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May 28, 2015

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: San Diego Gas & Electric Company, Docket No. ER15-1144-000
Responses to Deficiency Letter**

Dear Ms. Bose:

Enclosed please find responses of San Diego Gas & Electric Company ("SDG&E") to the four questions in the deficiency letter dated April 28, 2015, and an associated tariff record. SDG&E understands that this filing constitutes an amendment to the filing of February 27, 2015, although SDG&E continues to request that the requested rate reduction and associated tariff and contract changes become effective March 1, 2015.

If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Respectfully submitted,

/s/ Jonathan J. Newlander

Jonathan J. Newlander

Attorney for San Diego Gas & Electric Company

cc: Mr. David Reich

TARIFF RECORD

APPENDIX XI

Generation Interconnection O&M Fixed Charge Rate

SDG&E shall apply the Generation Interconnection O&M Fixed Charge Rate (“Fixed Charge Rate”) to interconnection facility capital costs specified in each Interconnection Agreement to which SDG&E is a party and pursuant to which a generation facility owned by a third party is interconnected to a transmission facility owned by SDG&E. The Fixed Charge Rate shall equal 5.35414 % when billed on an annual basis and 0.44618 % when billed on a monthly basis. The Fixed Charge Rate compensates SDG&E for ongoing costs incurred on behalf or for the benefit of SDG&E’s Interconnection Agreement counterparties. SDG&E-owned generation facilities shall be subject to the Fixed Charge Rate on the same basis as third-party generation.

RESPONSES

San Diego Gas & Electric Company
Docket No. ER15-1144-000

Responses to Deficiency Letter

Request 1

Please explain the derivation and provide supporting documentation for the 50% split between transmission and distribution for Electric Plant Held for Future Use (Account 105) in Statement AG at page AG-2.

Response to Request 1

Page AG-2 is a copy of 2013 FERC Form 1 page 214 (Electric Plant Held for Future Use) that lists four Substation Land and Land Rights assets for a total amount of \$13,092,995. The hand written calculation shows the derivation of the \$6,546,497.50 ($\$13,092,995 \times 50\%$) allocated to Transmission and Distribution per SDG&E's guidelines for Reassignments of Substation Assets between Transmission and Distribution for Land and Land Rights (see attached guideline pages). Page AG-2 is provided as supporting documentation of the December 31, 2013 ending balance of \$6,546 (in thousands) shown on page AG-1, line 13.

Prepared by: Leonor Sanchez
Date: May 28, 2015

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AG
SPECIFIED PLANT ACCOUNTS (OTHER THAN PLANT IN SERVICE)
AND DEFERRED DEBITS
BASE PERIOD- 12/31/2013 PER BOOK
(\$1,000)**

TRANSMISSION PLANT

Line No.	Month	Transmission Plant Held For Future Use	Line No.
1	Dec-12	\$ 4,076	1
2	Jan-13	4,076	2
3	Feb	4,076	3
4	Mar *	6,505	4
5	Apr *	6,546	5
6	May	6,546	6
7	Jun	6,546	7
8	Jul	6,546	8
9	Aug	6,546	9
10	Sep	6,546	10
11	Oct	6,546	11
12	Nov	6,546	12
13	Dec-13	6,546	13
14	Total 13 Months	77,650	14
15	13-Month Average	\$ 5,973	15

* The assets included in Electric Plant Held for Future Use is shared at 50/50 by Transmission and Distribution. Ocean Ranch was initially recorded in the books for \$4,858k in March 2013 that increased the March balance by \$2,429k (50% * \$4,858). An additional amount to true-up the purchase cost was recorded in April 2013 at \$83k increasing the April balance by \$41k (50% * \$83).

Name of Respondent San Diego Gas & Electric Company	This Report Is (1) <input type="checkbox"/> An Original (2) <input checked="" type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 08/07/2014	Year/Period of Report End of <u>2013/Q4</u>
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ELECTRIC PLANT HELD FOR FUTURE USE (Account 105)

1 Report separately each property held for future use at end of the year having an original cost of \$250,000 or more. Group other items of property held for future use.

2 For property having an original cost of \$250,000 or more previously used in utility operations, now held for future use, give in column (a), in addition to other required information, the date that utility use of such property was discontinued, and the date the original cost was transferred to Account 105

Line No.	Description and Location Of Property (a)	Date Originally Included in This Account (b)	Date Expected to be used in Utility Service (c)	Balance at End of Year (d)
1	Land and Rights:			
2				
3	Torrey Pines/Sorrento Mesa	3/31/2005	3/31/2014	1,785,268
4				
5	Salt Creek	7/31/2011	12/31/2015	6,005,098
6				
7	Oceanside	5/31/2012	12/31/2017	360,835
8				
9	Ocean Ranch	3/31/2013	12/31/2018	4,941,794
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21	Other Property			
22				
23				
24				
25				
26				
27				
28	(1) 13,092,995 * 50% Transmission =		6,546,497.50	
29				
30	* 50% Distribution =		6,546,497.50	
31				
32			13,092,995	
33				
34				
35				
36				
37				
38				
39				
40				
41				
42				
43				
44				
45				
46				
47	Total			13,092,995

GUIDELINES FOR REASSIGNMENTS OF SUBSTATION ASSETS BETWEEN TRANSMISSION AND DISTRIBUTION

LAND & LAND RIGHTS-

Land & Land Rights purchased and included in Distribution Plant, a portion of which supports Transmission facilities and Land & Land Rights purchased and included in Transmission Plant, a portion of which supports Distribution facilities are assigned 50% to Distribution and 50% to Transmission, provided that there is only 1-line high side to 1-line low side.

Where there is more than 1 line coming into the substation (high side), to 1 line moving out of the substation (low side), the land and land rights are split 75% to Transmission and 25% to Distribution.

STRUCTURES & IMPROVEMENTS-

Substation fences, gates, lighting, and landscaping purchased and included in Distribution Plant, a portion of which supports Transmission facilities and fences, gates, control houses, lighting, and landscaping purchased and included in Transmission Plant, a portion of which supports Distribution facilities are assigned 50% to Distribution and 50% to Transmission.

The 50/50 division is used for all substation structures and improvements, where transmission and distribution substation facilities are located, in which the improvements were historically classified in only one FERC account, and there is only 1 high side line to 1 low side line.

In substations where there is more than 1 line coming into the substation (high side), to 1 line moving out of the substation (low side), the land and land rights are split 75% to Transmission and 25% to Distribution.

CIRCUIT BREAKERS/SWITCHES-

The assignment of SDGE's transmission/local distribution breakers and switches to transmission or distribution is as shown in Attachment 5. In the single breaker arrangement, the **distribution line** to the bus is assigned to distribution. In the double breaker configuration, the distribution line connects to two circuit breakers, both of which serve only to isolate the distribution system. Accordingly, both breakers and associated switches are assigned to distribution. In the breaker-and-a-half configuration, the distribution line connects to two circuit breakers, one of which serves only to isolate the distribution line (and which therefore is assigned to distribution) and the other which serves to isolate both the distribution system and the transmission system. The latter circuit breaker and associated switches have a transmission function and are assigned to transmission.

GUIDELINES FOR REASSIGNMENTS OF SUBSTATION ASSETS BETWEEN TRANSMISSION AND DISTRIBUTION

TRANSFORMERS-

Assignment to Distribution or Transmission is determined by the ending voltage of the transformer. Ending transformer voltages of 69kv and above should be assigned to transmission. All lower-voltages are distribution.

LINES-

Lines of 69kv and above should be assigned to transmission. All lower-voltage lines are distribution.

**DETERMINATION OF SUBSTATION
LAND, LAND RIGHTS, & STRUCTURE ACCOUNTS
(Using the "Ultimate" Substation Design)**

No. 69kv or higher tieline entering or exiting the substation = 360.1 Land, 360.2 Land Rights, 361 Substation Structure/Improvements (Dist 100%). This is considered a Distribution Substation

- Business Unit = 04.

(1) 69kv or higher tieline entering, and distribution voltage leaving but no 69kv or higher tieline exiting the substation = 360.1 Land, 360.2 Land Rights, 361 Substation Structure/Improvements (Trans 50% Dist 50%) This is considered a Distribution Substation.

- Business Unit = 16.

More than (1) 69kv or higher tieline (same voltage) entering and/or exiting the substation and distribution voltage leaving the substation = 350.1 Land, 350.2 Land Rights, 352 Substation Structure/Improvements (Trans 50% Dist 50%) This is considered a Transmission Substation.

- Business Unit = 16. (Most substations fall here.)

Multiple very high voltages 500kv/230kv/138kv entering and/or exiting the substation, (multiple lines of different voltages) and, possibly, 69kv tielines entering and/or exiting the substation, AND some distribution level voltages entering and/or exiting the substation = 350.1 Land, 350.2 Land Rights, 352 Substation Structure/Improvements (Trans 75% Dist 25%). This is considered a Transmission Substation.

- Business Unit = 17. (e.g. Escondido.)

Only 69kv or higher tielines entering and/or exiting the substation. No distribution voltages leaving the substation = 350.1 Land, 350.2 Land Rights, 352 Substation Structure/Improvements (Trans 100%). This is considered a Transmission Substation.

- Business Unit = 03. (e.g. Imperial Valley, Miguel, Old Town 230kv yard.)

Responses to Deficiency Letter

Request 2

The Commission requires 13-month average plant balance for plant in service. Statement AD (Transmission Plant) provides 13 months of plant in service data for both the Book values (column (1)) and the Ratemaking value (column (2)) with a calculation for the difference between Book and Ratemaking values for December 2012 and December 2013. However, the derivation for the difference between Book and Ratemaking values for January 2013 through November 2013 is unsupported. Please provide all supporting documentation for the difference between Book and Ratemaking values for months January 2013 through November 2013 and support for the application of the seven element adjustment factor test to Book values in column (1).

Response to Request 2

Attached is a detailed spreadsheet that shows the monthly re-classification of per book plant to ratemaking plant based on the FERC Seven Factor Test in accordance with Guidelines in FERC Order No. 888. These Guidelines primarily identify appropriate steps to accurately determine whether individual assets that are recorded in one FERC functional area for 'per book' purposes, per the Federal Code of Regulations (CFR), need to be reclassified to a different functional area for ratemaking purposes. For example, if an asset recorded in an electric transmission plant account actually performs a distribution function in the system, then the asset should be reclassified for ratemaking purposes to the distribution business unit. The detailed spreadsheet identifies dollars moving out of electric transmission to other business units and dollars reclassified into electric transmission from other business units.

Prepared by: Leonor Sanchez
Date: May 28, 2015

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AD
COST OF PLANT
BASE PERIOD -12/31/2013 PER BOOK
(\$1,000)**

TRANSMISSION PLANT

Line No.	Month	(1) Total Transmission Plant Per Book	Reference From	(2) Transmission Plant Ratemaking	Reference From	Line No.
1	Dec-12	3,621,573	T-wp2	3,562,629	T-wp2	1
2	Jan-13	3,632,138	"	3,573,153	"	2
3	Feb	3,643,133	"	3,583,799	"	3
4	Mar	3,662,840	"	3,603,039	"	4
5	Apr	3,679,257	"	3,619,376	"	5
6	May	3,693,793	"	3,633,909	"	6
7	Jun	3,700,051	"	3,645,849	"	7
8	Jul	3,704,179	"	3,649,977	"	8
9	Aug	3,733,359	"	3,679,149	"	9
10	Sep	3,752,076	"	3,698,036	"	10
11	Oct	3,763,436	"	3,708,854	"	11
12	Nov	3,802,096	"	3,746,801	"	12
13	Dec-13	3,839,521	T-wp1	3,783,949	T-wp1	13
14	Total 13 Months	48,227,452		47,488,520		14
15						15
16						16
17	13-Month Average	3,709,804		3,652,963		17

The monthly weighted annual plant balance is based upon a 13-month average.

Column 2 represents the monthly ratemaking plant balances for the base period. These plant balances reflect the amounts shifted between functions (transmission to distribution, transmission to generation, distribution to transmission, etc.) as required by FERC Order 888 - Seven Factor Test.

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AD
COST OF PLANT
BASE PERIOD -12/31/2013 PER BOOK
(\$1,000)

TRANSMISSION PLANT

Line No.	Month	(1) Total Trans. Plant Per Book	Reference From	(2) Generation Account 101 Plant Reclass as Transmission	Reference From	(3) Distribution Account 101 Plant Reclass to Transmission	Reference From	(4) Transmission Account 101 Plant Reclass Steam Prod.	Reference From	(5) Transmission Account 101 Plant Reclass Other Prod.	Reference From	(6) Transmission Account 101 Plant Reclass as Nuclear	Reference From	(7) Transmission Account 101 Plant Reclass as Distribution	Reference From	(8) Transmission Plant Adjusted Book SUM (1:9)	Reference From	Line No.
1	Dec-12	3,621,573	FERC Form 1	4	AD3-OPwp2	4,661	AD5-Dwp2	(14,273)	(b)	(1,600)	(b)	(5,944)	(b)	(41,792)	(b)	3,562,629		1
2	Jan-13	3,632,138	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	(5,944)	"	(41,834)	"	3,573,153		2
3	Feb	3,643,133	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	(5,944)	"	(42,182)	"	3,583,799		3
4	Mar	3,662,840	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	(5,944)	"	(42,649)	"	3,603,039		4
5	Apr	3,679,257	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	(5,944)	"	(42,729)	"	3,619,376		5
6	May	3,693,793	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	(5,944)	"	(42,733)	"	3,633,909		6
7	Jun	3,700,051	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	-	"	(42,994)	"	3,645,849		7
8	Jul	3,704,179	(a)	4	"	4,661	"	(14,273)	"	(1,600)	"	-	"	(42,994)	"	3,649,977		8
9	Aug	3,733,359	(a)	4	"	4,659	"	(14,273)	"	(1,600)	"	-	"	(43,001)	"	3,679,149		9
10	Sep	3,752,076	(a)	4	"	4,659	"	(14,273)	"	(1,420)	"	-	"	(43,010)	"	3,698,036		10
11	Oct	3,763,436	(a)	4	"	4,659	"	(14,273)	"	(1,420)	"	-	"	(43,551)	"	3,708,854		11
12	Nov	3,802,096	(a)	4	"	4,659	"	(14,273)	"	(1,420)	"	-	"	(44,265)	"	3,746,801		12
13	Dec-13	3,839,521	FERC Form 1	4	"	4,659	"	(14,273)	T-wp1	(1,420)	T-wp1	-	T-wp1	(44,543)	T-wp1	3,783,949	T-wp1	13
14	Total 13 Months	48,227,452		58		60,585		(185,555)		(20,082)		(35,663)		(558,276)		47,488,520		14
15																		15
16																		16
17	13-Month Average	3,709,804		4		4,660		(14,273)		(1,545)		(2,743)		(42,944)		3,652,963		17

(a) : Monthly Fixed Capital Statements
(b) : Monthly rate base support workpapers

SAN DIEGO GAS & ELECTRIC COMPANY
 STATEMENT AD
 COST OF PLANT
 BASE PERIOD -12/31/2013 PER BOOK
 (\$1,000)

OTHER PRODUCTION

Line No.	Month	(1) Total Other Production Per Book	Reference From	(2) Other Production Account 101 Plant Related to Transmission	Reference From	(3) Other Production Account 101 Plant Related to Distribution	Reference From	(4) Transmission Account 101 Plant Related to Other Prod.	Reference From	(5) Other Production Ratemaking (1) + (2) + (3) + (4)	Reference From	Line No.
1	Dec-12	508,362	FERC Form 1	(4)	(b)	(36,524)	(b)	1,600	(b)	473,434		1
2	Jan-13	508,685	(a)	(4)	"	(36,524)	"	1,600	"	473,757		2
3	Feb	508,575	(a)	(4)	"	(37,068)	"	1,600	"	473,102		3
4	Mar	508,660	(a)	(4)	"	(37,068)	"	1,600	"	473,187		4
5	Apr	511,624	(a)	(4)	"	(39,741)	"	1,600	"	473,478		5
6	May	511,855	(a)	(4)	"	(39,891)	"	1,600	"	473,559		6
7	Jun	511,900	(a)	(4)	"	(39,926)	"	1,600	"	473,570		7
8	Jul	512,464	(a)	(4)	"	(40,496)	"	1,600	"	473,563		8
9	Aug	512,782	(a)	(4)	"	(40,814)	"	1,600	"	473,564		9
10	Sep	513,046	(a)	(4)	"	(40,814)	"	1,420	"	473,647		10
11	Oct	513,136	(a)	(4)	"	(40,814)	"	1,420	"	473,737		11
12	Nov	514,151	(a)	(4)	"	(41,651)	"	1,420	"	473,916		12
13	Dec-13	518,525	OP-wp1	(4)	"	(41,824)	OP-wp1	1,420	AD4-Twp1	478,117	OP-wp1	13
14	Total 13 Months	6,653,763		(58)		(513,156)		20,082		6,160,631		14
15												15
16												16
17	13-Month Average	511,828		(4)		(39,474)		1,545		473,895		17

(a) : Monthly Fixed Capital Statement
 (b) : Monthly Rate Base Support work papers

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AD
COST OF PLANT
BASE PERIOD -12/31/2013 PER BOOK
(\$1,000)

DISTRIBUTION PLANT

Line No.	Month	(1) Total Distribution Plant Per Book	Reference From	(2) Franchises Account 101 Plant Reclass as Distribution	Reference From	(3) Generation Account 101 Plant Reclass as Distribution	Reference From	(4) Transmission Account 101 Plant Reclass to Distribution	Reference From	(5) Distribution Account 101 Plant Reclass as Transmission	Reference From	(6) Distribution Plant Ratemaking SUM 1:5	Reference From	Line No.
1	Dec-12	4,928,232	FERC Form 1	223	(b)	36,524	AD3-OPwp2	41,792	AD4-Twp2	(4,661)	(b)	5,002,109		1
2	Jan-13	4,948,580	(a)	223	"	36,524	"	41,834	"	(4,661)	"	5,022,499		2
3	Feb	4,962,844	(a)	223	"	37,068	"	42,182	"	(4,661)	"	5,037,656		3
4	Mar	4,982,867	(a)	223	"	37,068	"	42,649	"	(4,661)	"	5,058,146		4
5	Apr	4,997,182	(a)	223	"	39,741	"	42,729	"	(4,661)	"	5,075,213		5
6	May	5,012,023	(a)	223	"	39,891	"	42,733	"	(4,661)	"	5,090,209		6
7	Jun	5,014,818	(a)	223	"	39,926	"	42,994	"	(4,661)	"	5,093,300		7
8	Jul	5,028,622	(a)	223	"	40,496	"	42,994	"	(4,661)	"	5,107,674		8
9	Aug	5,055,255	(a)	223	"	40,814	"	43,001	"	(4,659)	"	5,134,633		9
10	Sep	5,071,780	(a)	223	"	40,814	"	43,010	"	(4,659)	"	5,151,168		10
11	Oct	5,099,004	(a)	223	"	40,814	"	43,551	"	(4,659)	"	5,178,933		11
12	Nov	5,113,869	(a)	223	"	41,651	"	44,265	"	(4,659)	"	5,195,349		12
13	Dec-13	5,127,373	D-wp3	223	"	41,824	"	44,543	"	(4,659)	"	5,209,303	D-wp3	13
14	Total 13 Months	65,342,450		2,897		513,156		558,276		(60,585)		66,356,194		14
15														15
16														16
17	13-Month Average	5,026,342		223		39,474		42,944		(4,660)		5,104,323		17

(a) : Monthly Fixed Capital Statements
(b) : Monthly Rate Base Support Workpapers

San Diego Gas & Electric Company
Docket No. ER15-1144-000

Responses to Deficiency Letter

Request 3

Please provide the same information referenced above for the values in Statement AE (Accumulated Depreciation and Amortization). Please provide all supporting documentation for the difference between Book and Ratemaking values for months January 2013 through November 2013 and support for the application of the seven element adjustment factor test to Book values in column (1).

Response to Request 3

Attached please find detailed spreadsheets that show the monthly reclassification of accumulated depreciation and amortization between per book and ratemaking. The explanation driving the reclassification is the same as the response to Request 2.

Prepared by: Leonor Sanchez
Date: May 28, 2015

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AE
ACCUMULATED DEPRECIATION AND AMORTIZATION
BASE PERIOD - 12/31/2013 PER BOOK
(\$1,000)**

TRANSMISSION PLANT

Line No.	Month	(1) Total Transmission Reserves Per Book	Reference From	(2) Transmission Reserves Ratemaking	Reference From	Line No.
1	Dec-12	\$ 608,270	T-wp2	\$ 590,575	T-wp2	1
2	Jan-13	610,125	"	592,366	"	2
3	Feb	616,106	"	598,242	"	3
4	Mar	623,211	"	605,244	"	4
5	Apr	629,538	"	611,477	"	5
6	May	636,480	"	618,341	"	6
7	Jun	637,677	"	625,380	"	7
8	Jul	645,420	"	633,015	"	8
9	Aug	652,994	"	640,470	"	9
10	Sep	662,187	"	649,712	"	10
11	Oct	670,293	"	657,717	"	11
12	Nov	678,694	"	666,013	"	12
13	Dec-13	679,574	T-wp1	666,808	T-wp1	13
14	Total 13 Months	\$ 8,350,567		\$ 8,155,359		14
15	13-Month Average Balance	\$ 642,351		\$ 627,335		15

Column 2 represents the monthly ratemaking depreciation reserve balances for the base period. These depreciation reserve balances reflect the amounts shifted between functions (transmission to distribution , transmission to generation, distribution to transmission, etc.) as required by FERC Order 888: Seven-Element Adjustment Factor.

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AE
ACCUMULATED DEPRECIATION AND AMORTIZATION
BASE PERIOD - 12/31/2013 PER BOOK
(\$1,000)

TRANSMISSION PLANT

Line No.	Month	(1) Total Trans. Reserves Per Book	Reference From	(2) Generation Account 108 Reserves Reclass as Transmission	Reference From	(3) Distribution Account 108 Reserves Reclass to Transmission	Reference From	(4) Transmission Account 108 Reserves Reclass as Steam Prod.	Reference From	(5) Transmission Account 108 Reserves Reclass as Other Prod.	Reference From	(6) Transmission Account 108 Reserves Reclass as Nuclear	Reference From	(7) Transmission Account 108 Reserves Reclass as Distribution	Reference From	(8) Transmission Reserves Ratemaking SUM 1:7	Reference From
1	Dec-12	608,270	(a)	1	AE3-OPwp2	472	AE5-Dwp2	(1,320)	(b)	(315)	(b)	(5,944)	(b)	(10,589)	(b)	590,575	
2	Jan-13	610,125	(a)	1	"	475	"	(1,330)	"	(318)	"	(5,944)	"	(10,642)	"	592,366	
3	Feb	616,106	(a)	1	"	476	"	(1,355)	"	(321)	"	(5,944)	"	(10,722)	"	598,242	
4	Mar	623,211	(a)	1	"	479	"	(1,379)	"	(324)	"	(5,944)	"	(10,800)	"	605,244	
5	Apr	629,538	(a)	1	"	481	"	(1,401)	"	(327)	"	(5,944)	"	(10,872)	"	611,477	
6	May	636,480	(a)	1	"	507	"	(1,424)	"	(330)	"	(5,944)	"	(10,950)	"	618,341	
7	Jun	637,677	(a)	1	"	511	"	(1,447)	"	(333)	"	-	"	(11,028)	"	625,380	
8	Jul	645,420	(a)	1	"	515	"	(1,474)	"	(336)	"	-	"	(11,111)	"	633,015	
9	Aug	652,994	(a)	1	"	518	"	(1,502)	"	(340)	"	-	"	(11,201)	"	640,470	
10	Sep	662,187	(a)	1	"	522	"	(1,544)	"	(154)	"	-	"	(11,300)	"	649,712	
11	Oct	670,293	(a)	1	"	526	"	(1,567)	"	(156)	"	-	"	(11,380)	"	657,717	
12	Nov	678,694	(a)	1	"	530	"	(1,591)	"	(159)	"	-	"	(11,461)	"	666,013	
13	Dec-13	679,574	T-wp1	1	"	534	"	(1,611)	"	(162)	"	-	"	(11,528)	"	666,808	AD4-Twp1
14	Total 13 Months	8,350,567		13		6,547		(18,945)		(3,577)		(35,663)		(143,584)		8,155,359	
15																	
16																	
17	13-Month Average	642,351		1		504		(1,457)		(275)		(2,743)		(11,045)		627,335	

(a) : Monthly Cost of Property Report
(b) : Monthly Rate Base Support Workpapers

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AE
ACCUMULATED DEPRECIATION AND AMORTIZATION
BASE PERIOD - 12/31/2013 PER BOOK
(\$1,000)

OTHER PRODUCTION

Line No.	Month	(1) Total Other Production Per Book	Reference From	(2) Transmission Account 108 Reserves Related to Other Production	Reference From	(2) Other Production Account 108 Reserves Related to Transmission	Reference From	(3) Other Production Account 108 Reserves Related to Distribution	Reference From	(4) Other Production Ratemaking (1) + (2) + (3)	Reference From	Line No.
1	Dec-12	126,677	FERC Form 1	315	AE3-Twp2	(1)	(b)	(3,511)	(b)	123,480		1
2	Jan-13	128,306	(a)	318	"	(1)	"	(3,630)	"	124,992		2
3	Feb	129,937	(a)	321	"	(1)	"	(3,823)	"	126,433		3
4	Mar	131,572	(a)	324	"	(1)	"	(3,947)	"	127,949		4
5	Apr	133,209	(a)	327	"	(1)	"	(4,075)	"	129,461		5
6	May	134,838	(a)	330	"	(1)	"	(4,208)	"	130,960		6
7	Jun	136,484	(a)	333	"	(1)	"	(4,341)	"	132,476		7
8	Jul	138,027	(a)	336	"	(1)	"	(4,475)	"	133,888		8
9	Aug	139,673	(a)	340	"	(1)	"	(4,611)	"	135,400		9
10	Sep	141,261	(a)	154	"	(1)	"	(4,747)	"	136,667		10
11	Oct	142,908	(a)	156	"	(1)	"	(4,883)	"	138,180		11
12	Nov	144,557	(a)	159	"	(1)	"	(5,021)	"	139,695		12
13	Dec-13	146,215	OP-wp1	162	"	(1)	"	(5,160)	"	141,216	OP-wp1	13
14	Total 13 Months	1,773,664		3,577		(13)		(56,431)		1,720,797		14
15												15
16												16
17	13-Month Average	136,436		275		(1)		(4,341)		132,369		17

(a) : Monthly Cost of Property Reports
(b) : Monthly Rate Base Support Workpapers

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT AE
ACCUMULATED DEPRECIATION AND AMORTIZATION
BASE PERIOD - 12/31/2013 PER BOOK
(\$1,000)

DISTRIBUTION PLANT

Line No.	Month	(1) Total Distribution Reserves Per Book	Reference From	(2) Franchises Account 108 Reserve Recl as Distribution	Reference From	(3) Generation Account 108 Reserve Recl as Distribution	Reference From	(4) Transmission Account 108 Reserve Recl to Distribution	Reference From	(5) Distribution Account 108 Reserve Recl as Transmission	Reference From	(7) Distribution Reserves Ratemaking SUM 1:6	Reference From	Line No.
1	Dec-12	2,073,117	(a)	203	(b)	3,511	AE3-OPwp2	10,589	AE4-Twp2	(472)	(b)	2,086,947		1
2	Jan-13	2,085,620	(a)	203	"	3,630	"	10,642	"	(475)	"	2,099,621		2
3	Feb	2,098,831	(a)	203	"	3,823	"	10,722	"	(476)	"	2,113,102		3
4	Mar	2,111,650	(a)	203	"	3,947	"	10,800	"	(479)	"	2,126,121		4
5	Apr	2,125,013	(a)	203	"	4,075	"	10,872	"	(481)	"	2,139,681		5
6	May	2,123,165	(a)	203	"	4,208	"	10,950	"	(507)	"	2,138,018		6
7	Jun	2,189,382	(a)	203	"	4,341	"	11,028	"	(511)	"	2,204,443		7
8	Jul	2,200,945	(a)	203	"	4,475	"	11,111	"	(515)	"	2,216,219		8
9	Aug	2,208,682	(a)	203	"	4,611	"	11,201	"	(518)	"	2,224,178		9
10	Sep	2,219,764	(a)	203	"	4,747	"	11,300	"	(522)	"	2,235,492		10
11	Oct	2,231,066	(a)	203	"	4,883	"	11,380	"	(526)	"	2,247,006		11
12	Nov	2,241,963	(a)	203	"	5,021	"	11,461	"	(530)	"	2,258,118		12
13	Dec-13	2,251,592	D-wp1	203	"	5,160	"	11,528	"	(534)	"	2,267,949	D-wp3	13
14	Total 13 Months	28,160,791		2,638		56,431		143,584		(6,547)		28,356,896		14
15														15
16														16
17	13-Month Average	2,166,215		203		4,341		11,045		(504)		2,181,300		17

(a) : Monthly Cost of Property Reports
(b) : Monthly Rate Base Support Workpapers

San Diego Gas & Electric Company
Docket No. ER15-1144-000

Responses to Deficiency Letter

Request 4

Please provide justification and all supporting material for the split of common utility plant and expenses between electric and gas departments set forth on pages AD-10A and AD10-B.

Response to Request 4

Supporting material for the common utility plant and expenses split between electric and gas departments that is provided to support the electric percentages shown on pages AD-10A and AD-10B, respectively, is attached. As indicated in the Note section of work papers AH-4 and AH-5, SDG&E allocates common costs to its electric and gas departments based upon labor ratios. Common costs are defined as those costs that have not been directly assigned to either the electric or gas departments. Use of the labor ratio to segment common costs has been permitted by FERC and CPUC for rate setting purposes. The adoption of this methodology ensures consistency between State and Federal regulatory jurisdiction for the allocation of common plant and expenses.

Prepared by: Leonor Sanchez
Date: May 28, 2015

Name of Respondent San Diego Gas & Electric Company	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) / /	Year/Period of Report End of <u>2012/Q4</u>
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COMMON UTILITY PLANT AND EXPENSES

1. Describe the property carried in the utility's accounts as common utility plant and show the book cost of such plant at end of year classified by accounts as provided by Plant Instruction 13, Common Utility Plant, of the Uniform System of Accounts. Also show the allocation of such plant costs to the respective departments using the common utility plant and explain the basis of allocation used, giving the allocation factors.
2. Furnish the accumulated provisions for depreciation and amortization at end of year, showing the amounts and classifications of such accumulated provisions, and amounts allocated to utility departments using the Common utility plant to which such accumulated provisions relate, including explanation of basis of allocation and factors used.
3. Give for the year the expenses of operation, maintenance, rents, depreciation, and amortization for common utility plant classified by accounts as provided by the Uniform System of Accounts. Show the allocation of such expenses to the departments using the common utility plant to which such expenses are related. Explain the basis of allocation used and give the factors of allocation.
4. Give date of approval by the Commission for use of the common utility plant classification and reference to order of the Commission or other authorization.

ACCOUNT	December 31, 2012 Accumulated Depreciation
303 Misc. Intangible Plant	111,765,517
389 Land & Land Rights	27,275
390 Structures & Improvements	105,497,669
391 Office Furniture & Equipment	46,614,040
392 Transportation Equipment	(332,346)
393 Stores Equipment	92,292
394 Tools, Shop & Garage Equipment	245,715
395 Laboratory Equipment	890,330
396 Power Operated Equipment	(192,979)
397 Communication Equipment	48,783,985
398 Miscellaneous Equipment	926,595
108.4 Retirement Work in Progress	
FIN 47 Accumulated Depreciation	555,715
Fleet Capital Lease	15,570,330
	<hr/>
Total Accumulated Depreciation	330,444,138 =====

Split of Common Utility Plant to Departments: (excluding CWIP) (see Note 2- Page 356.2)		December 31, 2012	
		Balance End of Year	Accumulated Depreciation
Electric	<u>72.21%</u>	494,486,497	238,613,712
Gas	27.79%	190,303,002	91,830,426
Total	100.00%	<hr/> 684,789,499 =====	<hr/> 330,444,138 =====

SDG&E
COMMON ACCOUNT ALLOCATIONS
SUMMARY OF ELECTRIC & GAS ALLOCATIONS
FOR JANUARY - DECEMBER 2012

LINE NO	COMMON ACCOUNT DESCRIPTION	COMMON ACCOUNT RANGE	ELECTRIC	GAS	TOTAL	LINE NO
1	Administrative & General	920-923	72.21%	27.79%	100.00%	1
2	Property Insurance	924	84.96%	15.04%	100.00%	2
3	Injuries & Damages	925	72.21%	27.79%	100.00%	3
4	Pensions & Benefits	926	72.21%	27.79%	100.00%	4
5	Misc. Admin & General	928-935	72.21%	27.79%	100.00%	5

Note: Above items except property insurance are allocated to gas & electric based upon labor ratios.
See workpapers AH-4A to AH-4B for derivation.

San Diego Gas & Electric Company
Derivation of Common Plant and A&G Common Labor Cost Allocation
For the Period Ended December 31, 2011
From 2011 FERC Form 1, Page 354 - 355, Direct Payroll Distribution
2012 Split of Common Utility Plant

Line No	A	B	C	D	E	F	Line No
	Direct Payroll Expenses, Electric and Gas:						
1	<u>Function</u>	<u>FERC Form 1, Pages 354 - 355 Ref.</u>		<u>Electric Direct Payroll</u>	<u>Gas Direct Payroll</u>	<u>Total Direct Payroll</u>	1
2		<u>Electric</u>	<u>Gas</u>				2
3	Production	Line 20	N/A	\$ 8,929,920	\$ -	\$ 8,929,920	3
4							4
5	Transmission & Gas Storage	Line 21	Lines 55 & 56	17,431,831	6,773,822	24,205,653	5
6							6
7	Distribution	Line 23	Line 57	52,886,263	23,055,881	75,942,144	7
8							8
9	Customer Accounts	Line 24	Line 58	24,290,102	12,643,727	36,933,829	9
10							10
11	Customer Service & Informational	Line 25	Line 59	15,831,333	3,461,463	19,292,796	11
12							12
13	Sales	Line 26	Line 60	-	-	-	13
14							14
15	Total Direct Payroll Expenses Excluding A&G			\$ 119,369,449	\$ 45,934,893	\$ 165,304,342	15
16							16
17	Administrative & General	Line 27	Line 61	30,209,514	9,093,637	39,303,151	17
18							18
19	Total Direct Payroll Expenses Including A&G	Line 28	Line 62	\$ 149,578,963	\$ 55,028,530	\$ 204,607,493	19
20							20
21	Common Plant and A&G Common Labor Cost Allocation	L15 Col D/L15 Col F	L15 Col E/L15 Col F	72.21%	27.79%	100.00%	21
22							22

SAN DIEGO GAS & ELECTRIC COMPANY
Derivation of 2012 Percentages of Allocation of Common Accounts to Electric and Gas Division
For Property Insurance (FERC Account 924)
As Shown in Page AH-4
(\$1,000)

Line No	Description	A Electric Division	B Gas Division	C Total	Reference	Line No
1						1
2	Total Distribution Plant	\$ 4,659,306	\$ 1,254,082	\$ 5,913,388	Col. A - see Stmt AD1; Ln 13; TO3 C6 Orig. Filing/ Col. B - see wp AH-4C, Col C, Ln 3 Col. A - see Stmt AD-9; TO3 C6 Orig. Filing; 2011 FERC Form 1 Col. A - see Stmt AD1; Ln 3; TO3 C6 Orig. Filing Col. A - see Stmt AD1; Ln 9; TO3 C6 Orig. Filing Col. A - see Stmt AD1; Ln 17; TO3 C6 Orig. Filing see wp AH-4C, Col F, Lns 7 and 8	2
3	Total Transmission Plant	1,735,238		1,735,238		3
4	Total Steam Production Plant	380,494		380,494		4
5	Total Other Production Plant	325,981		325,981		5
6	General Plant	195,466		195,466		6
7	Common Plant	300,033	91,195	391,228		7
8	Total Plant in Service Excluding SONGS & Misc. Intangible Plant	\$ 7,596,518	\$ 1,345,277	\$ 8,941,795		8
9						9
10	Property Insurance Allocation %	84.96%	15.04%	100.00%		10

Name of Respondent San Diego Gas & Electric Company	This Report Is: (1) <input type="checkbox"/> An Original (2) <input checked="" type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) 08/07/2014	Year/Period of Report End of <u>2013/Q4</u>
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COMMON UTILITY PLANT AND EXPENSES

1. Describe the property carried in the utility's accounts as common utility plant and show the book cost of such plant at end of year classified by accounts as provided by Plant Instruction 13, Common Utility Plant, of the Uniform System of Accounts. Also show the allocation of such plant costs to the respective departments using the common utility plant and explain the basis of allocation used, giving the allocation factors.
2. Furnish the accumulated provisions for depreciation and amortization at end of year, showing the amounts and classifications of such accumulated provisions, and amounts allocated to utility departments using the Common utility plant to which such accumulated provisions relate, including explanation of basis of allocation and factors used
3. Give for the year the expenses of operation, maintenance, rents, depreciation, and amortization for common utility plant classified by accounts as provided by the Uniform System of Accounts. Show the allocation of such expenses to the departments using the common utility plant to which such expenses are related. Explain the basis of allocation used and give the factors of allocation
4. Give date of approval by the Commission for use of the common utility plant classification and reference to order of the Commission or other authorization.

ACCOUNT	December 31, 2013 Accumulated Depreciation
303 Misc. Intangible Plant	139,603,548
389 Land & Land Rights	27,275
390 Structures & Improvements	116,248,552
391 Office Furniture & Equipment	60,437,123
392 Transportation Equipment	(322,395)
393 Stores Equipment	113,350
394 Tools, Shop & Garage Equipment	343,576
395 Laboratory Equipment	929,696
396 Power Operated Equipment	(192,979)
397 Communication Equipment	53,080,042
398 Miscellaneous Equipment	1,212,198
108.4 Retirement Work in Progress	
FIN 47 Accumulated Depreciation	673,573
Fleet Capital Lease	18,618,389
Total Accumulated Depreciation	<u>390,771,948</u> =====

Split of Common Utility Plant to Departments: (excluding CWIP) (see Note 2- Page 356.2)		December 31, 2013	
		Balance End of Year	Accumulated Depreciation
Electric	<u>72.85%</u>	550,905,287	284,677,364
Gas	27.15%	205,313,364	106,094,584
Total	<u>100.00%</u>	<u>756,218,651</u> =====	<u>390,771,948</u> =====

SDG&E
COMMON ACCOUNT ALLOCATIONS
SUMMARY OF ELECTRIC & GAS ALLOCATIONS
AS SHOWN IN WORKPAPER AH-3
FOR JANUARY - DECEMBER 2013

LINE NO	COMMON ACCOUNT DESCRIPTION	COMMON ACCOUNT RANGE	ELECTRIC	GAS	TOTAL	LINE NO
1	Administrative & General	920-923	72.85%	27.15%	100.00%	1
2	Property Insurance	924	86.42%	13.58%	100.00%	2
3	Injuries & Damages	925	72.85%	27.15%	100.00%	3
4	Pensions & Benefits	926	72.85%	27.15%	100.00%	4
5	Misc. Admin & General	928-935	72.85%	27.15%	100.00%	5

Note: Above items except property insurance are allocated to gas & electric based upon labor ratios.
See workpapers AH-5A to AH-5B for derivation.

San Diego Gas & Electric Company
Derivation of Common Plant and A&G Common Labor Cost Allocation
For the Period Ended December 31, 2012
From 2012 FERC Form 1, Page 354 - 355, Direct Payroll Distribution
As Shown in Workpaper AH-5, For January - December 2013

Line No	A	B	C	D	E	F	Line No
	<u>Direct Payroll Expenses, Electric and Gas:</u>						
1	<u>Function</u>	<u>FERC Form 1, Pages 354 - 355 Ref.</u>		<u>Electric Direct Payroll</u>	<u>Gas Direct Payroll</u>	<u>Total Direct Payroll</u>	1
2		<u>Electric</u>	<u>Gas</u>				2
3	Production	Line 20	N/A	\$ 11,746,489	\$ -	\$ 11,746,489	3
4							4
5	Transmission & Gas Storage	Line 21	Lines 55 & 56	19,114,128	5,847,987	24,962,115	5
6							6
7	Distribution	Line 23	Line 57	55,490,404	25,560,900	81,051,304	7
8							8
9	Customer Accounts	Line 24	Line 58	24,590,730	12,710,239	37,300,969	9
10							10
11	Customer Service & Informational	Line 25	Line 59	17,741,966	3,840,228	21,582,194	11
12							12
13	Sales	Line 26	Line 60	-	-	-	13
14							14
15	Total Direct Payroll Expenses Excluding A&G			\$ 128,683,717	\$ 47,959,354	\$ 176,643,071	15
16							16
17	Administrative & General	Line 27	Line 61	29,727,617	11,299,141	41,026,758	17
18							18
19	Total Direct Payroll Expenses Including A&G	Line 28	Line 62	\$ 158,411,334	\$ 59,258,495	\$ 217,669,829	19
20							20
21	Common Plant and A&G Common Labor Cost Allocation	L15 Col D/L15 Col F	L15 Col E/L15 Col F	72.85%	27.15%	100.00%	21
22							22

SAN DIEGO GAS & ELECTRIC COMPANY
Derivation of 2013 Percentages of Allocation of Common Accounts to Electric and Gas Division
For Property Insurance (FERC Account 924)
As Shown in Page AH-5
For January - December 2013
(\$1,000)

Line No	Description	A Electric Division	B Gas Division	C Total	Reference	Line No
1						1
2	Total Distribution Plant	\$ 4,884,524	\$ 1,311,744	\$ 6,196,268	Col. A - ave. of beg. and end. balances for distribution, see 2012 FERC Form 1 footnote for Page 204, Ln 104, Col. g / Col. B - see wp AH-5C, Col C, Ln 3 Col A - 2012 FERC Form 1 footnote with wood to steel pole adjustments Col. A - 2012 FERC Form 1 footnote for Page 204, Ln 104, Col. g Col. A - 2012 FERC Form 1 footnote for Page 204, Ln 104, Col. g Col. A - ave. of beg. and end. balances for distribution, see 2012 FERC Form 1 footnote for Page 204, Ln 104, Col. G see wp AH-5C, Col F, Lns 7 and 8	2
3	Total Transmission Plant	2,735,086		2,735,086		3
4	Total Steam Production Plant	492,802		492,802		4
5	Total Other Production Plant	470,617		470,617		5
6	General Plant	218,048		218,048		6
7	Common Plant	314,151	120,901	435,052		7
8	Total Plant in Service Excluding SONGS & Misc. Intangible Plant	\$ 9,115,227	\$ 1,432,645	\$ 10,547,872		8
9						9
10	Property Insurance Allocation %	86.42%	13.58%	100.00%		10