

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

Application of San Diego Gas & Electric Company
(U 902 E) to Return Revenues from the Sale of Greenhouse
Gas Allowances and to Recover Forecasted Costs
Associated with California's Greenhouse Gas Emissions
Reduction Program for 2013 and 2014.

Application 13-08-____
(Filed August 1, 2013)

**APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
TO RETURN REVENUES FROM THE SALE OF GREENHOUSE
GAS ALLOWANCES AND TO RECOVER FORECASTED
COSTS ASSOCIATED WITH CALIFORNIA'S GREENHOUSE
GAS EMISSIONS REDUCTION PROGRAM FOR 2013 AND 2014**

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San Diego Gas & Electric Company (SDG&E) submits the following Application to Return Revenues from the Sale of Greenhouse Gas Allowances and to Recover Forecasted Costs Associated with California's Cap-and-Trade Program for 2013 and 2014, pursuant to Decision (D.) 12-12-033 and Articles 2 and 3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission).

I. INTRODUCTION AND SUMMARY

On March 24, 2011, the Commission instituted Rulemaking (R.) 11-03-012 (the GHG OIR) to address utility cost and revenue issues associated with the California Air Resources Board's (ARB) implementation of California's greenhouse gas (GHG) emissions reduction program, Cap-and-Trade. Cap-and-Trade, which was implemented by ARB on January 1, 2012, sets a cap on GHG emissions and allows firms to accomplish GHG reduction goals at a minimum cost.

As part of Cap-and-Trade regulation, the State's investor-owned electric utilities, SDG&E, Southern California Edison (SCE) and Pacific Gas and Electric Company (PG&E),

receive allowances that they are required to consign for sale in quarterly auctions implemented by ARB. The revenues from the auctioning of these allowances are to be used in ways that benefit electric ratepayers and not to be used for the benefit of entities or persons other than electric ratepayers.¹

On June 27, 2012, the California Legislature passed Senate Bill 1018, adding Public Utilities Code sections 748.5(a) and (c), which provide:

748.5(a) Except as provided in subdivision (c), the commission shall require revenues, including any accrued interest, received by an electrical corporation as a result of the direct allocation of greenhouse gas allowances to electric utilities pursuant to subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations to be credited directly to the residential, small business, and emissions-intensive trade-exposed retail customers of the electrical corporation.

748.5(c) The commission may allocate up to 15 percent of the revenues, including any accrued interest, received by an electrical corporation as a result of the direct allocation of greenhouse gas allowances to electrical distribution utilities pursuant to subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations, for clean energy and energy efficiency projects established pursuant to statute that are administered by the electrical corporation and that are not otherwise funded by another funding source.

In Phase 1 of the GHG OIR, the Commission explored the possible use of revenues that the electric utilities may generate from the sale of GHG emissions allowances, and in Decision (D.) 12-12-033, the Commission adopted a framework for the allocation of GHG allowance auction revenues. Pursuant to Ordering Paragraph 1 of D.12-12-033, the Commission directed the utilities to distribute GHG allowance revenues to customers using a hierarchy (see Table 1 below), after first setting aside appropriate amounts for customer outreach and education activities and administrative activities. Furthermore, under section 748.5(c), the Commission may allocate up to 15 percent of the revenues received by an electrical corporation as a result of

¹ ARB, Article 5: California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms, § 95892 (d).

the direct allocation of greenhouse gas allowances to electrical distribution utilities for clean energy and energy efficiency projects that are not funded by another source.

Table 1 - Revenue Return Allocation Hierarchy

Hierarchy	Description
1	Emission-intensive and trade-exposed entities
2	Offset Cap-and-Trade Program rate impacts for small businesses
3	Neutralize Cap-and-Trade Program rate impacts for residential customers
4	Climate Dividend

In D.12-12-033, the Commission further directs the electric utilities to file an application by August 1 of each year, beginning in 2013 and continuing through 2015, setting forth forecasted GHG costs for the subsequent year and estimating GHG revenues to be distributed to eligible customer classes.² The utilities must also forecast administrative and customer outreach expenses for the subsequent year.³

As directed, this Application sets forth SDG&E’s forecasted GHG costs for 2014, a forecast of administrative and outreach expenses for 2014, and an estimate of the GHG revenues to be distributed to eligible customer classes in 2014. In addition, SDG&E includes its 2013 GHG costs and allowance auction revenues to be approved and amortized over a 24-month period, consistent with the Commission’s guidance in D.12-12-033.⁴ SDG&E requests approval of forecasted 2013 and 2014 GHG costs of \$152.075 million. This revenue requirement covers the costs of direct GHG compliance costs associated with SDG&E’s utility-owned generation plants and indirect costs that are embedded in market electricity prices or charged by third parties to SDG&E under contract. SDG&E estimates the return of approximately \$188.237 million in allowance auction revenues to eligible customers for 2013 and 2014. This estimate is based on

² D.12-12-033 at 214 (Ordering Paragraph No. 23).

³ *Id.*

⁴ *Id.* at 214 (Ordering Paragraph No. 21).

forecast allowance revenue of \$199.902 million, less offsets for: (1) SDG&E's customer outreach and administrative cost estimates of \$477,500 for 2013 and \$187,500 for 2014, which includes SDG&E's contribution of \$52,500 towards the costs of the Targetbase customer outreach study, and (2) a set-aside of \$11 million for incremental energy efficiency and clean energy investments in 2014. SDG&E requests authorization to begin incorporating these costs and revenues in rates concurrent with its 2014 ERRR forecast rate adjustment.⁵

II. SDG&E'S FORECAST OF 2013 AND 2014 GHG COSTS

As discussed in the Direct Testimony of David T. Barker, forecasted GHG costs are a key determinant of the forecasted volumetric return of Cap-and-Trade auction revenues to small business and residential customers. SDG&E estimates approximately \$152.0 million in GHG costs for 2013 and 2014.⁶ As discussed below, SDG&E's forecast of GHG Costs includes an estimate of both direct and indirect emissions, and related GHG costs associated with implementation of California's GHG emissions reduction program.

SDG&E has a direct compliance obligation for GHG emissions from burning natural gas at its facilities, including carbon dioxide, methane, and nitrous oxide, and for imports of electricity into California. SDG&E forecasts the 2013 and 2014 expected direct GHG emissions based on fuel used by 1) SDG&E-owned resources, 2) SDG&E contracted-for specific resources including renewables, and 3) imports of electricity. The fuel volume is multiplied by an emissions factor of 0.05307 metric tons of CO₂e per MMBtu to calculate direct emissions obligations for each plant.

SDG&E also delivers out-of-state electricity to a delivery point inside California and is thus responsible for the GHG emissions attributed to the generation of that electricity. For electricity from SDG&E's Desert Star combined-cycle generation plant in Nevada, the

⁵ Assumes 2013 GHG costs are approved for recovery in this Application and not in the 2013 ERRR Forecast decision or the decision in this proceeding on revenue return allocation methodology for EITE and small business customers. If 2013 GHG costs are approved in either of those decisions, SDG&E would implement costs and revenue return in accordance with D.12-12-033 Ordering Paragraphs 20 and 21.

⁶ SDG&E may update this forecast when SDG&E files its 2014 ERRR Forecast of GHG prices and emissions.

calculation is the same as SDG&E's other owned facilities—multiplying the forecast of fuel burned by the emission factor of 0.05307 metric tons of CO₂e per MMBtu. Imported power from “unspecified sources” or Combined Heat and Power (CHP) outside the State uses calculations based on the ARB mandatory reporting regulations. Electricity from out-of-state renewable resources that are not imported directly into California can be used to offset the emissions of imports under the ARB Renewable Portfolio Standard (RPS) adjustment. Specifically, the RPS adjustment allows the importer to deduct GHG emissions avoided from out-of-state renewables from total direct emissions.

In addition to the costs associated with direct emissions, SDG&E customers face a second type of GHG compliance cost—indirect costs. Indirect costs are costs embedded in market electricity prices, or charged by third parties to SDG&E under contract. The party selling the power is responsible for the GHG allowance acquisition, but, either explicitly or implicitly, charges for the cost of acquiring allowances. Thus, the cost to purchase electricity from the wholesale market, as well as from suppliers under contracts that include market-based prices, have a cost of compliance with the Cap-and-Trade Program built into the electricity price. The compliance instrument is procured by the first deliverer, however, and is not procured by SDG&E. To estimate the GHG emissions embedded in these net-CAISO market purchases, SDG&E used the default emissions rate from the ARB for unspecified power, 0.428 MT per MWh. In addition to market purchases, contracts with some CHP facilities are included in indirect costs. For simplicity, SDG&E estimates GHG costs associated with CHP on the assumption that the CHP units, on average, are as efficient as unspecified power, assigning a 0.428 MT per MWh emissions rate to all purchases of power from CHP facilities.

SDG&E's forecast of GHG costs then uses SDG&E forecasted prices for compliance instruments for 2013 and 2014 to calculate the total 2013 and 2014 GHG costs as \$152.0 million. The 2013 GHG costs are proposed to be amortized over 24 months, beginning concurrently with

SDG&E's 2014 ERRRA forecast rate adjustment.⁷ The 2014 GHG costs are proposed to be amortized over 12 months, beginning concurrently with SDG&E's 2014 ERRRA forecast rate adjustment.

III. PROPOSED OFFSETS FOR CUSTOMER OUTREACH COSTS, ADMINISTRATIVE COSTS AND INCREMENTAL ENERGY EFFICIENCY AND CLEAN ENERGY INVESTMENTS IN 2013 AND 2014

A. SDG&E Seeks Authorization to Deduct \$175,000 from GHG Auction Revenues to Fund Customer Outreach Costs in 2014.

As discussed in the Direct Testimony of Rick Janke, in D.12-12-033, the Commission directs the investor-owned utilities to set aside GHG revenues to cover customer outreach and education efforts in advance of distributing remaining GHG revenues to EITE, small business, and residential customers.⁸ California Public Utilities Code section 748.5(b) and D.12-12-033 direct the investor-owned utilities to develop a customer outreach and education plan to “achieve maximum feasible public awareness” of the crediting of GHG allowance revenues.⁹ The investor-owned utilities are further guided by the Commission’s focus on “maximizing the amount, and therefore benefit, of GHG allowance revenue returned to customers,”¹⁰ and advised that “[c]ustomer outreach and education program benefits must be weighed against the cost of these programs in order to maximize both customer understanding of the Cap-and-Trade program and GHG allowance revenue returns to ratepayers.”¹¹ SDG&E proposes to set aside an estimated \$175,000 to fund education and outreach activities beginning in the calendar year

⁷ Assumes 2013 GHG costs are approved for recovery in this Application and not in the 2013 ERRRA Forecast decision or the decision in this proceeding on revenue return allocation methodology for EITE and small business customers. If 2013 GHG costs are approved in either of those decisions, SDG&E would implement costs and revenue return in accordance with D.12-12-033 Ordering Paragraphs 20 and 21.

⁸ D.12-12-033 at 205 (Ordering Paragraph No. 1).

⁹ *See Id.* at 88, *et seq.*

¹⁰ *Id.* at 90.

¹¹ *Id.* at 185 (Finding of Fact No. 185)

2014.¹² SDG&E further proposes to rollover any unspent funds remaining at the end of the year to the subsequent year.

As directed in D.12-12-033, the investor-owned utilities selected a third party marketing services firm, Targetbase, to independently assess the outreach and education needs pertaining to this project. On July 1, 2013, Targetbase released a report of its findings with a projected cost of \$62 million for two years. While Targetbase's report appears to be well-intentioned and thorough, implementation of its recommendations would require a significantly larger monetary investment and expand the scope of outreach messaging well beyond the specifics of the return of Cap-and-Trade auction revenues to customers. SDG&E proposes to spend much less than it would under Targetbase's recommendation; SDG&E's proposal would provide for a positive education and outreach program, while maximizing the benefit to customers of the allowance revenue return.

SDG&E's estimate of customer outreach and education costs for 2014 is much lower than the initial estimate of \$750,000 submitted by SDG&E for 2013.¹³ SDG&E notes that based on further evaluation, most activities proposed under the implementation plan can be achieved at a modest cost, allowing SDG&E to return maximum revenue to customers. This is due both to SDG&E's ability to leverage existing marketing and outreach activities, as well as the focused approach pursued (*e.g.*, not overwhelming customers with duplicative messaging through multiple inserts or emails). Accordingly, under this proposed plan, SDG&E's budget would be reduced by approximately \$575,000 per year, as compared to the original forecast.

There will be an additional cost of \$52,500 to cover SDG&E's share of Targetbase's \$500,000 fee, to be divided among the three utilities, potentially in a similar fashion to other statewide efforts. SDG&E proposes allocation based on SDG&E's combined bundled and

¹² SDG&E has not recorded billing or education and outreach costs in 2013 thus far. SDG&E is awaiting the billing amount of SDG&E's share of the costs for Targetbase's services, \$500,000 total to be split among the three investor-owned utilities.

¹³ Ordering paragraph 14 of D.12-12-033 authorizes SDG&E to spend \$750,000 on customer outreach and education activities in 2013 and does not include the costs to hire the marketing and public relations firm (\$500,000) in Ordering Paragraph 13.

unbundled load share of the three investor-owned electric utilities, estimated at 10.5 percent. SDG&E requests that its share of Targetbase costs be added to the final requested amount, to offset the allowance revenues returned to customers.

B. SDG&E Proposes to Deduct \$12,500 in Administrative Costs for 2014.

SDG&E expects the majority of the activities and costs related to billing system changes to be incurred in 2013, as the revenue return is currently planned to begin in February 2014. While these costs are expected to be incurred in 2013, depending upon the timing of the approved decision, these costs could be further delayed until 2014. After the initial implementation of necessary billing system changes, estimated at \$425,000, SDG&E anticipates the need to budget for on-going administrative costs. SDG&E currently projects these costs will be approximately \$12,500 per year. This reflects the direct labor costs associated with administrative activities,¹⁴ as further discussed in the Direct Testimony of Rick Janke.

C. SDG&E Proposes to Set Aside \$11 Million of Auction Revenues in 2014 to Fund Incremental Energy Efficiency and Clean Energy Programs Approved in Other Proceedings.

As discussed in the Direct Testimony of David T. Barker, and consistent with Public Utilities Code section 748.5(c), SDG&E proposes to set aside \$11 million in allowance auction revenues for potential incremental energy efficiency and clean energy investments in 2014. SDG&E does not request approval of energy efficiency and clean energy investment programs in this Application—approval of such programs will occur in different proceedings. Rather, SDG&E proposes that the \$11 million be set aside, so that funding will be available if programs are approved in those proceedings. If funds set aside are not used, they would be returned to customers in 2015 through the allowance auction revenue true-up process.

¹⁴ Does not include any ongoing administrative costs related to expanding EITE revenue return to customers with less than 10,000 MT of direct emissions.

IV. ESTIMATED CAP-AND-TRADE AUCTION REVENUES TO BE DISTRIBUTED TO ELIGIBLE CUSTOMER CLASSES IN 2013 AND 2014

A. Forecasted Revenue

SDG&E was allocated Cap-and-Trade allowances by the ARB for 2013, will be allocated Cap-and-Trade allowances by the ARB for 2014 and is required to offer all of these allowances for sale in ARB's 2014 quarterly auctions. The revenues generated from the sale of the allowances will depend on the amount of allowances allocated to SDG&E by ARB, the amount of allowances allocated by SDG&E to each of the four auctions, whether all auctioned allowances are sold, and the clearing price of each respective auction.

The forecast of allowance revenues is calculated by multiplying the total number of allowances allocated to SDG&E for consignment that are forecasted to be sold by forecast prices for the allowances of each respective vintage. SDG&E estimates that approximately \$199.9 million in allowance auction revenues will be generated in auctions through 2014 for the benefit of SDG&E customers.

B. EITE Allowance Auction Revenue Set Aside

The first customer group to receive an allocation from the allowance auction revenue is the customer group in EITE industries. This group was defined in D.12-12-033 as those firms counted as EITE by ARB, as listed in Table 8.1 of the Cap-and-Trade Regulation, and in the Cap-and-Trade Program for opt-in entities. SDG&E's estimate of the revenues to be allocated to EITE in 2013 and 2014 is approximately \$1.98 million, as discussed in the Direct Testimony of David T. Barker.

C. Small Businesses

Small businesses are defined as entities with monthly demand not exceeding 20 kilowatts in more than three months in a twelve-month period. These customers will receive the revenue return through a volumetrically-calculated rate adjustment. The forecasted return of allowance auction revenues to small business customers for 2013 and for 2014 is approximately \$15.66

million. The 2013 GHG costs and revenues returned are requested to be amortized over 24 months. These customers will be on multiple rate schedules and may be direct access customers, as described in the Direct Testimony of Yvonne Le Mieux.

D. Residential Customers

The volumetric revenue return to residential customers is designed to neutralize the rate impacts of Cap-and-Trade Program costs. Residential customers will receive their first return of allowance auction revenues in electric rates through a volumetrically-calculated rate adjustment and a second return through the Climate Dividend described below. The resulting volumetric revenue return for residential customers for 2013 and 2014 is forecast to be approximately \$65.48 million. SDG&E proposes to amortize the 2013 GHG costs and volumetrically-returned revenues over 24 months and to return revenues to both bundled and direct access customers.

E. Climate Dividend

Remaining allowance revenues, if any, will be allocated to residential customers on an equal dollar-per-residential-account basis, which will be credited to customers semi-annually as an on-bill credit. SDG&E forecasts the combined Climate Dividend for 2013 and 2014 to be approximately \$105.11 million, which would result in a Climate Dividend of about \$42.93 semi-annually, assuming there are two equal payments in 2014.¹⁵

V. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Categorization and Need for Hearings

SDG&E requests that this Application be categorized as Ratesetting, in accordance with Rule 7.1. SDG&E does not anticipate a need for hearings in this matter.

B. Issues to be Considered

The issues to be considered by the Commission are:

¹⁵ It is not clear whether the Commission will direct the 2013 Climate Dividend to be credited in one payment or two in 2014.

- SDG&E’s forecast of 2013 and 2014 GHG costs
- SDG&E’s estimate of the amount of Cap-and-Trade auction revenues to be returned to eligible customers in 2013 and 2014
- SDG&E’s proposed offsets for customer outreach and administrative costs for 2013 and 2014.
- SDG&E’s proposed set-aside for incremental energy efficiency and clean energy investments in 2014.

C. Proposed Schedule

As discussed above, the Commission directed SDG&E to file this application in D.12-12-033, which establishes a framework for the allocation of Cap-and-Trade auction revenues to be received by the State’s investor-owned electric utilities. As such, key policy issues have already been resolved by the Commission. Therefore, in order to facilitate the speed return of auction revenues to customers, SDG&E proposed the following expedited schedule for this Application. Adherence to this proposed schedule would enable SDG&E to begin allocating auction revenues to customers in the first quarter of 2014:

<u>Action</u>	<u>Date</u>
Application filed	August 1, 2013
CPUC publishes notice in Daily Calendar	August 5, 2013
Responses/Protests	September 4, 2013
Reply to Responses/Protests	September 16, 2013
Prehearing Conference	September 18, 2013
Scoping Memo Issued	September 27, 2013
Concurrent Opening Briefs	October 8, 2013
Concurrent Reply Briefs	October 31, 2013
Proposed Decision	November, 2013
Commission Decision Adopted	December, 2013

Should the Commission decline to adopt an expedited schedule for consideration of this Application, this would delay the return of revenues to customers accordingly.

D. Additional Procedural Requirements

This Application is filed in accordance with D.12-12-033 and Articles 2 and 3 of the Commission's Rules of Practice and Procedure. In accordance with Articles 2 and 3, SDG&E provides the following additional information.

1. Rule 2.1 (a) - Legal Name

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

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Shirley Amrany
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Los Angeles, California 90013-1034
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E-Mail: DNg@semprautilities.com

3. Rule 2.2 – Articles of Incorporation

A copy of SDG&E's Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on

August 31, 2009 in connection with SDG&E's Application No. 09-08-019, and is incorporated herein by reference.

4. Rule 3.2 (a) (1) – Balance Sheet

SDG&E's financial statement, balance sheet and income statement for the twelve-month period ending March 31, 2013 are included with this Application as Attachment A.

5. Rule 3.2 (a) (2) – Statement of Effective Rates

A statement of all of SDG&E's presently effective electric rates can be viewed electronically by accessing: <http://sdge.com/rates-regulations/current-and-effective-tariffs/current-and-effective-tariffs>. Attachment B to this Application provides the current table of contents from SDG&E's electric tariffs on file with the Commission.

6. Rule 3.2 (a) (3) – Statement of Proposed Rate Change

A statement of proposed rate change is attached as Attachment C.

7. Rule 3.2 (a) (4) – Description of Property and Equipment

A general description of SDG&E's property and equipment was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve for the twelve-month period ending March 31, 2013 is attached as Attachment D.

8. Rule 3.2 (a) (5) and (6) – Summary of Earnings

A summary of SDG&E's earnings (for the total utility operations for the company) for twelve-month period ending March 31, 2013, is included as Attachment E to this Application.

9. Rule 3.2 (a) (7) – Statement re Tax Depreciation

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plant properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which

includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

10. Rule 3.2 (a) (8) – Proxy Statement

A copy of SDG&E’s most recent proxy statement, dated April 25, 2013, as sent to all shareholders of SDG&E’s parent company, Sempra Energy, was mailed to the Commission on April 30, 2013 and is incorporated herein by reference.

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

The rate increase reflected in this Application passes through to customers only increased costs to SDG&E for the services or commodities furnished by it.

12. Rule 3.2 (b) – Notice to State, Cities and Counties

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing this Application, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in Attachment F to this Application.

13. Rule 3.2 (c) – Newspaper Publication

In compliance with Rule 3.2 (c) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing of this Application, publish in newspapers of general circulation in each county in its service territory notice of this Application.

14. Rule 3.2 (d) – Bill Insert Notice

In compliance with Rule 3.2 (d) of the Commission’s Rules of Practice and Procedure, SDG&E will, within 45 days after the filing of this Application, provide notice of this Application to all of its customers along with the regular bills sent to those customers that will generally describe the proposed rate changes addressed in this Application.

VI. CONFIDENTIAL INFORMATION

SDG&E is submitting the testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E’s declaration of confidential treatment attached to the testimony and submitted in conformance with D.06-06-066 and D.08-04-023 and ARB rules and regulations. The confidential information appears in the testimony of SDG&E witnesses Yvonne Le Meux and David T. Barker. Confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information pertaining to SDG&E’s forecast of GHG costs for 2013 and 2014.

VII. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, public versions of testimony and related exhibits on parties to the service list for R.11-03-012. Hard copies will be sent by overnight mail to the Assigned Commissioner in R.11-03-012, Commission President, Michael Peevey, the Assigned Administrative Law Judges in R.11-03-012, Jessica T. Hecht and Melissa K. Semcer, and Chief Administrative Law Judge, Karen Clopton.

VIII. CONCLUSION

Based on this Application and the supporting testimony and exhibits, SDG&E respectfully requests that the Commission approve as reasonable: (1) SDG&E’s forecasted GHG costs of \$152.075 million for 2013 and 2014; (2) SDG&E’s estimate of the GHG revenues to be

ATTACHMENT A

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2013

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

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

	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2012
<u>First Mortgage Bonds:</u>				
6.80% 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
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,378
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	1,976,936
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	172,498
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
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	349,305
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	08-15-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,412,500
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,820,139
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	5,643,750
<u>Unsecured Bonds:</u>				
5.90% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
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

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2013

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2012</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$71,644

Amounts and Rates of Dividends Declared:

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

Preferred Stock	Shares	Dividends Declared				
	Outstanding 12-31-12	2008	2009	2010	2011	2012
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	242,344	0	0	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
	<u>3,413,770</u>	<u>\$5,062,012 [1]</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>

Common Stock

Dividend to Parent	\$0	\$150,000,000 [2]	\$0	\$0	\$0
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A balance sheet and a statement of income and retained earnings of Applicant for the three months ended March 31, 2013 are attached hereto.

[1] Includes \$242,344 of interest expense related to redeemable preferred stock.

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

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2013

1. UTILITY PLANT		<u>2013</u>
101	UTILITY PLANT IN SERVICE	\$13,814,734,463
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	13,009,441
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	703,534,645
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,045,526,309)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(292,190,394)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(312,560)
118	OTHER UTILITY PLANT	779,039,518
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(211,493,042)
120	NUCLEAR FUEL - NET	<u>115,623,026</u>
	 TOTAL NET UTILITY PLANT	 <u>9,965,363,510</u>

2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	5,948,208
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(364,300)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>952,343,811</u>
	 TOTAL OTHER PROPERTY AND INVESTMENTS	 <u>957,927,719</u>

Data from SPL as of May 29, 2013

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2013**

3. CURRENT AND ACCRUED ASSETS		2013
131	CASH	25,325,897
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	67,290,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	205,547,738
143	OTHER ACCOUNTS RECEIVABLE	33,510,885
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,213,606)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	762,633
151	FUEL STOCK	1,270,335
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	77,448,342
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	128,515
165	PREPAYMENTS	32,469,403
171	INTEREST AND DIVIDENDS RECEIVABLE	8,562
173	ACCRUED UTILITY REVENUES	56,844,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	3,954,870
175	DERIVATIVE INSTRUMENT ASSETS	81,332,678
TOTAL CURRENT AND ACCRUED ASSETS		582,680,752
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	34,534,283
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,633,966,301
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	5,570,672
184	CLEARING ACCOUNTS	365,819
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	35,468,147
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	15,641,988
190	ACCUMULATED DEFERRED INCOME TAXES	668,991,536
TOTAL DEFERRED DEBITS		3,394,538,746
TOTAL ASSETS AND OTHER DEBITS		14,900,510,727

Data from SPL as of May 29, 2013

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2013**

5. PROPRIETARY CAPITAL

	2013
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	25,688,570
216 UNAPPROPRIATED RETAINED EARNINGS	(2,987,695,902)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	10,651,726
TOTAL PROPRIETARY CAPITAL	(4,393,177,522)

6. LONG-TERM DEBT

221 BONDS	(3,536,905,000)
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	11,503,604
TOTAL LONG-TERM DEBT	(3,779,121,396)

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(659,966,131)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(43,900,292)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(349,694,443)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	0
230 ASSET RETIREMENT OBLIGATIONS	(750,326,969)
TOTAL OTHER NONCURRENT LIABILITIES	(1,803,887,835)

Data from SPL as of May 29, 2013

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2013**

8. CURRENT AND ACCRUED LIABILITES		2013
231	NOTES PAYABLE	0
232	ACCOUNTS PAYABLE	(273,714,074)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(35,360,393)
235	CUSTOMER DEPOSITS	(58,065,129)
236	TAXES ACCRUED	(83,786,733)
237	INTEREST ACCRUED	(58,729,179)
238	DIVIDENDS DECLARED	(1,204,917)
241	TAX COLLECTIONS PAYABLE	(5,980,553)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(408,724,517)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(34,775,951)
244	DERIVATIVE INSTRUMENT LIABILITIES	(173,806,999)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	0
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,134,148,445)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(29,208,014)
253	OTHER DEFERRED CREDITS	(347,595,715)
254	OTHER REGULATORY LIABILITIES	(1,077,510,804)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(26,104,094)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	(5,201,256)
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,822,813,545)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(481,742,101)
TOTAL DEFERRED CREDITS		(3,790,175,529)
TOTAL LIABILITIES AND OTHER CREDITS		(\$14,900,510,727)

Data from SPL as of May 29, 2013

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2013

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$1,138,774,977
401	OPERATING EXPENSES	\$762,272,900	
402	MAINTENANCE EXPENSES	44,905,548	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	126,462,217	
408.1	TAXES OTHER THAN INCOME TAXES	28,567,672	
409.1	INCOME TAXES	18,628,904	
410.1	PROVISION FOR DEFERRED INCOME TAXES	66,931,140	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(19,119,123)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	612,606	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		1,029,261,864
	NET OPERATING INCOME		109,513,113

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	387	
418	NONOPERATING RENTAL INCOME	95,104	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	1,291,366	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	9,699,714	
421	MISCELLANEOUS NONOPERATING INCOME	96,945	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	11,183,516	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	62,512	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	(673,419)	
	TOTAL OTHER INCOME DEDUCTIONS	(610,907)	
408.2	TAXES OTHER THAN INCOME TAXES	126,995	
409.2	INCOME TAXES	(3,738,779)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	1,107,851	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(13,789,053)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	(16,292,986)	
	TOTAL OTHER INCOME AND DEDUCTIONS		28,087,409
	INCOME BEFORE INTEREST CHARGES		137,600,522
	NET INTEREST CHARGES*		45,269,436
	NET INCOME		\$92,331,086

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (4,159,281)

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2013**

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$2,896,569,733
NET INCOME (FROM PRECEDING PAGE)	92,331,086
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(1,204,917)
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$2,987,695,902</u>

ATTACHMENT B



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Sheet 1

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

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3C6

Issued by

Date Filed

Jul 17, 2013

Advice Ltr. No. 2502-E

Lee Schavrien

Effective

Jul 17, 2013

Decision No. _____

Senior Vice President
Regulatory Affairs

Resolution No. _____

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Sheet 4

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Advice Ltr. No. 2492-E
Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Jun 24, 2013
Effective Jul 24, 2013
Resolution No. _____



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101-00753	02-04	Back of Urgent Notice Applicable to Forms 101-00753/1 through 101-00753/11	16944-E
101-00753/1	04-11	Urgent Notice Payment Request Security Deposit to Establish Credit.....	22325-E
101-00753/2	03-05	Urgent Notice Payment Request Security Deposit to Re-Establish Credit.	18084-E
101-00753/3	04-11	Urgent Notice Payment Request for Past Due Security Deposit.....	22326-E
101-00753/4	04-11	Urgent Notice Payment Request for Past Due Bill	22327-E
101-00753/5	02-04	Urgent Notice Payment Request for Returned Payment.....	16948-E
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill.	16949-E
101-00753/7	02-04	Urgent - Sign Up Notice for Service	16950-E
101-00753/8	02-04	Reminder Notice – Payment Request for Past Due Bill	16951-E
101-00753/9	02-04	Closing Bill Transfer Notification	16952-E
101-00753/10	04-11	Payment Agreement Confirmation	22328-E
101-00753/11	02-04	ESP Reminder Notice – Payment Request for Past Due Bill	16954-E
101-00754	04-11	Final Notice Before Disconnection (mailed), Notice of Past Due Closing Bill, and Notice of Past Due Closing Bill Final Notice	22329-E
101-01071	04-11	Bill, and Notice of Past Due Closing Bill Final Notice	22330-E
101-01072	04-11	Notice of Disconnect (delivered).....	22331-E

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(Continued)



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Sheet 13

SAMPLE FORMS

<u>Form No.</u>	<u>Date</u>		<u>Cal. P.U.C. Sheet No.</u>	
<u>Collection Notices (Continued)</u>				
101-02171	05-10	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units).....	21885-E	L
101-02172	03-09	Notice of Disconnect (MDTs).....	21139-E	
101-2452G	02-04	Notice to Tenants - Request for Termination of Gas and Electric Service Customer Payment Notification	16959-E	L
<u>Operation Notices</u>				
101-2371	11-95	No Access Notice.....	8826-E	
101-3052B	3-69	Temporary "After Hour" Turn On Notice.....	2512-E	
101-15152B		Door Knob Meter Reading Card.....	2515-E	
107-04212	4-99	Notice of Temporary Electric Service Interruption (English & Spanish).....	12055-E	
115-00363/2	9-00	Sorry We Missed You.....	13905-E	
115-002363	9-00	Electric Meter Test.....	13906-E	
115-7152A		Access Problem Notice.....	3694-E	
124-70A		No Service Tag.....	2514-E	

ATTACHMENT C

ATTACHMENT C

The following table represents the class average rate impacts for the forecasted 2013 and 2014 GHG costs.

	Current Total Rate (€/KWhr)	Proposed Total Rate (€/KWhr)	Total Rate Change (€/KWhr)	Total Rate Change (%)
Residential	18.322	18.912	0.590	3.22%
Small Commercial	18.158	18.793	0.635	3.50%
Med & Lg C&I	14.474	15.101	0.627	4.33%
Agriculture	17.653	18.259	0.606	3.43%
Lighting	14.920	15.357	0.437	2.93%
System Total	16.269	16.879	0.610	3.75%

ATTACHMENT D

SAN DIEGO GAS & ELECTRIC COMPANY

**COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF MARCH 31, 2013**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841	202,900
303	Misc. Intangible Plant	81,520,486	11,078,747
	TOTAL INTANGIBLE PLANT	81,743,327	11,281,647
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	84,030,312	29,523,280
312	Boiler Plant Equipment	163,687,597	50,892,454
314	Turbogenerator Units	113,549,888	33,742,610
315	Accessory Electric Equipment	81,990,584	26,098,568
316	Miscellaneous Power Plant Equipment	27,246,540	6,051,304
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	485,031,439	146,354,733
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	277,036,192	270,925,071
322	Boiler Plant Equipment	591,318,155	411,248,452
323	Turbogenerator Units	145,006,671	137,503,408
324	Accessory Electric Equipment	173,385,318	167,984,970
325	Miscellaneous Power Plant Equipment	315,862,324	242,135,327
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,502,892,337	1,230,080,904
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	19,768,311	3,733,993
342	Fuel Holders, Producers & Accessories	20,348,101	4,611,347
343	Prime Movers	83,907,064	20,309,186
344	Generators	329,065,526	85,729,347
345	Accessory Electric Equipment	31,789,966	7,598,777
346	Miscellaneous Power Plant Equipment	23,634,662	9,587,037
	TOTAL OTHER PRODUCTION	508,659,535	131,572,114
	TOTAL ELECTRIC PRODUCTION	2,496,583,311	1,508,007,751

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	40,729,073	0
350.2	Land Rights	145,103,372	13,482,138
352	Structures and Improvements	290,687,015	41,648,196
353	Station Equipment	1,012,129,614	162,491,758
354	Towers and Fixtures	668,445,399	98,533,872
355	Poles and Fixtures	276,229,924	57,554,393
356	Overhead Conductors and Devices	413,970,289	179,798,011
357	Underground Conduit	295,811,801	29,666,935
358	Underground Conductors and Devices	331,501,245	30,805,548
359	Roads and Trails	188,232,366	9,230,410
	TOTAL TRANSMISSION	3,662,840,098	623,211,261
360.1	Land	16,176,228	0
360.2	Land Rights	75,998,461	33,931,264
361	Structures and Improvements	3,722,216	1,444,934
362	Station Equipment	409,121,908	87,245,628
364	Poles, Towers and Fixtures	531,435,130	236,622,400
365	Overhead Conductors and Devices	418,181,335	169,692,885
366	Underground Conduit	985,622,589	383,717,516
367	Underground Conductors and Devices	1,298,778,785	774,160,157
368.1	Line Transformers	505,377,972	85,597,996
368.2	Protective Devices and Capacitors	17,953,598	(7,869,842)
369.1	Services Overhead	123,106,284	123,759,283
369.2	Services Underground	310,736,530	223,254,965
370.1	Meters	202,190,251	(6,503,644)
370.2	Meter Installations	52,824,493	(23,084,857)
371	Installations on Customers' Premises	6,587,527	11,512,005
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	25,054,032	18,169,284
	TOTAL DISTRIBUTION PLANT	4,982,867,339	2,111,649,973
389.1	Land	7,312,143	0
389.2	Land Rights	0	0
390	Structures and Improvements	31,696,281	19,312,843
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	58,146	3,851
393	Stores Equipment	17,466	16,426
394.1	Portable Tools	21,320,129	6,479,741
394.2	Shop Equipment	341,129	201,191
395	Laboratory Equipment	302,226	54,702
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	176,337,661	72,659,651
398	Miscellaneous Equipment	1,367,470	252,221
	TOTAL GENERAL PLANT	238,844,812	99,179,645
101	TOTAL ELECTRIC PLANT	11,462,878,888	4,353,330,277

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104	86,104
303	Miscellaneous Intangible Plant	0	0
	TOTAL INTANGIBLE PLANT	86,104	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	745,855
	TOTAL STORAGE PLANT	2,096,606	789,847
365.1	Land	4,649,144	0
365.2	Land Rights	2,218,045	1,236,870
366	Structures and Improvements	11,541,403	9,772,625
367	Mains	144,211,595	58,952,189
368	Compressor Station Equipment	80,722,436	60,392,867
369	Measuring and Regulating Equipment	18,749,465	15,082,517
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	262,092,088	145,437,068
374.1	Land	102,187	0
374.2	Land Rights	8,147,355	6,135,038
375	Structures and Improvements	43,447	61,253
376	Mains	570,330,291	325,480,577
378	Measuring & Regulating Station Equipment	15,310,566	6,799,974
380	Distribution Services	243,932,849	283,952,800
381	Meters and Regulators	140,729,411	40,264,319
382	Meter and Regulator Installations	86,686,309	27,234,331
385	Ind. Measuring & Regulating Station Equipme	1,516,811	1,040,352
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,223,272	4,760,037
	TOTAL DISTRIBUTION PLANT	1,072,022,498	695,728,681

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0	25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	7,782,181	3,244,248
394.2	Shop Equipment	76,864	32,136
395	Laboratory Equipment	283,094	246,094
396	Power Operated Equipment	162,284	101,588
397	Communication Equipment	1,584,689	1,011,961
398	Miscellaneous Equipment	198,325	62,119
	TOTAL GENERAL PLANT	10,161,937	4,798,150
101	TOTAL GAS PLANT	1,346,459,233	846,839,849
COMMON PLANT			
303	Miscellaneous Intangible Plant	209,268,901	119,918,355
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	7,168,803	0
389.2	Land Rights	1,080,961	27,275
390	Structures and Improvements	256,754,217	108,358,486
391.1	Office Furniture and Equipment - Other	24,896,081	10,354,016
391.2	Office Furniture and Equipment - Computer E	75,038,041	40,217,340
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	9,263
393	Stores Equipment	144,926	97,557
394.1	Portable Tools	1,231,914	161,102
394.2	Shop Equipment	248,289	145,142
394.3	Garage Equipment	978,325	(18,675)
395	Laboratory Equipment	2,236,234	913,867
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	99,972,742	50,234,687
398	Miscellaneous Equipment	2,488,264	976,434
118.1	TOTAL COMMON PLANT	681,575,012	330,862,939
	TOTAL ELECTRIC PLANT	11,462,878,888	4,353,330,277
	TOTAL GAS PLANT	1,346,459,233	846,839,849
	TOTAL COMMON PLANT	681,575,012	330,862,939
101 & 118.1	TOTAL	13,490,913,133	5,531,033,065
101	PLANT IN SERV-SONGS FULLY RECOVER	(1,164,131,236)	(1,164,131,236)
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	0	0

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-ASSETS HELD FOR SALE		
	Electric	(2,075,007)	(322,902)
	Common	0	0
		<u>(2,075,007)</u>	<u>(322,902)</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	<u>(20,739,032)</u>	<u>68,707,138</u>
101	PLANT IN SERV-SUNRISE FIRE MITIGATION		
	Electric	<u>0</u>	<u>0</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	<u>(2,894,035)</u>	<u>(2,894,035)</u>
101	Accrual for Retirements		
	Electric	(7,182,663)	(7,182,663)
	Gas	(932,037)	(932,037)
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(8,114,700)</u>	<u>(8,114,700)</u>
102	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	<u>0</u>	<u>0</u>
104	Electric	85,194,000	2,454,037
	Gas	0	0
	TOTAL PLANT LEASED TO OTHERS	<u>85,194,000</u>	<u>2,454,037</u>
105	Plant Held for Future Use		
	Electric	13,009,441	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	<u>13,009,441</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	745,946,145	
	Gas	51,108,959	
	Common	96,376,241	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>893,431,345</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	<u>0</u>	<u>221,468</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0	853,968,288
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0	853,968,288
101.1	ELECTRIC CAPITAL LEASES	778,390,265	89,540,721
118.1	COMMON CAPITAL LEASE	22,110,896	16,218,358
		800,501,161	105,759,079
120	NUCLEAR FUEL FABRICATION	62,963,775	40,861,208
143	FAS 143 ASSETS - Legal Obligation	116,218,782	(741,744,352)
	FIN 47 ASSETS - Non-Legal Obligation	75,659,638	31,454,525
143	FAS 143 ASSETS - Legal Obligation	0	(1,380,557,945)
	TOTAL FAS 143	191,878,420	(2,090,847,773)
	UTILITY PLANT TOTAL	14,339,937,267	3,336,693,638

ATTACHMENT E

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
THREE MONTHS ENDED MARCH 31, 2013
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$1,139
2	Operating Expenses	<u>1,029</u>
3	Net Operating Income	<u><u>\$110</u></u>
4	Weighted Average Rate Base	\$6,764
5	Rate of Return*	7.79%

*Authorized Cost of Capital

ATTACHMENT F

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