BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) for authorization to: (1) issue certain tax exempt Debt Securities (First Mortgage Bonds, debentures, overseas indebtedness, foreign securities, medium-term notes, accounts receivable financing) in order to guarantee the obligations of others, and to enter into long-term loans, in an aggregate principal amount up to $750 million of debt capital, in addition to previously-authorized amounts; (2) include certain features in the Debt Securities or to enter into certain derivative transactions related to underlying debt in order to improve the terms and conditions of the debt portfolio and with the goal of lowering the cost of money for the benefit of ratepayers; (3) hedge planned issuances of Debt Securities, (4) obtain certain exemptions from the Commission's Competitive Bidding Rule; and (5) take all other necessary, related actions.	Application No. 11-10- ___ (Filed October 17, 2011)

APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)

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TABLE OF CONTENTS

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

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) for authorization to: (1) issue certain tax exempt Debt Securities (First Mortgage Bonds, debentures, overseas indebtedness, foreign securities, medium-term notes, accounts receivable financing) in order to guarantee the obligations of others, and to enter into long-term loans, in an aggregate principal amount up to $750 million of debt capital, in addition to previously-authorized amounts; (2) include certain features in the Debt Securities or to enter into certain derivative transactions related to underlying debt in order to improve the terms and conditions of the debt portfolio and with the goal of lowering the cost of money for the benefit of ratepayers; (3) hedge planned issuances of Debt Securities, (4) obtain certain exemptions from the Commission's Competitive Bidding Rule; and (5) take all other necessary, related actions.	Application No. 11-10- ___ (Filed October 17, 2011)

**APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

Pursuant to Sections 816-830, 851 of the California Public Utilities Code ("P.U. Code") and Rules 2.1 et seq. and 3.5 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), San Diego Gas & Electric Company ("SDG&E" or "Applicant") requests authorization from the Commission:

1. To issue First Mortgage Bonds ("FMBs"), debentures, overseas indebtedness, foreign securities, medium-term notes, tax exempt Debt Securities in order to guarantee the obligations of others, accounts receivable financing, and to enter into long-term loans (collectively, "Debt Securities") as further described in Section IV, in an aggregate principal amount of up to $750 million of new debt capital, in addition to previously-authorized amounts. SDG&E's management or Board of Directors will determine the principal amount and the terms and conditions of each issue of Debt Securities according to market conditions at the time of sale;

2. To include certain features in SDG&E's Debt Securities as further described in Section V or to enter into certain derivative transactions related to underlying debt in order to improve the terms and conditions of SDG&E's debt portfolio and with the goal of lowering SDG&E's cost of money for the benefit of ratepayers;

3. To hedge, when appropriate, existing or planned issuances of Debt Securities;
4. To obtain certain exemptions from the Commission's Competitive Bidding Rule; and
5. Take all other necessary and related actions (as described in Section XIII).

The authorization requested in this Application is in addition to the unused authority previously granted in Commission Decisions ("D.") 10-10-023 and 08-07-029, as discussed in Section II below.

I. INTRODUCTION

SDG&E is requesting additional long-term financing authority at this time to continue to fund its capital expenditure plans. SDG&E anticipates spending approximately $4 billion over the next three years to, among other things, serve an increasing load, improve reliability, enhance safety, meet its renewable portfolio standard goals, reduce congestion costs, connect new generation, and upgrade and modernize aging infrastructure. Specifically, SDG&E is completing the Sunrise Powerlink project that will go into service in 2012. SDG&E has spent $1.2 billion on Sunrise through September 30, 2011 and is on track to spend to its budget of $1.9 billion to complete this project.

SDG&E is also planning to invest in renewables projects, technology upgrades to transmission and distribution systems, and substation investments over the 2012 through 2014 period. Moreover, SDG&E plans to invest over $700 million annually in base capital investments during each year from 2012 through 2014 to support customer demand and upgrade aging infrastructure. In sum, the investments outlined above are being made to help deliver safe and reliable supplies of energy to SDG&E's service territory as the area's energy demands increase and to facilitate the goals noted above.

Capital investment projections are updated as part of SDG&E's financial plan development and are subject to substantial changes from year to year as business and regulatory requirements and conditions evolve. Thus, in considering these estimates, it is important to emphasize that variability is inherent in the financial planning process. A recent example is the pipeline safety initiative. SDG&E is actively working with regulatory agencies to define requirements and identify necessary infrastructure investments. This initiative will likely require additional capital investment starting in 2012 and going beyond 2014.

As indicated above, SDG&E has a robust capital investment plan to ensure that customers continue to receive reliable, safe service. The annual capital costs are shown in the testimony of Jack S. Lewis, specifically in Schedule I. To fulfill these objectives, SDG&E requests herein authority to issue various kinds of long-term debt. These securities and their features are described below and are supported by the testimony of Gary H. Hayes.

II. BACKGROUND

A. Remaining Long-Term Debt Authority

As illustrated in Table 1 below, all of SDG&E's current-remaining long-term debt financing authority was granted by D.10-10-023 and D.08-07-029, which authorized the issuance of long-term debt capital up to $800 million and $1.1 billion, respectively, including $413 million of rollover debt.[1] Through the month ending August 31, 2011, SDG&E has utilized just over $280 million of the long-term debt authority granted by D.10-10-023, leaving just over $519 million of remaining authority. However, SDG&E anticipates issuing $250 million before December 31, 2011, which will leave only $269 million of unused long-term debt authority at year-end 2011.

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[1] "Rollover" refers to Securities issued for the purpose of refunding or rolling over at maturity Securities previously issued and upon which SDG&E paid the fees prescribed by P.U. Code § 1904.

Table 1

SDG&E's CPUC Long-Term Debt Authority ($ millions)

	New debt	Rollover debt	New preferred	Rollover preferred
D.93-09-069	250.00	-	100.00	-
Bank loans	(37.17)	-	-	-
Series TT	(57.65)	-	-	-
Series UU	(16.70)	-	-	-
$1.70 preferred	-	-	(35.00)	-
$1.82 preferred	-	-	(16.64)	-
Series BBB (part)	(138.48)	-	-	-
Remaining authority	-	-	48.36	-
D.04-01-009	551.43	108.58	4.00	76.00
CV2004 (part)	-	(4.99)	-	-
Series BBB (part)	(111.52)	-	-	-
Series CCC	(250.00)	-	-	-
Series DDD (part)	(189.91)	-	-	-
Series EEE (part)	-	(103.59)		
Remaining authority	-	-	4.00	76.00
D.06-05-015	800.00	-	200.00	-
Series DDD (part)	(60.10)	-	-	-
Series EEE (part)	(57.65)	-	-	-
Series FFF	(250.00)	-	-	-
Series GGG	(300.00)	-	-	-
Series HHH (part)	(132.26)			
Remaining authority	(0.00)	-	200.00	-
D.08-07-029	687.00	413.00	-	-
Series HHH (part)	(117.74)	-	-	-
Series III	(500.00)			
Series JJJ (part)	(69.26)			
Remaining authority	-	413.00	-	-
D.10-10-023	800.00	-	150.00	-
Series JJJ (part)	(280.74)			
Remaining authority	519.26	-	150.00	-
Total remaining authority, all decisions	519.26	413.00	402.36	76.00

In summary, the financing necessary to support SDG&E's capital investments in 2012 through 2014, as discussed in Section I, exceeds the currently unused portion of the existing debt authorizations. SDG&E expects that $250 million of the $519 million of remaining funding authority will be utilized before year-end 2011, at which time SDG&E will issue new long-term debt as noted in the testimony of Mr. Lewis on Schedule VII. As to subsequent years, SDG&E expects to issue $250 million of new long-term debt in 2012; another $250 million in 2013; and another $500 million of long-term debt before year-end 2014. These projected expenditures are reflected in Schedule III(a). Consequently, significant new near-term financings will be needed to fund the capital investments that are reflected in this Application and in the associated testimony of Mr. Lewis on Schedule I. Additional information about the requested authorizations is provided below.

III. USE OF PROCEEDS

SDG&E intends to apply the net proceeds from the proposed debt capital financings to various SDG&E projects, or to reimburse SDG&E's treasury for monies expended or planned to be expended for the expansion and enhancement of its utility plant. Further detail on these uses is included in Schedules I and III(a) contained in the testimony of Mr. Lewis.

IV. DESCRIPTION OF DEBT SECURITIES

The following describes the types of Debt Securities that may be issued. Optional features designed to enhance the terms and conditions of the Debt Securities are described in Section V of this Application. SDG&E is requesting the same types of Debt Securities requested in its previous long-term debt financing application, Application ("A.") 10-05-016, which was approved by the Commission in D.10-10-023.

In general, each series of Debt Securities is expected to have a maturity of between one (1) year and one hundred (100) years. Medium-term notes are expected to have a maturity of between nine (9) months and forty (40) years.

With the exception of FMBs and long-term loans (as discussed below), each issue of Debt Securities may be issued under an indenture or a supplement to an existing indenture to be delivered to the trustee for such issue. The indenture or supplemental indenture would set forth the terms and conditions of each issue of Debt Securities.

A. Secured Debt

Secured debt may be secured by a lien on property or through other credit-enhancement arrangements described in Section V.H, below.

FMBs will be issued in accordance with SDG&E's trust indenture dated July 1, 1940, as amended and supplemented and which heretofore has been filed with the Commission. The supplemental indenture delivered in connection with each new series of FMBs will be in a form consistent with supplemental indentures previously filed with the Commission.

Secured debt may be sold to either domestic or foreign investors. It may be sold to underwriters who in turn will offer the secured debt to investors, or it may be sold directly to investors either with or without the assistance of a private placement agent. Secured debt may be registered with the Securities and Exchange Commission ("SEC"), depending on the method of offering and sale, and may be listed on a stock exchange.

In certain instances, SDG&E may enter into contractual agreements whereby a third party will provide appropriate credit facilities as security for a secured debt issue. The cost of the credit facilities will be included in determining the issue's overall cost.

B. Unsecured Debt ("Debentures")

Debentures may be sold to either domestic or foreign investors. They may be sold to underwriters who in turn will offer the debentures to investors, or they may be sold directly to investors either with or without the assistance of a placement agent. Debentures may be registered with the SEC and may be listed on a stock exchange. Unsecured debt may be senior or subordinated.

C. Foreign Capital Markets

Debt Securities issued by SDG&E in foreign capital markets may be denominated in, or proceeds from their sale received in, United States ("U.S.") dollars or in other currencies. International bond issuance is commonly separated into two categories, U.S.-pay and foreign-pay. The U.S.-pay international bond market consists primarily of Eurodollar bonds, which are issued and traded outside of the U.S. and denominated in U.S. dollars. The foreign-pay, or simply foreign, bond market describes issues sold in a country outside of the U.S. in the local currency.

Certain circumstances may make international borrowing attractive to a U.S. utility. Competition among global investment banks may create low-cost offshore funding opportunities. Foreign bond markets may have a better appetite for a particular debt security than domestic markets. Finally, a domestic utility may find international markets more accessible during a time when domestic bond markets are not. To reduce or eliminate the risk of currency fluctuations, SDG&E may engage in currency swaps (defined below) or other arrangements.

D. Medium-Term Notes

Medium-term notes ("MTNs") are a form of debt that may be offered on a continuous or periodic basis. Generally, MTNs are noncallable, unsecured, senior debt securities with investment-grade credit ratings. Like corporate debt, MTNs can carry either fixed or variable rates of interest, can be sold overseas, and can be backed with certain issuer assets, like accounts receivable. MTNs differ primarily from bonds in their distribution process. MTNs are sold to investors by banks and broker-dealers on what is known as a "best-efforts" basis: in contrast to a bond underwriting, the agent in an MTN offering has no obligation to buy the notes and the issuer is not guaranteed funds. Many MTN programs permit the borrower to bypass financial intermediaries altogether and sell debt directly to investors. Finally, unlike corporate bonds, which are typically sold in large, discrete offerings, MTNs are usually sold in small amounts either on a continuous or an intermittent basis.

E. Direct Long-Term Loans

SDG&E may enter into long-term loans, Debt Securities with a maturity of greater than one year, pursuant to a line of credit with banks, insurance companies, or other financial institutions. SDG&E may enter into loans when it finds that interest rates or other circumstances make it attractive to do so.

F. Accounts-Receivable Financing

SDG&E may issue Debt Securities secured by a pledge, sale or assignment of its accounts receivable. SDG&E anticipates that the transactions would be structured to be a true sale for bankruptcy purposes, a sale for financial reporting, and debt for tax purposes although other structures may be developed using accounts receivable as security or collateral.

Because an accounts receivable financing would be an encumbrance on utility properties to the extent that accounts receivable are considered to be utility property, SDG&E requests authorization under P.U. Code § 851 to mortgage and encumber utility property.

G. Tax-Exempt Debt

SDG&E anticipates that from time to time the cost of SDG&E's Debt Securities may be reduced by placing such securities with one or more political subdivisions ("Authority") and unconditionally guaranteeing or otherwise securing such Authority's obligations in respect of its issuances of tax-exempt debt in connection with the financing of SDG&E's facilities. SDG&E anticipates having the ability to use the tax-exempt option whenever (1) its facilities qualify for tax-exempt financing under federal law, either as eligible pollution control facilities or facilities that may be financed by tax-exempt revenue bonds under the "two-county" rule and (2) it receives sufficient "volume cap," or tax-exempt borrowing authority, from the California Debt Limit Allocation Committee ("CDLAC"). Such tax-exempt financings may be structured substantially as follows:

- An Authority would issue and sell one or more series of its bonds, notes, debentures or other securities ("Authority Bonds") to a group of underwriters who would ultimately market such Authority Bonds to investors.
- Concurrently with the sale and delivery of such Authority Bonds and in consideration for the proceeds of the Authority Bonds, SDG&E would enter into a loan agreement or other security agreement with the Authority, or would enter into an installment-sale agreement with the Authority pursuant to which the eligible facilities would be conveyed to the Authority in consideration for the proceeds of the Authority Bonds, and the eligible facilities would be reconveyed to SDG&E in consideration for its Debt Securities. The operation and control of such facilities would remain with SDG&E or the project operator at all times.
- Concurrently with the sale and delivery of such Authority Bonds, SDG&E would issue and deliver to the Authority, in consideration of the Authority's obligations set forth in (2) above, SDG&E Debt Securities plus accrued interest (the terms and conditions of such indebtedness would be substantially consistent with the terms and

conditions of such Authority Bonds) or would unconditionally guarantee or otherwise secure such Authority's obligations in respect of the Authority Bonds. All rights and title of such Authority in company Debt Securities would be assigned to a trustee under an indenture pursuant to which the Authority Bonds would have been issued as security for the purchasers of the Authority Bonds.

H. Variable-Rate Debt

SDG&E anticipates that from time to time the cost of SDG&E debt may be reduced by issuing variable-rate debt securities. A variable-rate Debt Security includes, but is not limited to, Debt Securities bearing interest based on the prime rate of banks, bankers' acceptances, Eurocommercial paper, or some other referenced interest rate. A variable-rate Debt Security may also be a Debt Security for which investors possess a series of periodic, mandatory put options that require SDG&E to repurchase all or a portion of the Debt Securities, and which may be coupled with a re-marketing obligation by SDG&E of the repurchased Debt Security.

Certain variable-rate Debt Securities require credit support, such as bank lines. These bank lines may be in the form of a short-term or long-term bank line agreement. Since these credit facilities are an integral part of the variable-rate debt issuance, such facilities (and any borrowing thereunder) should not be considered by the Commission to count against existing short-term debt authorizations.

I. "Fall-Away" Mortgage Bonds

SDG&E may issue debt that is initially secured and subsequently convertible into unsecured debt, known as "fall-away bonds." These senior notes are initially secured under their indenture by collateral FMBs issued in equal principal amount under the existing 1940 first mortgage indenture and delivered to the fall-away indenture trustee. Subsequent to the redemption or maturity of all outstanding FMBs (other than the collateral FMBs held by the fall-away indenture trustee) the fall-away bonds will become unsecured general obligations of SDG&E. The fall-away bonds' indenture will contain a negative pledge clause, which provides that the newly-unsecured obligations will be secured equally with any secured bonds that may be issued in the future.

J. Subordinated Debt

SDG&E may issue subordinated debt securities, which will be junior in right of payment to its senior unsecured and secured indebtedness.

V. DEBT SECURITY ENHANCEMENTS

SDG&E hereby requests authorization to include certain features in its Debt Securities or enter into certain derivative transactions related to underlying debt. Such measures would be taken when appropriate to improve the terms and conditions of SDG&E's Debt Securities and to lower the overall cost of money for the benefit of the ratepayers. SDG&E is requesting the same types of security enhancements and related derivative transactions as requested in A.10-05-016 and approved by the Commission in D.10-10-023.

A. Put Options

SDG&E anticipates that from time to time the cost of its Debt Securities may be reduced by the inclusion of a put option. This feature grants to a Debt Security owner the right to require SDG&E to repurchase all or a portion of that holder's securities. Debt holders are willing to accept a lower interest rate in exchange for the protection against rising interest rates offered by the put option.

B. Call Options

SDG&E anticipates that from time to time it may retain the right to retire, fully or partially, a Debt Security before the scheduled maturity date. This is commonly referred to as "calling" the security. The chief benefit of such a feature is that it permits SDG&E, should market rates fall, to replace the bond issue with a lower-cost issue, thus producing a positive net benefit to ratepayers.

C. Sinking Funds

SDG&E anticipates that from time to time the cost of SDG&E Debt Securities may be reduced by the use of a sinking fund. A sinking fund normally operates in one of two ways: (1) SDG&E may set aside a sum of money periodically so that, at the maturity date of the bond issue, there is a pool of cash available to redeem the issue, or (2) SDG&E may periodically redeem a specified portion of the bond issue. Typically, SDG&E would have the right to meet its sinking fund obligations in the latter fashion by either calling a certain number of bonds or purchasing the bonds in the open market.

D. Interest Rate Swaps

An interest rate swap is a contractual agreement between two parties to exchange a series of payments for a stated period. In a typical interest rate swap, one party issues fixed-rate debt while another issues floating rate debt, and the two swap interest payment obligations based on a notional principal amount (the principal itself is not exchanged). Swaps are generally used to reduce either fixed-rate or floating-rate costs, or to convert fixed-rate borrowing to floating.

E. Swaptions

Swaption contracts give the right to enter into a swap agreement (or to exit a swap) under specified terms and conditions. The swaption's strike price, maturity, size and structure can be tailored to suit a party's particular needs. Corporate treasurers use swaptions to hedge an existing or anticipated exposure while retaining the ability to benefit from an advantageous change in interest rates, which is a benefit ultimately realized by SDG&E ratepayers in a lower cost of debt.

F. Caps and Collars

In order to reduce ratepayers' exposure to interest rate risk on variable-rate securities, SDG&E may negotiate some type of maximum rate, usually called a cap. In that case, even if variable rates increase above the cap (or ceiling) rate, SDG&E would only pay the ceiling rate. In addition to the ceiling rate, sometimes a counterparty will desire a "floor" rate. In the event that the variable rate falls below the floor rate, SDG&E would pay the floor rate. The combination of a floor and a ceiling rate is called an interest-rate "collar" because SDG&E's interest expense is restricted to a band negotiated by SDG&E and the counterparty.

G. Currency Swaps

A currency swap is an arrangement in which one party agrees to make periodic payments in its domestic currency, based on either fixed or floating interest rates, to a counterparty, who in turn makes periodic payments to the first party in a different currency. The payments are based on notional principal amounts that are fixed at the initiation of the swap. Unlike interest rate swaps, the principal amount is generally exchanged at the beginning of the transaction and re-exchanged at maturity. Currency swaps are useful in the management of exchange risk and will be used when necessary to hedge exposures created by Debt Securities denominated in foreign currencies.

H. Credit Enhancements

SDG&E may obtain credit enhancements for Debt Securities, such as letters of credit, standby bond purchase agreements, surety bonds or insurance policies, or other credit support arrangements. Such credit enhancements may be included to reduce interest costs or improve other credit terms; and the cost of such credit enhancements would be included in the cost of the Debt Securities.

I. Capital Replacement

SDG&E may specify that it intends to replace Debt Securities when redeemed with replacement securities having similar, or more equity-like, characteristics. Capital replacement refers to an issuer's declaration of intent, or in some cases its covenant, to replace Debt Securities with new securities that receive similar or better rating-agency equity credit.

J. Interest Deferral

SDG&E may issue subordinated Debt Securities that permit discretionary interest payment deferral during an extension period. The extension period may specify a period wherein the issuer is not required to take any action. The deferral period shall not extend beyond the maturity date of the series of Debt Securities. SDG&E may be obligated to pay any such accrued interest at the end of the extension period; however, in certain cases, claims for deferred payments may be waived in part or in whole.

K. Special-Purpose Entity Transactions

In some instances it may be advantageous for SDG&E to guarantee the securities of a special-purpose entity ("SPE"). The SPE would be a subsidiary or other affiliate of SDG&E (including a limited partnership, a limited liability company or a business trust) and would issue securities and commit the proceeds from the issuance thereof to SDG&E. Although the structure of an actual transaction may vary, generally the SPE would issue long-term Debt Securities to the investment community, either for cash or in exchange for existing SDG&E securities. The securities may be guaranteed by SDG&E in order to obtain better rates and/or terms. The guarantee could cover any accrued and unpaid distributions on the securities, the redemption price and any repurchase obligations as well as the liquidation preference. The proceeds of the issuance by the SPE would be loaned to SDG&E through the issuance of Debt Securities featuring terms and conditions specified by SDG&E at the time of issuance. This type of transaction can result in SDG&E obtaining external capital which qualifies as having equity-like characteristics for the credit rating agencies but which SDG&E can treat as debt for tax purposes.

L. Delayed Drawdown

SDG&E may enter long-term loans or issue debt securities where the full principal amount is not borrowed immediately, but over time in a series of disbursements which draw down the funding over a period of time.

M. Special-Purpose Entity Transactions

In some instances, it may be advantageous for SDG&E to guarantee the preferred securities of an SPE. As described in Section V.K above, the SPE would be a subsidiary or other affiliate of SDG&E (including a limited partnership, a limited liability company or a business trust) that would issue preferred securities and loan the proceeds from the issuance to SDG&E in exchange for Debt Securities featuring terms and conditions specified by SDG&E at the time of issuance. SDG&E may in some cases guarantee the SPE's securities. This type of transaction would typically result in SDG&E obtaining external capital which qualifies as having preferred characteristics for the credit rating agencies but which SDG&E can treat as debt for tax purposes.

VI. HEDGING THE ISSUANCE OF SECURITIES

Under certain circumstances, SDG&E may wish to hedge the issuance of debt securities. For instance, compliance with legal, regulatory, and administrative matters may preclude SDG&E from acting on a low-cost funding opportunity during a time of market volatility. Conversely, SDG&E may have an immediate need for funds, but be reluctant to fix its cost at prevailing interest rates. Issuance-hedging strategies grant the ability to enter financial markets at times when interest rates or other circumstances appear most favorable. SDG&E is requesting in this Application the same types of issuance-hedge techniques requested in A.10-05-016 and approved by the Commission in D.10-10-023.

A. "Price Today, Fund Later" Strategies

These hedges allow SDG&E to lock in today's interest rate and issue securities at some later date.

1. Treasury Lock

This approach is used to lock in the Treasury component of SDG&E's borrowing cost. SDG&E can delay securities issuance and capture the current Treasury yield by selling short Treasury securities (i.e., selling Treasury securities that it does not own) of a maturity comparable to that of the contemplated debt security. If interest rates rise, SDG&E will cover its short Treasury position at a profit, which will be offset by the higher interest cost of the newly-issued securities; if interest rates decline, SDG&E will cover its short Treasury position at a loss, but this will be offset by the lower cost on the newly-issued securities.

2. Treasury Options

The purchase of Treasury put options is an alternative to the Treasury lock. In this transaction, SDG&E would purchase put options entitling it to sell Treasury securities of a maturity comparable to that of the contemplated security issuance at a specified yield (the "strike yield") at any time before the option's expiration date. If interest rates rise above the put's strike yield, SDG&E will exercise the put and the resulting profit offsets the increased cost of borrowing. If interest rates decline, SDG&E will let the option expire worthless and issue securities at prevailing lower rates.

3. Interest Rate Swaps

A forward-starting interest rate swap allows SDG&E to delay a securities issuance and capture current yields. As the fixed-rate payer in an interest rate swap, SDG&E hedges its borrowing cost: if interest rates rise, unwinding the swap at a profit offsets higher borrowing costs. Conversely, if rates decline, lower borrowing costs offset the loss caused by unwinding the swap.

B. "Fund Today, Price Later" Strategies

These hedges allow SDG&E to fund immediately and price the securities at some future date.

1. Long Hedge

This approach allows SDG&E to issue now and capture its current credit spread, but leave the all-in cost of the securities issue open. SDG&E establishes a long hedge by issuing securities today and investing the proceeds in Treasury securities of a comparable maturity. If interest rates subsequently decline, the gain in the value of the Treasury portfolio will compensate SDG&E for the lost opportunity to finance at lower rates. On the other hand, if rates rise, the interest expense savings realized by issuing immediately will be offset by the decline in value of the Treasury portfolio. Thus, the Treasury component of SDG&E's effective borrowing cost will be determined by the Treasury rates prevailing when it chooses to unwind the hedge; the credit spread is determined at the time of issuance.

2. Treasury Options

The purchase of Treasury call options is an alternative to the long hedge. With this approach, SDG&E would issue securities today and purchase call options on Treasury securities of a comparable maturity. Such a call option allows the holder to purchase Treasury securities at a specified yield (the "strike yield") anytime before the expiration date. If rates decline below the strike yield, exercising the option produces a gain used to offset the interest cost of the securities issued today. If interest rates rise above the strike yield, the option will expire unexercised. In this case SDG&E benefits from the lower borrowing rate.

3. Interest Rate Swaps

A forward-starting interest rate swap allows SDG&E to issue securities immediately and benefit from a subsequent fall in interest rates. As the floating-rate payer in an interest rate swap, SDG&E hedges its borrowing cost: if interest rates decline, unwinding the swap at a profit will compensate SDG&E for the lost opportunity to finance at lower rates. Conversely, if rates rise, the interest expense savings realized by issuing immediately will be offset by the loss caused by unwinding the swap.

VII. COMPETITIVE BIDDING

A. Public Offerings By Competitive Bidding

Rules adopted in D.38614, as amended in D.49941, D.75556, and D.81908, and Commission Resolution Number F-616 (“Resolution F-616”) (collectively, the “Competitive Bidding Rule”), generally require California public utilities to obtain competitive bids for the underwriting of their debt. In Resolution Number F-616, dated October 1, 1986, the Commission stated that the Competitive Bidding Rule is mandatory for all domestic debt issues of debentures and FMBs of $200 million or less.

SDG&E intends to competitively bid all underwritten public offerings of fixed-rate debentures and FMBs of $200 million or less, establishing the exact principal amounts and maturities, the redemption, security, subordination, and conversion provisions (if any), and the other terms and provisions of any competitively bid Debt Security. At issuance, the Debt Security’s price and associated interest rate will be determined by the bid that results in the lowest cost of funds.

In Resolution F-616, the Commission also modified its prior policy and stated that telephonic competitive bidding is allowable. Consistent with this modification, SDG&E requests that the Commission authorize (1) the invitation of bids by telephone or through other electronic means such as e-mail, and (2) the receipt of bids from two or more underwriters or underwriting syndicates by telephone or through other electronic means such as e-mail. Furthermore, SDG&E seeks authority to accelerate, postpone, or cancel the scheduled date and time for the receipt of bids and/or vary the terms and provisions of the Debt Securities submitted for bid telephonically or through other electronic means such as e-mail. Finally, SDG&E requests authority to reject all bids and request resubmission of bids telephonically or through other electronic means such as e-mail.

B. Exemption from Competitive Bidding Rule for Issues Over $200 Million

In Resolution F-616, the Commission stated that it would grant exemptions from the Competitive Bidding Rule for debt issues in excess of $200 million upon a compelling showing by a utility that, because of the size of an issue, such an exemption is warranted. SDG&E believes that exempting issues in excess of $200 million in principal amount would enable SDG&E to meet its financing requirements on the most favorable terms available.

The size of a debt offering may determine whether competitive bidding or negotiated underwriting results in the lowest cost. In a competitively bid offering, the investment-banking community is divided into competing bidding syndicates, each composed of fewer participants than in a conventional, negotiated-underwriting syndicate. This increases the risk that the winning syndicate will be unable to efficiently and profitably distribute SDG&E's securities in secondary markets, because a competitive bid tends to fragment the capital commitment and placement capabilities of underwriters, who must work against each other and are less able to thoroughly gauge market demand for an offering. As a competitively bid issue grows, underwriter uncertainty grows with it; this will be reflected in a higher rate of interest.

In this regard, it is worth considering the significant changes witnessed in the underwriting sector in recent years. Among the major stand-alone investment banks, three have exited the market altogether while two others have refashioned themselves as commercial banks to survive. The number of large commercial banks that underwrite securities has been decreasing over the last decade as well, the acquisitions of Dresdner Bank and Wachovia in 2008 being the most recent examples. This reduction in the number and size of potential bidding syndicates suggests that the uncertainty inherent to competitive bidding will be exacerbated, leading to debt costs well above those set in negotiated underwritings.

The effect of a shrinking playing field on competitively-bid offerings has been compounded by the financial crisis of 2008-2009, which significantly weakened the banking sector's overall capital position. SDG&E has observed that banks are extremely reluctant to assume large, "balance-sheet intensive" positions with any single counterparty, evidence that at this time a competitive bid will result in a comparatively higher coupon.

In comparison to competitive bidding, negotiated pricing involves a single underwriting syndicate that counts more participants than does a bidding syndicate. Such an arrangement disperses underwriting risk, as more participants will presumably provide (1) a superior assessment of market demand, and (2) a reduction in the number of bonds each syndicate member must resell vis-à-vis a competitive bid. Consequently, a negotiated offering for issues larger than $200 million may result in a lower cost to SDG&E and its ratepayers. In addition, a negotiated offering may provide greater flexibility to adjust the timing and terms of a proposed debt offering to meet changing market conditions.

Finally, competitive bidding of large offerings (i.e., more than $200 million) may have the unwanted effect of limiting diverse business enterprise ("DBE") participation in SDG&E's

financing activities. Since 2004, SDG&E and its utility affiliate, Southern California Gas Company ("SoCalGas"), have actively sought to include DBE underwriting firms in their FMB offerings, employing 29 DBE firms in aggregate. Most recently, in its August 15, 2011 bond offering of $350 million, SDG&E successfully employed a DBE firm in a lead underwriter role and assigned two other DBEs to the transaction's only co-manager roles. SDG&E's treasury group continues to cultivate new DBE relationships for future potential transactions.

Difficulty arises in employing DBE firms in large, competitively bid offerings. DBE firms in comparison with larger Wall Street "bulge bracket" firms are less capitalized (capping the absolute amount they can underwrite) and are more limited in their distribution capabilities (forcing them to commit risk capital to a single offering for a longer period). Such limitations would force most, if not all, of SDG&E's DBE firms to decline participation in a competitive bid of $200 million or more. An exemption from the Competitive Bidding Rule for debt issues in excess of $200 million would enable SDG&E to continue its efforts to increase the number of DBE underwriters in its syndicates. The Commission has previously adopted this exemption in D.10-10-023 and D.08-07-029, which has facilitated SDG&E's ability to retain DBEs, as noted above.

C. Exemption for Debt Issues for which Competitive Bidding Is Not Viable or Available

The Commission stated in Resolution F-616 that "[d]ebt issues for which competitive bidding is not viable or available are exempt [from the Competitive Bidding Rule]." While Resolution F-616 did not specify the type of financings that fall within the exemption, a study by the Commission's Evaluation and Compliance Division identified various types of debt instruments that should be exempted. Specifically, the study states:

> A number of these debt securities, either by their nature or by established business practices do not lend themselves to competitive bidding. Securities privately

placed with specific lenders and bank term loans obviously must be negotiated. Competitive bidding is not presently available in European or Japanese markets. Certain tax-exempt pollution control bonds have terms which are specifically negotiated. Variable interest rate debt is normally completed on a negotiated basis. It is reasonable that these types of debt instruments should be exempt from the Competitive Bidding Rule.[2]

SDG&E requests authority consistent with the Commission's Evaluation and Compliance Division's report, to issue, without competitive bid, Debt Securities other than domestic fixed-rate debentures and FMBs, including, without limitation: MTNs, foreign debt, long-term loans, Debt Securities (or other forms of security) issued in conjunction with tax-exempt financings, subordinated debt, and SPE transactions. SDG&E intends to confine its issuance of securities for which competitive bidding is neither viable nor available to those for which it can obtain a lower cost and/or more favorable terms than it could through domestic offerings of fixed-rate debentures and FMBs. The terms and conditions of Debt Securities issued in each financing sold by means other than competitive bidding will be determined by negotiations between SDG&E and the underwriters selected for the proposed offering or the lenders or investors to whom the securities are to be issued.

D. Elimination of the One-Day Notice Period

SDG&E seeks authority to eliminate the one-day notice requirement referred to in Resolution F-616.[3] Through the use of the SEC's shelf registration procedures, it is possible to price an offering when market conditions appear most favorable. It is therefore desirable to be able to minimize the period of time between the issuance of an invitation for bids and the scheduled receipt of bids. The time interval between these events may be reasonably shortened

[2] California Public Utilities Commission Evaluation and Compliance Division, *Report on the California Public Utilities Commission's Competitive Bidding Rule for Issuance of Debt Securities*, September 5, 1986, p. 5.

[3] Resolution F-616, p. 2, Ordering Paragraph 4.

to as little as a few hours. Further, it is desirable to be able to make adjustments in the size or terms of an offering up to the last moment in response to the current market conditions. Given today's technology and accessibility to such technology allowing for near instantaneous communication and ability for real-time transacting, prospective bidders do not require twenty-four hour notification to adequately respond to an invitation for bids or to adjust terms.

The Commission has previously authorized all the competitive-bid exemptions requested above, most recently in D.10-10-023 and D.08-07-029.

VIII. FEES

A fee of $381,000 will be payable under P.U. Code § 1904(b) upon the Commission's approval of the authorization requested in this Application. The calculation of the fee is shown in Schedule X contained in the testimony of Mr. Lewis.

IX. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Compliance with Rule 2.1

In accordance with Rule 2.1 of the Commission's Rules of Practice and Procedure, Applicants provide the following information concerning the proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.

1. Proposed Category of Proceeding

Applicant proposes to categorize this Application as a "ratesetting" proceeding within the meaning of Commission Rules 1.3(e) and 7.1.

2. Need for Hearing and Proposed Schedule

Applicant believes that no hearing is necessary in this proceeding and respectfully requests that the Commission find that no hearing is necessary in respect of this Application. In order to expedite the processing of this Application, Applicant concurrently serves the testimony of Mr. Lewis, which provides additional schedules containing information pertaining to the authorizations requested in this application beyond that information normally required by Rule 3.5 of the Commission's Rules of Practice and Procedure, and P.U. Code §§ 816-830, 851.

If, however, the Commission finds that a public hearing is necessary, Applicant requests that such hearing be conducted as soon as practicable. Applicant is prepared to proceed with any necessary hearing. Applicant proposes the following procedural schedule:

ACTION	DATE
Application filed	October 17, 2011
Protests filed, if any	30 days after notice of filing in Daily Calendar (or November 16, 2011)
ALJ Proposed Decision	February 2012
Comments on Proposed Decision	20 Days After Proposed Decision
Final Commission Decision	March 2012

The issues in this proceeding are whether Applicant should be authorized, pursuant to and consistent with P.U. Code §§ 816-830 and 851, to issue the securities described herein with the features described herein, and whether Applicant should be authorized, where appropriate to be exempt from the Commission's Competitive Bidding Rules. Applicant is unaware of any specific objections any party might raise to any of these issues.

B. Statutory Authority - Rule 2.1

This Application is filed pursuant to P.U. Code §§ 816-830 and 851 and complies with the applicable orders of the Commission and the Commission's Rules of Practice and Procedure.

C. Legal Name and Correspondence

San Diego Gas & Electric Company is a public utility organized and existing under the laws of the State of California. Applicant is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. Applicant's principal place of business is 8330 Century Park Court, San Diego, California 92123.

The attorney representing Applicant in this matter is Paul A. Szymanski. Correspondence or communications regarding this Application should be addressed to:

William P. Fuller
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, CA 92123-1530
Telephone: (858) 654-1885
Facsimile: (858) 654-1788
wfuller@semprautilities.com

with a copy to:

Paul A. Szymanski
Senior Counsel
San Diego Gas & Electric Company
101 Ash Street, HQ-12
San Diego, CA 92101-3017
Telephone: (619) 699-5078
Facsimile: (619) 699-5027
PSzymanski@semprautilities.com

D. Articles of Incorporation - Rule 2.2

A copy of Applicant'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 August 31, 2009 in connection with A.09-08-019, and is incorporated herein by reference.

E. Description of Property and Equipment - Rule 3.5

A general description of Applicant's property was filed with the Commission on October 5, 2001, in connection with A.01-10-005, and is incorporated herein by reference. A statement of account of the original cost and depreciation reserve attributable thereto is attached to this Application as Attachment A.

F. Balance Sheet, and Income Statement - Rule 2.3

Applicant's June 30, 2011 Balance Sheet and Income Statement of is attached to this Application at Attachment B.

G. Capitalization

Applicant's regulatory capitalization at June 30, 2011, is set forth on Attachment C.

H. Proxy Statement - Rule 3.5

A copy of SDG&E's most recent proxy statement, dated April 27, 2011, was provided to the Commission on May 4, 2011, and is incorporated herein by reference.

I. Service

This Application is being served on the parties identified on the attached Certificate of Service.

X. ATTACHMENTS

Attachments A through C, described below, are a part of, and incorporated into, this Application:

<u>Attachment A</u>: Applicant's statement of account of the original cost and depreciation reserve attributable to Applicant's property and equipment.

<u>Attachment B</u>: Applicant's most recent balance sheet, together with financial and income statements.

<u>Attachment C</u>: Applicant's adjusted capitalization at June 30, 2011.

XI. TESTIMONIES

This Application is supported by two testimonies, which are being separately served, concurrently with the filing of this Application. The Direct Testimony of Jack S. Lewis provides information concerning Applicant's request for financing authority, especially as to capital spending needs. The Direct Testimony of Gary H. Hayes provides information concerning Applicant's request for financing authority, especially as to the particular securities and their features for which authorization is sought.

XII. REQUESTED AUTHORIZATIONS

WHEREFORE, Applicant respectfully requests that the Commission issue its Order herein, providing specifically for the following:

1. To issue Debt Securities, in an aggregate principal amount of up to $750 million of new debt capital, in addition to previously-authorized amounts. SDG&E's management or Board of Directors will determine the principal amount and the terms and conditions of each issue of Debt Securities according to market conditions at the time of sale;

2. To issue certain tax-exempt Debt Securities in order to guarantee the obligations of others;

3. To include certain features in SDG&E's Debt Securities or to enter into certain derivative transactions related to underlying debt in order to improve the terms and conditions of SDG&E's debt portfolio and with the goal of lowering SDG&E's cost of money for the benefit of ratepayers;

4. To hedge, when appropriate, planned issuances of Debt Securities

5. To obtain certain exemptions from the Commission's Competitive Bidding Rule;

6. To take all necessary and related actions, including but not limited to:

    a. Specifically finding, as required by P.U. Code § 818, that in the opinion of the Commission, the money, property or labor to be procured or paid for by such issues is reasonably required for the purposes so specified, and that, except as otherwise permitted in the order in the case of bonds, notes, or other evidences of indebtedness, such purposes are not, in whole or in part, reasonably chargeable to operating expenses or to income.

    b. Providing that the authority granted in such Order shall be effective upon payment of the fee prescribed in P.U. Code §§ 1904(b) and 1904.1, which is computed to be $381,000.

    c. Providing that the authority granted in such Order shall be in addition to the authority previously granted in D.10-10-023, D.08-07-029, D.06-05-015, D.04-01-009, and D.93-09-069 (as extended by D.96-05-066 and D.00-01-016).

d. Granting such additional authorizations as this Commission may deem appropriate.

Assuming the Commission approves the authorizations requested in this Application, SDG&E respectfully requests that the Commission incorporates the specific language set forth above in its Ordering Paragraphs. Based on SDG&E's experience, the specific language above will provide the necessary assurances to the financial institutions and their representatives, which will refer to the Commission's Ordering Paragraphs, that SDG&E has in fact acquired the requisite regulatory authority to engage in the issuances of the Debt and Preferred Securities addressed herein.

DATED at San Diego, California, this 17th day of October 2011

Respectfully submitted,

/s/ Paul A. Szymanski

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Attorney for
San Diego Gas & Electric Company

/s/ *Robert M. Schlax*

Robert M. Schlax
Vice President, Controller, Chief Financial Officer, Chief Accounting Officer, & Treasurer
San Diego Gas & Electric Company

VERIFICATION

I am Robert M. Schlax, Vice President, Controller, Chief Financial Officer, Chief Accounting Officer, & Treasurer for San Diego Gas & Electric Company ("SDG&E"). I am an officer of SDG&E and am authorized to make this verification for and on behalf of said corporation. The content of this document is true, except as to matters that are stated on information and belief. 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 this 17th day of October, 2011 in San Diego, California.

By: ___/s/ ROBERT M. SCHLAX_____________________

Robert M. Schlax
Vice President, Controller, Chief Financial Officer, Chief Accounting Officer, & Treasurer
San Diego Gas & Electric Company

ATTACHMENT A

SAN DIEGO GAS & ELECTRIC COMPANY

COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF JUNE 30, 2011

No.	Account	Original Cost	Reserve for Depreciation and Amortization
	ELECTRIC DEPARTMENT		
302	Franchises and Consents	$ 222,841	$ 202,900
303	Misc. Intangible Plant	3,958,182	2,608,439
	TOTAL INTANGIBLE PLANT	4,181,023	2,811,340
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	51,596,636	14,554,321
312	Boiler Plant Equipment	117,145,548	26,113,961
314	Turbogenerator Units	103,810,052	24,286,493
315	Accessory Electric Equipment	38,050,056	7,794,008
316	Miscellaneous Power Plant Equipment	20,566,029	3,599,982
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	345,694,840	76,395,283
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	275,372,629	269,984,448
322	Boiler Plant Equipment	549,606,512	402,827,813
323	Turbogenerator Units	142,364,937	136,499,450
324	Accessory Electric Equipment	173,148,357	167,014,377
325	Miscellaneous Power Plant Equipment	310,374,560	229,490,065
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,451,150,672	1,206,099,832
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	17,015,096	2,118,384
342	Fuel Holders, Producers & Accessories	19,170,415	3,084,459
343	Prime Movers	51,569,644	7,387,124
344	Generators	208,427,667	28,778,684
345	Accessory Electric Equipment	21,423,873	2,207,990
346	Miscellaneous Power Plant Equipment	489,800	88,873
	TOTAL OTHER PRODUCTION	318,242,398	43,667,942
	TOTAL ELECTRIC PRODUCTION	2,115,087,910	1,326,163,058

No.	Account	Original Cost	Reserve for Depreciation and Amortization
350.1	Land	$ 40,568,568	$ 0
350.2	Land Rights	63,055,489	11,541,810
352	Structures and Improvements	101,309,228	32,521,948
353	Station Equipment	689,018,075	146,186,345
354	Towers and Fixtures	109,806,163	83,470,769
355	Poles and Fixtures	216,252,988	42,894,196
356	Overhead Conductors and Devices	279,186,631	163,028,041
357	Underground Conduit	134,727,005	20,498,311
358	Underground Conductors and Devices	118,069,117	22,748,999
359	Roads and Trails	32,495,819	6,241,926
	TOTAL TRANSMISSION	1,784,489,083	529,132,345
360.1	Land	16,176,228	0
360.2	Land Rights	72,900,536	31,295,748
361	Structures and Improvements	3,313,454	1,417,676
362	Station Equipment	369,987,120	75,979,911
364	Poles, Towers and Fixtures	482,548,056	210,175,962
365	Overhead Conductors and Devices	376,991,935	141,901,948
366	Underground Conduit	913,897,479	348,331,202
367	Underground Conductors and Devices	1,202,431,680	693,005,850
368.1	Line Transformers	465,999,812	78,690,156
368.2	Protective Devices and Capacitors	16,175,442	(7,059,211)
369.1	Services Overhead	115,635,531	121,949,492
369.2	Services Underground	297,545,043	199,776,083
370.1	Meters	188,447,948	(25,491,946)
370.2	Meter Installations	41,466,247	(27,499,342)
371	Installations on Customers' Premises	6,354,673	10,764,189
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	24,358,624	17,240,681
	TOTAL DISTRIBUTION PLANT	4,594,229,808	1,870,478,399
389.1	Land	7,523,627	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,853,022	16,612,502
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	58,146	(688)
393	Stores Equipment	19,150	16,816
394.1	Portable Tools	17,699,993	5,526,973
394.2	Shop Equipment	336,798	178,129
395	Laboratory Equipment	320,845	33,135
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	137,765,044	60,667,419
398	Miscellaneous Equipment	456,067	99,856
	TOTAL GENERAL PLANT	194,124,853	83,333,161
101	TOTAL ELECTRIC PLANT	8,692,112,677	3,811,918,302

No.	Account	Original Cost	Reserve for Depreciation and Amortization
	GAS PLANT		
302	Franchises and Consents	$ 86,104	$ 86,104
303	Miscellaneous Intangible Plant	138,801	0
	TOTAL INTANGIBLE PLANT	224,905	86,104
360.1	Land	0	0
361	Structures and Improvements	43,992	43,992
362.1	Gas Holders	0	0
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	0
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	2,052,614	558,469
	TOTAL STORAGE PLANT	2,096,606	602,461
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,164,731
366	Structures and Improvements	11,548,563	8,988,143
367	Mains	125,963,599	57,434,140
368	Compressor Station Equipment	73,291,003	51,871,209
369	Measuring and Regulating Equipment	18,466,591	13,564,848
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	236,136,085	133,023,072
374.1	Land	102,187	0
374.2	Land Rights	8,059,723	5,766,986
375	Structures and Improvements	43,447	61,253
376	Mains	536,155,188	306,610,000
378	Measuring & Regulating Station Equipment	12,753,808	6,405,858
380	Distribution Services	238,614,368	273,726,943
381	Meters and Regulators	130,500,172	32,282,495
382	Meter and Regulator Installations	83,753,566	22,902,419
385	Ind. Measuring & Regulating Station Equipm	1,516,811	953,628
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,274,409	4,694,918
	TOTAL DISTRIBUTION PLANT	1,016,773,679	653,404,499

No.	Account	Original Cost	Reserve for Depreciation and Amortization
392.1	Transportation Equipment - Autos	$ 0	$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	7,030,399	2,743,064
394.2	Shop Equipment	84,181	27,920
395	Laboratory Equipment	283,094	191,733
396	Power Operated Equipment	162,284	67,256
397	Communication Equipment	1,693,847	1,093,674
398	Miscellaneous Equipment	243,605	90,332
	TOTAL GENERAL PLANT	9,571,911	4,313,983
101	TOTAL GAS PLANT	1,264,803,186	791,430,119

COMMON PLANT

No.	Account	Original Cost	Reserve for Depreciation and Amortization
303	Miscellaneous Intangible Plant	148,615,402	71,352,417
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,612,511	0
389.2	Land Rights	1,080,961	27,275
390	Structures and Improvements	201,670,897	88,301,604
391.1	Office Furniture and Equipment - Other	22,506,000	11,790,527
391.2	Office Furniture and Equipment - Computer E	49,699,555	20,192,545
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(22,114)
393	Stores Equipment	133,501	36,573
394.1	Portable Tools	1,216,212	88,562
394.2	Shop Equipment	284,834	158,854
394.3	Garage Equipment	1,214,904	58,142
395	Laboratory Equipment	2,392,911	898,997
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	89,842,189	42,561,908
398	Miscellaneous Equipment	2,230,094	664,664
118.1	TOTAL COMMON PLANT	526,567,283	235,578,044
	TOTAL ELECTRIC PLANT	8,692,112,677	3,811,918,302
	TOTAL GAS PLANT	1,264,803,186	791,430,119
	TOTAL COMMON PLANT	526,567,283	235,578,044
101 & 118.1	TOTAL	10,483,483,146	4,838,926,466
101	PLANT IN SERV-SONGS FULLY RECOVER	$ (1,164,131,236)	$ (1,164,131,236)
101	PLANT IN SERV-ELECTRIC NON-RECON Common	$ 0	$ 0
118	PLANT IN SERV-COMMON NON-RECON Common - Transferred Asset Adjustment	$ (3,960,652)	$ (3,960,652)

No.	Account	Original Cost	Reserve for Depreciation and Amortization
101	Accrual for Retirements		
	Electric	$ (7,802,055)	$ (7,802,055)
	Gas	(46,371)	(46,371)
	TOTAL PLANT IN SERV-NON RECON ACCT	(7,848,426)	(7,848,426)
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	0	0
105	Plant Held for Future Use		
	Electric	61,407,094	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	61,407,094	0
107	Construction Work in Progress		
	Electric	1,279,935,825	
	Gas	13,274,408	
	Common	76,488,590	
	TOTAL CONSTRUCTION WORK IN PROGRESS	1,369,698,824	0
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	221,468
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	0
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	718,543,010
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0	718,543,010
101.1	ELECTRIC CAPITAL LEASES	778,390,265	41,039,260
118.1	COMMON CAPITAL LEASE	26,058,321	9,381,985
		804,448,586	50,421,245
120	NUCLEAR FUEL FABRICATION	62,963,775	29,927,980
143	FAS 143 ASSETS - Legal Obligation	114,954,310	(607,882,844)
	FIN 47 ASSETS - Non-Legal Obligation	42,421,035	17,800,569
143	FAS 143 ASSETS - Legal Obligation	0	(1,239,593,618)
	TOTAL FAS 143	157,375,345	(1,829,675,893)
	UTILITY PLANT TOTAL	$ 11,763,436,457	$ 2,632,423,962

ATTACHMENT B

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
JUNE 30, 2011

	1. UTILITY PLANT	2011
101	UTILITY PLANT IN SERVICE	$10,962,448,576
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	61,407,094
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,267,788,599
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,435,432,230)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(219,289,513)
118	OTHER UTILITY PLANT	603,836,327
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(164,737,849)
120	NUCLEAR FUEL - NET	58,457,430
	TOTAL NET UTILITY PLANT	8,134,478,434

	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	5,165,500
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(563,045)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	808,145,985
	TOTAL OTHER PROPERTY AND INVESTMENTS	812,748,440

Data from SPL as of August 26, 2011

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
JUNE 30, 2011

3. CURRENT AND ACCRUED ASSETS

		2011
131	CASH	8,339,934
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	171,903,249
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	73,961,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	203,751,222
143	OTHER ACCOUNTS RECEIVABLE	37,718,118
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,659,435)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	710,381
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	774,242
151	FUEL STOCK	1,673,225
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	62,637,386
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	303,308
165	PREPAYMENTS	97,661,498
171	INTEREST AND DIVIDENDS RECEIVABLE	4,033,194
173	ACCRUED UTILITY REVENUES	53,692,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	9,778,696
175	DERIVATIVE INSTRUMENT ASSETS	22,223,003
	TOTAL CURRENT AND ACCRUED ASSETS	745,501,521

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	29,043,420
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,994,853,817
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	5,644,424
184	CLEARING ACCOUNTS	795,768
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	4,422,258
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	21,321,214
190	ACCUMULATED DEFERRED INCOME TAXES	214,373,863
	TOTAL DEFERRED DEBITS	2,270,454,764
	TOTAL ASSETS AND OTHER DEBITS	11,963,183,159

Data from SPL as of August 26, 2011

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
JUNE 30, 2011

5. PROPRIETARY CAPITAL

		2011
201	COMMON STOCK ISSUED	($291,458,395)
204	PREFERRED STOCK ISSUED	(78,475,400)
207	PREMIUM ON CAPITAL STOCK	(592,222,753)
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	(479,665,368)
214	CAPITAL STOCK EXPENSE	25,688,571
216	UNAPPROPRIATED RETAINED EARNINGS	(2,141,018,530)
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	9,757,356
	TOTAL PROPRIETARY CAPITAL	(3,547,394,519)

6. LONG-TERM DEBT

221	BONDS	(2,686,905,000)
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	(253,720,000)
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	9,163,587
	TOTAL LONG-TERM DEBT	(2,931,461,413)

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(719,916,085)
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(49,728,871)
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(314,245,440)
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230	ASSET RETIREMENT OBLIGATIONS	(640,736,485)
	TOTAL OTHER NONCURRENT LIABILITIES	(1,724,626,881)

Data from SPL as of August 26, 2011

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
JUNE 30, 2011

8. CURRENT AND ACCRUED LIABILITES

		2011
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	(302,462,644)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(33,247,068)
235	CUSTOMER DEPOSITS	(59,147,180)
236	TAXES ACCRUED	(292,581)
237	INTEREST ACCRUED	(33,575,466)
238	DIVIDENDS DECLARED	(1,204,917)
241	TAX COLLECTIONS PAYABLE	(4,583,301)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(516,208,973)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(34,111,256)
244	DERIVATIVE INSTRUMENT LIABILITIES	(225,124,981)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	(1,209,958,367)

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	(15,810,882)
253	OTHER DEFERRED CREDITS	(252,531,925)
254	OTHER REGULATORY LIABILITIES	(1,053,128,675)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(23,688,665)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	(5,201,256)
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,045,657,516)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(153,723,060)
	TOTAL DEFERRED CREDITS	(2,549,741,979)
	TOTAL LIABILITIES AND OTHER CREDITS	($11,963,183,159)

Data from SPL as of August 26, 2011

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
SIX MONTHS ENDED JUNE 30, 2011

---

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		$1,728,915,728
401	OPERATING EXPENSES	$1,116,206,146	
402	MAINTENANCE EXPENSES	70,824,781	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	217,129,883	
408.1	TAXES OTHER THAN INCOME TAXES	38,802,316	
409.1	INCOME TAXES	(46,899,024)	
410.1	PROVISION FOR DEFERRED INCOME TAXES	202,019,337	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(39,714,160)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(1,336,980)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT		
	TOTAL OPERATING REVENUE DEDUCTIONS		1,557,032,299
	NET OPERATING INCOME		171,883,429

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(18,356)	
418	NONOPERATING RENTAL INCOME	221,974	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	1,523,923	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	33,038,022	
421	MISCELLANEOUS NONOPERATING INCOME	472,188	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	35,237,751	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	1,260,430	
	TOTAL OTHER INCOME DEDUCTIONS	1,260,430	
408.2	TAXES OTHER THAN INCOME TAXES	250,384	
409.2	INCOME TAXES	(29,247,041)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	0	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	6,498,365	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	(22,498,292)	
	TOTAL OTHER INCOME AND DEDUCTIONS		56,475,613
	INCOME BEFORE INTEREST CHARGES		228,359,042
	NET INTEREST CHARGES*		66,086,061
	NET INCOME		$162,272,981

**NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (10,071,740)*

Data from SPL as of August 26, 2011

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
SIX MONTHS ENDED JUNE 30, 2011

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	$1,981,155,383
NET INCOME (FROM PRECEDING PAGE)	162,272,981
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(2,409,834)
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	$2,141,018,530

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
JUNE 30, 2011

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000	shares	Par Value $27,500,000
Preferred Stock	10,000,000	shares	Without Par Value
Preferred Stock	Amount of shares not specified		$80,000,000
Common Stock	255,000,000	shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK			
5.0%	375,000	shares	$7,500,000
4.50%	300,000	shares	6,000,000
4.40%	325,000	shares	6,500,000
4.60%	373,770	shares	7,475,400
$1.70	1,400,000	shares	35,000,000
$1.82	640,000	shares	16,000,000
COMMON STOCK	116,583,358	shares	291,458,395

(b) Terms of Preferred Stock:
Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009, 06-05-015 and 10-10-023 to which references are hereby made.

(c) Brief Description of Mortgage:
Full information as to this item is given in Application Nos. 08-07-029 and 10-10-023 to which references are hereby made.

(d) Number and Amount of Bonds Authorized and Issued:

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2010
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
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	60,000,000	3,510,000
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,368
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,349,987
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,239
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,409,993
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,927
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	179,199
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	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
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	382,603
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	6,761,806
4.50% Series III, due 2040	08-15-10	500,000,000	500,000,000	0
Unsecured Bonds:				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
JUNE 30, 2011

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2010
Commercial Paper & ST Bank Loans	Various	Various	Various	0	$79,249

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 12-31-10	Dividends Declared 2006	2007	2008		2009		2010
5.0%	375,000	$375,000	$375,000	$375,000		$375,000		$375,000
4.50%	300,000	270,000	270,000	270,000		270,000		270,000
4.40%	325,000	286,000	286,000	286,000		286,000		286,000
4.60%	373,770	343,868	343,868	343,868		343,868		343,868
$ 1.7625	0	1,145,625	969,375	242,344		0		0
$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000		2,380,000		2,380,000
$ 1.82	640,000	1,164,800	1,164,800	1,164,800		1,164,800		1,164,800
	3,413,770	$5,965,293	$5,789,043	$5,062,012	[2]	$4,819,668		$4,819,668
Common Stock								
Amount		$0	$0	$0		$150,000,000	[1]	$0

A balance sheet and a statement of income and retained earnings of Applicant for the six months ended June 30, 2011 are attached hereto.

[1] San Diego Gas & Electric Company dividend to parent.
[2] Includes $242,344 of interest expense related to redeemable preferred stock.

ATTACHMENT C

ATTACHMENT C
San Diego Gas & Electric Company Total Regulatory Capitalization
June 30, 2011
($ Millions)

No.	Interest % 30-Jun	Bond	Maturity	Principal ($ millions)
1	6.800%	SERIES KK	6/01/15	14.4
2	5.000%	SERIES OO-2	12/01/27	60.0
3	5.250%	SERIES OO-3	12/01/27	45.0
4	5.000%	SERIES OO-4	12/01/27	45.0
5	5.850%	SERIES RR	6/01/21	60.0
6	5.875%	SERIES VV (CV2004A)	2/15/34	43.6
7	5.875%	SERIES WW (CV2004B)	2/15/34	40.0
8	5.875%	SERIES XX (CV2004C)	2/15/34	35.0
9	5.875%	SERIES YY (CV2004D)	1/01/34	24.0
10	5.875%	SERIES ZZ (CV2004E)	1/01/34	33.7
11	Var	SERIES AAA (CV2004F)	5/01/39	75.0
12	5.3500%	SERIES BBB	5/15/35	250.0
13	5.3000%	SERIES CCC	11/15/15	250.0
14	6.0000%	SERIES DDD	6/1/26	250.0
15	Var	SERIES EEE	7/1/18	161.2
16	6.1250%	SERIES FFF	9/15/37	250.0
17	6.0000%	SERIES GGG	6/1/39	300.0
18	5.3500%	SERIES HHH	5/15/40	250.0
19	4.5000%	SERIES III	8/15/40	500.0
Total First Mortgage Bonds				2,686.9
Other Long-Term Debt				
20	5.900%	CPCFA96A	6/01/14	129.8
21	5.300%	CV96A	7/01/21	38.9
22	5.500%	CV96B	12/01/21	60.0
23	4.900%	CV97A	3/01/23	25.0
Total Other Long-Term Debt				253.7
Long-Term Debt before Unamortized premiums, issue expenses & loss on reacquired debt net of tax				**2,940.6**
	Unamortized discount less premium			(9.2)
	Unamortized issued expense			(29.0)
	Unamortized loss on reacquired debt net of tax			(12.5)
Long-Term Debt net of Unamortized premuims, issue expenses & loss on reacquired debt net of tax				**2,889.9**
Equity Capital				
Common Stock Equity				**3,468.9**
Preferred Stock Equity				**78.5**
Total Equity				**3,547.4**
Total Regulatory Capitalization				**6,437.3**

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true and correct copy of **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)** on each party named in the official service list in A.10-05-016 by electronic service. Those parties who have not provided an electronic address have been served by U.S. mail, including the State of California, cities and counties in its service territory, by placing copies properly addressed and sealed envelopes and depositing such envelopes in the U.S. mail with first-class postage pre-paid.

Copy via Federal Express to Chief Administrative Law Judge Karen Clopton.

Executed this 17th day of October, 2011 in San Diego, California.

/s/ LISA FUCCI-ORTIZ

Lisa Fucci-Ortiz

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: A1005016 - SDG&E - FOR AUTHORIT
FILER: SAN DIEGO GAS & ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: OCTOBER 28, 2010

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Parties

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SAN DIEGO GAS & ELECTRIC COMPANY
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FOR: SAN DIEGO GAS & ELECTRIC COMPANY

Information Only

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State Service

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION

DIVISION OF ADMINISTRATIVE LAW JUDGES
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SAN FRANCISCO, CA 94102-3214

TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS