement of income and retained earnings of applicant for the nine months ended Sep 30, 2015 are attached hereto.

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

ATTACHMENT B
STATEMENT OF PRESENT RATES



San Diego Gas & Electric Company
San Diego, California

	<u>Revised</u>	Cal. P.U.C. Sheet No.	<u>27389-E</u>
Canceling	<u>Revised</u>	Cal. P.U.C. Sheet No.	<u>27167-E</u>

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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. 2867-E

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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 26901-E
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San Diego Gas & Electric Company
San Diego, California

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San Diego Gas & Electric Company
San Diego, California

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San Diego Gas & Electric Company
San Diego, California

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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 27109-E
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San Diego Gas & Electric Company
San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 25466-E

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San Diego, California

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26474-E

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San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 26171-E

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San Diego, California

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ATTACHMENT C

STATEMENT OF PROPOSED RATES

ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

If the CPUC approves SDG&E's application, a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours per month could see a monthly winter bill increase of 0.8%, or \$0.86, from a typical current monthly bill of \$104.49 to \$105.35.

The first table below provides illustrative bill changes for bundled customers, while the second table presents illustrative bill changes for DA customers. For DA customers who do not pay commodity, the Utility Distribution Company (UDC) rate changes on a class average basis are presented below. 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'S ILLUSTRATIVE ELECTRIC BUNDLED RATE
CHANGE
(TOTAL RATES INCLUDE UDC¹ AND COMMODITY²)**

Customer Class	Class Average Rates Effective 01/01/16³ (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Change Per application (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
Residential	22.442	22.166	(0.276)	-1.23
Small Commercial	22.322	22.486	0.164	0.73
Medium and Large C&I⁴	18.626	18.772	0.146	0.78
Agricultural	16.421	16.594	0.173	1.05
Lighting	18.682	18.828	0.146	0.78
System Total	20.366	20.359	(0.0007)	-0.03

¹ UDC rates include Department of Water Resources (DWR) Bond Charge.

² Commodity rates include DWR Power Charge credit.

³ Rates effective 1/1/16 per Advice Letter (AL) 2840-E.

⁴ C&I stands for Commercial and Industrial.

SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC UDC¹ RATE CHANGE

Customer Class	Class Average Rates Effective 01/01/16² (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Change Per application (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
Residential	12.624	12.433	(0.191)	-1.51
Small Commercial	13.405	13.646	0.241	1.80
Medium and Large C&I³	9.086	9.313	0.227	2.50
Agricultural	8.398	8.640	0.242	2.88
Lighting	12.208	12.410	0.202	1.65
System Total	10.825	10.900	0.075	0.69

¹ UDC rates include DWR Bond Charge.

² Rates effective 1/1/16 per AL 2840-E.

³ C&I stands for Commercial and Industrial.

If the CPUC approves the pending balance in the 2014 ERRR Compliance proceeding, it would represent an additional \$5.7 million (approximately). The following two tables show bill changes for the combined total revenue requirement forecasted in this application, compared to current rates. The first table displays bill changes for bundled customers, while the second table demonstrates bill changes for DA customers. For DA customers who do not pay commodity, the UDC rate changes on a class average basis are presented below. 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'S ILLUSTRATIVE ELECTRIC BUNDLED RATE
CHANGE
(TOTAL RATES INCLUDE UDC¹ AND COMMODITY²)**

Customer Class	Class Average Rates Effective 01/01/16³ (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Change Per application Including SDG&E's 2014 ERRR Compliance Proceeding (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
Residential	22.442	22.197	(0.245)	-1.09
Small Commercial	22.322	22.518	0.196	0.88
Medium and Large C&I⁴	18.626	18.797	0.171	0.92
Agricultural	16.421	16.621	0.200	1.22
Lighting	18.682	18.850	0.168	0.90
System Total	20.366	20.388	0.022	0.11

SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC UDC¹ RATE CHANGE

Customer Class	Class Average Rates Effective 01/01/16² (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Change Per application Including SDG&E's 2014 ERRR Compliance Proceeding (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
Residential	12.624	12.462	(0.162)	-1.28
Small Commercial	13.405	13.676	0.271	2.02
Medium and Large C&I³	9.086	9.337	0.251	2.76
Agricultural	8.398	8.666	0.268	3.19
Lighting	12.208	12.431	0.223	1.83
System Total	10.825	10.927	0.102	0.94

ATTACHMENT D

COST OF PROPERTY AND DEPRECIATION RESERVE

SAN DIEGO GAS & ELECTRIC COMPANY

**COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF SEPTEMBER 30, 2015**

<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	141,257,013.30	55,237,654.10
	TOTAL INTANGIBLE PLANT	141,479,854.66	55,440,554.40
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	95,069,397.72	38,339,236.01
312	Boiler Plant Equipment	166,496,015.17	65,352,525.17
314	Turbogenerator Units	131,184,022.25	43,737,556.07
315	Accessory Electric Equipment	85,626,487.97	31,536,908.21
316	Miscellaneous Power Plant Equipment	43,116,186.54	8,718,987.81
	Steam Production Decommissioning	0.00	0.00
	TOTAL STEAM PRODUCTION	536,018,627.94	187,731,731.56
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	8,868,527.59	2,658,162.87
322	Boiler Plant Equipment	223,650,959.30	21,662,290.99
323	Turbogenerator Units	26,982,318.72	2,370,893.39
324	Accessory Electric Equipment	10,877,778.70	1,458,232.53
325	Miscellaneous Power Plant Equipment	147,104,595.48	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	(417,484,179.79)	(76,957,383.00)
	TOTAL NUCLEAR PRODUCTION	0.00	0.29
340.1	Land	143,475.87	0.00
340.2	Land Rights	56,032.61	6,454.27
341	Structures and Improvements	22,703,423.92	6,004,182.75
342	Fuel Holders, Producers & Accessories	20,348,101.38	6,479,169.80
343	Prime Movers	85,663,135.71	29,421,287.80
344	Generators	341,381,604.65	117,434,698.52
345	Accessory Electric Equipment	32,506,374.56	10,881,715.74
346	Miscellaneous Power Plant Equipment	26,173,720.53	11,856,992.31
	TOTAL OTHER PRODUCTION	528,975,869.23	182,084,501.19
	TOTAL ELECTRIC PRODUCTION	1,064,994,497.17	369,816,233.04

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	68,252,868.81	0.00
350.2	Land Rights	155,882,509.41	17,972,319.17
352	Structures and Improvements	411,641,763.98	54,688,943.96
353	Station Equipment	1,252,715,442.09	228,291,663.65
354	Towers and Fixtures	895,606,322.35	140,680,581.74
355	Poles and Fixtures	429,102,068.40	76,749,078.07
356	Overhead Conductors and Devices	545,756,460.54	207,469,775.95
357	Underground Conduit	334,549,032.17	43,671,941.46
358	Underground Conductors and Devices	354,590,177.43	43,969,271.39
359	Roads and Trails	308,794,016.99	21,949,474.23
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	TOTAL TRANSMISSION	4,756,890,662.17	835,443,049.62
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	83,197,072.94	38,359,570.23
361	Structures and Improvements	4,016,116.21	1,850,707.07
362	Station Equipment	472,371,457.66	140,040,909.84
363	Storage Battery Equipment	32,252,131.27	1,860,326.80
364	Poles, Towers and Fixtures	628,150,966.37	254,207,249.32
365	Overhead Conductors and Devices	526,985,838.60	190,117,310.22
366	Underground Conduit	1,095,293,587.53	434,325,980.32
367	Underground Conductors and Devices	1,413,682,572.55	843,367,411.59
368.1	Line Transformers	560,544,506.46	115,809,024.77
368.2	Protective Devices and Capacitors	25,188,633.24	(2,646,021.89)
369.1	Services Overhead	133,139,239.44	120,913,318.90
369.2	Services Underground	331,022,935.25	233,634,073.91
370.1	Meters	192,381,788.02	63,246,231.22
370.2	Meter Installations	56,007,062.17	15,970,423.15
371	Installations on Customers' Premises	7,948,192.28	10,767,852.61
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	27,523,799.88	19,416,915.56
	TOTAL DISTRIBUTION PLANT	5,605,882,127.67	2,481,241,283.62
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	32,160,259.94	23,852,688.16
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	10,322.68
393	Stores Equipment	15,720.46	15,343.08
394.1	Portable Tools	23,360,039.75	7,769,338.51
394.2	Shop Equipment	341,135.67	239,358.64
395	Laboratory Equipment	2,145,336.65	189,367.64
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	244,486,723.66	88,931,537.04
398	Miscellaneous Equipment	4,484,346.50	585,204.29
	TOTAL GENERAL PLANT	314,424,379.77	121,760,545.92
101	TOTAL ELECTRIC PLANT	11,883,671,521.44	3,863,701,666.60

<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	43,992.02	43,992.02
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	2,052,614.24	964,581.84
	TOTAL STORAGE PLANT	2,096,606.26	1,008,573.86
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,337,635.32
366	Structures and Improvements	12,228,213.09	9,749,130.94
367	Mains	212,063,882.02	68,011,342.33
368	Compressor Station Equipment	83,709,593.70	66,992,402.04
369	Measuring and Regulating Equipment	20,861,500.73	16,225,663.29
371	Other Equipment	(181,013.09)	0.00
	TOTAL TRANSMISSION PLANT	335,563,612.00	162,316,173.92
374.1	Land	102,187.24	0.00
374.2	Land Rights	8,239,569.29	6,659,839.47
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	658,276,219.13	352,997,910.42
378	Measuring & Regulating Station Equipment	17,808,618.23	7,535,386.86
380	Distribution Services	253,454,115.48	293,152,964.41
381	Meters and Regulators	157,283,066.75	52,481,684.81
382	Meter and Regulator Installations	92,643,598.15	34,705,122.32
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,157,471.96
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	5,223,271.51	4,902,467.41
	TOTAL DISTRIBUTION PLANT	1,194,590,903.39	753,654,100.76

<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	74,500.55	74,500.68
394.1	Portable Tools	8,155,631.79	3,865,715.48
394.2	Shop Equipment	76,864.06	47,717.41
395	Laboratory Equipment	283,093.66	272,724.95
396	Power Operated Equipment	162,284.40	149,377.85
397	Communication Equipment	2,496,030.92	852,710.96
398	Miscellaneous Equipment	157,056.49	57,770.31
	TOTAL GENERAL PLANT	11,405,461.87	5,346,020.64
101	TOTAL GAS PLANT	1,543,742,687.72	922,410,973.38
COMMON PLANT			
303	Miscellaneous Intangible Plant	315,860,381.66	198,478,812.23
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	1,080,961.15	27,776.34
390	Structures and Improvements	334,569,892.00	135,052,124.46
391.1	Office Furniture and Equipment - Other	26,695,638.41	13,331,548.42
391.2	Office Furniture and Equipment - Computer E	51,159,501.34	30,917,421.92
392.1	Transportation Equipment - Autos	33,942.29	(338,930.17)
392.2	Transportation Equipment - Trailers	12,195.98	3,950.55
393	Stores Equipment	63,971.09	47,752.50
394.1	Portable Tools	1,232,026.51	300,114.17
394.2	Shop Equipment	213,047.56	137,387.63
394.3	Garage Equipment	1,096,434.79	161,187.27
395	Laboratory Equipment	1,997,981.54	898,912.90
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	192,835,322.47	67,449,231.27
398	Miscellaneous Equipment	2,287,818.69	1,418,683.97
118.1	TOTAL COMMON PLANT	936,308,030.04	447,692,994.36
	TOTAL ELECTRIC PLANT	11,883,671,521.44	3,863,701,666.60
	TOTAL GAS PLANT	1,543,742,687.72	922,410,973.38
	TOTAL COMMON PLANT	936,308,030.04	447,692,994.36
101 & 118.1	TOTAL	14,363,722,239.20	5,233,805,634.34
101	PLANT IN SERV-SONGS FULLY RECOVER	0.00	0.00
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	(2,540,241.64)	0.00

<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	(1,633,319.82)	(1,633,319.82)
		<u>(1,633,319.82)</u>	<u>(1,633,319.82)</u>
101	Accrual for Retirements		
	Electric	(6,398,695.94)	(6,398,695.94)
	Gas	(73,301.91)	(73,301.91)
		<u>(6,471,997.85)</u>	<u>(6,471,997.85)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(6,471,997.85)</u>	<u>(6,471,997.85)</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	10,784,868.30
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>10,784,868.30</u>
	TOTAL PLANT LEASED TO OTHERS	<u>85,194,000.02</u>	<u>10,784,868.30</u>
105	Plant Held for Future Use		
	Electric	11,307,727.50	0.00
	Gas	0.00	0.00
		<u>11,307,727.50</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>11,307,727.50</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	550,237,348.56	
	Gas	161,642,662.44	
	Common	65,548,179.58	
		<u>777,428,190.58</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>777,428,190.58</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	908,970,513.69
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	908,970,513.69
101.1	ELECTRIC CAPITAL LEASES	837,939,281.00	172,812,856.00
118.1	COMMON CAPITAL LEASE	20,071,932.81	18,803,784.44
		858,011,213.81	191,616,640.44
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	(62,963,775.37)	(40,861,208.00)
143	FAS 143 ASSETS - Legal Obligation	271,718,404.13	(844,124,606.57)
	SONGS Plant Closure - FAS 143 contra	(270,338,553.03)	(61,166,058.00)
	FIN 47 ASSETS - Non-Legal Obligation	69,819,775.07	29,177,883.96
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,371,078,441.35)
	TOTAL FAS 143	71,199,626.17	(2,247,191,221.96)
	UTILITY PLANT TOTAL	16,156,217,437.97	4,089,881,117.14

ATTACHMENT E
SUMMARY OF EARNINGS

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2015
(DOLLARS IN MILLIONS)

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,613
2	Operating Expenses	<u>3,073</u>
3	Net Operating Income	<u><u>\$540</u></u>
4	Weighted Average Rate Base	\$4,471
5	Rate of Return*	7.79%

*Authorized Cost of Capital

ATTACHMENT F

GOVERNMENTAL ENTITIES RECEIVING NOTICE

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

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
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
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ATTACHMENT G

GHG REVENUE AND RECONCILIATION FORM

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Appendix D of the Proposed Decision mailed 9/12/14 in A.13-08-002 et al. Appendix D provides specific information on reporting methodology and confidentiality treatment of data.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

For Template D-4, each utility must provide the data in spreadsheet format, but may modify the template as appropriate to present the requested information by rate schedule.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	2013		2014		2015		2016		2017	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded	Forecast	Recorded ²	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A	12.09	N/A	13.13	N/A	13.58	N/A
2 Allocated Allowances (MT)	6,919,341	-	6,549,142	-	6,426,430	-	6,406,805	-	6,406,042	-
3 Revenues										
4 Prior Balance	N/A	N/A	(102,074,500)	(82,503,131)	(19,755,324)	(18,393,131)	31,586,221	31,892,368	937,057	-
5 Allowance Revenue	(103,302,000)	(82,453,505)	(94,570,000)	(76,756,698)	(77,695,500)	(79,929,224)	(84,121,350)	(84,121,350)	(87,727,369)	-
6 Interest	-	(49,626)	(28,773)	(47,002)	(76,463)	24,203	24,796	24,796	96,857	-
7 Franchise Fees and Uncollectibles	-	-	(1,771,359)	(1,706,341)	(1,190,048)	(1,581,513)	(1,026,495)	(1,026,495)	(1,041,258)	-
8 Subtotal Revenues	(103,302,000)	(82,503,131)	(198,444,632)	(161,013,172)	(98,717,335)	(99,879,665)	(53,536,828)	(53,230,681)	(87,734,713)	-
9 Expenses										
10 Outreach and Administrative Expenses (from Template D3)	1,227,500	-	187,500	801,369	334,835	334,989	80,036	80,036	187,500	-
11 Franchise Fees and Uncollectibles	-	-	-	-	-	-	-	-	-	-
12 Interest	-	-	-	(119)	-	(154)	-	-	-	-
13 Subtotal Expenses	1,227,500	-	187,500	801,250	334,835	334,835	80,036	80,036	187,500	-
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ³	-	-	-	-	-	-	-	630,910	1,315,911	-
15 Net GHG Revenues (Line 8 + Line 13 + Line 14)	(102,074,500)	(82,503,131)	(198,257,132)	(160,211,922)	(98,382,500)	(99,544,830)	(53,456,792)	(52,519,735)	(86,231,302)	-
16 GHG Revenues to be Distributed in Future Years	-	-	51,037,250	-	-	-	-	-	-	-
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(102,074,500)	(82,503,131)	(147,219,882)	(160,211,922)	(98,382,500)	(99,544,830)	(53,456,792)	(52,519,735)	(86,231,302)	-
18 GHG Revenue Returned to Eligible Customers										
19 EITE Customer Return ^{4,5}	-	-	1,583,553	-	1,384,559	-	4,238,010	4,238,010	908,553	-
20 Small Business Volumetric Return	-	-	10,982,219	11,533,823	6,954,493	13,247,750	3,648,498	3,648,498	4,446,237	-
21 Residential Volumetric Return	-	-	45,915,031	35,582,852	31,314,308	39,050,655	-	-	-	-
22 Subtotal EITE + Volumetric Returns	-	-	58,480,803	47,116,675	39,653,361	52,298,405	7,886,508	7,886,508	5,354,790	-
23 Number of Households Eligible for the California Climate Credit Per-Household Semi-Annual Climate Credit ⁶	-	-	1,224,253	1,306,520	1,224,251	1,313,989	1,306,630	1,306,630	1,314,398	-
24 (-0.5 x (Line 17 + 22) + Line 23)	-	-	36.24	36.24	23.99	23.99	17.44	17.44	30.77	-
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	-	-	88,739,079	94,702,116	58,729,139	79,138,793	45,570,284	45,570,284	80,876,512	-
26 Revenue Balance (Line 15 + Line 22 + Line 25)	N/A	(82,503,131)	N/A	(18,393,131)	N/A	31,892,368	N/A	937,057	N/A	-

¹ Includes 50% of 2013 allowance revenues and expenses.

² Recorded data is equal to forecast with the exception of the prior balance, which reflects the difference between the 2015 October - December forecast that was filed in the 2015 November Update vs. the recorded data for that same time period.

³ The 2016 recorded and 2017 forecasted columns includes the Multifamily Program set aside consistent with the March 18, 2016 Administrative Law Judge ruling in the Development of a Successor to Net Energy Metering proceeding (Rulemaking 14-07-002).

⁴ SDG&E's forecasted 2016 EITE Customer Return represents Prior Year EITE Customer Return of \$2,968,113 to be distributed in 2016, as well as the 2016 forecasted EITE Customer Return of \$1,269,897.

⁵ EITE Customer Return for 2016 has been updated to reflect the methodology approved in Decision 14-12-037.

⁶ Due to timing in receiving approval of D.15-03-019, the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household. The October residential CCC was based on the authorized 2015 residential CCC of \$23.99 per household.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016		2017	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO₂e)										
2	Utility Owned Generation (UOG)										
3	Tolling Agreements										
4	Energy Imports (Specified)										
5	Energy imports (Unspecified)										
6	RPS Adjustment										
7	Qualifying Facility (QF) Contracts										
8	Contract with Financial Settlement										
8	Subtotal										
9	Indirect GHG Emissions (MTCO₂e)										
10	CAISO Market Purchases										
11	Contract Purchases										
12	Subtotal										
13	Total Emissions (MTCO₂e)	5,596,398	5,678,547	5,473,713	5,590,681	4,811,519	5,053,678	4,203,567	4,203,567	4,286,977	-
14	Proxy GHG Price (\$/MT)	\$ 17.35	\$ 13.57	\$ 14.44	\$12.04	\$ 12.09	\$12.79	\$ 13.13	\$ 13.13	\$ 13.58	-
15	GHG Costs (\$)										
16	Direct GHG Costs ¹										
17	Direct GHG Costs - Financial Settlement										
18	Indirect GHG Costs										
19	Previous Year's Forecast Reconciliation ²										
20	Total Costs (\$)	N/A	N/A	\$ -	-	\$ (25,881,702)	(35,475,620)	(6,804,979)	(6,804,979)	-	-
		89,750,005	61,221,829	61,715,000	64,361,474	32,289,561	25,484,582	48,399,201	48,399,201	58,217,144	-
21	Forecast Variance³ (\$)	N/A	(28,528,177)	N/A	2,646,474	N/A	(6,804,979)	N/A	-	N/A	(58,217,144)

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¹Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes

²The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition, due to updates to recorded 2013 and 2014 amounts, this figure has been updated.

³Also reflects adjustment for shift in regulatory accounting from cash to accrual

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016		2017	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded	Forecast	Recorded
1 Utility Outreach										
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-
3 Other (Consultant) ^{2,5}	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-
5 Utility Administrative										
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	35,000	51,342	35,000	35,000	35,000	-
10 Other ⁴	-	N/A	12,500	12,500	12,500	-	12,500	12,500	12,500	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	47,500	47,500	-
Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	88,683	47,500	47,500	47,500	-
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000	-	140,000	140,000	140,000	-
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	88,683	187,500	187,500	187,500	-

¹ Includes actual expenses January through September and forecasted expenses October through December.

² 2013 forecasted expenses were revised from D.13-12-041 to shift the \$52.5k for Targetbase costs from admin to outreach pursuant to Resolution E-4611.

³ 2014 forecasted expenses were revised from D.13-12-041 to shift the \$35k for marketing from outreach to administration pursuant to Resolution E-4611.

⁴ Direct labor costs associated with: (1) Subsequent pricing and credit updates to the billing system; (2) customer eligibility review and verification process; (3) Manual set-up and maintenance required for the identified EITE customers; and (4) Monitoring of check cutting activities related to Net Energy Metering customers.

⁵ Bill inserts and emails costs of \$19,540 booked to GHGCOEMA in April/May/December 2014 were transferred to GHGACMA in October 2015.

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Bundled Customers				Unbundled Customers			
	Forecast MWH Sales (MWh) (B)	Forecast GHG Revenue Req (\$) ¹ (C)	Rate Impact (\$/kWh) ² (D)	Forecast GHG Revenue (\$) ³ (E)	Forecast MWH Sales (MWh) (F)	Forecast GHG Revenue Req (\$) ¹ (G)	Rate Impact (\$/kWh) ² (H)	Forecast GHG Revenue (\$) (I)
DR	7,106,077	\$ 25,071,319	0.00353	\$ 76,747,135	101,924	N/A	N/A	\$ 97,589
TOU-DR	0	\$ -	0.00353	\$ 31,689	-	N/A	N/A	\$ -
DM	45,041	\$ 156,566	0.00353	\$ 970,840	1,086	N/A	N/A	\$ 1,538
DS	18,322	\$ 64,039	0.00353	\$ 338,299	-	N/A	N/A	\$ -
DT	145,046	\$ 520,111	0.00353	\$ 2,068,249	16	N/A	N/A	\$ -
DT-RV	4,067	\$ 14,584	0.00353	\$ 104,603	-	N/A	N/A	\$ -
DR-TOU	12,776	\$ 45,806	0.00353	\$ 71,469	861	N/A	N/A	\$ 185
DR-SES	5,261	\$ 8,033	0.00317	\$ 108,541	4,777	N/A	N/A	\$ 62
EV-TOU	70	\$ 188	0.00317	\$ -	-	N/A	N/A	\$ -
EV-TOU-2	36,290	\$ 123,879	0.00317	\$ 336,100	2,678	N/A	N/A	\$ 215
A	1,920,774	\$ 6,174,992	0.00320	\$ 3,288,857	14,057	N/A	N/A	\$ 35,060
TOU-A	0	\$ -	0.00320	\$ 118,068	152	N/A	N/A	\$ 377
ATC	60,190	\$ 135,857	0.00320	\$ 137,903	308	N/A	N/A	\$ 763
A-TOU	36,546	\$ 141,694	0.00320	\$ 31,427	1,563	N/A	N/A	\$ 3,866
AD	35,011	\$ 133,161	0.00340	\$ 76	-	N/A	N/A	\$ -
AL-TOU	6,659,036	\$ 22,580,867	0.00340	\$ 1,232,803	20,147	N/A	N/A	\$ 242,710
AY-TOU	89,561	\$ 325,681	0.00340	\$ 5,288	214	N/A	N/A	\$ 493
DGR	35,195	\$ 132,759	0.00340	\$ 654	-	N/A	N/A	\$ -
A6-TOU	49,875	\$ 163,744	0.00340	\$ 12,184	-	N/A	N/A	\$ 182,935
OL-TOU	3,613	\$ 12,539	0.00340	\$ 34	-	N/A	N/A	\$ -
PA	75,059	\$ 236,489	0.00289	\$ 53,415	412	N/A	N/A	\$ 983
TOU-PA	0	\$ -	0.00289	\$ 562	-	N/A	N/A	\$ -
PA-T-1	226,741	\$ 634,347	0.00289	\$ 6,026	129	N/A	N/A	\$ 307
Streetlighting	103,651	\$ 241,435	0.00233	\$ -	-	N/A	N/A	\$ -
Total	16,668,202	\$ 56,918,088	0.00341	\$ 85,664,221	148,324	N/A	N/A	\$ 567,083

¹In accordance with Section 2.5. of the Amended Joint Investor-Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap-and-trade costs incurred will be captured as part of the larger ERRA true-up process. SDG&E will true-up total ERRA balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRA Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column C does not include a GHG cost reconciliation.

²Rate impacts are based on customer class.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Information					
		2013	2014	2015 (estimated actual)	2016 (forecast)	2017 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,960,202	\$55,204,180	\$58,217,144
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$84,121,350)	(\$87,727,369)
3	Emissions Intensity (MTCO/MWh) *	0.322	0.284			

* SDG&E Emissions Intensities are calcluated based on renewable energy consumed and RECs associated with consumpmtion in that year. It is not adjusted for RPS Compliance banking or modifications to RPS Adjstments in that year.

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