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April 9, 2012

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: San Diego Gas & Electric Company, Docket No. ER12-1417-001

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, and Part 35.12 of the Regulations of the Federal Energy Regulatory Commission ("FERC" or "Commission"), San Diego Gas & Electric Company ("SDG&E") here submits an Errata to its Appendix X to its currently-effective Transmission Owner ("TO") Tariff. Appendix X was filed with the Commission on March 30, 2012. Appendix X was proposed a Formula for calculating the rate that SDG&E will charge Citizens Sunrise Transmission LLC ("Citizens"), a wholly-owned subsidiary of Citizens Energy Corporation ("Citizens Energy"), for its lease of the transfer capability of a portion of the Border East Line of the Sunrise Powerlink Transmission Project ("Sunrise").

I. NATURE AND PURPOSE OF FILING

SDG&E learned this week that there were certain corrections that needed to be made to the as-filed Appendix X. A description of these corrections follows:

Part II (Terms), Section (A) Nos. (2) (Transmission Plant Allocation Factor Less Substations and Underground Lines) and (3) (Transmission Plant Allocation Factor Less Substations, Underground Lines, and Overhead Lines): Changed the Uniform System of Account ("U.S.A.") No. for Station Equipment references from 362 to 353.

Part II (Terms), Section (C) (Definition of Terms):

1. Term No. 17 (Federal Income Tax Rate Component) and 34 (State Income Tax Component): Changed to include in Equity both the Weighted Cost of Common and Preferred Equity.

2. Term No. 37 (Transmission Maintenance Expenses): The U.S.A. number is changed from 569 (Maintenance of Structures) to 570 (Maintenance of Station Equipment).
3. Term No. 38 (Transmission Operation Expenses): Applicable U.S.A. number is changed from 561 to 562.
4. Terms No. 40 (Transmission Plant less the sum of Substations and Underground Lines) and 41 (Transmission Plant less the sum of Substations, Underground Lines, and Overhead Lines): Applicable U.S.A. number changed from 362 to 353.
5. Terms No. 42 (Transmission Related A&G Expenses); (43) (Transmission Related A&G Expenses Including Property Insurance); and (46) (Transmission Related General and Common Plant Revenue): The words "For Citizens" were added to these definitions.
6. Term No. 44 (Transmission Related General Plant) and 45 (Transmission Related Common Plant): These terms were deleted since they are not used in formula and the following terms were renumbered.

Part III (Calculation of Citizens Rate), Section B.1. (e): Deleted the reference to "Accumulated Deferred Income Tax".

Part III (Calculation of Citizens Rate), Section B.1. (f): Included the word "Related".

Part III (Calculation of Citizens Rate), Section C.1: Deleted the phrase "the sum of the Federal Income Tax Component plus the State Income Tax Component plus" and included the word "Rate" after the phrase "Cost of Capital."

II. THESE CORRECTIONS DO NOT EFFECT THE PROPOSED CITIZENS RATE

The above described corrections do not effect allocation of costs in Statement BK cost of service that was included in SDG&E's March 30, 2012 filing. Specifically, Statement BK correctly reflected the corrections SDG&E is proposing in this errata filing to Appendix X. As a result, SDG&E is only proposing to make these changes to Appendix X since these corrections do not result in any changes to the various allocated cost components of Citizens Rates. Thus, SDG&E does not propose to change any of the testimony SDG&E submitted in its March 30, 2012 filing.

III. A LIST OF DOCUMENTS SUBMITTED

In support of this errata filing, SDG&E provides the following:

- Redline of the corrected sheets to Appendix X;
- Clean corrected sheets to Appendix X.

IV. REQUEST FOR WAIVER, APPROVAL AND EFFECTIVE DATE

SDG&E respectfully requests the Commission to grant any waivers necessary to permit Appendix X, as corrected, to become effective concurrently with the in-service date of Sunrise, currently projected to be June 1, 2012.

SDG&E believes that the Commission may grant a waiver of the 60-day prior notice requirement of Section 205 of the Federal Power Act and the Commission's regulations for the following reasons. First, these corrections do not cause a change to the as-filed Citizens rate. Second, the form of the Transfer Capability Lease will be executed when Sunrise goes into service currently anticipated to occur on Jun 1, 2012. It is vital that SDG&E have in place at that time an effective Citizens rate. The Commission has previously measured the 60-day notice period from the initial filing date in circumstances where a rate increase is amended in a good faith effort to cure a deficiency and the customer that is the subject of that rate does not contest the cure. *Order Granting and Denying Waiver of Notice and Clarify Waiver Policy*, 60 FERC ¶ 61,106, at fn10 (1992). In this circumstance where there is no rate increase and the only customer that will be the subject of the filed rate is supportive of this errata filing,¹ the Commission is justified to conclude that good cause exists to grant this waiver to allow the corrected Appendix X and associated rate to go into effect on June 1, 2012.

V. SERVICE

Copies of this Filing have been served on all parties to Docket No. ER11-4318, including the California Public Utilities Commission, the CAISO, Pacific Gas and Electric Company, Southern California Edison Company and other participating transmission owners that have transferred operational control over their transmission facilities and entitlements to the CAISO.

Respectfully submitted,

/s/ JAMES F. WALSH

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Attorneys for
San Diego Gas & Electric Company

Enclosures

cc: Debi Le Vine, Director CAISO
Nicholas Sher, California Public Utilities Commission
Donald Allen
Paul Breakman

¹ Counsel for Citizens Sunrise Transmission LLC (and Citizens Energy Corp.) has authorized counsel for SDG&E to state that Citizens supports the instant errata filing.