

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

Application of Southern California Edison Company (U 338 E) for Approval of Demand Response Programs, Goals and Budgets for 2009-2011
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Demand Response Programs and Budgets for Years 2009 through 2011
Application of Pacific Gas and Electric Company For Approval of 2009-2011 Demand Response Programs and Budgets (U39E)

Application 08-06-001
(Filed June 2, 2008)

Application 08-06-002
(Filed June 2, 2008)

Application 08-06-003
(Filed June 2, 2008)

**AMENDED APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M)
FOR APPROVAL OF DEMAND RESPONSE PROGRAMS AND BUDGETS FOR
YEARS 2009 THROUGH 2011**

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**AMENDED APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M)
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YEARS 2009 THROUGH 2011**

**I.
INTRODUCTION**

In compliance the California Public Utilities' Commission's ("Commission" or "CPUC") Rules of Practice and Procedures ("Rules") and the requirements set forth in: 1) California Public Utilities Commission ("CPUC") Decision ("D.") 06-03-024; 2) Administrative Law Judge ("ALJ") Jessica Hecht's 2008 rulings of February 27, August 7, August 27; 3) Joint Assigned Commissioner Chong and Grueneich's ruling of April 11; and CPUC D. 08-04-050, San Diego Gas & Electric Company ("SDG&E") submits this Application for approval of its portfolio of Demand Response ("DR") programs and related budgets for program years ("PY") 2009 through 2011 (the "Application").

As discussed in greater detail below and in the testimony served concurrently herewith and incorporated by reference, the Application seeks Commission authority to: 1) implement a portfolio of DR programs; and, 2) expend the associated program and measurement and evaluation budgets.

II. BACKGROUND

In D.06-03-024, the Commission approved DR activities and budgets for Southern California Edison Company (“SCE”), SDG&E and Pacific Gas and Electric Company (“PG&E”), collectively (the “IOU’s”) and required each investor-owned utility (“IOU”), to file an IOU-specific DR program application by June 1, 2008¹, for approval of its DR activities and budgets for 2009-2011. On February 27, 2008 ALJ Hecht issued a ruling to provide guidance as to the scope and contents of the referenced Applications to better ensure the IOU’s proposals would be consistent with the Commission’s expectations for the development of DR over the next several years, and to ensure that the Applications contain sufficient information to support a thorough and comprehensive review of DR activities and budgets. On April 11, 2008, Commissioner Rachelle Chong issued a joint ruling with Commissioner Dian Grueneich providing guidance regarding the integration of Energy Efficiency (EE) and DR programs in each of the utilities’ respective 2009-2011 applications. Subsequent to the issuance of these rulings, two additional rulings were issued requiring utilities to amend their previously filed 2009-2011 DR applications, modifying the schedule for the submittal of the amended applications and setting forth a limited procedural schedule for the proceeding.

On August 27, 2008 the IOUs were ordered to refile their applications on September 19, 2008 to address gaps in each of their applications originally filed on June 2, 2008.

To ensure the amended applications fully comply with all Commission guidance and requirements, the IOUs were to work with Energy Division to fill in any gaps in information and program proposals and include a statement of compliance in each of their amended applications.

¹ SDG&E originally filed its 2009-2011 DR application on June 2, 2008. D. 06-03-024 directed utilities to file their applications on June 1, 2008. However, June 1, 2008, fell on a Sunday and the application was filed on the next business day, June 2, 2008.

SDG&E worked with Energy Division staff to identify and address gaps and obtain the requisite statement of compliance attached hereto as Appendix A.

Consistent with the above referenced Decisions, Rulings and the Rules, SDG&E hereby submits its Amended DR Application.

III. SUMMARY OF APPLICATION

The Application is supported by seven SDG&E witnesses: Mark Gaines, Director Customer Programs Customer Programs; Mark Ward, Principal Energy Programs Advisor Customer Programs; Kathryn Smith, Senior Market Analyst Regulatory Policy and Analysis; Kevin McKinley, Customer Programs Measures and Evaluation Supervisor Regulatory Customer Programs; Terry Mohn, IT Architect, IT Program Delivery Team; Athena Besa, Customer Programs Policy and Support Manager; and Tony Choi, Transactional Scheduling Manager. The witnesses' prepared direct testimony is served concurrently herewith, incorporated in the Application by reference, and summarized below:

A. SDG&E's Demand Response Policy (Chapter I)

SDG&E witness Mark Gaines describes SDG&E's policy guiding the design of the portfolio of DR programs that SDG&E proposes to offer to its customers during the three-year program cycle of 2009-2011 and describes the principles used to develop the details of SDG&E's DR program portfolio, cost-effectiveness, IT strategy and measurement & evaluation ("M&E") results described in the referenced testimony of SDG&E witnesses Ward, Smith, McKinley and Mohn. Finally, Mr. Gaines' testimony describes SDG&E's identification of

potential future changes that would be necessary to enable DR programs to transition and participate in the CAISO's Market Redesign and Technology Upgrade ("MRTU") in the future.

B. Demand Response Portfolio and Budgets (Chapter II)

SDG&E witness Mark Ward describes SDG&E's portfolio of DR programs and associated budgets that SDG&E proposes to offer to its customers during PY 2009-2011, and explains SDG&E's program development process. Mr. Ward's testimony also presents exemplary tariffs associated with SDG&E's proposed portfolio of DR programs.

C. Load Impacts of DR Programs (Chapter III)

SDG&E witness Kathryn Smith presents the load impacts of SDG&E's DR programs calculated in accordance with the load impact protocols, adopted in D. 08-04-050, and describes SDG&E's proposed budget for SDG&E's DR M&E activities planned for 2009-2011.

D. Cost Effectiveness (Chapter IV)

SDG&E witness Kevin McKinley presents the results of the overall cost effectiveness analysis for the 2009-2011 proposed programs and the overall portfolio.

E. Information Technology (IT) (Chapter V)

SDG&E's witness Terry Mohn, describes SDG&E's proposed system enhancements and system integration efforts to support SDG&E's proposed 2009-2011 DR portfolio.

F. Integrated Demand Side Management (IDSM) (Chapter VI)

SDG&E witness Athena Besa, describes SDG&E proposed strategy to integrate across various program portfolios in different Commission proceedings i.e., Energy Efficiency, Low Income Energy Efficiency, Demand Response, Advanced Metering Infrastructure, Distributed Generation and the California Solar Initiative.

G. Demand Response Participating Load Pilot (PLP) under MRTU (Chapter VII)

SDG&E witnesses Mark Gaines and Tony Choi jointly present SDG&E's proposed PLP program under the CAISO's MRTU. The testimony includes a description of the PLP proposal, pilot objectives, budget and an M&E proposal.

IV. RATE AND REVENUE IMPACTS

A. Current Cost Recovery Mechanism

Consistent with the regulatory accounting and cost recovery treatment initially established by D.03-03-036 and most recently affirmed by D.05-06-017, SDG&E currently records all program costs associated with its existing DR programs in its Advanced Metering and Demand Response Memorandum Account (AMDRMA),² with one exception as discussed below. For the authorized DR program costs for 2009-2011 not recovered through SDG&E's 2008 General Rate Case (GRC) adopted rates,³ SDG&E proposes that the O&M expenses, capital related costs (i.e. depreciation, return and taxes), customer capacity incentive payments, and all other authorized program costs be recorded in the existing AMDRMA, including costs associated with the proposed PLP program. On September 18, 2008, SDG&E filed Advice Letter 2024-E seeking Commission authorization to amend its Preliminary Statement and establish an AMDRMA sub-account to record all costs associated with the PLP program. SDG&E proposes that there be no change to the existing disposition of the AMDRMA balances being transferred to the Rewards and Penalties Balancing Account (RPBA) on an annual basis for amortization in SDG&E's electric distribution rates over 12 months, effective on January 1st of each year, consistent with SDG&E's adopted tariffs. As noted above, there is currently one

² See D.03-03-036, Ordering Paragraph 8, and D.05-06-017.

exception to the way SDG&E records demand response program costs in AMDRMA. As authorized in D.03-03-036, SDG&E records the energy component of the customer incentive payments to its Energy Resource Recovery Account (ERRA). SDG&E requests to continue this treatment of these costs. SDG&E is therefore requesting approval of \$19.591 million, \$20.068 million and \$20.956 million in budgeted funds for 2009, 2010 and 2011, respectively, to fund its DR programs. SDG&E's revised funding request includes its original request of \$48.535 million plus an additional \$12.080 million from previously-authorized 2006-2008 DR program budgets to fund its Commission-required PLP program referenced above.

Illustrative electric rate impacts of SDG&E's proposal in years 2010, 2011 and 2012 as compared to present rates are shown in the table below.

**SAN DIEGO GAS & ELECTRIC®
DEMAND RESPONSE PROGRAMS - ELECTRIC
ILLUSTRATIVE ELECTRIC DISTRIBUTION RATE IMPACT
2010**

<u>Customer Class</u>	<u>2008</u>	<u>2010</u>	<u>Change</u>	
	¢/kWh	¢/kWh	¢	%
(a)	(b)	(c)	(d)	(e)
Residential	6.159	6.173	0.014	0.2%
Small Commercial	5.119	5.130	0.011	0.2%
Med & Lg Commercial/Industrial	2.871	2.877	0.006	0.2%
Agriculture	5.078	5.089	0.011	0.2%
Street Lighting	7.323	7.331	0.008	0.1%
System Total	4.354	4.364	0.010	0.2%

³ In its 2008 GRC, SDG&E requested distribution rate funding for activities associated with its current ALTOU-CP, SLRP, BIP, RBRP, and OBMC programs. SDG&E's proposal herein does not include any proposed revision to the treatment of those components of the program costs.

**SAN DIEGO GAS & ELECTRIC
DEMAND RESPONSE PROGRAMS - ELECTRIC
ILLUSTRATIVE ELECTRIC DISTRIBUTION RATE IMPACT
2011**

Customer Class	2008	2011	Change	
	¢/kWh	¢/kWh	¢	%
(a)	(b)	(c)	(d)	(e)
Residential	6.159	6.177	0.018	0.3%
Small Commercial	5.119	5.133	0.014	0.3%
Med & Lg Commercial/Industrial	2.871	2.878	0.007	0.3%
Agriculture	5.078	5.091	0.013	0.3%
Street Lighting	7.323	7.332	0.009	0.1%
System Total	4.354	4.366	0.012	0.3%

**SAN DIEGO GAS & ELECTRIC
DEMAND RESPONSE PROGRAMS - ELECTRIC
ILLUSTRATIVE ELECTRIC DISTRIBUTION RATE IMPACT
2012**

Customer Class	2008	2012	Change	
	¢/kWh	¢/kWh	¢	%
(a)	(b)	(c)	(d)	(e)
Residential	6.159	6.183	0.024	0.4%
Small Commercial	5.119	5.138	0.019	0.4%
Med & Lg Commercial/Industrial	2.871	2.881	0.010	0.3%
Agriculture	5.078	5.096	0.018	0.4%
Street Lighting	7.323	7.336	0.013	0.2%
System Total	4.354	4.370	0.016	0.4%

**V.
STATUTORY AND PROCEDURAL REQUIREMENTS**

A. Proposed Category, Issues to be Considered, Need for Hearings and Proposed Schedule

SDG&E proposes to categorize this Application as a “rate-setting” proceeding within the meaning of Rules 1.3(e) and 7.1. SDG&E does not believe hearings will be necessary but respectfully requests that the Commission adopt a final decision by year-end 2008 to enable SDG&E to have ample time to implement these programs effective January 1, 2009. Therefore, SDG&E proposes the following schedule:

Schedule

Filing of Amended Application	September 19, 2008
Protests and Responses to Amended Application	September 29, 2008
Pre-Hearing Conference	October 1, 2008
Rebuttal Testimony	October 9, 2008
Proposed Decision	November 18, 2008
Comments on Proposed Decision	December 8, 2008
Reply Comments on Proposed Decision	December 15, 2008
Final Decision	December 18, 2008

B. Statutory Authority – Rule 2.1

This Application is made pursuant to Sections 451, 701, 702 , 728, and 729 of the Public Utilities Code of the State of California; the Commission’s Rule of Practice and Procedure; and the other relevant prior decisions, orders, and resolutions of the Commission.

C. Legal Name, Place of Business/Incorporation – Rule 2.1(a)

Applicant’s legal name is San Diego Gas & Electric Company. SDG&E is a public utility corporation organized and existing under the laws of the State of California, with its principal place of business at 8830 Century Park Court, San Diego, California 92123.

D. Correspondence – Rule 2.1(b)

Correspondence or communications regarding this application should be addressed to:

Linda Wrazen
Regulatory Case Administrator For:
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, California 92123
Telephone: (858) 637-7914
Facsimile: (858) 654-1788
E-Mail: lwrazen@semprautilities.com

With a copy to:

Steven D. Patrick
Attorney For:
San Diego Gas & Electric Company
555 West 5th Street, Suite 1400
Los Angeles, CA 90013
Telephone: (213) 244-2954
Facsimile: (213) 629-9620
E-Mail: spatrick@sempra.com

E. Articles of Incorporation - Rule 16

SDG&E is incorporated under the laws of the State of California. A certified copy of the restated Articles of Incorporation, as last amended, currently in effect and certified by the California Secretary of State, was filed with the Commission on October 1, 1998 in connection with SDGE&E' Application No. 98-10-012, and is incorporated herein by reference.

F. Financial Statement, Balance Sheet, and Income Statement - Rule 3.2(a)(4)

Appendix B to this Application is SDG&E's Balance Sheet as of June 30, 2008.

G. Rates – Rules 3.2(a)(2) and 3.2(a)(3)

Illustrative electric distribution rate impacts for years 2010-2012 resulting from the proposed DR budgets are presented in Section IV.

H. Property and Equipment – Rule 3.2(a)(4)

A general description of SoCalGas and SDG&E's respective properties was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is being incorporated herein by reference. Appendix C to this Application is a statement of SDG&E's Costs of Property and Depreciation Reserve Applicable Thereto as of June 30, 2008.

I. Summary of Earnings – Rules 3.2(a)(5)

Appendix D to this Application is a Summary of Earnings for SDG&E for the 3 months ended June 30, 2008.

J. Depreciation – Rule 3.2(7)

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 1954, and liberalized depreciation , which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior 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 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.

K. Proxy Statement – Rule 3.2(a)(8)

A copy of SDG&E’s most recent proxy statement, dated April 4, 2008, was mailed to the California Public Utilities Commission on April 29, 2008

L. Pass Through of Costs – Rule 3.2(a)(10)

The changes that SDG&E seeks in this Application reflect estimated costs to SDG&E, and SDG&E proposes to pass through to customers only costs that SDG&E incurs for the services and commodities it furnishes.

M. Service and Notice – Rule 3.2(b)

SDG&E is serving this Application on all parties in 08-06-002 and R.07-01-041. Within ten days of filing this Application, SDG&E will mail notice of this Application to the State of California and to cities and counties that SDG&E will post the notice in its offices and publish the notice in newspapers of general circulation in each county in its service territory. In addition, SDG&E will include notices with the regular bills mailed to all customers affected by the proposed rate changes. The service list of state and government agencies is attached hereto as Appendix E.

**VI.
RELIEF REQUESTED**

For the reasons set forth in this Application and accompanying testimony, SDG&E respectfully asks the Commission to:

- 1) Consider this Application and grant all the relief requested herein.
- 2) Find that SDG&E’s proposals are in conformance with the Commission directives and policies.
- 3) Approve SDG&E’s DR program plans, measures, pilots, and budgets for PY 2009-2011.

- 4) Authorize SDG&E to record all PY 2009-2011 program costs in appropriate regulatory accounts.
- 5) Approve SDG&E's rate increase.
- 6) Grant such other and further relief which the Commission finds to be just and reasonable.

WHEREFORE, SDG&E respectfully requests the Commission grant its Application as filed.

Dated this 19th day of September, 2008.

Respectfully submitted,

/s/ Hal Snyder

Hal Snyder
Vice President – Customer Programs
San Diego Gas & Electric Company

/s/ Steven D. Patrick

Steven D. Patrick
Attorney for
San Diego Gas & Electric Company

VERIFICATION

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 Application are true and 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 this 19th day of September, 2008 at San Diego, California.

/s/ Hal Snyder

Hal Snyder

Vice President – Customer Programs
San Diego Gas & Electric Company

APPENDIX A
Certificate of Compliance

SDG&E APPLICATION DEFICIENCIES CHECKLIST

SDG&E Application Deficiencies	SDG&E's Amended Application Citation
1. Look at existing programs that will align with MRTU Release 1/1A and beyond.	
<ul style="list-style-type: none"> ▪ Assessment of the advantages and disadvantages of modifying existing programs 	Chapter I, Appendix A in its entirety
<ul style="list-style-type: none"> ▪ Discuss equipment and costs needed to bring programs closer to MRTU integration 	Chapter I, 5.1.E Chapter VII
<ul style="list-style-type: none"> ▪ Comprehensive timeline for MRTU integration program by program 	Chapter I, Appendix A in its entirety
<ul style="list-style-type: none"> ▪ Demonstration of work with CAISO to determine opportunities for integration 	Chapter I, Section V in its entirety
<ul style="list-style-type: none"> ▪ Proposed methods to integrate emergency DR into the wholesale market based on examples from other markets 	Chapter I, Page 13
<ul style="list-style-type: none"> ▪ SDG&E should also address how the MRTU barriers they have identified impact each of the aforementioned CAISO DR products 	Chapter I, Pages 11-12
<ul style="list-style-type: none"> ▪ SDG&E shall submit a more detailed SDG&E-focused discussion on the viability of operating DR programs as NPL, PI and PDR and the timing of goals and milestones for integration of these programs 	Chapter I, Appendix A in its entirety
2. Ancillary Services. At least one PL Pilot to be ready by Summer 2009 including:	
<ul style="list-style-type: none"> ▪ Budgets 	Chapter VII, Section F
<ul style="list-style-type: none"> ▪ Barriers 	Chapter VII, Section D
<ul style="list-style-type: none"> ▪ IT Infrastructure – software/technology changes/upgrades needed 	Chapter VII, Section D
<ul style="list-style-type: none"> ▪ Implementation Plan 	Chapter VII, Section D and Chapter VII, Appendix A
<ul style="list-style-type: none"> ▪ Transition Plan on how to get there 	Chapter VII, Section D and Chapter VII, Appendix A in its entirety
3. Pilots (non-MRTU)	
<ul style="list-style-type: none"> ▪ Full description of pilot purpose including purpose, information it will provide and how it will inform future decision making. Research plan for Residential Automated Controls Technology pilot. 	Chapter II, Section IV.B.6
<ul style="list-style-type: none"> ▪ Following Intermittent Load (Renewables) Pilot – SDG&E needs to provide additional information that evaluates and analyzes the ability of DR to assist with the integration of renewable energy sources. 	Chapter I, Section 5.D

**SDG&E APPLICATION DEFICIENCIES
CHECKLIST**

SDG&E Application Deficiencies	SDG&E's Amended Application Citation
<ul style="list-style-type: none"> ▪ Small Load Aggregator Pilot 	Chapter I, Page 9
4. EE/DR Integration ¹	
<ul style="list-style-type: none"> ▪ Describe programs, activities and funding requests combined for EE/DR activities. List separately from non-EE related projects to ensure funding is separate and clear. 	Chapter VI Chapter II, Appendix C
<ul style="list-style-type: none"> ▪ Integrated DSM marketing (outside of the statewide programs) Provide a specific integrated marketing plan. 	Chapter VI Chapter II, Appendix C
<ul style="list-style-type: none"> ▪ Roadmap to develop integrated technology. 	Chapter VI Chapter II, Appendix C
<ul style="list-style-type: none"> ▪ Proposals that outline plans to build partnerships with third parties and local governments. 	Chapter VI Chapter II, Appendix C
<ul style="list-style-type: none"> ▪ ME&O proposals to coordinate EE/DR 	Chapter VI Chapter II, Appendix C
<ul style="list-style-type: none"> ▪ Launch integrated programs to confine pilots to poorly understood approaches 	Chapter VI Chapter II, Appendix C
5. Existing Pilots	
<ul style="list-style-type: none"> ▪ Smart meter/emerging technologies- great opportunity to come up with a pilot to test integration – lay out framework for it in this application 	Chapter II, Section IV.B.6 Chapter II, Section IV.E.3
6. Enabling Technology – Auto DR TA/TI Enhancement	
1) SDG&E has not provided an estimate to quantify their DR proposal in MW (for ADR and ET) that would be potentially enabled (over the next three years) through the expenditure of the ET budget. Note: This area is not a deficiency, but is a data request	Chapter III, page 6
7. Load Impacts	
Enrollment from 2006-2008- want this for May 2006, May 2007, and May 2008 Type of participants (use PG&E DR application Table 5-11, pg 5-23) <ol style="list-style-type: none"> a. Agriculture, mining, & construction b. Manufacturing c. Wholesale, transport, other utilities d. Retail Store e. Offices, hotels, finance and service f. Schools g. Institutional/government h. Other or unknown 	Chapter III page 13-14

¹ The ED Statement of Compliance will contain a caveat that staff makes no determination of compliance on the IDSM chapter (or any other programs/projects involving IDSM integration) and that Energy Division staff will continue to review those sections going forward. The inclusion of this caveat will not affect the Docket Office's acceptance of SDG&E's filing.

SDG&E APPLICATION DEFICIENCIES CHECKLIST

SDG&E Application Deficiencies	SDG&E's Amended Application Citation
<ul style="list-style-type: none"> ▪ Expected load drop by <u>notification timing</u>. <ol style="list-style-type: none"> 1. DA, 2. DO 3 hr lead time, and 3. Emergency response (less than 30 minutes). 	Chapter III page 29-31
<ul style="list-style-type: none"> ▪ <u>Section 5.2. Required Information for All Programs (continuing and new proposals)</u> <ol style="list-style-type: none"> 1. Estimated enrollment for each year, and how it was determined. SDG&E needs to explain this in more detail. 2. How programs fit into local resource adequacy (reference in testimony) 3. Estimated Load impact, based on protocols to be adopted. These estimates should be sufficiently accurate that they can be used in the Long Term Procurement Planning proceeding. Updates or supplemental testimony to incorporate different assumptions may be needed to assure accurate numbers, but IOUs should be comfortable using the number submitted in these applications in future Long-Term Procurement Planning proceedings if they are found to be reasonable here. 	Chapter III page 11-12
<ul style="list-style-type: none"> ▪ For the Ex-Post Appendix, the following programs seem to be missing: CPP-E and BIP? If these programs were not triggered in 07, please state that in your testimony. 	Chapter III Appendix A Page 216-301
<ul style="list-style-type: none"> ▪ On the question of how DR programs fit into local resource adequacy, please insert into testimony a statement that addresses this question. 	Chapter III page 14-15
<ul style="list-style-type: none"> ▪ For the portfolio load impact analysis, Section 5.3 of the 2/11 ALJ Ruling requires expected load drop broken down by several factors including customer type. ED staff requested that SDG&E provide load impact breakdown by specific industry (eg. agriculture, manufacturing, etc.). If this data cannot be provided by 9/19, it should be provided by the end of Oct. Its absence in the 9/19 filing will not be considered a deficiency, but it is information that ED seeks to have. If they cannot be done, give an explanation of why in your testimony. 	Chapter III page 32
<ul style="list-style-type: none"> ▪ In the ex-ante appendix, the document states that for CBP, CPP-E and BIP, the forecasted load impacts do not vary by hour or by temperature. The testimony will need to explain why this is so. 	Chapter III page 23
<ul style="list-style-type: none"> ▪ Pg. 9 of Kathryn Smith's amended draft testimony states that SDG&E did its own 2007 evaluation of the CBP program to come up with forecasted load impacts. The testimony will need to describe in further detail, or provide in an appendix, more detail as to how SDG&E calculated the 2007 results, specifically its conclusion of a 31% load reduction for the day-ahead component. If the details of the 2007 analysis are located in Appendix B, then indicate that. 	Chapter III page 19-20 Chapter III Appendix A page 40-194
<ul style="list-style-type: none"> ▪ SDG&E will provide explanation of enrollment for PTR and CPP 	Chapter III page 11-12
<ul style="list-style-type: none"> ▪ SDG&E will use the categories day-ahead trigger, day-of non-emergency trigger and day-of emergency trigger. The results for 	Chapter III page 32-35

SDG&E APPLICATION DEFICIENCIES CHECKLIST

SDG&E Application Deficiencies	SDG&E's Amended Application Citation
breaking it down by trigger will be very similar to notification timing, except Summer Saver.	
<ul style="list-style-type: none"> ▪ SDG&E will explain why they didn't provide reference load and actual event day load for its ex-ante for Summer Saver Program as required in Protocol 21. 	Chapter II appendix B page 2
<ul style="list-style-type: none"> ▪ Protocol 5 – Change in energy use for each year 	Chapter III page 19
<ul style="list-style-type: none"> ▪ Protocol 8 – Report for each event day and average event day (include in testimony – partially complied) 	Chapter III Appendix A in its entirety
<ul style="list-style-type: none"> ▪ Protocol 9 – Lists statistical tests and measures if use day-matching methods 	Chapter III Appendix A page 214
<ul style="list-style-type: none"> ▪ Protocol 10 – List statistical test and measure for regression methods 	Chapter III Appendix A in its entirety
<ul style="list-style-type: none"> ▪ Protocol 19 – Change in energy use for each month and year 	Chapter II Appendix B in its entirety
<ul style="list-style-type: none"> ▪ Protocol 20 – Uncertainty Adjusted 	Chapter III Appendix B in its entirety
<ul style="list-style-type: none"> ▪ Protocol 21 – report in specific form 	Chapter III Appendix B in its entirety
<ul style="list-style-type: none"> ▪ Protocol 22 – impacts using 1-in-2 and 1-in-10 weather condition (partial compliance) 	Chapter III page 27-28 Appendix B in its entirety
<ul style="list-style-type: none"> ▪ Protocol 24 - Portfolios 	Chapter III page 27-34
8. Supporting Documentation – Guidance Document Section 5	Chapter II, Section C (summary matrix)
9. Cost Effectiveness	
<ul style="list-style-type: none"> ▪ Use of gross margin calculator 	Chapter IV, Page 5
<ul style="list-style-type: none"> ▪ Output tables filled in 	Chapter IV, Page 13-16
10. Other – Inclusion of DR Contracts (summary of performance numbers)	Chapter II, Appendix E in its entirety

**SDG&E INFORMATION REQUIRED OR RECOMMENDED
IN THE FEBRUARY/APRIL GUIDANCE DOCUMENTS**

FEBRUARY GUIDANCE DOCUMENT			
Page	Section	Information Required	SDG&E CITATION
4	1.1	Relationship with Market Redesign and Technology Upgrade	Chapter I, Section V in its entirety
7	2	Describe programs and funding request for combined EE/DR activities	Chapter II, Pages 15-16 Chapter VI, Page 15
8	2.1	ME&O proposals to coordinate EE/DR	Chapter VI, Pages 4-6
9	3	What Type of DR Activities Should be Included – e.g. emergency triggered DR programs, AC Cycling, BIP	Chapter I, Page 15
10	3.1	Proposals Designed to Function Within Expected MRTU Structure	Chapter I, Section V in its entirety
11	3.2	Inclusion of Demand Response Contracts	Chapter II, Appendix E in its entirety
12	3.3	Business Energy Coalition	Not Applicable to SDG&E
13	3.4	Multi-Program Participation Rules	Chapter II, Section 6 and Appendix C (summary matrix)
14	3.5	EE/IDSM Management Strategic Planning – make it easy to separate joint costs from DR-only costs to avoid double-counting	Chapter II, Pages 15-16 Chapter VI
14	3.6	Coordination with other Demand-Response Related Proceedings	Chapter I, Page 12 Chapter III, Pages 5, 14
18	4.2	Expanding Programs that Promote Enabling Technologies	Chapter II, Section IV.E.3 Page 60
18	4.3	Augmenting Auto DR	Chapter II, Section I.V.D, Page 45 Section I.V.D. Page 51
19	4.4	Possible Pilots	Chapter VII in its entirety
20	4.4.1	Ancillary Services under the CAISO's MRTU	Chapter VII in its entirety
21	4.4.2	Following Intermittent Load Renewables	Chapter I, Page 14
22	5.1. 5	Actual DR load reduction & how it was distributed to customers	Chapter III, Page 16-18 Chapter III Ex-post Appendix A in its entirety
22	4.4.3	Small Load Aggregation – propose pilots or programs that aggregate small loads so these customers can participate in DR	Chapter I, Page 9
23	5.1	1, Budget for 2006-2008. 2. Enrollment from 2006-2008, including: <ul style="list-style-type: none"> ▪ number of participants, ▪ type of participants, ▪ Megawatts, and ▪ Megawatts by type of participant ▪ Proposed changes in programs for 2009-2011 (if any) from existing activities, and reasons for those proposed changes ▪ Copies of contracts with providers/aggregators, and information sufficient to verify contract performance 	Chapter II, Appendix A Chapter III, Pages 13-14
24-26	5.2	Required Information for all Programs (continuing and new proposals) <ol style="list-style-type: none"> 1. Program details, including: <ul style="list-style-type: none"> ▪ Budget 	Chapter II, Appendix B in its entirety

**SDG&E INFORMATION REQUIRED OR RECOMMENDED
IN THE FEBRUARY/APRIL GUIDANCE DOCUMENTS**

FEBRUARY GUIDANCE DOCUMENT			SDG&E CITATION
Page	Section	Information Required	
		<ul style="list-style-type: none"> ▪ Trigger mechanism ▪ Notification timing ▪ Baseline or other terms for settlement ▪ Incentive amounts <ol style="list-style-type: none"> 2. Estimated enrollment for each year and how it was determined 3. How programs fit into local resource adequacy 4. Estimated Load impact, based on protocols to be adopted. These estimates should be sufficiently accurate that they can be used in the Long Term Procurement Proceeding 5. Estimated Cost Effectiveness (CE) based on Protocols to be adopted 6. Marketing and Outreach funding disaggregated by target customer (if appropriate given further guidance on EE/DR coordination) 7. Proposal of and schedule for how each program will align with MRTU Release 1/1A and beyond 8. Other information, as appropriate and necessary 	<p>Chapter III, Page 12</p> <p>Chapter III, Page 14</p> <p>Chapter III, Pages 23-25, Appendix B in its entirety</p> <p>Chapter IV in its entirety</p> <p>Chapter II, Appendix B</p> <p>Chapter I, Appendix A in its entirety</p>
26	5.3	<p>Required Information on Proposed Portfolio</p> <ol style="list-style-type: none"> 1. Estimated total customers and load (in MW) available 2. Expected load drop, total and broken down by relevant factors, including <ul style="list-style-type: none"> ▪ Customer Type ▪ Notification timing ▪ Trigger mechanism ▪ Other factors as appropriate ▪ Cost effectiveness of overall portfolio, again total and broken down by relevant factors 	<p>Chapter III, Pages 18-23</p> <p>Chapter III, Pages 25-31</p> <p>Chapter IV, Pages 13-16</p>
27	6	<p>Potential Evaluation Criteria</p> <ol style="list-style-type: none"> 1. Projected future performance, including but not necessarily limited to estimated participation (customers and enrolled load) and estimated load drop 2. Cost 3. Load impact – during peak times for each program year 4. Cost effectiveness – estimated over 2009-2011 period 5. Operational compatibility with future wholesale markets 	<p>Chapter III, Pages 6-9</p> <p>Chapter III, Appendix B in its entirety</p> <p>Chapter IV, Pages 15-16</p> <p>Chapter I, Appendix A in its entirety</p>

**SDG&E INFORMATION REQUIRED OR RECOMMENDED
IN THE FEBRUARY/APRIL GUIDANCE DOCUMENTS**

FEBRUARY GUIDANCE DOCUMENT			SDG&E CITATION
Page	Section	Information Required	
		<p>6. Versatility (for example: Can a program be called under a variety of circumstances, or only in very rare or specialized situations? Does it have multiple triggers?)</p> <p>7. Flexibility to adaptation to changes in operation of the wholesale market</p> <p>8. Locational Value (for example, can it be called by specific location if needed? Does it count towards locational resource adequacy or more specific local needs?)</p> <p>9. Consistency of offerings throughout the state (for example, are equivalent programs available in or appropriate for other parts of the state?)</p> <p>10. Simplicity/Understandability (for example: Can customers understand how programs operate and what is expected of them)</p> <p>11. Track record of performance (if proposing continuation of existing programs): this includes, but may not be limited to, actual load drop (especially compared to enrolled load and estimated load drop), target groups and types of participants, actual cost, how often was it called, actual load drop rate, actual load pick-up rate, and other factors as appropriate. Include an explanation of why actual load drop may not have been as anticipated.</p>	<p>Chapter II, Appendix B in its entirety</p> <p>Chapter I, Appendix A in its entirety</p> <p>Chapter I, Appendix A in its entirety</p> <p>Chapter II, Pages 27-32</p> <p>Chapter II, Pages 8-16</p> <p>Chapter III, Pages 16-18 Chapter III, Appendix A in its entirety</p>
28	7	Other Information – discussion of how and to what extend information on DR programs and pilots will be shared among IOUs, Community Choice Aggregators, Municipal Utilities and other Load Serving Entities	Chapter I 5.A.2

**SDG&E INFORMATION REQUIRED OR RECOMMENDED
IN THE FEBRUARY/APRIL GUIDANCE DOCUMENTS**

APRIL GUIDANCE DOCUMENT*			SDG&E CITATION
Page	Section	Information Required	
2	2.1	EE Strategic Planning Initiative	Chapter VI
4	2.2	ME&O Integration and Coordination	Chapter VI, Page 4-6
8	2.1	ME&O proposals to coordinate EE/DR	Chapter VI, Pages 4-6
5	2.3	Initial Strategic Plan Proposals for Pilot Projects on Comprehensive Integration of DSM Options	Chapter VI, Page 11
5	2.4	Previous Guidance on IDSM Coordination in the DR Applications	Chapter VI, Pages 1-2
8	3.1	Zero Net Energy Programmatic Initiatives and EM&V Metrics	Chapter VI
9	3.2	Energy Division Recommendations based on March 7 workshop	Chapter VI
9	4.1	Cost-Effectiveness IDSM Pilots	Chapter VI
10	4.2	Attribution of Energy Savings	Chapter VI
10	4.3	Funding Sources and Cost-Benefit Methodologies	Chapter VI
12	4.4	Free-Ridership	Chapter V
12	5.1	Instructions for Submitting Coordinated IDSM Proposals	Chapter VI
13	5.2	Coordination of IDSM Proposal Review and Approval	Chapter VI
13	6	Definition of "Success"	Chapter VI

*After on-going discussions with Energy Division's Energy Efficiency staff, Energy Division determined that staff feedback on the IDSM chapter/integration projects will be best handled through on-going review/feedback processes beyond the September 19 filing deadline. Hence, the ED Statement of Compliance will contain a caveat that staff makes no determination of compliance on the IDSM chapter (or any other programs/projects involving IDSM integration) and that Energy Division staff will continue to review those sections going forward. The inclusion of this caveat will not affect the Docket Office's acceptance of SDG&E's filing.

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298


**Energy Division Statement of Compliance**

The Energy Division at the California Public Utilities Commission certifies that the 2009 – 2011 Demand Response Programs and Budget application (Application) of San Diego Gas & Electric Company (U-902-M) (SDG&E) is in compliance¹ with the ALJ Ruling dated February 27, 2008, in R.07-01-041².

This statement of compliance makes no determination of compliance with respect to any chapter of the Application that contains information about IDSM (Integrated Demand Side Management) programs and/or pilots. IDSM was addressed in a Joint Commissioners' Ruling dated April 11, 2008, in R.07-01-041 and R.06-04-010³. The Commission will continue to examine IDSM programs and/or pilots and will make a determination about them at a future time.

This statement of compliance also excludes any other aspects of the Application that requires integration with other demand side programs. The Commission will continue to examine these programs and/or pilots and will make a determination about them at a future time.

* Please note that the statement of compliance does not preclude future requests for additional information or analysis. Energy Division has not performed a qualitative review of the Application before it is filed, and the statement of compliance does not imply Energy Division support of proposals, data or analyses contained in the Application.



Bruce Kaneshiro, Supervisor
Demand Response Section
Energy Division

9/17/08

Date

¹ Compliance means that the Application has, at a minimum level, presented information in sufficient detail to provide a basis for analysis. Compliance does not mean that the Application or any part of the Application is approved or will be approved by the Commission.

² Providing Guidance on Content and Format of 2009-2011 Demand Response Activity Applications. February 27, 2008. <http://docs.cpuc.ca.gov/EFILE/RULINGS/79323.htm>

³ Joint Assigned Commissioners' Ruling providing guidance on integrated demand-side management in 2009-2011 portfolio applications. April 11, 2008. <http://docs.cpuc.ca.gov/EFILE/RULINGS/81355.htm>

APPENDIX B
Financial Statements

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
JUNE 30, 2008

(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 specific		\$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
\$1.7625	550,000	shares	13,750,000
\$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 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 to which reference is hereby made.

(d) Number and Amount of Bonds Authorized and Issued

	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2007
<u>First Mortgage Bonds:</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	1,107,385
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	1,015,600
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	880,600
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	679,680
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	952,968
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	2,120,625
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	5,898,383
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	0
<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
JUNE 30, 2008

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2007</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$613,862

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</u>	<u>Dividends Declared</u>				
	<u>12-31-07</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>
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	550,000	1,674,375	1,498,125	1,321,875	1,145,625	969,375
\$ 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>3,963,770</u>	<u>\$6,494,043</u>	<u>\$6,317,793</u>	<u>\$6,141,543</u>	<u>\$5,965,293</u>	<u>\$5,789,043</u> [2]

Common Stock

Amount	\$200,000,000	\$200,000,000	\$75,000,000	\$0	\$0 [1]
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A balance sheet and a statement of income and retained earnings of Applicant for the six months ended June 30, 2008, are attached hereto.

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

[2] Includes \$969,375 of interest expense related to redeemable preferred stock.

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
JUNE 30, 2008

1. UTILITY PLANT		<u>2008</u>
101	UTILITY PLANT IN SERVICE	\$9,024,651,149
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	3,010,030
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	344,133,754
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(3,943,989,675)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(217,937,805)
118	OTHER UTILITY PLANT	553,148,065
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(125,389,354)
120	NUCLEAR FUEL - NET	<u>30,913,978</u>
TOTAL NET UTILITY PLANT		<u>5,668,540,142</u>

2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	5,092,432
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(462,256)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>847,481,853</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>852,112,029</u>

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
JUNE 30, 2008

3. CURRENT AND ACCRUED ASSETS

		2008
131	CASH	17,857,280
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	44,312
136	TEMPORARY CASH INVESTMENTS	13,000,000
141	NOTES RECEIVABLE	456,241
142	CUSTOMER ACCOUNTS RECEIVABLE	171,327,964
143	OTHER ACCOUNTS RECEIVABLE	31,006,221
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,232,697)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	28,616,587
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	682,876
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	61,241,075
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	62,681
164	GAS STORED	398,228
165	PREPAYMENTS	26,958,960
171	INTEREST AND DIVIDENDS RECEIVABLE	17,533,624
173	ACCRUED UTILITY REVENUES	42,787,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,269
175	DERIVATIVE INSTRUMENT ASSETS	83,258,731
	TOTAL CURRENT AND ACCRUED ASSETS	492,001,352

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	20,550,157
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,161,763,305
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	88,659,938
184	CLEARING ACCOUNTS	(27,250)

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
JUNE 30, 2008

5. PROPRIETARY CAPITAL

	<u>2008</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	1,076,262,996
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>(15,532,102)</u>
TOTAL PROPRIETARY CAPITAL	<u>2,276,816,913</u>

6. LONG-TERM DEBT

221 BONDS	1,636,905,000
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>(2,766,860)</u>
TOTAL LONG-TERM DEBT	<u>1,887,858,140</u>

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	-
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SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
JUNE 30, 2008

8. CURRENT AND ACCRUED LIABILITES

	<u>2008</u>
231 NOTES PAYABLE	0
232 ACCOUNTS PAYABLE	203,715,576
233 NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234 ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	39,965,764
235 CUSTOMER DEPOSITS	51,580,832
236 TAXES ACCRUED	1,344,901
237 INTEREST ACCRUED	15,242,588
238 DIVIDENDS DECLARED	1,204,917
241 TAX COLLECTIONS PAYABLE	2,468,888
242 MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	125,536,028
243 OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	-
244 DERIVATIVE INSTRUMENT LIABILITIES	333,099,469
245 DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	<hr/>
TOTAL CURRENT AND ACCRUED LIABILITIES	<u>774,158,963</u>

9. DEFERRED CREDITS

252 CUSTOMER ADVANCES FOR CONSTRUCTION	22,276,989
253 OTHER DEFERRED CREDITS	164,152,911
254 OTHER REGULATORY LIABILITIES	1,190,744,501
255 ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	27,367,726
257 UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281 ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	5,201,256
282 ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	559,531,152
283 ACCUMULATED DEFERRED INCOME TAXES - OTHER	134,253,080
	<hr/>

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED JUNE 30, 2008

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$1,534,773,485
401	OPERATING EXPENSES	\$1,048,003,328	
402	MAINTENANCE EXPENSES	60,710,743	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	155,398,369	
408.1	TAXES OTHER THAN INCOME TAXES	33,238,004	
409.1	INCOME TAXES	35,028,183	
410.1	PROVISION FOR DEFERRED INCOME TAXES	46,161,669	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(5,937,769)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(1,114,783)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	<u>(3,157,081)</u>	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>1,368,330,663</u>
	NET OPERATING INCOME		166,442,822

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(40,375)	
418	NONOPERATING RENTAL INCOME	195,485	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	14,903,150	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	11,925,313	
421	MISCELLANEOUS NONOPERATING INCOME	456,028	
421.1	GAIN ON DISPOSITION OF PROPERTY	<u>-</u>	
	TOTAL OTHER INCOME	<u>27,439,601</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>754,647</u>	
	TOTAL OTHER INCOME DEDUCTIONS	<u>754,647</u>	
408.2	TAXES OTHER THAN INCOME TAXES	146,655	
409.2	INCOME TAXES	(1,885,348)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	1,624,568	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	<u>-</u>	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>(114,125)</u>	

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED JUNE 30, 2008

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$1,078,672,830
NET INCOME (FROM PRECEDING PAGE)	136,929,973
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(2,409,834)
OTHER RETAINED EARNINGS ADJUSTMENTS	<u>0</u>
RETAINED EARNINGS AT END OF PERIOD	<u><u>\$1,213,192,969</u></u>

APPENDIX C
Cost of Property and Depreciation
Reserve

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETC
AS OF JUNE 30, 2008

<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	22,955,925
	TOTAL INTANGIBLE PLANT	27,101,104	23,158,825
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	42,778,546	10,350,081
312	Boiler Plant Equipment	115,880,325	14,611,991
314	Turbogenerator Units	99,508,676	14,343,127
315	Accessory Electric Equipment	33,388,899	4,539,990
316	Miscellaneous Power Plant Equipment	18,988,284	1,642,754
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	325,071,248	45,534,463
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	269,024,932	265,570,216
322	Boiler Plant Equipment	393,511,631	393,511,631
323	Turbogenerator Units	138,355,917	135,590,262
324	Accessory Electric Equipment	166,938,296	166,739,892
325	Miscellaneous Power Plant Equipment	263,259,953	209,541,881
107	ICIP CWIP	0	5,748,505
	TOTAL NUCLEAR PRODUCTION	1,231,374,405	1,176,986,064
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	4,421,921	422,565
342	Fuel Holders, Producers & Accessories	15,295,980	1,191,398
343	Prime Movers	20,824,413	2,469,301
344	Generators	161,390,856	9,569,412
345	Accessory Electric Equipment	9,441,506	925,515
346	Miscellaneous Power Plant Equipment	359,058	42,575
	TOTAL OTHER PRODUCTION	211,879,638	14,623,195
	TOTAL ELECTRIC PRODUCTION	1,768,325,290	1,237,143,722

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 34,598,156	\$ 0
350.2	Land Rights	61,843,614	9,724,973
352	Structures and Improvements	82,221,113	27,879,556
353	Station Equipment	536,310,385	129,105,044
354	Towers and Fixtures	104,824,106	77,830,257
355	Poles and Fixtures	131,738,237	40,279,704
356	Overhead Conductors and Devices	217,547,997	148,933,169
357	Underground Conduit	121,396,712	10,704,328
358	Underground Conductors and Devices	97,617,298	13,646,836
359	Roads and Trails	22,163,817	5,104,773
	TOTAL TRANSMISSION	1,410,261,437	463,208,638
360.1	Land	16,850,971	0
360.2	Land Rights	67,495,119	26,952,543
361	Structures and Improvements	3,300,454	1,835,006
362	Station Equipment	308,179,202	70,654,675
364	Poles, Towers and Fixtures	402,859,046	184,915,293
365	Overhead Conductors and Devices	316,301,988	102,740,508
366	Underground Conduit	786,789,244	301,759,754
367	Underground Conductors and Devices	1,063,076,836	575,533,413
368.1	Line Transformers	395,437,705	65,313,253
368.2	Protective Devices and Capacitors	19,582,114	(1,118,322)
369.1	Services Overhead	100,212,755	119,555,414
369.2	Services Underground	270,682,216	164,757,076
370.1	Meters	89,344,078	32,538,085
370.2	Meter Installations	42,692,421	9,913,376
371	Installations on Customers' Premises	6,149,125	9,437,900
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	22,976,704	16,279,713
	TOTAL DISTRIBUTION PLANT	3,911,929,978	1,681,067,688
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,510,426	12,131,028
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	175,979	135,990
393	Stores Equipment	54,331	48,160
394.1	Portable Tools	13,102,223	4,182,334
394.2	Shop Equipment	372,653	154,346
395	Laboratory Equipment	292,331	(37,373)
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	104,534,992	47,186,975
398	Miscellaneous Equipment	462,560	(15,535)
	TOTAL GENERAL PLANT	156,108,695	63,984,944
101	TOTAL ELECTRIC PLANT	7,273,726,504	3,468,563,817

<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	407,546	365,280
	TOTAL STORAGE PLANT	451,538	409,272
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,038,326
366	Structures and Improvements	10,874,587	7,750,651
367	Mains	125,301,159	48,962,979
368	Compressor Station Equipment	60,934,381	40,264,088
369	Measuring and Regulating Equipment	17,678,496	10,744,291
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	221,654,952	108,760,336
374.1	Land	102,187	0
374.2	Land Rights	7,964,453	5,094,826
375	Structures and Improvements	43,447	61,253
376	Mains	500,344,366	275,216,856
378	Measuring & Regulating Station Equipment	8,659,757	5,704,345
380	Distribution Services	229,471,419	259,368,052
381	Meters and Regulators	73,765,077	29,928,144
382	Meter and Regulator Installations	58,756,858	21,785,492
385	Ind. Measuring & Regulating Station Equipm	1,516,811	801,189
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,170,333	4,150,766
	TOTAL DISTRIBUTION PLANT	885,794,708	602,110,923

<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	6,711,101	2,240,697
394.2	Shop Equipment	84,597	7,015
395	Laboratory Equipment	283,094	(120,774)
396	Power Operated Equipment	162,284	6,659
397	Communication Equipment	2,513,952	1,311,214
398	Miscellaneous Equipment	292,071	65,442
	TOTAL GENERAL PLANT	10,121,600	3,610,257
101	TOTAL GAS PLANT	1,118,822,461	715,551,650
COMMON PLANT			
303	Miscellaneous Intangible Plant	177,486,067	150,947,550
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,654,409	0
389.2	Land Rights	1,385,339	27,275
390	Structures and Improvements	151,116,844	57,019,342
391.1	Office Furniture and Equipment - Other	24,105,216	11,497,859
391.2	Office Furniture and Equipment - Computer E	21,994,891	11,928,023
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(84,544)
393	Stores Equipment	140,123	(156,562)
394.1	Portable Tools	164,532	3,915
394.2	Shop Equipment	312,954	139,590
394.3	Garage Equipment	2,441,663	574,131
395	Laboratory Equipment	2,463,298	826,107
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	75,361,182	43,824,707
398	Miscellaneous Equipment	2,003,542	82,774
118.1	TOTAL COMMON PLANT	464,697,373	276,098,257
	TOTAL ELECTRIC PLANT	7,273,726,504	3,468,563,817
	TOTAL GAS PLANT	1,118,822,461	715,551,650
	TOTAL COMMON PLANT	464,697,373	276,098,257
101 & 118.1	TOTAL	8,857,246,339	4,460,213,724
101	PLANT IN SERV-SONGS FULLY RECOVER	\$ (1,166,929,070)	\$ (1,166,929,070)
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	\$ (13,520,435)	\$ (13,520,435)
	Gas	(94,289)	(94,289)
	TOTAL PLANT IN SERV-NON RECON ACC	<u>(13,614,724)</u>	<u>(13,614,724)</u>
	Electric	0	0
	Gas	<u>0</u>	<u>0</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0</u>	<u>0</u>
105	Plant Held for Future Use		
	Electric	4,420,116	0
	Gas	<u>0</u>	<u>0</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>4,420,116</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	255,113,646	
	Gas	6,483,400	
	Common	<u>87,670,240</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>349,267,286</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	<u>0</u>	<u>4,600,000</u>
108	Accum. Depr SONGS SGRP Removal		
	Electric	<u>0</u>	<u>1,744,502</u>
108.5	Accumulated Nuclear Decommissioning		
	Electric	<u>0</u>	<u>606,643,235</u>
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0</u>	<u>606,643,235</u>
120	NUCLEAR FUEL FABRICATION	<u>82,591,759</u>	<u>56,811,313</u>
143	FAS 143 ASSETS - Legal Obligation	126,668,513	(533,503,647)
	FIN 47 ASSETS - Legal Obligation	40,736,297	16,384,737
143	FAS 143 ASSETS - Non-legal Obligation	<u>0</u>	<u>(1,103,804,245)</u>
	TOTAL FAS 143	167,404,810	(1,620,923,155)
	UTILITY PLANT TOTAL	<u>\$ 8,280,386,516</u>	<u>\$ 2,328,545,825</u>

APPENDIX D
Summary of Earnings

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
THREE MONTHS ENDED JUNE 30, 2008
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$1,535
2	Operating Expenses	<u>1,368</u>
3	Net Operating Income	<u><u>\$167</u></u>
4	Weighted Average Rate Base	\$3,978
5	Rate of Return*	8.40%

*Authorized Cost of Capital

APPENDIX E
Service list of state and
government agencies

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

City of Imperial Beach
Attn. City Clerk
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
825 Imperial Beach Blvd
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

City of Lemon Grove
Attn. City Attorney
3232 Main St.
Lemon Grove, CA 92045

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

City of Lemon Grove
Attn. City Clerk
3232 Main St.
Lemon Grove, CA 92045

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

County of Orange
Attn. County Clerk
P.O. Box 838
Santa Ana, CA 92702

City of National City
Attn. City Attorney
1243 National City Blvd
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
P.O. Box 789
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

City of San Clemente
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
Attn. County Clerk
P.O. Box 121750
San Diego, CA 92101

City of San Diego
Attn. City Attorney
202 C Street.
San Diego, CA 92101

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

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

City of San Marcos
Attn. City Attorney
1 Civic Center Dr.
San Marcos, CA 92069

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

City of San Marcos
Attn. City Clerk
1 Civic Center Dr.
San Marcos, CA 92069

City of Santee
Attn. City Attorney
10601 Magnolia Avenue
Santee, CA 92071

City of Santee
Attn. City Clerk
10601 Magnolia Avenue
Santee, CA 92071

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Attn. City Attorney
PO Box 1988
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

APPENDIX F

Service list of potential interested parties

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists: A.08-06-001 - Last changed: September 18, 2008

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Service Lists: R.07-01-041 - Last changed: September 29, 2008

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brbarkovich@earthlink.net; bdicapo@caiso.com; bdicapo@caiso.com; rmettling@bluepointenergy.com;
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hcf@cpuc.ca.gov; jk1@cpuc.ca.gov; jc8@cpuc.ca.gov; jhe@cpuc.ca.gov; joc@cpuc.ca.gov;
jym@cpuc.ca.gov; mjd@cpuc.ca.gov; wtr@cpuc.ca.gov; skg@cpuc.ca.gov; tjs@cpuc.ca.gov;
ys2@cpuc.ca.gov; claufenb@energy.state.ca.us;

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N. Potomac, MD 20878

BRAD MANUILOW
American Technology Research
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San Francisco, CA 94111

WARREN MITCHELL
The Energy Coalition
15615 Alton Parkway, Suite 245
Irvine, CA 92618

STEVE GEORGE
GSC Group
101 Montgomery, 15th Floor
San Francisco, CA 94104

BRUCE PERLSTEIN
Pacific Gas & Electric Company
245 Market Street
San Francisco, CA 94105

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists: A.05-06-017 - Last changed: September 18, 2008

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **NOTICE OF AVAILABILITY** of the foregoing **AMENDED APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR APPROVAL OF DEMAND RESPONSE PROGRAMS AND BUDGETS FOR YEARS 2009-2011 (RE-SERVED TO REFLECT CONSOLIDATED CAPTION ONLY)** has been electronically mailed to each party of record of the service list in **A. 08-06-001, R.07-01-041, R.06-04-010 and A.05-06-017**. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Chief Administrative Law Judge Angela Minkin and Administrative Law Judge Jessica Hecht.

Executed this 30th day of September, 2008 at Los Angeles, California.

/s/ Marivel Munoz

Marivel Munoz