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September 30, 2014

The Hon. 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. ER14-__-000
TO4 Formula Depreciation Rate Change for Non-Transmission
Common Plant and General Plant**

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act,¹ Section 35.13 of the Federal Energy Regulatory Commission's (FERC or Commission) regulations,² and San Diego Gas & Electric Company's (SDG&E) fourth Transmission Owner (TO) Formula rate mechanism (TO4 Formula or TO4 Formula Rate),³ SDG&E submits this "single-issue" depreciation rate filing (Filing). This Filing updates SDG&E's non-transmission depreciation rates for Common Plant and General Plant contained in the TO4 Formula (Cycle 1)⁴ to reflect the impact of changes to plant balances and related depreciation rates for 2013, the TO4 Cycle 2 Base Period.

The proposed impact of the revised non-transmission depreciation rates and their proposed impact on Base Transmission Revenue Requirements (BTRR) will be reflected

¹ 16 U.S.C. §824d (20__).

² 18 C.F.R. § 35.13.

³ The Commission approved the TO4 Offer of Settlement (Settlement) embodying the TO4 Formula in *San Diego Gas & Electric Company*, 147 FERC ¶61,150 (2014).

⁴ The term "Cycle" refers to the specific Informational Filing (or annual filing) submitted under the TO4 Formula. The term "TO4 Cycle 1" refers to the first Informational Filing submitted in the TO4 Formula and the term "TO4 Cycle 2" refers to the second Informational Filing submitted in the TO4 Formula. The capitalized terms have the meaning ascribed to them in SDG&E's TO Tariff or in this Filing.

in the TO4 Cycle 2 Formula Rate Informational Filing, which will be filed on December 1, 2014, to become effective January 1, 2015.

As discussed more fully below, this Filing is required by the California Public Utilities Commission's (CPUC) Decision (D.) 13-05-010 (CPUC Decision) and SDG&E's TO4 Formula Rate Protocols.

I. NATURE AND PURPOSE OF FILING

SDG&E proposes to revise its Formula Rate⁵, set forth in SDG&E's Transmission Owner Tariff, FERC Electric Tariff, Volume No. 11 (TO Tariff), to reflect non-transmission depreciation rates for Common Plant and General Plant for 2013, the Base Period for TO4, Cycle 2. This 2013 update is required by D.13-05-010 and contemplated by Section D.5 of SDG&E's Rate Protocols.

Specifically, D.13-05-010 set parameters requiring SDG&E to recalculate depreciation rates annually reflecting updated recorded plant balances and to submit the revised depreciation rates to the CPUC *via* an informational letter filed each year. The plant balances and related depreciation rates changed for the referenced plant categories for calendar year 2013, the Base Period for TO4 Cycle 2 (Base Period). To reflect the changed non-transmission depreciation rates in TO4 Cycle 2, SDG&E is required pursuant to Section D.5 of SDG&E's Formula Rate Protocols to make this single-issue depreciation rate filing to obtain Commission approval of the changed depreciation rates for Common Plant and General Plant.

II. BACKGROUND

As described in the Affidavit of Robert Wieczorek (Wieczorek Affidavit), Exhibit No. SDG-1, the TO4 Formula Protocols allow SDG&E to make this Filing to change the depreciation rates for General Plant and Common Plant and the amortization periods for Intangible Plant upon approval by the CPUC of revised depreciation rates and/or amortization periods for these plant categories.⁶

On May 9, 2013, the CPUC issued D.13-05-010 which, among other things, requires SDG&E to recalculate non-transmission depreciation rates for Common Plant and General Plant on an annual basis. The non-transmission depreciation rates for 2013, which is the Base Period for TO4 Cycle 2, differ from the corresponding rates reflected in the TO4 Formula Cycle 1. Those depreciation rates are based on recorded depreciation

⁵ The TO4 Formula Rate is set forth in Appendix VIII of SDG&E's TO Tariff, Formula Rate Protocols and Formula Rate Spreadsheet.

⁶ See Section D.5 of the TO4 Protocols.

for Common Plant and General Plant for 2011 and 2012.⁷ D.13-05-010 did not require changes in amortization periods.

III. PROPOSED DEPRECIATION RATE REVISIONS

SDG&E is making the Filing to request Commission approval to recalculate the non-transmission depreciation rates reflected in the TO4 Formula to reflect 2013 recorded depreciation, consistent with the CPUC Decision. In this filing, SDG&E is proposing to revise only those aspects of the Formula that are necessary to correctly reflect the CPUC Decision (D.13-05-010).

Mr. Wieczorek's Affidavit explains the basis for and recalculation of the 2013 non-transmission depreciation rates for Common Plant and General Plant. For illustrative purposes, Mr. Wieczorek also estimates the future impact of the proposed depreciation rate changes on SDG&E's currently-effective Base Transmission Revenue Requirement.

Mr. Wieczorek also compares the 2012 Electric General Plant and Common Plant rates to the 2013 Electric General Plant and Common Plant rates. That comparison results in a net expense increase of \$1,136,900, consisting of a total Electric General Plant expense reduction of <\$23,500> and a total Common Plant expense increase of \$1,160,400. The TO4, Cycle 2 True-Up Period four (4) month difference from September 1, 2013 through December 31, 2013, amounts to a net increase of \$433,100, which is the sum of the \$443,743 and <\$10,629>. The overall impact to Electric Transmission expense, using applicable labor ratios, results in a net increase of \$51,523 over the four (4) month True-Up Period, *i.e.*, September through December 2013 (True-Up Period), and is the sum of \$53,274 and <\$1,751>.

IV. EFFECTIVE DATE AND WAIVER

Consistent with the normal operation of the TO4 Formula, SDG&E respectfully requests that the Commission permit this Filing to be reflected in SDG&E's TO4 Cycle 2 Informational Filing for the Rate Effective Period commencing January 1, 2015. Permitting the revised depreciation rates to be reflected as proposed (1) ensures consistency in the application of the CPUC-adopted depreciation rates for FERC-jurisdictional and CPUC-jurisdictional rates and (2) avoids any timing gap in effectuating consistent depreciation rates across the federal and state jurisdictions.

⁷ The TO4 Formula reflected depreciation rates applicable to SDG&E's 2011 calendar year recorded depreciation for the first seven months of SDG&E's TO4 Cycle 1 Prior Year Period, 12 months ended May 2012 and to SDG&E's 2012 calendar year recorded depreciation for the last five months of SDG&E's TO4 Formula Cycle 1 Prior Year Period, 12 months ended May 2012.

To the extent necessary, SDG&E respectfully requests, pursuant to Section 35.11 of the Commission's regulations,⁸ waiver of the 60-day prior notice requirement specified in Section 35.3 to permit the Filing to become effective January 1, 2015. Good cause exists for such waiver to be granted for the reasons stated above and because grant of the waiver would be consistent with the Commission's policy set forth in *Central Hudson Gas & Electric Corp.*,⁹ i.e., this filing is prompted by CPUC D. 13-05-010 and is provided for in the TO4 Formula Protocols.

Finally, SDG&E believes that the information contained in this Filing provides a sufficient basis for acceptance. SDG&E requests, however, that, to the extent deemed necessary, the Commission waive any other filing requirements contained in Part 35 of its regulations to permit SDG&E to reflect the proposed non-transmission depreciation rates and impact on BTRRs in its TO4 Cycle 2 Informational Filing, effective January 1, 2015.

V. LIST OF DOCUMENTS SUBMITTED

This Filing consists of the following items:

1. Transmission Letter;
2. Affidavit of Robert Wiczorek on Behalf of San Diego Gas & Electric Company, Exhibit No. SDG-1 and the following Exhibits:
 - a. Exhibit No. SDG-1-1—2012 CPUC Electric General Plant Depreciation Rates (Excerpt from TO4 Settlement—Statement AJ work papers);
 - b. Exhibit No. SDG-1-2—2012 CPUC Common Plant Depreciation Rates (Excerpt from TO4 Settlement—Statement AJ work papers);
 - c. Exhibit No. SDG-1-3—2013 CPUC Electric General Plant Depreciation Rates (TO4 Cycle 2 Base Period--Statement AJ work papers);
 - d. Exhibit No. SDG-1-4—2013 CPUC Common Plant (TO4 Cycle 2 Base Period—Statement AJ work papers);
 - e. Exhibit No. SDG-1-5—2013 Illustrative Comparison Demonstrating Impact of Using 2012 Electric General Plant Depreciation Rates in 2013 (TO4 Cycle 2 Base Period);

⁸ 18 C.F.R. §35.11.

⁹ *Central Hudson Gas & Electric Corp.*, 60 FERC ¶61,106, reh'g denied, 61 FERC ¶61,089 (1992).

- f. Exhibit No. SDG-1-6— Illustrative Comparison Demonstrating Impact of Using 2012 Common Plant Depreciation Rates in 2013 (TO4 Cycle 2 4-Month True-Up Period);
 - g. Exhibit No. SDG-1-7-- Illustrative Comparison Demonstrating Impact of Using 2012 Electric General Plant Depreciation Rates in 2013 (TO4 Cycle 2 Base Period);
 - h. Exhibit No. SDG-1-8-- Illustrative Comparison Demonstrating Impact of Using 2012 Common Plant Depreciation Rates in 2013 (TO4 Cycle 2 True-Up Period).
3. Exhibit No. SDG-2—Work papers (SDG&E 2013 Annual Report to the CPUC on Depreciation Rates, pursuant to D.13-05-010).

VI. SERVICE

A copy of this Filing has been served on all parties to TO4 Formula Rate proceeding, Docket No. ER13-941. The CPUC, the California System Independent Operator (“CAISO”) and the CAISO Participating Transmission Owners have also been served.

VII. COMMUNICATIONS

SDG&E requests that all correspondence, pleadings and other communications concerning this filing be served upon the following individuals:¹⁰

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¹⁰ SDG&E requests waiver of Rule 203(b)(3) to the extent necessary to permit each of the individuals identified above to be placed on the Commission’s official service list in this proceeding.

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Respectfully submitted,



Georgetta J. Baker

Attorney for
San Diego Gas & Electric Company

Enclosures/gjb

Affidavit of Robert Wiczorek

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

San Diego Gas & Electric Company) Docket Nos. ER13-941-000
ER13-941-001
ER13-941-002

**AFFIDAVIT OF ROBERT WIECZOREK
FOR SAN DIEGO GAS & ELECTRIC COMPANY**

I, Robert Wieczorek, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. My name is Robert Wieczorek. I am the Principal Depreciation Accountant in the Capital Asset Management Group in the Accounting Operations Department at San Diego Gas & Electric Company (“SDG&E”). My business address is 8330 Century Park Court San Diego, CA 92123.

2. I am submitting this affidavit on behalf of SDG&E. The statements made herein are true and correct to the best of my knowledge and belief, and I adopt them as my sworn testimony in this proceeding.

3. I have worked for the Sempra Companies for 39 years and specifically at SDG&E for 12 years. In my current position as Principal Depreciation Accountant in the Capital Asset Management group, I am responsible for establishing SDG&E’s depreciation and amortization rates that are generated and updated from studies filed in SDG&E’s Transmission Owner (“TO”) Formula rate filings at the Federal Energy Regulatory Commission (“FERC” or “Commission”) and General Rate Cases at the California Public Utilities Commission (“CPUC”). I am also responsible for preparing annual notifications to the CPUC of depreciation rate changes (substantiated by required studies) arising from the annual recalculation of General Plant,

Common Plant, and Intangible Plant based on the annual application of CPUC-authorized parameters to updated plant balances. The annual updates to the CPUC form the basis of the “single-issue” Section 205 depreciation rate change filings SDG&E makes at the FERC. Both of the CPUC and FERC depreciation rate change filings are discussed more fully below.

4. I joined Southern California Gas Company (SoCalGas) in 1976 as a crew assistant, transferring to the Accounting Work Order analysis group after receiving a Bachelor of Science Degree in Accounting. I held numerous positions at SoCalGas until SDG&E and SoCalGas merged in 1998, after which I transferred to SDG&E. I have held numerous positions at SDG&E, assuming my current position in 2007.

5. I received an Associate of Arts degree from Glendale Community College, a Bachelor of Science degree in Business Administration with an emphasis in Accounting from California State University at Northridge, and a Masters of Business Administration from the National University here in San Diego. I have been a member of the Society of Depreciation Professionals and have attended many of their depreciation training programs. I have also been a member of SHRM and was certified as a Compensation Professional during that time period.

6. I submitted depreciation testimony in SDG&E’s Fourth Transmission Owner (TO) Formula rate mechanism (“TO4 Formula”). I have also previously submitted testimony on depreciation before the CPUC in SDG&E’s and SoCalGas’ 2012 General Rate Cases (A.10-12-005 and A.10-12-006).

7. The purpose of my affidavit is to describe SDG&E’s proposed revisions to the non-transmission depreciation rates reflected in SDG&E’s TO4 Formula transmission rate (“Formula Rate”) for 2013, the Base Period of SDG&E’s TO4 Cycle 2 Formula Rate. The proposed

revisions are necessary to implement the CPUC Decision, issued May 9, 2013, in SDG&E's 2012 General Rate Case (D.13-05-010).

In summary, D.13-05-010 set parameters requiring SDG&E to recalculate depreciation rates annually reflecting updated recorded plant balances and to submit the revised depreciation rates to the CPUC *via* annual informational letters. The plant balances and related depreciation rates changed for the referenced plant categories for calendar year 2013, the Base Period for TO4 Cycle 2 (Base Period). To reflect these changed non-transmission depreciation rates in TO4 Cycle 2, SDG&E is required, pursuant to Section D.5 of SDG&E's TO4 Formula Rate Protocols to make this single-issue depreciation rate filing (Filing) to obtain Commission approval to reflect the changed depreciation rates and/ or amortization periods for Common Plant and General Plant and Intangible Plant, as applicable, and their impact on the applicable Base Transmission Revenue Requirements (BTRR)).

8. My affidavit is organized as follows:

- In Section II, I provide background on SDG&E's Formula Rate and the calculation of non-transmission depreciation expense under the Formula Rate;
- In Section III, I describe the CPUC Decision, the method of determination of non-transmission depreciation rates in the CPUC Decision, and the proposed revised non-transmission depreciation rates adopted in the CPUC Decision;
- In Section IV, I describe the revisions to the depreciation module of the Formula Rate necessary to conform to the CPUC Decision on non-transmission depreciation rates; and
- In Section V, I discuss the quantification of the changes in General Plant, Common Plant, and Intangible Plant accounts.

II. BACKGROUND ON SDG&E'S FORMULA RATE

9. SDG&E's TO4 Formula consists of Appendix VIII, Formula Rate Protocols ("Protocols") and a Formula Rate Spreadsheet. The TO4 Formula became effective on September 1, 2013 upon Commission approval of the Offer of Settlement ("Settlement") embodying the TO4 Formula on May 27, 2014.¹

10. Section D.5 of the Protocols provides:

SDG&E reserves the right to make a single-issue Section 205 filing to change the depreciation rates for General Plan and Common Plant and the amortization periods for Intangible Plant upon approval by the CPUC of revised depreciation rates and/or amortization periods for these plant categories...If there is a change in the depreciation rates for General Plant and Common Plant and/or in the amortization periods for Intangible Plant, and SDG&E elects not to make a filing, SDG&E will provide notice of the change.... However, SDG&E will not then be able to incorporate the CPUC-approved change in its TO4 Formula.

Thus, in order to incorporate the CPUC-approved change in non-transmission depreciation rates for General and Common Plant in this TO4 Formula, Cycle 2, SDG&E is making this single-issue filing to reflect changes in the non-transmission depreciation rates for General Plant and Common Plant. As noted below, because the amortization periods are unaffected by D.13-05-010, SDG&E is not proposing in this single-issue filing any change to the amortization periods reflected in the TO4 Formula.

III. THE SDG&E 2012 GRC FINAL DECISION

11. The CPUC Decision, D.13-05-010, adopted a revenue requirement for SDG&E's CPUC-jurisdictional Electric, Gas, General Plant, Common Plant and Intangible Plant assets.

12. Among other things, D.13-05-010 reviewed, adopted, and authorized (without modification) all of the SDG&E FERC account proposals that I submitted for the Test Year 2012 and for the subsequent years 2013, 2014 and 2015. This includes the Electric General and

¹ *San Diego Gas & Electric Company*, 147 FERC ¶61, 150 (2014).

Common rates that are utilized and specified by FERC in the SDG&E TO4 Formula Rate. As required by D.13-05-010, SDG&E will rebuild and recalculate depreciation rates for Common Plant and General Plant each January for the calendar years through and including 2015.

The 2012 General Rate Case and D.13-05-010 require no change to the currently-effective Intangible Plant amortization periods and subsequent rates. Accordingly, this single-issue filing does not address amortization; it is limited solely to specifying and outlining changes in the depreciation rates for Electric General Plant and Common Plant.

More particularly, pursuant to D.13-05-010, the 2012 Test Year General Plant and Common Plant depreciation rates were recalculated resulting in the 2012 Electric General Plant and Common Plant depreciation rates stated in the TO4 Formula. In January 2013, in compliance with D.13-05-010, SDG&E recalculated the 2013 General Plant and Common Plant rates effective January 1, 2013, for the full calendar year of 2013. This update of the depreciation rates for Common Plant and General Plant for 2013 is the sole basis and reason for this Section 205 filing.

13. SDG&E uses the Actuarial² method of depreciation analysis to determine the Average Service Lives and the Iowa Curve for each mortality account. There are also numerous forecast accounts that generate rates based on their end-lives. Straight-line depreciation is the accepted CPUC method. Only changes in plant and reserve balances, with their effect on the remaining lives for each FERC account, generate the yearly rate differences during the effectiveness of the GRC. From 2012 to 2013, General Plant rates increased for one (1) FERC account, decreased for five (5) FERC accounts, and stayed the same for four (4) FERC

² Actuarial Method is appropriate when both the asset installation and retirement is captured by vintage year. This direct analysis from more precise record-keeping delivers results superior to simulated SPR methods.

accounts. The same comparison shows Common Plant rates increased for four (4) FERC accounts, decreased for six (6) accounts, and stayed the same for one (1) FERC account. Both General Plant and Common Plant are comprised of numerous items each having a relatively low value. Consistent with FERC guidelines, the items in these accounts are not accounted for individually, but are depreciated by vintage group over the specified service life and retired at the end of the life span. Accounting for property in such a way eliminates costly record keeping and continuous physical tracking of the assets.

IV. REVISIONS TO THE FORMULA RATE TO CONFORM TO THE CPUC DECISION

14. The CPUC-authorized changes to the non-transmission depreciation rates require modifications to two Statement AJ-Workpapers included in Attachment A of the TO4 Offer of Settlement (Settlement) embodying the Formula Rate, Docket No. ER13-941-001 (Statement AJ Workpapers). Those Statement AJ workpapers, designated “TO4-Annual General Plant Depreciation Rates” (Cycle 1, for 12-Months Ending May 31, 2012) and “TO-4 Annual Common Plant Depreciation Rates” (Cycle 1, for 12-Months Ending May 31, 2012), are attached to this Affidavit as Exhibit Nos. SDG-1-1 and SDG-1-2, respectively. The updated 2013 values are attached hereto as Exhibit Nos. SDG-1-3, “Electric General Plant Depreciation Rates – 2013” and SDG-1-4, “Common Plant Depreciation Rates – 2013.”

V. QUANTIFICATION OF CHANGED DEPRECIATION RATES

15. Exhibit Nos. SDG-1-5 through SDG-1-8 estimate the future impact of these depreciation rate changes on SDG&E’s BTRR. To arrive at the estimates reflected in those exhibits, I rebuilt the recorded 2013 depreciation expense (for illustrative purposes) using the 2012 Electric General Plant and Common Plant rates. Using actual recorded 2013 depreciation expense, summed for the period over which the analysis was capturing (January-December 2013

– TO4 Cycle 2 Base Period and Sept-Dec 2013 – TO4 Cycle 2 True-Up Period), I backed into a depreciable base using the actual 2013 depreciation rates that generated the recorded expense. I then took that derived depreciable base times the 2012 depreciation rates to arrive at a figure representing the estimated 2013 depreciation expense using 2012 depreciation rates. I then computed the delta taking actual recorded 2013 expense less the estimated 2013 expense (using 2012 depreciation rates). That comparison against 2013 plant balances (2013 rates vs 2012 rates) results in a net \$1,136,900 expense increase consisting of a total Electric General Plant expense reduction of approximately <\$23,500> (Exhibit No. SDG-1-5) and a total Common Plant expense increase of approximately \$1,160,400 (Exhibit No. SDG-1-6). The TO4 True-Up Period four (4) month difference from September 1, 2013 through December 31, 2013 amounts to a net increase of approximately \$433,100, which is the sum of the \$443,743 and <\$10,629>. (Exhibit Nos. SDG-7 and SDG-8). The overall impact to Electric Transmission expense, using applicable labor ratios, results in a net increase of \$51,523 over the four (4) month True-Up Period) and is the sum of \$53,274 and <\$1,751>. (Exhibit Nos. SDG-1-7 and SDG-1-8).

VI. CONCLUSION

16. My Affidavit demonstrates that the revisions SDG&E is proposing to the Formula Rate are necessary to properly implement the Formula Rate Protocols and reflect the CPUC Decision (D.13-05-010) for the TO4 Cycle 2 Informational Filing.

VERIFICATION

State of California)
City/County of San Diego)

Robert Wieczorek, being duly sworn, on oath, says that he is the Robert Wieczorek identified in the foregoing prepared direct testimony; that he prepared or caused to be prepared such testimony on behalf of San Diego Gas & Electric Company; that the answers appearing therein are true to the best of his knowledge and belief; and that if asked the questions appearing therein, his answer would, under oath, be the same.

/s/ ROBERT WIECZOREK
Robert Wieczorek

SAN DIEGO GAS AND ELECTRIC COMPANY
Statement AJ - Workpapers
TO4 - Annual General Plant Depreciation Rates
Cycle 1, For 12 - Months Ending May 31, 2012
For Use During the 5-Months Period from Jan 1, 2012 to May 31, 2012

2012 General Rates ^{1, 2}

Rates based on 12/31/2011 Plant Balances						
Line No	FERC Account	Description	(a) Life Rate	(b) Removal Rate	(c) = a + b Total Rate	Line No
1						1
2	E0139000	Struct. and Improv.	4.67%	1.16%	5.83%	2
3	E0139220	Transprtn Eq-Trailer	4.46%	0.00%	4.46%	3
4	E0139310	Stores Equip.-Other	3.92%	0.00%	3.92%	4
5	E0139411	Portable Tools-Other	3.79%	0.00%	3.79%	5
6	E0139420	Shop Equipment	4.78%	0.00%	4.78%	6
7	E0139510	Laboratory Eq.-Other	7.35%	0.00%	7.35%	7
8	E0139710	Commun. Equip.-Other	3.06%	0.46%	3.52%	8
9	E0139720	Commun. Equip.-SWPL	2.27%	0.34%	2.61%	9
10	E0139760	Commun. Equip.-SRPL	3.56%	0.54%	4.10%	10
11	E0139810	Misc. Equip. - Other	8.78%	0.00%	8.78%	11
12						12

¹ The above Electric General Plant depreciation rates are applicable to SDG&E's 2012 calendar year recorded depreciation. As such, they are applicable to the last five months of SDG&E's TO4 Formula Cycle 1 Prior Year Period, 12 months ended May 2012.

² These rates may not be changed absent a section 205 or 206 filing. The annual Information Filing will reference the docket number of the FERC proceeding that establishes new General Plant and Common Plant depreciation rates and Intangible Plant amortization periods.

SAN DIEGO GAS AND ELECTRIC COMPANY
Statement AJ - Workpapers
TO4 - Annual Common Plant Depreciation Rates

Cycle 1, For 12 - Months Ending May 31, 2012
For Use During the 5-Months Period from Jan 1, 2012 to May 31, 2012

2012 Common Rates^{1, 2}

Rates based on 12/31/2011 Plant Balances						
Line No	FERC Account	Description	(a) Life Rate	(b) Removal Rate	(c) = a + b Total Rate	Line No
1						1
2	C1839010	Struct & Imprv-Other	4.35%	0.43%	4.78%	2
3	C1839110	Offc Furn & Eq-Other	5.81%	0.00%	5.81%	3
4	C1839120	Offc Furn & Eq-Cmptr	19.31%	0.00%	19.31%	4
5	C1839220	Transprtn Eq-Trailer	55.04%	0.00%	55.04%	5
6	C1839310	Stores Equip.-Other	21.37%	0.00%	21.37%	6
7	C1839411	Portable Tools-Other	4.52%	0.00%	4.52%	7
8	C1839421	Shop Equip. - Other	4.86%	0.00%	4.86%	8
9	C1839431	Garage Equip.-Other	9.84%	0.00%	9.84%	9
10	C1839510	Laboratory Eq.-Other	4.22%	0.00%	4.22%	10
11	C1839710	Commun. Equip.-Other	6.83%	0.00%	6.83%	11
12	C1839810	Misc. Equip. - Other	10.89%	0.00%	10.89%	12
13						13

¹ The above Common Plant depreciation rates are applicable to SDG&E's 2012 calendar year recorded depreciation. As such, they are applicable to the last five months of SDG&E's TO4 Formula Cycle 1 Prior Year Period, 12 months ended May 2012.

² These rates may not be changed absent a section 205 or 206 filing. The annual Information Filing will reference the docket number of the FERC proceeding that establishes new General Plant and Common Plant depreciation rates and Intangible Plant amortization periods.

SAN DIEGO GAS AND ELECTRIC COMPANY
Statement AJ - Workpapers
TO4 - Annual General Plant Depreciation Rates

Cycle 2, For 12 - Months Ending December 31, 2013
 For Use During the 12-Months Period from January 1 to December 31, 2013

2013 General Rates ^{1, 2}

Rates based on 12/31/2012 Plant Balances						
Line No	FERC Account	Description	(a) Life Rate	(b) Removal Rate	(c) = a + b Total Rate	Line No
1						1
2	E0139000	Struct. and Improv.	4.69%	1.17%	5.86%	2
3	E0139220	Transprtn Eq-Trailer	4.46%	0.00%	4.46%	3
4	E0139310	Stores Equip.-Other	2.65%	0.00%	2.65%	4
5	E0139411	Portable Tools-Other	3.79%	0.00%	3.79%	5
6	E0139420	Shop Equipment	4.72%	0.00%	4.72%	6
7	E0139510	Laboratory Eq.-Other	7.35%	0.00%	7.35%	7
8	E0139710	Commun. Equip.-Other	3.06%	0.46%	3.52%	8
9	E0139720	Commun. Equip.-SWPL	2.11%	0.32%	2.43%	9
10	E0139760	Commun. Equip.-SRPL	3.53%	0.53%	4.06%	10
11	E0139810	Misc. Equip. - Other	7.00%	0.00%	7.00%	11
12						12

- ¹ The above Electric General Plant depreciation rates are applicable to SDG&E's 2013 calendar year recorded depreciation.
- ² These rates may not be changed absent a section 205 or 206 filing. The annual Information Filing will reference the docket number of the FERC proceeding that establishes new General Plant and Common Plant depreciation rates and Intangible Plant amortization periods.

SAN DIEGO GAS AND ELECTRIC COMPANY
Statement AJ - Workpapers
TO4 - Annual Common Plant Depreciation Rates

Cycle 2, For 12 - Months Ending December 31, 2013
 For Use During the 12 Months Period from January 1 to December 31, 2013

2013 Common Rates^{1, 2}

Rates based on 12/31/2012 Plant Balances						
Line No	FERC Account	Description	(a) Life Rate	(b) Removal Rate	(c) = a + b Total Rate	Line No
1						1
2	C1839010	Struct & Imprv-Other	4.66%	0.46%	5.12%	2
3	C1839110	Offc Furn & Eq-Other	5.74%	0.00%	5.74%	3
4	C1839120	Offc Furn & Eq-Cmptr	19.40%	0.00%	19.40%	4
5	C1839220	Transprt Eq-Trailer	32.11%	0.00%	32.11%	5
6	C1839310	Stores Equip.-Other	14.53%	0.00%	14.53%	6
7	C1839411	Portable Tools-Other	4.54%	0.00%	4.54%	7
8	C1839421	Shop Equip. - Other	4.86%	0.00%	4.86%	8
9	C1839431	Garage Equip.-Other	9.41%	0.00%	9.41%	9
10	C1839510	Laboratory Eq.-Other	4.21%	0.00%	4.21%	10
11	C1839710	Commun. Equip.-Other	7.15%	0.00%	7.15%	11
12	C1839810	Misc. Equip. - Other	9.91%	0.00%	9.91%	12
13						13

¹ The above Common Plant depreciation rates are applicable to SDG&E's 2013 calendar year recorded depreciation.

² These rates may not be changed absent a section 205 or 206 filing. The annual Information Filing will reference the docket number of the FERC proceeding that establishes new General Plant and Common Plant depreciation rates and Intangible Plant amortization periods.

TO 4 CYCLE 2, 12-MONTH PERIOD (ILLUSTRATIVE)

IMPACT OF USING 2012 RATES IN 2013 (12 Months)						
	A	B	C	D	E	F
	Recorded	2013		2012	Jan-Dec	A-E
	2013 Expense	Depr	Depreciable	Depr	Expense	
	Jan-Dec	Rate	Base	Rate	w/2012 rate	Delta
			<u>Electric General</u>			
C1839010	2,127,122.34	0.0586	36,299,016.04	0.0583	2,116,232.64	10,889.70
C1839110	2,593.30	0.0446	58,145.74	0.0446	2,593.30	-
C1839120	462.84	0.0265	17,465.66	0.0392	684.65	(221.81)
C1839310	808,305.95	0.0379	21,327,333.77	0.0379	808,305.95	-
C1839411	14,253.19	0.0472	301,974.36	0.0478	14,434.37	(181.18)
C1839421	21,209.30	0.0735	288,561.90	0.0735	21,209.30	-
C1839431	4,029,381.54	0.0352	114,471,066.48	0.0352	4,029,381.54	-
C1839510	65,472.46	0.0243	2,694,339.92	0.0261	70,322.27	(4,849.81)
C1839710	492,338.29	0.0406	12,126,558.87	0.0410	497,188.91	(4,850.62)
C1839810	95,472.62	0.0700	1,363,894.57	0.0878	119,749.94	(24,277.32)
	<u>7,656,611.83</u>				<u>7,680,102.88</u>	<u>(23,491.05)</u>
Allocation of Electric Genral to Electric Transmission - 16.48% (Labor Ratio)						<u><u>(3,871.33)</u></u>

TO 4 CYCLE 2, 12-MONTH PERIOD (ILLUSTRATIVE)
COMMON PLANT

IMPACT OF USING 2012 RATES IN 2013 (12 Months)						
	Recorded 2013 Expense 2013 Expense Jan-Dec	B 2013 Depr Rate	C Depreciable Base	D 2012 Depr Rate	E Jan-Dec Exense w/2012 rate	F A-E Delta
			<u>Common</u>			
C1839010	12,712,923.18	0.0512	248,299,280.86	0.0478	11,868,705.63	844,217.55
C1839110	1,437,201.90	0.0574	25,038,360.63	0.0581	1,454,728.75	(17,526.85)
C1839120	14,638,177.82	0.1940	75,454,524.85	0.1931	14,570,268.75	67,909.07
C1839220	9,950.72	0.3211	30,989.47	0.5504	17,056.61	(7,105.89)
C1839310	21,057.77	0.1453	144,926.15	0.2137	30,970.72	(9,912.95)
C1839411	55,570.67	0.0454	1,224,023.57	0.0452	55,325.87	244.80
C1839421	11,692.70	0.0486	240,590.53	0.0486	11,692.70	-
C1839431	86,327.06	0.0941	917,397.02	0.0984	90,271.87	(3,944.81)
C1839510	92,924.12	0.0421	2,207,223.75	0.0422	93,144.84	(220.72)
C1839710	7,053,145.65	0.0715	98,645,393.71	0.0683	6,737,480.39	315,665.26
C1839810	292,476.07	0.0991	2,951,322.60	0.1089	321,399.03	(28,922.96)
	<u>36,411,447.66</u>				<u>35,251,045.15</u>	<u>1,160,402.51</u>
						845,353.23
						<u>139,314.21</u>

TO4 CYCLE 2, 4-MONTH TRUE-UP PERIOD (ILLUSTRATIVE)
ELECTRIC GENERAL

IMPACT OF USING 2012 RATES IN 2013 (4 Months)						
	A	B	C	D	E	F
	Recorded 2013 Expense Sept-Dec	2013 Depr Rate	Depreciable Base	2012 Depr Rate	Sept-Dec 13 Expense w/2012 rate	A-E Delta
			<u>Electric General</u>			
E0139000	626,080.11	0.0586	10,683,960.92	0.0583	622,874.92	3,205.19
E0139220	864.43	0.0446	19,381.84	0.0446	864.43	-
E0139310	154.30	0.0265	5,822.64	0.0392	228.25	(73.95)
E0139411	271,699.47	0.0379	7,168,851.45	0.0379	271,699.47	-
E0139420	5,367.21	0.0472	113,712.08	0.0478	5,435.44	(68.23)
E0139510	6,786.49	0.0735	92,333.20	0.0735	6,786.49	-
E0139710	2,048,757.10	0.0352	58,203,326.70	0.0352	2,048,757.10	-
E0139720	50,644.38	0.0243	2,084,130.86	0.0261	54,395.82	(3,751.44)
E0139760	189,563.07	0.0406	4,669,041.13	0.0410	191,430.69	(1,867.62)
E0139810	31,751.08	0.0700	453,586.86	0.0878	39,824.93	(8,073.85)
	<u>3,231,667.64</u>				<u>3,242,297.52</u>	<u>(10,629.88)</u>
	Allocation of Electric Genral to Electric Transmission - 16.48% (Labor Ratio)					<u><u>(1,751.80)</u></u>

TO4 CYCLE 2, 4-MONTH TRUE-UP PERIOD (ILLUSTRATIVE)
COMMON PLANT

IMPACT OF USING 2012 RATES IN 2013 (4 Months)						
	A	B	C	D	E	F
	Recorded 2013 Expense Sept-Dec	2013 Depr Rate	Depreciable Base	2012 Depr Rate	Sept-Dec 13 Expense w/2012 rate	A-E Delta
			<u>Common</u>			
C1839010	4,752,490.15	0.0512	92,822,073.24	0.0478	4,436,895.10	315,595.05
C1839110	483,471.73	0.0574	8,422,852.44	0.0581	489,367.73	(5,896.00)
C1839120	4,920,297.57	0.1940	25,362,358.61	0.1931	4,897,471.45	22,826.12
C1839220	3,571.60	0.3211	11,123.01	0.5504	6,122.11	(2,550.51)
C1839310	7,019.29	0.1453	48,308.95	0.2137	10,323.62	(3,304.33)
C1839411	18,644.67	0.0454	410,675.55	0.0452	18,562.53	82.14
C1839421	3,791.96	0.0486	78,023.87	0.0486	3,791.96	-
C1839431	33,125.61	0.0941	352,025.61	0.0984	34,639.32	(1,513.71)
C1839510	30,630.23	0.0421	727,558.91	0.0422	30,702.99	(72.76)
C1839710	2,830,093.04	0.0715	39,581,720.84	0.0683	2,703,431.53	126,661.51
C1839810	81,745.07	0.0991	824,874.57	0.1089	89,828.84	(8,083.77)
	13,164,880.92				12,721,137.18	443,743.74
	Allocation of Common to Electric - 72.85% (Labor Ratio)					323,267.32
	Allocation of Electric Portion of Common to Electric Transmission - 16.48% (Labor Ratio)					53,274.45



Joff Morales
Regulatory Affairs
8330 Century Park Court
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jmorales@semprautilities.com

August 6, 2013

Mr. Edward Randolph
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: 2013 Annual Report on Depreciation Rates

Dear Mr. Randolph

In compliance with California Public Utilities Commission (CPUC) Standard Practice U-4, San Diego Gas & Electric Company (SDG&E) is providing the attached proposed depreciation rates to be used for calculating depreciation expense for SDG&E for the year 2013.

These proposed rates incorporate the lives, salvage percents and procedural changes recommended and approved by the CPUC in D.08-07-046 dated July 31, 2008.

If you have any questions, please contact Joff Morales at (858) 650-4098

Sincerely,

JOFF MORALES
Regulatory Affairs

Attachments

SAN DIEGO GAS & ELECTRIC
ANNUAL DEPRECIATION ACCRUAL RATE CALCULATION FOR 2013
STRAIGHT LINE REMAINING LIFE METHOD
BALANCES AS OF JANUARY 1, 2013
USING AUTHORIZED NET SALVAGE RATES AND SERVICE LIVES

FERC ACCT	ASSET CLASS	DESCRIPTION	RECORDED GROSS PLANT AS OF 01/01/2013 (A)	FUTURE NET SALVG NET PERCENT (B)	FUTURE NET SALVG AMOUNT (C)	RECORDED DEPR RES AS OF 01/01/2013 (D)	NET BALANCE (E)	AVERAGE REMAINING LIFE (YRS) (F)	AVERAGE SERVICE LIFE (YRS) (G)	TOTAL ANNUAL ACCRUAL AMOUNT (H)	TOTAL ANNUAL ACCRUAL PERCENT (I)
4004 Steam Production - PA											
311	E0131100	Struct. and Improv.	47,549,164	-18	-8,558,850	-9,319,959	46,788,055	23.50	30	1,990,981	0.0419
312	E0131200	Boiler Plant Equip.	106,539,213	-10	-10,653,921	-25,153,741	92,039,393	23.50	30	3,916,570	0.0368
314	E0131400	Turbogenerator Units	96,278,246	-2	-1,925,565	-21,912,671	76,291,140	23.50	30	3,246,431	0.0337
315	E0131500	Accessory Elect. Eq.	40,289,015	-2	-805,780	-7,814,611	33,280,184	23.50	30	1,416,178	0.0352
316	E0131600	Misc. Power Plnt Eq.	22,738,220	-3	-682,147	-4,489,435	18,930,932	23.50	30	805,572	0.0354
4004 Steam Production - DSEC											
311	E0131100	Struct. and Improv.	28,455,113	0	0	-11,623,863	16,831,250	16.50	29	1,020,076	0.0358
312	E0131200	Boiler Plant Equip.	46,514,421	0	0	-17,663,670	28,850,751	16.50	29	1,748,530	0.0376
314	E0131400	Turbogenerator Units	9,791,866	0	0	-3,387,037	6,404,829	16.50	29	388,171	0.0396
315	E0131500	Accessory Elect. Eq.	39,528,656	0	0	-15,373,716	24,154,940	16.50	29	1,463,936	0.0370
316	E0131600	Misc. Power Plnt Eq.	3,334,875	0	0	-1,075,500	2,259,375	16.50	29	136,932	0.0411
4004 Total Steam Production			441,018,789		-22,626,263	-117,814,203	345,830,849			16,133,377	0.0366
4006 Nuclear Production											
321	E0132130	Struc&Imprv-PostlCIP	8,606,435	0	0	-2,384,107	6,222,328	9.50	2022	654,982	0.0761
322	E0132230	ReacPltEq-PostlCIP	196,224,151	0	0	-13,570,573	182,653,578	9.50	2022	19,226,692	0.0980
323	E0132330	TurbognUnts-PostlCIP	8,566,451	0	0	-2,049,552	6,516,899	9.50	2022	685,989	0.0801
324	E0132430	AccesElecEq-PostlCIP	6,733,711	0	0	-1,215,610	5,518,101	9.50	2022	580,853	0.0863
325	E0132530	MiscPPEquip-PostlCIP	120,862,071	0	0	-45,433,567	75,428,504	9.50	2022	7,939,843	0.0657
4006 Total Nuclear Production			340,992,819		0	-64,653,409	276,339,410			29,088,359	0.0853
4008 Other Production PA & MM											
341	E0134100	Struct. and Improv.	18,258,017	-1	-182,580	-3,142,372	15,298,225	21.76	27	702,906	0.0385
342	E0134200	Fuel Holders, P & A	19,753,709	-2	-395,074	-4,184,860	15,963,923	21.01	28	759,872	0.0385
343	E0134300	Prime Movers	61,721,729	0	0	-11,319,556	50,402,173	16.83	25	2,995,151	0.0485
344	E0134400	Generators	185,207,644	-0.5	-926,038	-37,045,601	149,088,081	22.83	28	6,529,700	0.0353
345	E0134500	Accessory Elect. Eq.	20,317,430	-2	-406,349	-3,604,395	17,119,384	18.70	25	915,549	0.0451
346	E0134600	Misc. Power Plnt Eq.	1,177,702	0	0	-145,881	1,031,821	16.19	25	63,712	0.0541
4008 Other Production DSEC											
341	E0134100	Struct. and Improv.	1,322,457	0	0	-396,313	926,144	16.50	29	56,130	0.0424
342	E0134200	Fuel Holders, P & A	594,393	0	0	-226,340	368,053	16.50	29	22,306	0.0375
343	E0134300	Prime Movers	22,299,361	0	0	-8,016,290	14,283,071	16.50	29	865,641	0.0388
344	E0134400	Generators	108,059,344	0	0	-42,526,943	65,532,401	16.50	29	3,971,661	0.0368
345	E0134500	Accessory Elect. Eq.	9,110,025	0	0	-3,225,702	5,884,323	16.50	29	356,626	0.0391
346	E0134600	Misc. Power Plnt Eq.	22,339,521	0	0	-9,226,325	13,113,196	16.50	29	794,739	0.0356

SAN DIEGO GAS & ELECTRIC
ANNUAL DEPRECIATION ACCRUAL RATE CALCULATION FOR 2013
STRAIGHT LINE REMAINING LIFE METHOD
BALANCES AS OF JANUARY 1, 2013
USING AUTHORIZED NET SALVAGE RATES AND SERVICE LIVES

FERC ACCT	ASSET CLASS	DESCRIPTION	RECORDED GROSS PLANT AS OF 01/01/2013 (A)	FUTURE NET SALVG PERCENT (B)	FUTURE NET SALVG AMOUNT (C)	RECORDED DEPR RES AS OF 01/01/2013 (D)	NET BALANCE (E)	AVERAGE REMAINING LIFE (YRS) (F)	AVERAGE SERVICE LIFE (YRS) (G)	TOTAL ANNUAL ACCRUAL AMOUNT (H)	TOTAL ANNUAL ACCRUAL PERCENT (I)
4008 Other Production - Solar											
344	E0134410	Generators - Solar	35,738,929	0	0	-3,183,323	32,555,606	22.65	25	1,437,334	0.0402
345	E0134510	Accessory Elect. Eq.	2,315,702	0	0	-430,295	1,885,407	20.59	25	91,569	0.0395
4008 Total Other Production			508,215,963		-1,910,041	-126,674,196	383,451,808			19,562,896	0.0385
4012 Electric Distribution											
361	E0136100	Struct. and Improv.	3,496,653	-100	-3,496,653	-1,425,260	5,568,046	37.40	54	148,878	0.0426
362	E0136210	Station Equip.-Other	403,208,893	-100	-403,208,893	-85,160,419	721,257,367	39.30	49	18,352,605	0.0455
363	E0136300	Batteries - Storage	0	0	0	0	0	0.00	10	0	0.1000
364	E0136400	Poles, Towers & Fxtr	523,135,965	-95	-496,979,167	-232,117,289	787,997,843	35.80	44	22,011,113	0.0421
365	E0136500	Overhead Cond & Dev	411,543,722	-70	-288,080,605	-165,513,901	534,110,426	39.70	48	13,453,663	0.0327
366	E0136600	Underground Conduit	975,029,564	-40	-390,011,826	-378,024,707	987,016,683	39.60	53	24,924,664	0.0256
367	E0136700	Undergrnd Cond & Dev	1,287,879,446	-55	-708,333,695	-761,900,348	1,234,312,793	27.80	40	44,399,741	0.0345
368	E0136810	Line Transformers	498,603,434	-45	-224,371,545	-83,583,443	639,391,536	26.20	33	24,404,257	0.0489
368	E0136820	Capacitors	16,264,951	-50	-8,132,476	8,141,912	32,539,339	8.80	13	3,697,652	0.2273
369	E0136910	Services Overhead	122,101,650	-90	-109,891,485	-123,253,712	108,739,423	39.00	50	2,788,190	0.0228
369	E0136920	Services Underground	309,182,406	-70	-216,427,684	-219,826,021	305,784,069	33.20	48	9,210,364	0.0298
370	E0137010	Meters	17,413,200	0	0	-3,667,611	13,745,589	42.70	48	321,911	0.0185
370	E0137011	Meters - Electronic	185,781,837	0	0	-28,728,366	157,053,471	12.70	15	12,366,415	0.0666
370	E0137020	Meter Installations	4,555,545	0	0	-224,434	4,331,111	47.50	48	91,181	0.0200
370	E0137021	Meter Instllns-Elctr	46,852,085	0	0	-6,512,860	40,339,225	12.90	15	3,127,072	0.0667
371	E0137100	Installns -Cust Prem	6,544,307	-90	-5,889,876	-11,400,855	1,033,328	8.00	19	129,166	0.0197
373	E0137320	St. Lghtg & Sgnl Sys	24,800,706	-70	-17,360,494	-18,010,624	24,150,576	22.50	32	1,073,359	0.0433
4012 Total Electric Distribution			4,836,394,364		-2,872,184,400	-2,111,207,938	5,597,370,826			180,500,230	0.0373
4014 Electric General											
390	E0139000	Struct. and Improv.	31,045,122	-25	-7,761,281	-18,922,562	19,883,841	10.93	30	1,819,199	0.0586
392	E0139220	Transprtn Eq-Trailer	58,146	0	0	-3,202	54,944	21.20	27	2,592	0.0446
393	E0139310	Stores Equip.-Other	17,466	0	0	-16,310	1,156	2.50	25	462	0.0265
394	E0139411	Portable Tools-Other	20,985,643	0	0	-6,279,051	14,706,592	18.50	27	794,951	0.0379
394	E0139420	Shop Equipment	328,720	0	0	-196,745	131,975	8.50	24	15,526	0.0472
395	E0139510	Laboratory Eq.-Other	302,226	0	0	-49,149	253,077	11.40	20	22,200	0.0735
397	E0139710	Commun. Equip.-Othe	151,267,789	-15	-22,690,168	-65,397,068	108,560,889	20.40	28	5,321,612	0.0352
397	E0139720	Commun. Equip.-SWP	5,945,573	-15	-891,836	-4,828,623	2,008,786	13.90	28	144,517	0.0243
397	E0139760	Commun. Equip.-SRPI	13,871,107	-15	-2,080,666	-406,347	15,545,426	27.60	28	563,240	0.0406
398	E0139810	Misc. Equip. - Other	1,367,470	0	0	-228,290	1,139,180	11.90	15	95,729	0.0700

SAN DIEGO GAS & ELECTRIC
ANNUAL DEPRECIATION ACCRUAL RATE CALCULATION FOR 2013
STRAIGHT LINE REMAINING LIFE METHOD
BALANCES AS OF JANUARY 1, 2013
USING AUTHORIZED NET SALVAGE RATES AND SERVICE LIVES

FERC ACCT	ASSET CLASS	DESCRIPTION	RECORDED GROSS PLANT AS OF 01/01/2013 (A)	FUTURE NET SALVG PERCENT (B)	FUTURE NET SALVG AMOUNT (C)	RECORDED DEPR RES AS OF 01/01/2013 (D)	NET BALANCE (E)	AVERAGE REMAINING LIFE (YRS) (F)	AVERAGE SERVICE LIFE (YRS) (G)	TOTAL ANNUAL ACCRUAL AMOUNT (H)	TOTAL ANNUAL ACCRUAL PERCENT (I)
	4014	Total Electric General	225,189,262		-33,423,951	-96,327,347	162,285,866			8,780,028	0.0390
		4020 Other Storage									
363	G0136360	LNG Distrib Storg Eq	1,979,252	0	0	-723,638	1,255,614	14.14	20	88,799	0.0449
	4020	Total Other Storage	1,979,252		0	-723,638	1,255,614			88,799	0.0449
		4022 Gas Transmission									
366	G0136600	Struct and Land Imp.	11,541,403	0	0	-9,661,827	1,879,576	6.85	30	274,391	0.0238
367	G0136700	Mains	140,220,035	-5	-7,011,002	-58,758,493	88,472,544	27.02	45	3,274,335	0.0234
368	G0136800	Compressor Statn Eq	80,601,864	-25	-20,150,466	-59,452,684	41,299,646	10.99	27	3,757,930	0.0466
369	G0136900	Meas & Reg Statn Eq	18,765,332	-5	-938,267	-14,919,049	4,784,550	9.19	23	520,626	0.0277
	4022	Total Gas Transmission	251,128,634		-28,099,734	-142,792,053	136,436,315			7,827,281	0.0312
		4024 Gas Distribution									
375	G0137500	Struct & Imp	43,447	0	0	-61,253	-17,806	2.50	44	0	0.0000
376	G0137600	Mains	567,285,194	-45	-255,278,337	-323,076,501	499,487,030	43.00	60	11,615,977	0.0205
378	G0137800	Meas & Reg Statn Eq	15,178,798	-15	-2,276,820	-6,695,534	10,760,084	33.60	42	320,241	0.0211
380	G0138000	Services	243,575,891	-75	-182,681,918	-282,483,747	143,774,062	28.00	48	5,134,788	0.0211
381	G0138100	Meters & Regulators	75,570,213	0	0	-28,869,553	46,700,660	33.00	44	1,415,172	0.0187
381	G0138101	Meters-Regs-Modules	65,063,770	0	0	-10,171,665	54,892,105	12.30	15	4,462,773	0.0686
382	G0138200	Meter & Reg Instllns	62,138,653	-45	-27,962,394	-22,508,621	67,592,426	27.00	38	2,503,423	0.0403
382	G0138201	Mtr-Reg-Mod Install	24,686,322	0	0	-4,137,530	20,548,792	12.10	15	1,698,247	0.0688
385	G0138500	Ind Meas & Reg St Eq	1,516,811	0	0	-1,028,103	488,708	9.97	24	49,018	0.0323
387	G0138711	Other Equipment	993,722	0	0	-627,388	366,334	6.30	11	58,148	0.0585
387	G0138712	Other Eq -CNG Deprec	3,571,353	0	0	-3,441,048	130,305	6.40	11	20,360	0.0057
	4024	Total Gas Distribution	1,059,624,174		-468,199,469	-683,100,943	844,722,700			27,278,147	0.0257
		4026 Gas General									
392	G0139220	Transprtn Eq-Trailer	74,501	0	0	-74,501	0	5.10	21	0	0.0000
394	G0139410	Portable Tools	7,689,809	0	0	-3,150,877	4,538,932	12.20	23	372,044	0.0484
394	G0139420	Shop Equipment	76,864	0	0	-30,572	46,292	7.40	23	6,256	0.0814
395	G0139500	Laboratory Equipment	283,094	0	0	-241,982	41,112	2.50	14	16,445	0.0581
396	G0139600	Power Operated Eq.	162,284	0	0	-97,547	64,737	2.50	20	25,895	0.1596
397	G0139700	Communication Equip.	1,541,611	0	0	-980,115	561,496	4.40	15	127,613	0.0828
398	G0139800	Misc. Equipment	198,325	0	0	-58,227	140,098	9.00	19	15,566	0.0785
	4026	Total Gas General	10,026,488		0	-4,633,821	5,392,667			563,818	0.0562

SAN DIEGO GAS & ELECTRIC
ANNUAL DEPRECIATION ACCRUAL RATE CALCULATION FOR 2013
STRAIGHT LINE REMAINING LIFE METHOD
BALANCES AS OF JANUARY 1, 2013
USING AUTHORIZED NET SALVAGE RATES AND SERVICE LIVES

FERC ACCT	ASSET CLASS	DESCRIPTION	RECORDED GROSS PLANT AS OF 01/01/2013 (A)	FUTURE NET SALVG PERCENT (B)	FUTURE NET SALVG AMOUNT (C)	RECORDED DEPR RES AS OF 01/01/2013 (D)	NET BALANCE (E)	AVERAGE REMAINING LIFE (YRS) (F)	AVERAGE SERVICE LIFE (YRS) (G)	TOTAL ANNUAL ACCRUAL AMOUNT (H)	TOTAL ANNUAL ACCRUAL PERCENT (I)
4028 Common											
390	C1839010	Struct & Imprv-Other	242,425,231	-10	-24,242,523	-105,497,669	161,170,085	12.98	26	12,416,802	0.0512
391	C1839110	Offc Furn & Eq-Other	23,482,223	0	0	-9,999,944	13,482,279	10.00	18	1,348,228	0.0574
391	C1839120	Offc Furn & Eq-Cmptr	71,095,233	0	0	-36,614,095	34,481,138	2.50	5	13,792,455	0.1940
392	C1839220	Transprt Eq-Trailer	33,369	0	0	-6,584	26,785	2.50	20	10,714	0.3211
393	C1839310	Stores Equip.-Other	144,926	0	0	-92,292	52,634	2.50	20	21,054	0.1453
394	C1839411	Portable Tools-Other	1,193,702	0	0	-147,481	1,046,221	19.30	23	54,208	0.0454
394	C1839421	Shop Equip. - Other	248,289	0	0	-142,125	106,164	8.80	29	12,064	0.0486
394	C1839431	Garage Equip.-Other	978,325	0	0	43,891	1,022,216	11.10	21	92,092	0.0941
395	C1839510	Laboratory Eq.-Other	2,236,234	0	0	-890,330	1,345,904	14.30	26	94,119	0.0421
397	C1839710	Commun. Equip.-Othe	112,129,060	0	0	-48,783,985	63,345,075	7.90	13	8,018,364	0.0715
398	C1839810	Misc. Equip. - Other	2,472,920	10	247,292	-926,595	1,299,033	5.30	14	245,101	0.0991
4028 Total Common			456,439,512		-23,995,231	-203,057,209	277,377,534			36,105,200	0.0791

CERTIFICATE OF SERVICE

I hereby certify that I have this day served an electronic copy of the foregoing document upon each person designated on the official service list compiled by the Secretary in Docket No. ER13-941-000. In addition, I certify that I have also caused the foregoing to be served by overnight delivery upon the following:

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Dated at San Diego, California, this 30th day of September, 2014.

/s/ JOEL DELLOSA
Joel Dellosa