

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

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902 M) for Approval of its Energy Storage  
Procurement Framework and Program As Required by  
Decision 13-10-040.

Application No. 16-03-\_\_\_\_  
(Filed March 1, 2016)

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

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March 1, 2016

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Pursuant to Sections 2835 *et seq.* of the California Public Utilities Code (“P.U. Code”) and Rules 2.1 *et seq.* of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), San Diego Gas & Electric Company (“SDG&E”) requests review and approval of its Energy Storage Procurement Framework and Program. This Application is in response to, and consistent with, the direction provided in Commission Decision (“D.”) 13-10-040 (“Energy Storage Decision”).<sup>1</sup>

**I. INTRODUCTION**

On December 16, 2010, the Commission opened Rulemaking (“R.”) 10-12-007 to implement the provisions of Assembly Bill (“AB”) 2514 (Stats. 2010, ch. 469), to determine appropriate targets, if any, to procure viable and cost-effective energy storage systems.<sup>2</sup>

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<sup>1</sup> See esp. D.13-10-040 at 77, Ordering Paragraph 4.

<sup>2</sup> Energy storage systems are defined in P.U. Code Section 2835(a):

(1) “Energy storage system” means commercially available technology that is capable of absorbing energy, storing it for a period of time, and thereafter dispatching the energy. An “energy storage system” may have any of the characteristics in paragraph (2), shall accomplish one of the purposes in paragraph (3), and shall meet at least one of the characteristics in paragraph (4).

(2) An “energy storage system” may have any of the following characteristics:

(A) Be either centralized or distributed.

(B) Be either owned by a load-serving entity or local publicly owned electric utility, a customer of a load-serving entity or local publicly owned electric utility, or a third party, or is jointly owned by two or more of the above.

Footnote continued...

On October 21, 2013, the Commission issued the Energy Storage Decision adopting procurement targets for SDG&E to procure energy storage systems during 2014-2020. SDG&E's procurement target is indicated in Table JG-1 of SDG&E witness Joshua Gerber's testimony and in Table 1 below. The Energy Storage Decision also adopted this procurement framework and design program to achieve procurement targets, and it ordered the utilities to file procurement applications containing a proposal for procuring energy storage resources, as described in Section 3.d of Appendix A of the Energy Storage Decision.<sup>3</sup> Pursuant to the Commission's Order, SDG&E filed its first such application, A.14-02-006, which proposed SDG&E's 2014 biennial electric storage procurement plan, and which was subsequently approved in D.14-10-045. The subject Application provides SDG&E's 2016 biennial electric storage procurement plan which updates the prior plan based on data and experience from the past two years.

SDG&E respectfully seeks approval of SDG&E's overall procurement plan, inclusive of incremental storage-related resources, as explained in the accompany testimony of Joshua Gerber; the procurement aspects of the plan as explained in the testimonies of Joshua Gerber and Patrick Charles; the evaluation plan explained in the testimony of Randy Nicholson; and the cost allocation methodologies explained in the testimony of Cynthia Fang.

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(3) An "energy storage system" shall be cost effective and either reduce emissions of greenhouse gases, reduce demand for peak electrical generation, defer or substitute for an investment in generation, transmission, or distribution assets, or improve the reliable operation of the electrical transmission or distribution grid.

(4) An "energy storage system" shall do one or more of the following:

(A) Use mechanical, chemical, or thermal processes to store energy that was generated at one time for use at a later time.

(B) Store thermal energy for direct use for heating or cooling at a later time in a manner that avoids the need to use electricity at that later time.

(C) Use mechanical, chemical, or thermal processes to store energy generated from renewable resources for use at a later time.

(D) Use mechanical, chemical, or thermal processes to store energy generated from mechanical processes that would otherwise be wasted for delivery at a later time.

<sup>3</sup> See D.13-10-040 at 77, Ordering Paragraph 3.

## II. OVERALL STRATEGY AND 2014 – 2020 PLAN

The Energy Storage Decision directs SDG&E to solicit and target procurement of 165 MW of energy storage capacity by 2020. The procurement of energy storage systems will be conducted for three different domains: transmission, distribution and customer. The targets (as set by D.13-10-040) and the timing of the procurement are as follow:

**Table 1. SDG&E’s Procurement Schedule Based on the Energy Storage Decision**

	2014	2016	2018	2020	2014-20
Transmission	10 MW	15 MW	22 MW	33 MW	80 MW
Distribution	7 MW	10 MW	15 MW	23 MW	55 MW
Customers	<u>3 MW</u>	<u>5 MW</u>	<u>8 MW</u>	<u>14 MW</u>	<u>30 MW</u>
Total	<u>20 MW</u>	<u>30 MW</u>	<u>45 MW</u>	<u>70 MW</u>	<u>165 MW</u>

The energy storage capacity to be procured by SDG&E is required to be in-service by the end of 2024.<sup>4</sup>

As with SDG&E’s 2014 plan, the 2016 plan proposed herein and two further, biennial solicitations thereafter will seek to identify projects consistent with the guiding principles established in AB 2514 and P.U. Code § 2835(a)(3). These guiding principles include:

- 1) The optimization of the grid, including peak reduction, contribution to reliability needs, or deferment of transmission and distribution upgrade investments;
- 2) The integration of renewable energy; and
- 3) The reduction of greenhouse gas emissions to 80 percent below 1990 levels by 2050, per Governor Brown’s mandate in Executive Order B-30-15.<sup>5</sup>

<sup>4</sup> D.13-10-040, Appendix A at 1.

<sup>5</sup> Executive Order B-30-15 is available at: <https://www.gov.ca.gov/news.php?id=18938>.

SDG&E intends to count existing projects towards 2016 and ongoing procurement cycle targets as appropriate.

### III. PROGRESS TOWARDS THE TARGETS

Based on previously approved storage projects, new storage additions since the 2014 procurement plan, currently pending contract(s), and currently pending customer-side interconnections, SDG&E has achieved 99.1 MW of energy storage, or 60% of its identified target. Nearly 94% of all installed and pending storage capacity is third-party-owned, with only 6% owned by SDG&E. SDG&E’s progress towards meeting the targets is described in Mr. Gerber’s testimony, and summarized by domain in the table below.

<b>Procurement Targets and Current Progress</b>	<b>Transmission</b>	<b>Distribution</b>	<b>Customer</b>	<b>Total</b>
Established Target	80.00 MW	55.00 MW	30.00 MW	165.00 MW
Less Existing projects as authorized	40.00 MW	6.15 MW	4.66 MW	- 50.81 MW
Less Expected offsets from 2014/2015 procurement and installations	40.00 MW	0.00 MW	8.29 MW	- 48.29 MW
<b>Net Target for 2016 and remaining cycles / [w/80% Domain Transfer]</b>	<b>0 MW / [39.08 MW]<sup>6</sup></b>	<b>48.85 MW / [9.77 MW]</b>	<b>17.05 MW</b>	<b>65.90 MW</b>

### IV. PROPOSED 2016 PROCUREMENT PLAN OVERVIEW

SDG&E’s energy storage optimization strategy is designed to allow SDG&E to meet its energy storage procurement targets established in the Energy Storage Decision while minimizing ratepayer costs, maximizing portfolio value, and managing risk. Through this strategy, SDG&E will contribute to the achievement of the market transformation envisioned in AB 2514 and the Energy Storage Decision.

Based on existing projects described in this Application and accompanying testimony,

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<sup>6</sup> D.13-10-040 authorized procurement flexibility among the transmission and distribution domains, and allows up to 80% of the target to be shifted between the two domains. See D.13-10-040, Appendix A at 3.

SDG&E is in compliance with the 2016 procurement target for the transmission and customer domains and is in compliance for the distribution domain if it elects to transfer between buckets and/or takes advantage of deferment.<sup>7</sup> While SDG&E is in compliance with its various Commission-established 2016 procurement targets in each domain, SDG&E believes there are near-term opportunities to address local capacity and preferred resource requirements with storage – and SDG&E is moving on an accelerated timeline to address those requirements. Similarly, there are opportunities to address evolving needs on the distribution system with storage technologies. Accordingly, for the 2016 storage procurement cycles and as described in detail in direct testimonies of Patrick Charles and Joshua Gerber, SDG&E is currently pursuing or will pursue energy storage in the following solicitations:

1. **2016 Preferred Resources Local Capacity Requirement (“LCR”) Request for Offers (“RFO”)** soliciting **up to 140 MW** from five different product types<sup>8</sup> including energy storage. Energy storage solicited in this RFO may come from any of the three grid domains: transmission, distribution, and / or customer.<sup>9</sup>
2. **2016 Distribution Reliability/Power Quality Request for Proposals** soliciting **up to 4 MW** of utility owned energy storage systems via a competitive Request for Proposal (“RFP”) process to potentially enable: a) some measure of distribution capacity deferral, or b) address reliability and/or provide outage management support.

However, as articulated in Mr. Gerber and Mr. Charles’s testimony, SDG&E will conduct

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<sup>7</sup> D.13-10-040 authorized procurement flexibility among the transmission and distribution domains, and allows up to 80% of the target to be shifted between the two domains. *Id.* SDG&E meets its 2016 procurement cycle targets if it elects to transfer between buckets and/or take advantage of deferment. Therefore SDG&E is not required to procure storage in the 2016 cycle, but recognizes that there may be real opportunities to procure storage now and is looking at all timing and quantity options.

<sup>8</sup> The five product types included in SDG&E’s 2016 Preferred Resources LCR RFO are: energy efficiency, demand response, renewables, energy storage and distributed generation.

<sup>9</sup> SDG&E issued this solicitation on February 26, 2016. As described in the testimony of Mr. Gerber and Mr. Charles, this solicitation is being issued under authority granted by D.14-03-004 and to give storage projects procured through this solicitation a realistic opportunity to meet a required Q3 2021 on-line date for local capacity resources. SDG&E deemed it necessary to issue this preferred resources solicitation ahead of the December 1, 2016 date anticipated in the Energy Storage Decision. Though issued on an accelerated timeline, SDG&E nevertheless expects that any storage procured through this solicitation would count towards SDG&E’s remaining storage procurement requirements.

the two solicitations in the 2016 cycle in order to capture any cost-effective, viable storage that may be available. While this Application and testimony indicate target quantities of storage SDG&E is seeking, the actual quantity procured may be less depending on cost, viability and other factors.

## **V. PROCUREMENT METHODOLOGY FOR PROPOSED 2016 PROCUREMENT**

SDG&E is working toward procuring energy storage systems from the 2014 procurement cycle via established procurement methodologies. For the 2016 Preferred Resources LCR RFO, SDG&E will use a methodology significantly similar to SDG&E's Long Term Procurement Plan ("LTPP") methodology. This process is described in Mr. Charles' testimony. For the 2016 Distribution Reliability RFO SDG&E will use a methodology similar to solicitations for distribution system infrastructure. This methodology is described in Mr. Charles' testimony.

The 2016 Distribution Reliability/Power Quality Solicitation will utilize the standard process that SDG&E has in place for the procurement of distribution reliability assets.

## **VI. EVALUATION PROTOCOL**

Energy storage is a nascent technology and therefore, evaluation of storage presents new and unique challenges. When evaluating energy storage SDG&E will look at quantitative and qualitative factors. The factors examined for each proposed program is detailed in the testimony of SDG&E witness Mr. Randy Nicholson.

## **VII. COST RECOVERY**

SDG&E does not propose any new recovery mechanisms as part of this proceeding; rather SDG&E proposes to utilize existing cost recovery mechanisms. The appropriate cost recovery mechanism to be applied to any given storage project should be determined by the service/function provided by the project. SDG&E's proposal follows Commission precedent that costs should be



recovered from all benefitting customers, which in this instance would tie cost recovery to the type of function and not necessarily domain.

## **VIII. OTHER ISSUES**

SDG&E will comply with the reporting requirements defined in D.13-10-040. This application also includes the following information which is incorporated by reference.

- Attachment B – Report on All Storage Resources Procured to Date in All Commission Proceedings
- Attachment C – List of Applicable Statutes and Rules That May Impact Energy Storage Procurement

## **IX. SUMMARY OF TESTIMONY**

This Application is supported by the testimonies of four witnesses, which are being separately served, concurrently with the filing of this Application.

- The Prepared Direct Testimony of Joshua M. Gerber provides information concerning SDG&E's policy and SDG&E's existing projects and plan.
- The Prepared Direct Testimony of Patrick K. Charles provides information concerning SDG&E's proposed Procurement Methodology.
- The Prepared Direct Testimony of Randy Nicholson provides information concerning SDG&E's proposed Evaluation Protocol.
- The Prepared Direct Testimony of Cynthia Fang provides information concerning SDG&E's cost recovery/memorandum account proposal.

## **X. 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, SDG&E provides 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**

SDG&E 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**

SDG&E does not believe that approval of this Application will require hearings and respectfully requests that the Commission find that no hearing is necessary. If, however, the Commission finds that an evidentiary hearing is necessary, SDG&E requests that such hearing be conducted as soon as practicable. SDG&E proposes the following procedural schedule, which includes hearings in the event hearings are deemed to be necessary.

<u><b>ACTION</b></u>	<u><b>DATE</b></u>
Application filed	March 1, 2016
Responses/Protests filed, if any	30 days after notice of filing in Daily Calendar (estimated April 4, 2016)
Reply to Responses/Protests	April 14, 2016
Prehearing Conference	May 17, 2016
Scoping Memo Issues	June 6, 2016
Hearings	(if needed)
Concurrent Opening Briefs	July 11, 2016
Concurrent Reply Briefs	July 25, 2016
ALJ Proposed Decision	September 2016
Comments on Proposed Decision	20 Days After Proposed Decision
Final Commission Decision	October 2016

The issues in this proceeding are: whether SDG&E’s Energy Storage Procurement Framework

should be authorized, pursuant to and consistent with D.13-10-040, with the features described in this Application and supporting documents; and whether SDG&E's cost recovery proposals should be authorized. SDG&E 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 D.13-10-040 and statutes and authorities identified in Attachment C to this Application, and complies with the applicable orders of the Commission and the Commission's Rules of Practice and Procedure.

**C. Legal Name and Correspondence – Rule 2.1(a)**

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

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

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SAN DIEGO GAS & ELECTRIC COMPANY

**D. Articles of Incorporation - Rule 2.2**

A certified copy of SDG&E's Restated Articles of Incorporation, as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014, in connection with SDG&E's Application No. A.14-09-008, and is incorporated herein by reference.

**E. Balance Sheet, Income Statement, Financial Statement and Summary of Earnings**

Although SDG&E is not seeking a rate change in this Application, and therefore Commission Rule 3.2 is not applicable, SDG&E provides a copy of its Balance Sheet, Income Statement, Financial Statement and Summary of Earnings for the nine-month period ending September 30, 2015 in Attachment A, for informational purposes only.

**F. Service**

This is a new application and no service list has been established. Accordingly, SDG&E will serve this Application on the parties to the service list for R.15-03-011. Hard copies will be sent by overnight mail to the Assigned Commissioner in R.15-03-011, Carla Peterman, the Assigned Administrative Law Judge in R.15-03-011, Regina DeAngelis and Chief Administrative Law Judge, Karen V. Clopton.

**XI. ATTACHMENTS**

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

Attachment A – SDG&E's Balance Sheet, Income Statement, Financial Statement and Summary of Earnings

Attachment B – Report on All Storage Resources Procured to Date in All Commission Proceedings

Attachment C – List of Applicable Statutes and Rules That May Impact Energy  
Storage Procurement

**XII. CONCLUSION**

WHEREFORE, SDG&E respectfully requests that the Commission issue its Order herein, approve SDG&E's storage procurement plan and proposals as set forth in this Application and supporting documents (including testimony, and attachments) and take all necessary and related actions, including granting such additional authorizations as this Commission may deem appropriate.

DATED at San Diego, California, this 1st day of March 2016

Respectfully submitted,

/s/ Paul A. Szymanski

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Attorney for  
San Diego Gas & Electric Company

/s/ Scott Drury

Scott Drury  
Chief Energy Supply Officer  
San Diego Gas & Electric Company



# Attachment A

(Balance Sheet, Income Statement,  
Financial Statement and  
Summary of Earnings)

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

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

Data from SPL as of September 30, 2015



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

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

Data from SPL as of September 30, 2015

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

**5. PROPRIETARY CAPITAL**

	2015
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	-
207 PREMIUM ON CAPITAL STOCK	(591,282,978)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(479,665,368)
214 CAPITAL STOCK EXPENSE	24,605,640
216 UNAPPROPRIATED RETAINED EARNINGS	(3,901,431,394)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	11,616,701
TOTAL PROPRIETARY CAPITAL	(5,227,615,794)

**6. LONG-TERM DEBT**

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

**7. OTHER NONCURRENT LIABILITIES**

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

Data from SPL as of September 30, 2015

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

**8. CURRENT AND ACCRUED LIABILITES**

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

**9. DEFERRED CREDITS**

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

	(\$17,282,702,227)
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Data from SPL as of September 30, 2015

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

<b>(a) Amounts and Kinds of Stock Authorized:</b>					
Common Stock		255,000,000	shares		Without Par Value
<b>Amounts and Kinds of Stock Outstanding:</b>					
Common Stock		116,583,358	shares		291,458,395

**(b) Brief Description of Mortgage:**

Full information as to this item is given in Application Nos. 08-07-029,10-10-023 and 12-03-005 to which references are hereby made.

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

	Nominal Date of Issue		Par Value Authorized and Issued	Outstanding		Interest Paid in 2014
<b>First Mortgage Bonds:</b>						
6.80% Series KK, due 2013	12-01-91		14,400,000	0		0
Var% Series OO, due 2027	12-01-92		250,000,000	150,000,000		7,612,500
5.85% Series RR, due 2021	06-29-93		60,000,000	0		0
5.875% Series VV, due 2034	06-17-04		43,615,000	43,615,000		2,562,373
5.875% Series WW, due 2034	06-17-04		40,000,000	40,000,000		2,350,000
5.875% Series XX, due 2034	06-17-04		35,000,000	35,000,000		2,056,250
5.875% Series YY, due 2034	06-17-04		24,000,000	24,000,000		1,410,000
5.875% Series ZZ, due 2034	06-17-04		33,650,000	33,650,000		1,976,938
4.00% Series AAA, due 2039	06-17-04		75,000,000	75,000,000		3,000,000
5.35% Series BBB, due 2035	05-19-05		250,000,000	250,000,000		13,375,000
5.30% Series CCC, due 2015	11-15-05		250,000,000	250,000,000		13,250,000
6.00% Series DDD, due 2026	06-08-06		250,000,000	250,000,000		15,000,000
1.65% Series EEE, due 2018	09-21-06		161,240,000	161,240,000		2,660,460
6.125% Series FFF, due 2037	09-20-07		250,000,000	250,000,000		15,312,500
6.00% Series GGG, due 2039	05-14-09		300,000,000	300,000,000		18,000,000
5.35% Series HHH, due 2040	05-13-10		250,000,000	250,000,000		13,375,000
4.50% Series III, due 2040	08-26-10		500,000,000	500,000,000		22,500,000
3.00% Series JJJ, due 2021	08-18-11		350,000,000	350,000,000		10,500,000
3.95% Series LLL, due 2041	11-17-11		250,000,000	250,000,000		9,875,000
4.30% Series MMM, due 2042	03-22-12		250,000,000	250,000,000		10,750,000
3.60% Series NNN, due 2023	09-09-13		450,000,000	450,000,000		16,200,000
.4677% Series OOO, due 2017	03-12-15		140,000,000	140,000,000		-
1.9140% Series PPP, due 2022	03-12-15		39,112,892	48,490,631		-
<b>Total 1st. Mortgage Bonds:</b>						<b>181,766,020</b>
<b>Unsecured Bonds:</b>						
5.30% CV96A, due 2021	08-02-96		38,900,000	38,900,000		2,061,700
5.50% CV96B, due 2021	11-21-96		60,000,000	60,000,000		3,300,000
4.90% CV97A, due 2023	10-31-97		25,000,000	25,000,000		1,225,000
<b>Total Unsecured Bonds</b>						<b>6,586,700</b>
<b>Total Bonds:</b>						<b>188,352,720</b>

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

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

**Amounts and Rates of Dividends Declared:**

The amounts and rates of dividends during the past five fiscal years are as follows:

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

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

**NOTE 11 PREFERRED STOCK 10K:**

On October 15, 2013, SDG&E redeemed all six series of its outstanding shares of contingently redeemable preferred stock for \$82 million, including a \$3 million early call premium (pg 9.1).

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

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

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

**1. UTILITY OPERATING INCOME**

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

**2. OTHER INCOME AND DEDUCTIONS**

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

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

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

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**3. RETAINED EARNINGS**

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

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

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

\*Authorized Cost of Capital



## Attachment B

(Report on All Storage Resources Procured to  
Date in All Commission Proceedings)

Existing Storage Projects

Project name	Internal Name	Eligible biennial procurement cycle	Online date (expected or actual)	Project type	Point of interconnection	Capacity (MW)	Energy content (MWh)	Location (city)	Location (zip code)	Procurement proceeding	Procurement mechanism	Status of project	Expected operational life (years)	Primary application of project	Secondary application of project	Technology manufacturer	Project owner	Project operator
Lake Hodges Pumped Hydro	Lake Hodges PPA	2014 Cycle	Q3 2011	Pumped Hydro	Transmission	40,000	240,000	Escondido	92025	D 04-08-028	Bilateral	Installed	25	Grid Optimization			SDWCA	SD&E
Borrego Springs Unit 1	Miraflores SES	2014 Cycle	Q3 2012	Battery - Li Ion	Distribution	0.050	1,500	Borrego Springs	92004	D 13-05-010	RFP	Installed	15	Islanding	Power Quality	Soft, Becker Hamfin	SD&E	SD&E
Borrego Springs Unit 2	Borrego CES	2014 Cycle	Q2 2013	Battery - Li Ion	Distribution	0.025	0,050	Borrego Springs	92004	D 13-05-010	RFP	Installed	15	Power Quality	Islanding	S&C, Kokam	SD&E	SD&E
Borrego Springs Unit 3	Borrego CES	2014 Cycle	Q2 2013	Battery - Li Ion	Distribution	0.025	0,050	Borrego Springs	92004	D 13-05-010	RFP	Installed	15	Power Quality	Islanding	S&C, Kokam	SD&E	SD&E
Borrego Springs Unit 4	Borrego CES	2014 Cycle	Q2 2013	Battery - Li Ion	Distribution	0.025	0,050	Borrego Springs	92004	D 13-05-010	RFP	Installed	15	Power Quality	Islanding	S&C, Kokam	SD&E	SD&E
GRC Energy Storage Program Unit 1	Pala SES	2014 Cycle	Q3 2012	Battery - Li Ion	Distribution	0.500	1,500	Pala, Diego	92059	D 13-05-010	RFP	Installed	15	Power Quality	Islanding	Governments, Saicem, Wilson	SD&E	SD&E
GRC Energy Storage Program Unit 2	Charmont CES	2014 Cycle	Q4 2012	Battery - Li Ion	Distribution	0.025	0,072	Poway	92111	D 13-05-010	RFP	In Progress	15	Power Quality	Islanding	Soft, PowerLab	SD&E	SD&E
GRC Energy Storage Program Unit 3	Poway CES	2014 Cycle	Q4 2012	Battery - Li Ion	Distribution	0.025	0,072	Poway	92064	D 13-05-010	RFP	In Progress	15	Power Quality	Islanding	Soft, PowerLab	SD&E	SD&E
GRC Energy Storage Program Unit 4	Borrego SES	2014 Cycle	Q2 2014	Battery - Li Ion	Distribution	1,000	3,000	Borrego Springs	92004	D 13-05-010	RFP	In Progress	15	Power Quality	Capacity/Infrastructure Deficit	Soft, ABB	SD&E	SD&E
GRC Energy Storage Program Unit 5	C124 Ortega Hwy	2014 Cycle	Q2 2014	Battery - Li Ion	Distribution	1,000	3,000	San Juan Capistrano	92675	D 13-05-010	RFP	In Progress	15	Power Quality	Capacity/Infrastructure Deficit	Governments, ABB, Samsung	SD&E	SD&E
GRC Energy Storage Program Unit 6	San Miguel	2014 Cycle	Q3 2014	Battery - Li Ion	Distribution	1,000	3,000	Julian	92036	D 13-05-010	RFP	In Progress	15	Power Quality	Capacity/Infrastructure Deficit	Governments, ABB, Samsung	SD&E	SD&E
GRC Energy Storage Program Unit 7	Julian	2014 Cycle	Q3 2014	Battery - Li Ion	Distribution	1,000	3,000	Julian	92036	D 13-05-010	RFP	In Progress	15	Power Quality	Capacity/Infrastructure Deficit	S&C, Kokam	SD&E	SD&E
GRC Energy Storage Program Unit 8	Julian	2014 Cycle	Q3 2014	Battery - Li Ion	Distribution	1,000	3,000	Julian	92036	D 13-05-010	RFP	In Progress	15	Power Quality	Capacity/Infrastructure Deficit	S&C, Kokam	SD&E	SD&E
GRC Energy Storage Program Unit 9	Canyon Crest Academy	2014 Cycle	Q3 2014	Battery - Li Ion	Distribution	6,150	3,000	San Diego	92130	D 13-05-010	RFP	In Progress	15	Power Quality	Capacity/Infrastructure Deficit	Soft, ABB	SD&E	SD&E
SGIP - In Service	SGIP - In Service	2014 Cycle	Various	Various	Customer Sited	0,065	Various	SD&E Service Territory	Various	D 11-12-030	SGIP Rules	Installed	Various	Demand Side Management		Various	Various	Various
SGIP - Proposed	SGIP - Proposed	2014 Cycle	Various	Various	Customer Sited	3,652	7,000	SD&E Service Territory	Various	D 11-12-030	SGIP Rules	In Progress	Various	Demand Side Management		Various	Various	Various
PLS - Proposed	PLS - Proposed	2014 Cycle	Various	Thermal	Customer Sited	4,656	7,000	SD&E Service Territory	Various	D 12-04-045	RFP	In Progress	Various	Demand Side Management		Various	Various	Various
Customer - In Service	SGIP/Prison/SGIP - In-Service	2016 Cycle	Various	Various	Customer Sited	3,000	Various	SD&E Service Territory	Various	D 11-12-030	SGIP Rule 21	Installed	Various	Demand Side Management		Various	Various	Various
Customer - Proposed	SGIP/Prison/SGIP - In-Service	2016 Cycle	Various	Various	Customer Sited	5,250	Various	SD&E Service Territory	Various	D 11-12-030	SGIP Rule 21	In Progress	Various	Demand Side Management		Various	Various	Various

59.00

## Attachment C

(List of Applicable Statutes and Rules That May  
Impact Energy Storage Procurement)

**Attachment C**  
**List of Applicable Statutes and Rules That May Impact Energy Storage Procurement**

Subject	Reference	Key Provision
Energy Storage	Assembly Bill (“AB”) 2514, codified at Public Utilities Code (“Pub. Util. Code”) § 2835	Requires California Public Utilities Commission (“CPUC”) to determine targets for load-serving entity procurement of energy storage resources
Energy Storage	CPUC Rulemaking (“R.”)15-03-011	Rulemaking to consider policy and implementation refinements to Energy Storage Procurement Framework and Design Program
Energy Storage	CPUC Decision (“D.”) 13-10-040	Requires Investor-Owned Utility (“IOU”) procurement of energy storage pursuant to biennial CPUC-approval Plan
Energy Storage	D.14-10-045	Approves IOU procurement applications for the 2014 biennial procurement period
Energy Storage	D.16-01-032	Addresses energy storage policy and program issues that must be resolved prior to the 2016 procurement solicitations
Greenhouse Gas (“GHG”) Emissions Performance Standard	Senate Bill (“SB”) 1368, codified at Pub.Util. Code § 8340 D.07-01-039	Prohibits “covered procurement” from exceeding CO2 emissions standard of 1100 lb./MWh
Renewables Portfolio Standard	SB 350, codified at Pub.Util. Code § 399.11 <i>et seq.</i>	Requires retail sellers and local publicly owned electric utilities to procure 50% of energy from renewable resources by December 31, 2030
Renewables Portfolio Standard Target	Pub.Util. Code § 399.15(b)(5)(B)(ii)	Retail sellers’ efforts to develop energy storage to integrate eligible RPS resources are among the factors underlying a CPUC waiver of an RPS target
Clean Energy	Pub.Util. Code § 400	The CPUC and California Energy Commission shall, where feasible, increase the use of energy storage, among other strategies, to meet clean energy objectives
GHG	AB 32, codified at Health &	Requires California to reduce

	Safety Code § 38500 et seq.	GHG emissions to 1990 levels by 2020
Self-Generation Incentive Plan (“SGIP”)	Pub.Util. Code §§ 379.5 and 379.6 D.01-03-073; D.08-11-044; D.11-09-015	Establish SGIP to provide incentives for investing in distributed generation
Permanent Load Shifting (“PLS”)	D.12-04-045 Resolution E-4586	Adopts PLS programs and budgets.
Demand Response	D.08-04-050 D.10-12-036	Load Impacts of Demand Response and Demand Response Participation in CAISO Market
Resource Adequacy	D.13-06-024	Energy Storage may be procured as a form of flexible capacity used to provide resource adequacy
Resource Adequacy	R.14-10-010	Continued refinements to Resource Adequacy Program and establish flexible capacity requirements
Resource Adequacy	D.15-06-063	Decision refining Resource Adequacy Program adopting modification to flexible RA rules for storage
Alternative-Fueled Vehicle Programs	R.13-11-007	Evaluation of electric vehicle batteries for energy storage
Integrated Resource Plan	SB 350, codified at Pub. Util. Code §§ 454.51-454.52 R.16-02-007	Need determinations may tie to procurement of energy storage
Long-Term Procurement for Local Capacity Requirements	D.14-03-004	Authorizes procurement of preferred resources and energy storage
Distribution Resource Planning and Sourcing using Distributed Energy Resources (“DERs”)	Pub.Util. Code § 769(g); R. 14-08-013 (“DRP”); 14-10-003 (“IDER”)	Proceedings in process to develop plan and pilot programs for DER integration and to develop potential sourcing mechanisms for DER grid services
Local Capacity Requirement Application for Approval of Contracts in the Western LA Basin	D.15-11-041	Decision approving Energy Storage contracts resulting from SCE’s LCR RFO

Local Generation Charge (“LGC”)	D.13-03-029	Authorized SDG&E to establish an LGC rate component which is designed to recover new generation costs for local reliability that are deemed to be subject to Cost Allocation Mechanism (“CAM”) policy.
Procurement Rules	D.07-12-052	Utility procurement outside of competitive solicitations; development of utility-owned resource
Transmission Interconnection Rules	California Independent System Operator Corporation (“CAISO”) Large Generator Interconnection Agreement	Requirements for generator interconnection to grid at transmission level
Distribution Interconnection Rules	Wholesale Distribution Access Tariff	Requirements for generator interconnection with IOU-owned distribution system
Distribution Interconnection Rules	Rule 21	Interconnection at distribution level by Qualifying Facilities (“QFs”) under Public Utility Regulatory Policies Act of 1978 (“PURPA”), net metering, and SGIP
Net Energy Metering	D.14-05-033	Customer-sited systems interconnecting with storage are treated the same as systems interconnecting without storage
Net Energy Metering	D.16-01-044	The “storage mandate charge” is collected through the PCIA and should not be part of the non-bypassable charge in the NEM successor tariff
Confidentiality	Pub. Util. Code § 454.5(g); D.06-06-066, D.08-04-023, D.11-07-028	Confidentiality of energy procurement information submitted to CPUC
Confidentiality	CPUC General Order 66-C	Exceptions to Public Records Act
Cost Recovery	D.04-12-048	10-year limit on recovery of procurement costs
Cost Recovery	D.06-07-029	Cost Allocation Methodology (“CAM”) for long-term procurement of new generation
Cost Recovery	D.08-09-012	Responsibility for non-bypassable charges
CAM	D.11-05-005	Modifies new generation and

		long-term contract CAM
Cost Recovery	Pub. Util. Code § 454.51(c)	Net costs of resources used to integrate renewable energy resources are allocated on a fully nonbypassable basis consistent with CAM
Standards of Conduct	D.02-10-062, as modified by D.02-12-074; D.03-06-067; D.03-06-076.	CPUC Standards of Conduct for energy procurement