

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

Expedited Application of SAN DIEGO GAS &
ELECTRIC COMPANY (U 902-E) under the Energy
Resource Recovery Account Trigger Mechanism

Application 10-04-xxx

**EXPEDITED TRIGGER APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)**

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April 30, 2010

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I. INTRODUCTION

Pursuant to Decision (“D.”) 02-10-062 and in accordance with the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) respectfully submits this Expedited Trigger Application addressing the disposition of SDG&E’s current Energy Resource Recovery Account (“ERRA”) balance.

As explained in more detail below and in the supporting testimony of SDG&E witness Yvonne Le Mieux, the ERRA balance is currently projected to be \$100 million overcollected at the end of June 30, 2010¹ (based on actual numbers through February 28, 2010 and projected numbers for March through June). SDG&E proposes that it be allowed to return this projected \$100 million overcollection minus a projected undercollection of \$26 million in the Non-fuel Generation Balancing Account (“NGBA”). Thus, the total amount to be returned would be \$74 million. SDG&E also proposes that the \$74 million be returned to ratepayers via a 12-month amortization period beginning on September 1, 2010, which is when the Federal Energy Regulatory

¹ Note that June 30, 2010 is approximately 60 days after the filing of this Application. According to D.02-10-062, trigger applications are to be expedited and include a projected account balance in 60 days or more from the date of the filing. D.02-10-062, Conclusion of Law (“COL”) 15.

Commission's ("FERC's") transmission rate is already scheduled to be adjusted.

Allowing the NGBA offset and a coordinated amortization period promotes rate stability and will minimize the size and number of rate changes customers will have to endure over the next year.

II. BACKGROUND

The ERRA balancing account was established by the Commission to record the investor-owned utilities' ("IOUs") fuel and purchased power revenues against actual recorded costs, excluding revenues collected for the California Department of Water Resources ("CDWR").² AB 57 mandated a trigger threshold for the balance in the ERRA of 5% of the electrical utility's actual recorded generation revenues for the prior calendar year.³

In accordance with D.02-10-062, which implemented the provisions of AB 57, SDG&E's ERRA is subject to a trigger mechanism designed to avoid ERRA balances above the 5% threshold. The trigger mechanism requires the filing of an expedited application for approval within 60 days from the filing date when the recorded monthly ERRA balance (undercollection or overcollection) exceeds a 4% trigger point and when the balance is projected to exceed the 5% threshold.⁴ The application should address a projected account balance; an amortization period for the balance of not less than 90 days; and a proposed allocation of the overcollection and/or undercollection among customers for rate adjustment based on the existing allocation methodology recognized by the Commission.⁵

² PUC Code Section 454.5(d)(3), initiated by Assembly Bill ("AB") 57.

³ *Id.*

⁴ D.02-10-062 at p. 64.

⁵ *Id.*

D.07-05-008 added a new rule to the trigger procedures by allowing SDG&E to file an advice letter seeking to maintain rates when it expected an overcollection or undercollection above the 4% trigger to self-correct within 120 days. Accordingly, on December 10, 2009, SDG&E filed Advice Letter (“AL”) 2131-E notifying the Commission that SDG&E’s ERRA balance exceeded its 4% trigger and 5% threshold.⁶ And projecting that the balance would self-correct below the 4% trigger within 120 days (by February 28, 2010). On January 4, 2010, the Division of Ratepayer Advocates (“DRA”) protested AL 2131-E, requesting that the Energy Division postpone approval of the AL until DRA had the opportunity to review SDG&E’s projections and comparisons submitted with its 2010 ERRA forecast in A.09-10-003. In response to DRA’s request, the Energy Division suspended the AL on January 7, 2010. Additionally, on January 20, 2010, DRA requested continued suspension of the AL to allow for review of actual balances. On February 28, 2010, SDG&E’s ERRA balance did not self-correct below the 4% trigger, primarily due to unforeseen decreases in expenses and higher than anticipated FERC refunds. Accordingly, on April 22, 2010, SDG&E withdrew AL 2131-E, paving the way for the filing of this Application.

Furthermore, pursuant to D.04-01-050, SDG&E is required to file an advice letter by April 1 of each year to establish the current year’s trigger amount. In Advice Letter 2147-E⁷, dated February 16, 2010, SDG&E reported that its 2009 electric commodity revenue, excluding CDWR revenue, was \$1,109 million. Consequently, SDG&E’s currently approved 4% trigger point is \$44.4 million and the 5% ERRA threshold is \$55.4

⁶ At the time of the Advice Letter 2131-E filing, SDG&E’s approved 4% trigger and 5% threshold amounts were \$41.2 and \$51.5 million, respectively. These amounts were approved in Advice Letter 2068-E, effective March 6, 2009.

⁷ Approved by the Commission on April 13, 2010 and effective February 16, 2010.

million. As explained by Ms. Le Mieud, the current and projected overcollections are above these new trigger and threshold amounts.

III. REQUESTED RELIEF

Through this application, SDG&E is seeking the Commission's expedited authorization to offset a projected \$100 million ERRA overcollection (as of June 30, 2010) with a projected \$26 million NGBA undercollection (as of June 30, 2010), resulting in a total amount of \$74 million to be returned to customers. SDG&E also seeks approval to make the return via a 12-month amortization period, beginning on September 1, 2010, which coincides with the implementation of changes to the FERC transmission rate.

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

In accordance with Rule 2.1 (a) – (c) of the Commission's Rules of Practice and Procedure, SDG&E provides the following 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. SDG&E's attorney in this matter is John A. Pacheco.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Kari Kloberdanz
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, California 92123
Telephone: (858) 637-7960
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with copies to:

John A. Pacheco
Attorney for:
San Diego Gas & Electric Company
101 Ash Street
San Diego, CA 92101-3017
Telephone: (619) 699-5130
Facsimile: (619) 699-5027
JPacheco@semprautilities.com

3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting because SDG&E proposed return of an ERRA overcollection will influence SDG&E's rates.

b. Need for Hearings

SDG&E does not believe that approval of this Application will require hearings. SDG&E has provided ample supporting testimony, analysis and documentation that provide the Commission with a sufficient record upon which to grant the relief requested on an ex parte basis.

c. Issues to be Considered

The issues to be considered are described in this Application and the accompanying testimony and exhibits.

d. Proposed Schedule

SDG&E proposes the following expedited schedule⁸:

<u>ACTION</u>	<u>DATE</u>
Application filed	April 30, 2010
Approx. End of Response Period (including expedited reply)	June 4, 2010
Prehearing Conference	June 8, 2010
Proposed Decision	June 16, 2010
Comments on Proposed Decision (reduced comment period)	June 18, 2010
Reply Comments on Proposed Decision (reduced comment period)	June 21, 2010
Commission Decision Adopted	June 24, 2010

B. 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.

C. Rule 3.2 (a) – (d) – Authority to Change Rates⁹

In accordance with Rule 3.2 (a) – (d) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.

⁸ Pursuant to D.02-10-062, trigger applications are to be expedited for approval in 60 days from the filing date. D.02-10-062 at p. 64 and COL 15.

⁹ Note Rule 3.2(a) (9) is not applicable to this application.

1. Rule 3.2 (a) (1) – balance sheet

SDG&E’s financial statement, balance sheet and income statement are included with this Application as Attachment A.

2. 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://www.sdge.com/regulatory/currentEffectiveTariffs.shtml>.

Attachment B to this Application provides the current table of contents from SDG&E’s electric tariffs on file with the Commission.

3. Rule 3.2 (a) (3) – statement of proposed rate change

A statement of proposed decreases is attached as Attachment C.

4. 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 is attached as Attachment D.

5. 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 three month period ending December 31, 2009, is included as Attachment E to this Application.

6. 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 plan

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.

7. Rule 3.2 (a) (8) – proxy statement

A copy of SDG&E’s most recent proxy statement, dated April 17, 2009, was mailed to the Commission on April 24, 2009 and is incorporated herein by reference.

8. Rule 3.2 (a) (10) – statement re pass through to customers

This Application is not seeking to increase rates as a pass through of increased costs. Rather, it is seeking to decrease rates via the return of an ERRA overcollection.

9. 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 ten 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.

10. 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 ten days after the filing of this Application, publish in newspapers of general circulation in each county in its service territory notice of this Application.

11. 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.

V. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, testimony and related exhibits on parties to the service list for A.09-10-003 (last year’s SDG&E ERRRA forecast proceeding) and R.08-02-007 (2008 OIR to Integrate and Refine Procurement Policies Underlying Long-Term Procurement Plans). Hard copies will be sent by overnight mail to the Assigned Commissioner and Assigned ALJ in R.08-02-007 and Chief ALJ Karen Clopton.

VI. CONCLUSION

Based on this Application and the supporting testimony and exhibits, SDG&E respectfully requests that the Commission grant the relief requested above and such

additional relief as the Commission believes is just and reasonable.

Respectfully submitted,

By: /s/ John A. Pacheco

John A. Pacheco

Attorney for:

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SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ LEE SCHAVRIEN

Lee Schavrien

San Diego Gas & Electric Company

Senior Vice President – Regulatory and Finance

DATED at San Diego, California, this 30th day of April 2010

OFFICER VERIFICATION

OFFICER VERIFICATION

Lee Schavrien declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **EXPEDITED TRIGGER APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 30th, 2010 at San Diego, California.

/s/ LEE SCHAVRIEN
Lee Schavrien
San Diego Gas & Electric Company
Senior Vice President – Regulatory and Finance

APPENDIX A

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
DECEMBER 31, 2009

(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
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(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009 and 06-05-01: to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application No. 06-05-015 and 08-07-029 to which reference is hereby made.

(d) Number and Amount of Bonds Authorized and Issued

<u>First Mortgage Bonds:</u>	<u>Nominal Date of Issue</u>	<u>Par Value Authorized and Issued</u>	<u>Outstanding</u>	<u>Interest Paid in 2009</u>
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	1,877,679
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	1,724,949
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	1,502,592
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,067,817
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,494,416
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	295,705
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	947,581
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	9,850,000
 <u>Unsecured Bonds:</u>				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
DECEMBER 31, 2009**

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2009</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$39,858

Amounts and Rates of Dividends Declared:

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

<u>Preferred Stock</u>	<u>Shares Outstanding 12-31-09</u>	<u>Dividends Declared</u>				
		2005	2006	2007	2008	2009
5.0%	375,000	\$375,000	\$375,000	\$375,000	\$375,000	\$375,000
4.50%	300,000	270,000	270,000	270,000	270,000	270,000
4.40%	325,000	286,000	286,000	286,000	286,000	286,000
4.60%	373,770	343,868	343,868	343,868	343,868	343,868
\$ 1.7625	0	1,321,875	1,145,625	969,375	242,344	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>\$6,141,543</u>	<u>\$5,965,293</u>	<u>\$5,789,043</u>	<u>\$5,062,012 [2]</u>	<u>\$4,819,668</u>

Common Stock

Amount	\$75,000,000	\$0	\$0	\$0	\$150,000,000 [1]
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A balance sheet and a statement of income and retained earnings of Applicant for the twelve months ended December 31, 2009, are attached hereto.

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

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

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
DECEMBER 31, 2009

1. UTILITY PLANT		<u>2009</u>
101	UTILITY PLANT IN SERVICE	\$10,056,217,933
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	2,973,017
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	545,954,329
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,211,696,068)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(255,383,870)
118	OTHER UTILITY PLANT	674,387,352
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(145,060,258)
120	NUCLEAR FUEL - NET	<u>51,050,581</u>
TOTAL NET UTILITY PLANT		<u>6,718,443,016</u>
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	5,168,553
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(520,025)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>678,587,409</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>683,235,937</u>

Data from SPL as of April 15, 2010

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
DECEMBER 31, 2009**

3. CURRENT AND ACCRUED ASSETS		2009
131	CASH	4,996,010
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	3,000
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	1,727,158
142	CUSTOMER ACCOUNTS RECEIVABLE	180,730,598
143	OTHER ACCOUNTS RECEIVABLE	81,984,725
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,186,422)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	18,351,929
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	5,453,946
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	59,203,059
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	355,115
165	PREPAYMENTS	95,639,713
171	INTEREST AND DIVIDENDS RECEIVABLE	4,018,839
173	ACCRUED UTILITY REVENUES	51,275,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	272,864,690
175	DERIVATIVE INSTRUMENT ASSETS	42,475,678
TOTAL CURRENT AND ACCRUED ASSETS		815,893,038
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	23,892,022
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,372,956,256
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	1,320,980
184	CLEARING ACCOUNTS	71,432
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	5,148,298
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	26,616,688
190	ACCUMULATED DEFERRED INCOME TAXES	239,777,827
TOTAL DEFERRED DEBITS		1,669,783,503
TOTAL ASSETS AND OTHER DEBITS		9,887,355,494

Data from SPL as of April 15, 2010

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
DECEMBER 31, 2009

5. PROPRIETARY CAPITAL

	<u>2009</u>
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	(279,618,042)
214 CAPITAL STOCK EXPENSE	25,688,571
216 UNAPPROPRIATED RETAINED EARNINGS	(1,611,830,266)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>9,600,268</u>
TOTAL PROPRIETARY CAPITAL	<u>(2,818,316,017)</u>

6. LONG-TERM DEBT

221 BONDS	(1,936,905,000)
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	<u>3,836,043</u>
TOTAL LONG-TERM DEBT	<u>(2,186,788,957)</u>

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(688,147,980)
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**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
DECEMBER 31, 2009**

8. CURRENT AND ACCRUED LIABILITES		2009
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	(279,634,879)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(14,196,909)
235	CUSTOMER DEPOSITS	(56,097,076)
236	TAXES ACCRUED	(349,495)
237	INTEREST ACCRUED	(22,512,413)
238	DIVIDENDS DECLARED	(1,204,917)
241	TAX COLLECTIONS PAYABLE	(4,354,784)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(465,017,879)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(41,031,778)
244	DERIVATIVE INSTRUMENT LIABILITIES	(273,311,902)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	0
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,157,712,032)

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	(16,970,284)
253	OTHER DEFERRED CREDITS	(139,089,611)
254	OTHER REGULATORY LIABILITIES	(891,359,106)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(26,265,527)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	(5,201,256)
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(733,644,764)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(229,079,730)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2009

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$3,022,995,481
401	OPERATING EXPENSES	\$1,870,679,817	
402	MAINTENANCE EXPENSES	167,804,014	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	322,537,660	
408.1	TAXES OTHER THAN INCOME TAXES	71,177,763	
409.1	INCOME TAXES	110,037,299	
410.1	PROVISION FOR DEFERRED INCOME TAXES	125,882,680	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(56,980,485)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(91,982)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	<u>(945,335)</u>	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>2,610,101,431</u>
	NET OPERATING INCOME		412,894,050

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(62,401)	
418	NONOPERATING RENTAL INCOME	423,100	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	7,011,668	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	29,102,903	
421	MISCELLANEOUS NONOPERATING INCOME	1,252,107	
421.1	GAIN ON DISPOSITION OF PROPERTY	<u>-</u>	
	TOTAL OTHER INCOME		<u>37,727,377</u>
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>394,403</u>	
	TOTAL OTHER INCOME DEDUCTIONS		<u>394,403</u>
408.2	TAXES OTHER THAN INCOME TAXES	350,412	
409.2	INCOME TAXES	(1,948,989)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	4,214,231	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(305,595)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS		<u>2,310,059</u>

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2009

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$1,417,747,578
NET INCOME (FROM PRECEDING PAGE)	348,902,357
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(4,819,669)
OTHER RETAINED EARNINGS ADJUSTMENTS	(150,000,000)
RETAINED EARNINGS AT END OF PERIOD	<u>\$1,611,830,266</u>

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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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Advice Ltr. No. 2160-E

Decision No. 10-03-022

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Apr 2, 2010

Effective Apr 2, 2010

Resolution No. _____



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Advice Ltr. No. 2135-E

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Issued by

Date Filed

Sep 25, 2009

Advice Ltr. No. 2111-E

Lee Schavrien

Effective Oct 25, 2009

Senior Vice President
Regulatory Affairs

Decision No. _____

Resolution No. _____



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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 19529-E

Canceling Original Cal. P.U.C. Sheet No. 15392-E

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Advice Ltr. No. 1820-E

Decision No. _____

Issued by
Lee Schavrien
Vice President
Regulatory Affairs

Date Filed Aug 15, 2006

Effective _____

Resolution No. _____

APPENDIX C

**SAN DIEGO GAS & ELECTRIC COMPANY- ELECTRIC DEPARTMENT
ATTACHMENT C**

PRESENT AND PROPOSED RATES

**SAN DIEGO GAS & ELECTRIC COMPANY —ELECTRIC DEPARTMENT
ILLUSTRATIVE ELECTRIC RATE IMPACT**

	Currently Effective Class Average Rates (¢/kWh)	Class Average Rates Including ERRAs Decrease (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change %
Residential	17.937	17.530	(0.407)	-2.27%
Small Commercial	17.924	17.485	(0.439)	-2.45%
Medium and Large C&I	14.485	14.052	(0.433)	-2.99%
Agricultural	17.431	17.012	(0.419)	-2.40%
Lighting	15.717	15.415	(0.302)	-1.92%
System Total	16.106	15.685	(0.421)	-2.61%

APPENDIX D

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF DECEMBER 31, 2009

<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	26,878,263	25,441,479
	TOTAL INTANGIBLE PLANT	27,101,104	25,644,379
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	44,556,906	12,372,661
312	Boiler Plant Equipment	116,756,529	20,394,906
314	Turbogenerator Units	100,079,315	19,306,187
315	Accessory Electric Equipment	33,468,903	6,204,450
316	Miscellaneous Power Plant Equipment	18,815,570	2,601,191
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	328,203,741	60,925,913
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	274,271,197	269,327,732
322	Boiler Plant Equipment	397,275,106	393,064,175
323	Turbogenerator Units	140,240,158	135,801,716
324	Accessory Electric Equipment	167,581,487	166,688,049
325	Miscellaneous Power Plant Equipment	288,774,862	220,560,120
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,268,426,486	1,185,725,468
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	16,473,840	1,169,729
342	Fuel Holders, Producers & Accessories	15,295,980	2,002,850
343	Prime Movers	21,550,498	3,843,899
344	Generators	235,088,389	16,989,607
345	Accessory Electric Equipment	10,918,268	1,381,194
346	Miscellaneous Power Plant Equipment	359,058	63,526
	TOTAL OTHER PRODUCTION	299,831,937	25,453,233
	TOTAL ELECTRIC PRODUCTION	1,896,462,165	1,272,104,614

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 37,822,715	\$ 0
350.2	Land Rights	70,905,656	10,602,206
352	Structures and Improvements	98,525,958	30,158,077
353	Station Equipment	640,671,917	142,191,284
354	Towers and Fixtures	107,855,852	80,141,238
355	Poles and Fixtures	171,014,838	39,053,226
356	Overhead Conductors and Devices	255,676,258	156,837,845
357	Underground Conduit	129,368,482	15,480,203
358	Underground Conductors and Devices	110,514,092	17,958,140
359	Roads and Trails	25,627,569	5,614,138
	TOTAL TRANSMISSION	1,647,983,336	498,036,358
360.1	Land	16,176,228	0
360.2	Land Rights	70,019,304	29,065,626
361	Structures and Improvements	3,253,836	1,360,498
362	Station Equipment	336,534,064	70,964,348
364	Poles, Towers and Fixtures	436,429,928	196,109,579
365	Overhead Conductors and Devices	346,271,498	121,604,912
366	Underground Conduit	859,452,730	321,055,409
367	Underground Conductors and Devices	1,134,515,369	626,308,456
368.1	Line Transformers	430,423,892	73,480,534
368.2	Protective Devices and Capacitors	17,421,145	(4,429,185)
369.1	Services Overhead	108,238,402	120,233,207
369.2	Services Underground	285,089,043	180,554,849
370.1	Meters	112,804,690	34,263,069
370.2	Meter Installations	52,806,919	10,593,716
371	Installations on Customers' Premises	6,246,317	10,101,205
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	24,253,948	16,363,069
	TOTAL DISTRIBUTION PLANT	4,239,937,312	1,807,629,291
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,776,375	14,355,772
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	26,034	2,528
393	Stores Equipment	52,833	49,209
394.1	Portable Tools	16,306,508	4,932,280
394.2	Shop Equipment	350,581	163,808
395	Laboratory Equipment	320,845	(2,238)
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	116,182,492	53,015,546
398	Miscellaneous Equipment	462,560	45,662
	TOTAL GENERAL PLANT	171,081,428	72,761,586
101	TOTAL ELECTRIC PLANT	7,982,565,345	3,676,176,229

<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	713,559	574,758
	TOTAL INTANGIBLE PLANT	799,663	660,862
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	1,725,499	432,146
	TOTAL STORAGE PLANT	1,769,491	476,138
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,101,529
366	Structures and Improvements	11,230,684	8,336,454
367	Mains	125,303,759	53,234,595
368	Compressor Station Equipment	68,648,046	45,513,137
369	Measuring and Regulating Equipment	18,958,071	12,185,727
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	231,006,888	120,371,442
374.1	Land	102,187	0
374.2	Land Rights	8,043,621	5,431,376
375	Structures and Improvements	43,447	61,253
376	Mains	518,913,255	290,113,338
378	Measuring & Regulating Station Equipment	9,998,057	5,997,237
380	Distribution Services	234,116,478	264,564,396
381	Meters and Regulators	85,147,770	29,219,878
382	Meter and Regulator Installations	67,598,820	22,180,227
385	Ind. Measuring & Regulating Station Equipm	1,516,811	878,091
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,274,409	4,472,986
	TOTAL DISTRIBUTION PLANT	930,754,854	622,918,782

<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	7,077,116	2,642,894
394.2	Shop Equipment	84,181	17,629
395	Laboratory Equipment	283,094	92,763
396	Power Operated Equipment	162,284	36,966
397	Communication Equipment	2,177,345	1,317,572
398	Miscellaneous Equipment	280,519	93,128
	TOTAL GENERAL PLANT	10,139,039	4,300,956
101	TOTAL GAS PLANT	1,174,469,936	748,728,179
COMMON PLANT			
303	Miscellaneous Intangible Plant	232,666,850	173,154,379
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,612,511	0
389.2	Land Rights	1,385,339	27,275
390	Structures and Improvements	184,276,024	70,091,643
391.1	Office Furniture and Equipment - Other	26,673,605	13,685,997
391.2	Office Furniture and Equipment - Computer E	44,946,931	13,393,429
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(50,811)
393	Stores Equipment	138,816	(44,113)
394.1	Portable Tools	581,115	23,819
394.2	Shop Equipment	310,478	163,086
394.3	Garage Equipment	1,603,804	177,114
395	Laboratory Equipment	2,370,507	894,736
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	83,900,257	46,428,424
398	Miscellaneous Equipment	2,252,318	389,562
118.1	TOTAL COMMON PLANT	586,785,867	317,802,632
	TOTAL ELECTRIC PLANT	7,982,565,345	3,676,176,229
	TOTAL GAS PLANT	1,174,469,936	748,728,179
	TOTAL COMMON PLANT	586,785,867	317,802,632
101 & 118.1	TOTAL	9,743,821,148	4,742,707,040
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	Accrual for Retirements		
	Electric	\$ (5,927,587)	\$ (5,927,587)
	Gas	(113,515)	(113,515)
	TOTAL PLANT IN SERV-NON RECON ACC	<u>(6,041,103)</u>	<u>(6,041,103)</u>
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	<u>0</u>	<u>0</u>
105	Plant Held for Future Use		
	Electric	2,973,017	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	<u>2,973,017</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	572,925,005	
	Gas	2,885,824	
	Common	86,821,033	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>662,631,862</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	318,538
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	3,669,000
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	606,043,897
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0</u>	<u>606,043,897</u>
101.1	ELECTRIC OMEC CAPITAL LEASE	717,747,941	8,718,197
118.1	COMMON CAPITAL LEASE	20,795,431	645,416
		<u>738,543,372</u>	<u>9,363,613</u>
120	NUCLEAR FUEL FABRICATION	<u>97,538,885</u>	<u>76,344,804</u>
143	FAS 143 ASSETS - Legal Obligation	126,668,513	(526,951,669)
	FIN 47 ASSETS - Legal Obligation	34,751,219	14,087,528
143	FAS 143 ASSETS - Non-legal Obligation	0	(1,148,078,945)
	TOTAL FAS 143	161,419,732	(1,660,943,087)
	UTILITY PLANT TOTAL	<u>\$ 10,236,755,677</u>	<u>\$ 2,607,331,467</u>

APPENDIX E

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,023
2	Operating Expenses	<u>2,610</u>
3	Net Operating Income	<u><u>\$413</u></u>
4	Weighted Average Rate Base	\$4,362
5	Rate of Return*	8.40%

*Authorized Cost of Capital

APPENDIX F

State of California
Attorney General's Office
P.O. Box 944255
Sacramento, CA 94244-2550

City of Chula Vista
Attn. City Attorney
276 Fourth Ave
Chula Vista, Ca 91910-2631

United States Government
General Services Administration
300 N. Los Angeles
Los Angeles, CA 90012

State of California
Attn. Director Dept of General
Services
PO Box 989052
West Sacramento, CA 95798-9052

City of Coronado
Attn. City Attorney
1825 Strand Way
Coronado, CA 92118

City of Carlsbad
Attn. City Clerk
1200 Carlsbad Village Drive
Carlsbad, CA 92008-1949

City of Carlsbad
Attn. City Attorney
1200 Carlsbad Village Drive
Carlsbad, CA 92008-19589

City of Dana Point
Attn. City Attorney
33282 Golden Lantern
Dana Point, CA 92629

City of Encinitas
Attn. City Attorney
505 S. Vulcan Ave.
Encinitas, CA 92024

City of Del Mar
Attn. City Attorney
1050 Camino Del Mar
Del Mar, CA 92014

City of Escondido
Attn. City Attorney
201 N. Broadway
Escondido, CA 92025

City of Solana Beach
Attn. City Attorney
635 S. Highway 101
Solana Beach, CA 92075

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825 Imperial Beach Blvd
Imperial Beach, CA 92032

City of Laguna Beach
Attn. City Clerk
505 Forest Ave
Laguna Beach, CA 92651

City of Imperial Beach
Attn. City Attorney
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Imperial Beach, CA 92032

City of Laguna Niguel
Attn. City Attorney
22781 La Paz Ste. B
Laguna Niguel, CA 92656

City of La Mesa
Attn. City Attorney
8130 Allison Avenue
La Mesa, CA 91941

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3232 Main St.
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Laguna Beach, CA 92651

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City of Mission Viejo
Attn City Attorney
200 Civic Center
Mission Viejo, CA 92691

City of Mission Viejo
Attn City Clerk
200 Civic Center
Mission Viejo, CA 92691

City of Oceanside
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300 N. Coast Highway
Oceanside, CA 92054-2885

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P.O. Box 838
Santa Ana, CA 92702

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National City, CA 92050

County of Orange
Attn. County Counsel
P.O. Box 1379
Santa Ana, CA 92702

City of National City
Attn. City Clerk
1243 National City Blvd
National City, CA 92050

City of Poway
Attn. City Attorney
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Poway, CA 92064

Naval Facilities Engineering
Command
Navy Rate Intervention
1314 Harwood Street SE
Washing Navy Yard, DC 20374-5018

City of Poway
Attn. City Clerk
P.O. Box 789
Poway, CA 92064

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Attn. City Attorney
100 Avenida Presidio
San Clemente, CA 92672

City of San Diego
Attn. Mayor
202 C St.
San Diego, CA 92010

City of San Clemente
Attn. City Clerk
100 Avenida Presidio
San Clemente, CA 92672

County of San Diego
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P.O. Box 121750
San Diego, CA 92101

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202 C Street.
San Diego, CA 92101

County of San Diego
Attn. County Counsel
1600 Pacific Hwy
San Diego, CA 92101

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San Diego, CA 92010

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1 Civic Center Dr.
San Marcos, CA 92069

City of San Diego
Attn. City Manager
202 C St.
San Diego, CA 92101

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San Marcos, CA 92069

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10601 Magnolia Avenue
Santee, CA 92071

City of Santee
Attn. City Clerk
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Vista, CA 92083

City of Vista
Attn. City Clerk
PO Box 1988
Vista, CA 92083

City of El Cajon
Attn. City Clerk
200 E. Main St.
El Cajon, CA 92020

City of Ramona
Attn. City Clerk
960 Main Street
Ramona, CA 92065

City of Lakeside
Attn. City Clerk
9924 Vine Street
Lakeside CA 92040

City of Fallbrook
Attn. City Clerk
233 E. Mission Road
Fallbrook, CA 92028

City of Julian
Attn. City Clerk
P.O. Box 1866
2129 Main Street
Julian, CA

City of Alpine
Attn. City Clerk
2707 Alpine Blvd
Alpine, CA 91901

City of Rancho San Diego - Jamul
Attn. City Clerk
3855 Avocado Blvd.
Suite 230
La Mesa, CA 91941

Borrego Springs Chamber of
Commerce
Attn. City Clerk
786 Palm Canyon Dr
PO Box 420
Borrego Springs CA 92004-0420

Spring Valley Chamber of Commerce
Attn. City Clerk
3322 Sweetwater Springs Blvd,
Ste. 202
Spring Valley, CA 91977-3142

Valley Center Chamber of Commerce
Attn. City Clerk
P.O. Box 8
Valley Center, CA 92082

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true and correct copy of the foregoing **EXPEDITED TRIGGER APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)** to each party of named in the official service list for proceeding A.09-10-003 (last year's SDG&E ERRRA forecast proceeding) and R.08-02-007 (2008 OIR to Integrate and Refine Procurement Policies Underlying Long-Term Procurement Plans) by electronic mail. Those parties without an email address were served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid. Copies were also sent via Federal Express to the Assigned Commissioner and Administrative Law Judges in the R.08-02-007 proceeding and to Chief Administrative Law Judge Karen Clopton.

Executed this 30th day of April 2010, at San Diego, California.

/s/ Lisa Fucci-Ortiz
Lisa Fucci-Ortiz