

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2016 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 15-04-____
(Filed April 15, 2015)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF ITS 2016 ELECTRIC PROCUREMENT REVENUE
REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS**

PUBLIC VERSION

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I. INTRODUCTION

In compliance with California Public Utilities Commission (“Commission”) Decisions (“D.”) 02-10-062, D.02-12-074, D.04-01-050, D.13-09-003, and D.14-10-033, as well as the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby submits this Application for Approval of its 2016 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Competition Transition Charge (“CTC”) revenue requirement; (3) the Local Generation (“LG”) revenue requirement; (4) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement; and (5) the GHG allowance revenues and return allocations (“Application”). In this Application, SDG&E also requests approval (1) for its proposed 2016 Local Generation Charge (“LGC”) rates; and (2) for its proposed vintage Power Charge Indifference Adjustment (“PCIA”) rates. SDG&E respectfully requests that the Commission approve the forecasts and proposals in this Application for recovery in rates beginning January 1, 2016.

As discussed in greater detail below and in the testimony accompanying this Application, SDG&E hereby requests approval of a total 2016 forecasted revenue requirement of \$ 1,285.845 million.¹ This total forecast is comprised of 2016 forecasts of the following:

- (1) the ERRA revenue requirement – \$1,317.869 million (includes 2016 forecast GHG costs of \$52.791 million);
- (2) the CTC revenue requirement– \$ 19.614 million;
- (3) the LG revenue requirement – \$7.127 million;
- (4) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – \$1.077 million; and
- (5) the following GHG allowance revenue return allocations which include 2014 actual and 2015 forecasted revenue reconciliation adjustments:
 - (a) \$1.286 million for energy-intensive trade-exposed (“EITE”) customers;
 - (b) \$4.883 million for small businesses;
 - (c) \$23.630 million for residential customers; and
 - (d) \$30.043 million for residential California Climate Credit.²

In addition, SDG&E requests approval of the following forecasts, which are used to calculate the GHG allowance revenue return allocations:

¹ This forecasted revenue requirement includes Franchise Fees and Uncollectibles (“FF&U”). The EITE return allocation is also included in this amount since it is part of the 2016 forecast revenue requirement, although it is not returned to customers in rates.

² The residential California Climate Credit is the semi-annual line item credit that goes to residential customers. It was previously referred to as the “climate dividend.” Pursuant to D.14-01-012, the Energy Division issued a letter on January 27, 2014 notifying the electric utilities that “California Climate Credit” will be used as the name for all on-bill credits of GHG allowance revenues that small businesses and residential customers receive.

- (1) the GHG allowance revenues – \$86.236 million;
- (2) the GHG administration, customer education and outreach plan costs of \$187,500.

The 2016 revenue requirement forecasts for ERRA, CTC, LG, SONGS Unit 1 Offsite Spent Fuel Storage Costs, and the GHG allowance revenue return are (\$32.585) million lower, \$3.630 million higher, \$0.178 million higher, (\$0.023) million lower, and \$106.046 million higher, respectively, than the currently-effective amounts in rates,³ for a combined total increase of \$77.246 million, or a 6.38% increase (an increase of 0.342 cents per kilowatt-hour, or 1.64% to the current system average rate).⁴

The Commission, however, recently approved for implementation SDG&E's 2015 GHG Forecast Revenue and Reconciliation Application (A.14-04-018) in D.15-03-019 (corrected by D.15-04-005), pursuant to which SDG&E will recover net revenue requirements of approximately \$28.055 million, to be amortized over eight months, beginning May 1, 2015. That amortization will result in rate impacts that reflect implementation of an approximately \$61.071 million annual revenue requirement beginning May 1, 2015. Thus, when the combined total revenue requirement forecasts in this Application are compared to rates that will be effective as of May 1, 2015, the combined total increase is approximately \$49.192 million (rather than \$77.246 million), with an incremental rate impact of approximately \$16.176 million.

³ On January 15, 2015, the Commission approved SDG&E's "Application of San Diego Gas & Electric Company (U-902-E) for Approval of ERRA, CTC and LG Forecasts for 2015" (A.14-04-015). *See* D.15-01-004. As the Commission noted in that decision, SDG&E requested and obtained approval to implement a lower revenue requirement in rates for the ERRA, CTC and LG components. The GHG Costs, GHG Allowance Revenue Available for Return and GHG California Climate Credit include 50% of the forecast revenue requirements from 2013 and 100% of the forecasted revenue requirements from 2014. Additionally, the authorized 2014 revenue requirements were amortized over nine months. Due to the timing in receiving approval of D.15-03-019 (issued March 27, 2015) (corrected by D.15-04-005) SDG&E's 2015 GHG costs, allowance revenue returns, and CCC, have not yet been implemented in rates.

⁴ Effective February 1, 2015, per Advice Letter 2695-E.

The combined total increase of \$77.246 million as of the date of this Application increases the system average rate by 0.342 cents per kilowatt-hour (1.64%). A typical non-CARE residential customer in the inland climate zone using 500 kilowatt-hours could see a monthly summer bill increase of 1.2% or \$1.23.⁵

The key drivers behind the combined total increase are increased renewable energy costs (\$108 million greater than in 2015) and lower natural gas prices (\$61 million less than in 2015).

Section VII below summarizes the relief SDG&E requests from the Commission in this Application.

II. BACKGROUND

SDG&E's 2016 forecasts and proposals in this Application contain several categories of electric procurement activities, each of which is discussed below. While in recent years, SDG&E has filed an annual application seeking approval of its forecast revenue requirements for ERRA, CTC and LG – as well as approval of its proposed LGC rates and vintage PCIA rates⁶ – the Commission has recently directed the utilities to incorporate GHG-related forecasts and proposals into their annual ERRA forecast applications, which SDG&E has done in this Application.⁷ Additionally, for the first time, SDG&E is proposing to incorporate its 2016 forecast of its SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – formerly an element of its General Rate Cases (“GRC”) – in this Application and also seeks authorization to include such forecasts in future ERRA forecast applications.

⁵ Customers' actual bill impacts will vary with usage per month, by season and by climate zone.

⁶ See, e.g., A.14-04-015.

⁷ See D.14-10-033, Ordering Paragraph (“OP”) 10.

A. ERRA

In D.02-10-062, the Commission established the ERRA balancing account – the power procurement balancing account required by Public Utilities (“P.U.”) Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities (“IOUs”) with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator-related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers.⁸

The ERRA regulatory process consists of (1) an annual forecast proceeding to adopt a forecast of the utility’s electric procurement cost revenue requirement and electricity sales for upcoming year; and (2) an annual compliance proceeding to review the utility’s compliance in the preceding year regarding energy resource contract administration, least cost dispatch, fuel procurement, and the ERRA balancing account. There is also an update process for fuel and purchased power forecasts and the ERRA mechanism.

P.U. Code Section 454.5(d)(3) also specified that the balance of the ERRA was not to exceed 5% of the IOUs actual recorded generation revenues for the prior calendar year, excluding revenues collected for the California Department of Water Resources (“DWR”).⁹ Accordingly, in D.02-10-062, the Commission established a trigger mechanism designed to avoid the 5% threshold point, pursuant to which IOUs must file an expedited application for approval to adjust rates in 60 days from the filing date when their ERRA balance reaches an

⁸ See D.02-10-062 at 60.

⁹ See D.02-10-062 at 62; *see also* D.11-05-005.

undercollection or overcollection of 4% and is projected to exceed the 5% trigger.¹⁰ As currently implemented, the trigger process exists independently of, but in conjunction with, the forecast process used for this Application. Thus, SDG&E does not currently include the prior year-end ERRA balance in its forecast applications as it is addressed via an ERRA trigger application or year-end consolidated advice letter filing.

B. CTC

The Transition Cost Balancing Account (“TCBA”), which is also reviewed in ERRA forecast proceedings, is designed to accrue all ongoing Competition Transition Charge (“CTC”) revenues and recover all ongoing CTC-eligible generation-related costs.¹¹ In accordance with D.02-12-074 and D.02-11-022, payments to Qualifying Facilities (“QFs”) that are above the market benchmark proxy price (*i.e.*, above-market QF power costs) are charged to the TCBA. Eligible ongoing CTC expenses reflect the difference between the market benchmark proxy price and the costs associated with QF contracts.

C. LG

The Local Generation Balancing Account (“LGBA”) is designed to record the costs and revenues of Local Generation where the Commission has determined that the generation resource is subject to the Cost Allocation Mechanism (“CAM”).¹² Such generation may take the form of power purchase agreements, company-owned generation units associated with new generation resources, or any other resources approved by the Commission for CAM treatment. In D.13-03-

¹⁰ In D.07-05-008, the Commission modified D.02-10-062 by adding a new rule to the trigger procedures, pursuant to which SDG&E is permitted to file an advice letter seeking to maintain rates when it expects an undercollection or overcollection above the 4% trigger will self-correct within 120 days.

¹¹ Assembly Bill 1890 established the expenses that are eligible for CTC recovery.

¹² The Commission adopted its CAM policy in D.06-07-029, which it later modified in D.11-05-005. The basic purpose of the CAM is to allow the advantages and costs of new generation to be shared by all benefiting customers in an IOU’s service territory.

029, the Commission authorized SDG&E to record costs associated with the Escondido Energy Center Purchase Power Tolling Agreement in the LGBA, with the balance to be reviewed in ERRA forecast proceedings.¹³ The costs recorded in the LGBA are recovered via the Local Generation Charge (“LGC”), a rate component.

D. PCIA

The other rate component in this Application is the Power Charge Indifference Amount rate. In D.06-07-030, as modified by D.07-01-030, the Commission resolved various issues relating to the cost responsibility surcharge applicable to Direct Access (“DA”) and Municipal Departing Load customers¹⁴ within the service territories of the IOUs. The PCIA component of the cost responsibility surcharge is intended to preserve bundled customer indifference to customers that migrate from bundled to DA load by ensuring that departing load customers pay their share of the cost responsibility associated with the above-market-costs of the utilities’ total procurement portfolio. Under the methodology adopted by the Commission in D.08-09-012, the Commission refined the indifference amount methodology by introducing the requirement to vintage departing load customers, based on their departure date, when assigning responsibility for the total portfolio of resources. The 2016 vintage PCIA rates will be based on applicable costs from SDG&E’s total portfolio of resources, including its forecasted ERRA and CTC revenue requirements, as well as its authorized 2016 Non-Fuel Generation Balancing Account (“NGBA”) revenue requirement and authorized 2016 Department of Water Resources (“DWR”)

¹³ D.13-03-029 at 20-21.

¹⁴ As noted in D.06-07-030, Direct Access load customers purchase electricity from an independent electric service provider and receive only distribution and transmission service from the utility, whereas bundled customers rely on the utility for all these services. Thus, distribution and transmission charges are “bundled” with a charge for the procurement of energy supplies. Departing Load generally refers to retail customers who were formerly IOU customers but now receive energy, transmission and distribution services from publicly owned utilities, self-generation, or other means. Municipal Departing Load refers to departing load served by municipal utilities and irrigation districts, for which a cost responsibility surcharge applies.

costs allocated to SDG&E. Although SDG&E proposes to update the currently effective vintage PCIA rates in this Application, it will not be able to provide actual vintage 2016 PCIA rates until the 2016 NGBA and DWR revenue requirements (and certain market price information) become available, which is anticipated to be in the second half of 2016. Once the necessary information becomes available, SDG&E will propose its 2016 PCIA rates.

E. SONGS Unit 1 Offsite Spent Fuel Storage Costs

In the past, the CPUC has approved recovery of SDG&E's portion of SONGS Unit 1 Offsite Spent Fuel Storage Costs in the context of SDG&E's GRC, and SDG&E tracks the authorized revenue requirement in its Nuclear Decommissioning Adjustment Mechanism ("NDAM") account. Southern California Edison Company – the majority owner of SONGS – has historically sought approval of its portion of SONGS Unit 1 Offsite Spent Fuel Storage costs in its annual ERRA forecast proceeding. SDG&E has recently determined that it is more appropriate to seek recovery of these costs through the ERRA forecast application process, and it is thus seeking authorization of the forecast 2016 revenue requirement for SONGS Unit 1 Offsite Spent Fuel Costs in this Application, and seeks authorization to do so in the future as well. If the Commission approves this request, SDG&E will withdraw its request for recovery of these costs from its pending GRC Application.¹⁵

F. GHG Costs and Allowance Revenues

Pursuant to the California Global Warming Solutions Act of 2006, Assembly Bill ("AB") 32, the California Air Resources Board ("ARB") designed a statewide GHG cap-and-trade program in which certain utilities are required to participate. The cap-and-trade program creates

¹⁵ See A.14-11-003 filed on November 14, 2014.

a cap on major sources of GHG emissions – including power plants, fuel suppliers and industrial facilities – to achieve GHG reduction goals.

Under the cap-and-trade program, utilities must forecast both GHG costs and allowance revenues. Utilities incur costs both by purchasing allowances for their own compliance obligation under the cap-and-trade program and, indirectly, through GHG costs embedded in the wholesale price of electricity. These GHG costs are incorporated into the generation component of electricity rates through the ERRA process in the same manner as other procurement-related costs, and they result in a carbon price signal intended to incent an overall reduction in GHG emission. The state allocates GHG allowances to ratepayers with the utilities acting as an intermediary to hold and then sell the allowances for ratepayer benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that results from GHG compliance.

On December 28, 2012, the Commission issued D.12-12-033 in Rulemaking (“R.”) 11-03-012. In D.12-12-033, the Commission required utilities to file applications for approval of forecast GHG costs and revenues, including administrative and customer outreach expenses, sufficient to calculate the amount of GHG allowance revenue that should be returned to the different customer classes in 2014.¹⁶ While recognizing that ERRA forecast proceedings¹⁷ already examine the utilities’ forecast procurement costs for the purpose of ensuring recovery of costs associated with fuel and purchased power, the Commission required that GHG-related

¹⁶ The Commission directed utilities to distribute GHG allowance revenues to customers using the following hierarchy: (1) emissions-intensive and trade-exposed (“EITE”) entities; (2) offset cap-and-trade program rate impacts for small business; (3) neutralize cap-and-trade program rate impacts for residential customers; and (4) semi-annual residential California Climate Credit.

¹⁷ SDG&E included its initial (2013) GHG cost forecasts in its 2013 ERRA Forecast Application (A.12-10-002), but it ultimately requested to defer inclusion of GHG costs in rates and record the costs in a new GHG sub-balancing account until such time as the Commission finalized implementation of its GHG methodologies. The Commission approved this approach in D.13-10-053.

forecasts be filed separately so that it could take a “more comprehensive and detailed approach” to evaluating GHG costs and allowance revenues.¹⁸ The Commission directed the utilities to file these applications annually, with the forecasts to be included in the next year’s rates, and to include in the application a reconciliation¹⁹ of recorded costs and allowance revenues with forecasts from prior years. Further, the Commission directed the utilities to file an application setting forth their proposed customer outreach plans for 2014 and 2015.

In compliance with these directives, SDG&E filed its 2014 GHG Revenue Forecast Application (A.13-08-005) on August 1, 2013, setting forth its forecasted GHG costs for 2014, a forecast of administrative and outreach expenses for 2014 and an estimate of the GHG revenues to be distributed by eligible customer classes in 2014. SDG&E filed its Customer Outreach Plan for 2014-2015 (A.13-08-026) on August 30, 2013.

In response to the utilities’ 2014 GHG Revenue Forecast Application filings, the assigned Commissioner and assigned Administrative Law Judge issued a Scoping Memo and Ruling that consolidated the utilities’ applications into a single proceeding (A.13-08-002) and divided the proceeding into two phases. Phase 1 focused on adopting GHG program forecasts costs and revenues for 2014. Phase 2 was to focus on standardizing procedures for future GHG Revenue Forecast Applications.

The Commission issued its Phase 1 decision (D.13-12-041) on December 27, 2013. In that decision, the Commission authorized the utilities to incorporate GHG-related forecasts of costs and allowance revenues into 2014 rates. It also authorized the forecast amounts of the California Climate Credit to be returned to residential customers for the first time in 2014.

¹⁸ D.12-12-033 at 147.

¹⁹ This reconciliation refers to a true-up performed for the purpose of incorporating the revenue return (including California Climate Credit) into rates.

Additionally, in D.13-12-041, the Commission ordered the utilities to true-up the 2013 forecasts against the 2013 actuals in connection with the filing of GHG Forecast Revenue and Reconciliation Applications later in 2014, and noted that this process would be repeated for 2014 forecasts in 2015.²⁰ In compliance with D.13-12-041, SDG&E filed its 2015 GHG Forecast Revenue and Reconciliation Application (A.14-04-018) concurrently with its 2015 ERRA Forecast Application (A.14-04-015) on April 15, 2014. SDG&E subsequently filed supplemental data on September 29, 2014; provided a fourth quarter update to this application on October 31, 2014; and submitted an amendment on January 16, 2015 to reflect updated information through the third quarter of 2014.

The Commission issued its Phase 2 decision (D.14-10-033) on October 22, 2014. In that decision, the Commission adopted methodologies for calculating forecast GHG allowance revenue and GHG costs, as well as recorded GHG allowance revenue and GHG costs. In so doing, the Commission indicated that utilities should use Attachments C and D to D.14-10-033, as corrected by D.14-10-055 and D.15-01-024, to provide the required information. The decision further adopted Confidentiality Protocols for cap-and-trade related data and required the utilities to use a proxy price in their forecasts. Lastly, the decision required the utilities to file GHG Forecast Revenue and Reconciliation Applications annually as part of their ERRA forecast applications.

On March 27, 2015, the Commission issued D.15-03-019 (as later corrected by D.15-04-005) in which it approved SDG&E's 2015 GHG Forecast Revenue and Reconciliation Application (as amended and updated).

²⁰ D.13-12-041 at 3, 7.

In accordance with D.14-10-033, SDG&E's 2016 GHG Forecast Revenue and Reconciliation Application is incorporated in this Application, and SDG&E will update this information in November 2015 to include actual data through the third quarter. Attachment G to this Application contains the information that the Commission directed the utilities to use in D.14-10-033.

III. SUMMARY OF APPLICATION AND PREPARED TESTIMONY

In this Application, SDG&E identifies the forecast of its load, the resources available to meet the load, fuel costs, GHG costs, and costs for SDG&E's various energy resources for 2016. SDG&E used these forecasts to develop its 2016 forecast of its ERRA revenue requirement, CTC revenue requirement, and LG revenue requirement forecasts. SDG&E also forecasts the SONGS Unit 1 Offsite Spent Fuel Storage Costs revenue requirement. SDG&E seeks approval of each of these 2016 forecast revenue requirements.

In addition, SDG&E requests approval of its 2016 forecast of allowance revenues resulting from the consignment and sale of allowances in ARB's quarterly auctions. SDG&E has allocated the allowance revenues to various customer classes, and it seeks approval of these allocations, including reconciliation adjustments.

Lastly, SDG&E requests approval of its proposed 2016 LGC rates and its proposal to update the currently-effective PCIA rates and to provide vintage 2016 PCIA rates.

In support of this Application, SDG&E provides the testimony of seven witnesses. That testimony is summarized below and incorporated by reference herein:

A. Mr. Benjamin A. Montoya

Mr. Montoya's testimony describes the resources that SDG&E expects to use in 2016 to meet its forecast bundled customer load. Mr. Montoya then forecasts the procurement costs that

SDG&E expects to record in 2016 to the ERRA, TCBA, and LGBA. In addition, Mr. Montoya provides a forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. Montoya also presents SDG&E's forecast of 2016 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which (as noted below) Ms. Phan uses in her 2016 forecast of the ERRA revenue requirement. Lastly, Mr. Montoya provides a 2016 forecast of GHG allowance revenues, the amount of revenue available for energy efficiency and clean energy investments in 2016, and the magnitude of the allowance revenues to be set aside for EITE customers.

B. Ms. Jenny Phan

Ms. Phan's testimony describes the purpose of the ERRA, TCBA, and LGBA. Using cost information provided by Mr. Montoya, Ms. Phan then presents SDG&E's 2016 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; and (3) the LG revenue requirement. Additionally, Ms. Phan compares the 2014 year-end recorded balances with the 2014 year-end actual balances in the GHG balancing accounts used for GHG expenses (GHG Customer Outreach and Education Memorandum Account and GHG Administrative Costs Memorandum Account) and GHG allowance revenues (GHG Revenue Balancing Account). Finally, Ms. Phan presents SDG&E's 2016 forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement.

C. Ms. Yvonne M. Le Mieux

Ms. Le Mieux's testimony presents the rate and bill impacts associated with the cost recovery of SDG&E's 2016 forecast of its (1) ERRA revenue requirement (including GHG costs); (2) CTC revenue requirement; (3) LG revenue requirement; (4) SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement; and (5) GHG allowance revenue return. Ms. Le Mieux

proposes rates for non-bypassable charges, including the (1) 2016 PCIA component of the cost responsibility surcharge applicable to departing load customers and (2) the Local Generation Charge applicable to all benefiting customers. Further, Ms. Le Mieux presents the methodology for the GHG allowance revenue returns, which involves (1) identifying the 2016 forecast GHG allowance revenue return allocation amounts (including the California Climate Credit); and (2) supporting the 2016 forecast GHG Revenue Returned to Eligible Customers and California Climate Credit information in Templates D-1 and D-4 of Attachment G to this Application.

D. Mr. Rick Janke

Mr. Janke’s testimony describes the overall approach that SDG&E proposes to employ to support ongoing customer awareness about the purpose and value of the GHG allowance revenues that will be credited to the bills of residential, small business and EITE customers. In addition, the testimony forecasts the costs of ongoing customer education and outreach as well as the ongoing administrative and billing costs associated with the return of allowance revenue to customers.

E. Ms. Ana Garza-Beutz

Ms. Garza-Beutz’s testimony presents SDG&E’s 2013 and 2014 actual revenues, 2013 updated actual costs, and 2014 estimated “actual”²¹ costs for GHG compliance instruments used to satisfy obligations under the ARB’s cap-and-trade program. Additionally, Ms. Garza-Beutz provides the 2015 estimated “actual” costs and actual revenues for January – February 2015. Ms. Garza-Beutz’s testimony will also describe the cap-and-trade program and detail the methodology behind SDG&E’s calculation of its unadjusted 2013 and 2014 actual revenues and

²¹ As explained by Ms. Garza-Beutz, some “actuals” are based on estimates or calculations rather than emission monitors, so they remain subject to modification since they have not yet been fully verified by ARB.

costs, both actual and estimated, and its unadjusted January – February 2015 actual revenues and estimated actual costs. These costs and revenues are adjusted to recorded numbers by Ms.

Vazquez Chihwaro for the purposes of the reconciliation performed by Ms. Le Mieux.

F. Ms. Monica Vazquez Chihwaro

Ms. Vazquez Chihwaro’s testimony presents the accounting procedures that are used to record the GHG costs described in Ms. Garza-Beutz’s testimony.

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

In accordance with Rule 2.1 (a) – (c) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.

1. Rule 2.1 (a) - Legal Name

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

2. Rule 2.1 (b) Correspondence

Correspondence or communications regarding this Application should be addressed to:

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3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting because SDG&E proposes to recover the forecasted revenue requirements described in this Application from its ratepayers, and the costs will thus influence SDG&E's rates.

b. Need for Hearings

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

c. Issues to be Considered

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

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
Application filed	April 15, 2015
Approx. End of Response Period (including Applicant Reply)	May 29, 2015
Prehearing Conference	June 11, 2015
ORA and Intervener Testimony	July 9, 2015
Concurrent Rebuttals	August 7, 2015
Proposed Decision	November 2015 (after SDG&E's November 2015 update)
Comments on Proposed Decision	November 17, 2015
Reply Comments on Proposed Decision	November 24, 2015
Commission Decision Adopted	No later than December 2015

B. Rule 2.2 – Articles of Incorporation

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

C. Rule 3.2 – Authority to Change Rates

In accordance with Rule 3.2 (a) – (d) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.²²

²² Note Rule 3.2(a) (9) is not applicable to SDG&E.

1. Rule 3.2 (a) (1) – Balance Sheet

SDG&E's financial statement, balance sheet and income statement for the nine-month period ending September 30, 2014 are included with this Application as Attachment A.

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

A statement of all of SDG&E's presently effective electric rates can be viewed electronically by accessing:

<http://www.sdge.com/rates-regulations/current-and-effective-tariffs/current-and-effective-tariffs>.

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

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

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

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

A general description of SDG&E's property and equipment was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve for the nine-month period ending September 30, 2014 is attached as Attachment D.

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

A summary of SDG&E's earnings (for the total utility operations for the company) for nine-month period ending September 30, 2014, is included as Attachment E to this Application.

6. Rule 3.2 (a) (7) – Statement Regarding Tax Depreciation

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the

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

7. Rule 3.2 (a) (8) – Proxy Statement

A copy of the most recent proxy statement sent to all shareholders of SDG&E’s parent company, Sempra Energy, dated March 20, 2014, was mailed to the Commission on May 12, 2014, and is incorporated herein by reference.

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

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

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

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

10. Rule 3.2 (c) – Newspaper Publication

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

11. Rule 3.2 (d) – Bill Insert Notice

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

V. CONFIDENTIAL INFORMATION

SDG&E is submitting the testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E’s declarations of confidential treatment attached to each of the witnesses’ testimonies and submitted in conformance with D.06-06-066 and D.08-04-023. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E’s electric procurement resources and strategies) that SDG&E witnesses must identify to support SDG&E’s revenue requirements forecasts for 2016.

VI. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, testimony and related exhibits on parties to the service list for A.14-04-015 (SDG&E’s 2015 ERRRA forecast proceeding), A.14-04-018 (SDG&E’s 2015 Forecast Revenue and Reconciliation Application) and R.10-05-006 (OIR to Integrate and Refine

Procurement Policies and Consider Long-Term Procurement Plans). Hard copies will be sent via FedEx to Chief ALJ Karen Clopton and ALJ Seaneen Wilson.

VII. CONCLUSION AND SUMMARY OF RELIEF REQUESTED

WHEREFORE, SAN DIEGO GAS & ELECTRIC COMPANY requests that the Commission:

(1) grant authority to change rates by approving as reasonable SDG&E's 2016 forecast of its ERRA revenue requirement pertaining to SDG&E's load, the resources available to meet SDG&E's load, and various input assumptions regarding fuel costs, GHG costs, and costs for SDG&E's various electric resources;

(2) grant authority to increase rates by approving as reasonable SDG&E's 2016 forecast of its CTC revenue requirement;

(3) grant authority to increase rates by approving as reasonable SDG&E's 2016 forecast of its LG revenue requirement;

(4) grant authority to increase rates by approving as reasonable SDG&E's 2016 forecast of its SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement;

(5) adopt SDG&E's proposed vintage 2016 PCIA rates, as will be provided in SDG&E's expected November 2015 update to this Application;

(6) adopt SDG&E's proposed 2016 LGC rates, as proposed in Attachment A to the Direct Testimony of Ms. Yvonne M. Le Mieux;

(7) approve SDG&E's 2016 forecast of its GHG allowance revenues;

(8) approve SDG&E's 2016 forecast for its GHG administration, customer education and outreach activities;

(9) adopt SDG&E's 2016 forecast of its GHG allowance revenue return allocations, including reconciliation adjustments, for EITE, small businesses, residential customers and residential California Climate Credit; and

(10) grant such additional relief as the Commission believes is just and reasonable.

SDG&E is ready to proceed with its showing in this Application.

Respectfully submitted,

By: /s/ Christopher M. Lyons
Christopher M. Lyons
Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY
101 Ash Street
San Diego, CA 92101
Telephone: (619) 696-1801
Facsimile: (619) 699-5027
E-mail: clyons@semprautilities.com

SAN DIEGO GAS & ELECTRIC COMPANY

By: 
 Lee Schavrien
San Diego Gas & Electric Company
Senior Vice President –Regulatory Affairs and Operations Support

DATED at San Diego, California, this 15th day of April 2015

OFFICER VERIFICATION

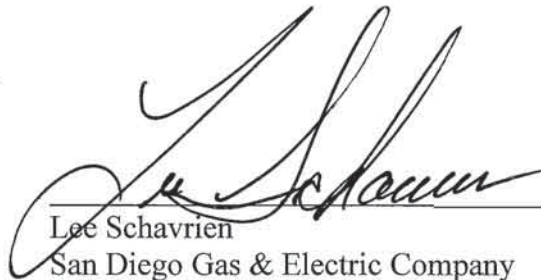
OFFICER VERIFICATION

Lee Schavrien declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF ITS 2016 ELECTRIC PROCUREMENT REVENUE REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on April 15, 2015 at San Diego, California.

A handwritten signature in black ink, appearing to read 'Lee Schavrien', is written over a horizontal line.

Lee Schavrien
San Diego Gas & Electric Company
Senior Vice President – Regulatory Affairs and Operations
Support

ATTACHMENT A

**BALANCE SHEET AND INCOME STATEMENT AND
FINANCIAL STATEMENT**

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
SEPTEMBER 30, 2014**

	1. UTILITY PLANT	<u>2014</u>
101	UTILITY PLANT IN SERVICE	\$13,265,270,702
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	13,092,995
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	850,382,133
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,186,909,599)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(410,449,684)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(687,632)
118	OTHER UTILITY PLANT	924,585,477
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(259,751,909)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	<u>10,284,477,205</u>
	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	5,947,314
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(364,300)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>1,086,913,134</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>1,092,496,148</u>

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
SEPTEMBER 30, 2014**

3. CURRENT AND ACCRUED ASSETS		2014
131	CASH	8,179,251
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	8,600,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	325,835,707
143	OTHER ACCOUNTS RECEIVABLE	27,346,788
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,306,398)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,037,349
151	FUEL STOCK	5,915,837
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	60,643,228
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	119,762,814
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	355,489
165	PREPAYMENTS	187,946,741
171	INTEREST AND DIVIDENDS RECEIVABLE	379,618
173	ACCRUED UTILITY REVENUES	66,408,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	3,140,584
175	DERIVATIVE INSTRUMENT ASSETS	122,719,561
TOTAL CURRENT AND ACCRUED ASSETS		934,965,069
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	33,866,452
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,415,826,388
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	5,408,508
184	CLEARING ACCOUNTS	773,515
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	69,070,258
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	12,678,902
190	ACCUMULATED DEFERRED INCOME TAXES	546,020,438
TOTAL DEFERRED DEBITS		4,083,644,461
TOTAL ASSETS AND OTHER DEBITS		16,395,582,883

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
SEPTEMBER 30, 2014**

5. PROPRIETARY CAPITAL

	2014
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	-
207 PREMIUM ON CAPITAL STOCK	(591,282,978)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(479,665,369)
214 CAPITAL STOCK EXPENSE	24,605,640
216 UNAPPROPRIATED RETAINED EARNINGS	(3,680,171,669)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	7,425,619
TOTAL PROPRIETARY CAPITAL	(5,010,547,152)

6. LONG-TERM DEBT

221 BONDS	(3,912,505,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(223,900,000)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	10,483,578
TOTAL LONG-TERM DEBT	(4,125,921,422)

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(665,589,287)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(30,799,317)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(123,587,487)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	(870,397,986)
TOTAL OTHER NONCURRENT LIABILITIES	(1,690,374,077)

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
SEPTEMBER 30, 2014**

8. CURRENT AND ACCRUED LIABILITES		2014
231	NOTES PAYABLE	0
232	ACCOUNTS PAYABLE	(426,187,421)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(36,331,647)
235	CUSTOMER DEPOSITS	(68,765,920)
236	TAXES ACCRUED	(142,413,013)
237	INTEREST ACCRUED	(56,002,581)
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	(5,069,005)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(300,676,506)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(36,787,838)
244	DERIVATIVE INSTRUMENT LIABILITIES	(149,662,867)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,221,896,798)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(36,637,985)
253	OTHER DEFERRED CREDITS	(364,727,768)
254	OTHER REGULATORY LIABILITIES	(1,317,940,681)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(21,820,437)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,855,909,283)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(749,807,280)
TOTAL DEFERRED CREDITS		(4,346,843,434)
TOTAL LIABILITIES AND OTHER CREDITS		(\$16,395,582,883)

Data from SPL as of November 20, 2014

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2014

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$3,888,295,041
401	OPERATING EXPENSES	\$2,604,800,533	
402	MAINTENANCE EXPENSES	112,891,857	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	373,934,327	
408.1	TAXES OTHER THAN INCOME TAXES	82,987,508	
409.1	INCOME TAXES	26,163,303	
410.1	PROVISION FOR DEFERRED INCOME TAXES	675,397,703	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(482,264,895)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(2,040,336)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>3,391,870,000</u>
	NET OPERATING INCOME		496,425,041

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	1,578	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	297,497	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	5,399,961	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	25,944,284	
421	MISCELLANEOUS NONOPERATING INCOME	371,195	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>32,014,515</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	8,038,828	
	TOTAL OTHER INCOME DEDUCTIONS	<u>8,226,364</u>	
408.2	TAXES OTHER THAN INCOME TAXES	496,329	
409.2	INCOME TAXES	(1,789,345)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	8,312,662	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(6,478,028)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>541,618</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>23,246,533</u>
	INCOME BEFORE INTEREST CHARGES		519,671,574
	NET INTEREST CHARGES*		<u>140,424,376</u>
	NET INCOME		<u><u>\$379,247,198</u></u>

**NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$10,362,273)*

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2014**

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,300,924,471
NET INCOME (FROM PRECEDING PAGE)	379,247,198
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$3,680,171,669</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
September 30, 2014

(a) Amounts and Kinds of Stock Authorized:
Common Stock 255,000,000 shares Without Par Value

Amounts and Kinds of Stock Outstanding:
COMMON STOCK 116,583,358 shares 291,458,395

(b) Brief Description of Mortgage:
Full information as to this item is given in Application Nos. 08-07-029,10-10-023 and 12-03-005 to which references are hereby made.

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

<u>First Mortgage Bonds:</u>	<u>Nominal Date of Issue</u>	<u>Par Value Authorized and Issued</u>	<u>Outstanding</u>	<u>Interest Paid in 2013</u>
6.80% Series KK, due 2013	12-01-91	14,400,000	0	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	0	2,876,250
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,373
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,250
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,936
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	2,900,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-15-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	2,571,778
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	0
 <u>Unsecured Bonds:</u>				
5.30% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.50% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.90% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
September 30, 2014

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2013</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$15,949

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>12-31-13</u>	2009	2010	2011	2012	2013
5.0%		\$375,000	\$375,000	\$375,000	\$375,000	\$281,250
4.50%		270,000	270,000	270,000	270,000	202,500
4.40%		286,000	286,000	286,000	286,000	214,500
4.60%		343,868	343,868	343,868	343,868	257,901
\$ 1.7625		0	0	0	0	0
\$ 1.70		2,380,000	2,380,000	2,380,000	2,380,000	1,785,000
\$ 1.82		1,164,800	1,164,800	1,164,800	1,164,800	873,600
	<u>0</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>	<u>\$4,819,668</u>	<u>\$3,614,751</u>

Common Stock

Dividend to Parent	\$150,000,000 [1]	\$0	\$0	\$0	\$0
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A balance sheet and a statement of income and retained earnings of Applicant for the nine months ended September 30, 2014 are attached hereto.

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

ATTACHMENT B

STATEMENT OF PRESENT RATES



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Sheet 1

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

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California Alternate Rates for Energy (CARE) Balancing Account.....	21639, 21640-E
Rewards and Penalties Balancing Account (RPBA).....	21643, 22802-E
Transition Cost Balancing Account (TCBA).....	22803, 19411, 22804, 22805, 19414-E
Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA).....	19415, 19416-E
Research, Development and Demonstration (RD&D) Balancing Account.....	19417, 19418-E
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Tree Trimming Balancing Account (TTBA).....	19421, 19422-E
Baseline Balancing Account (BBA).....	21377, 19424-E
EI Paso Turned-Back Capacity Balancing Account (EPTCBA).....	19425-E
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Pension Balancing Account (PBA).....	19441, 19442-E
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA).....	19443, 19444-E
Community Choice Aggregation Implementation Balancing Account (CCAIBA).....	19445-E

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(Continued)

1C7

Advice Ltr. No. 2719-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Date Filed Mar 26, 2015

Effective Mar 26, 2015

Resolution No. _____



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SONGS O&M Balancing Account (SONGSBA).....	25576, 25577-E	
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Lee Schavrien
Senior Vice President
Regulatory Affairs



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Advice Ltr. No. 2719-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Date Filed Mar 26, 2015

Effective Mar 26, 2015

Resolution No. _____

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ATTACHMENT C

STATEMENT OF PROPOSED RATES

ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

If the CPUC approves SDG&E's Application, a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours per month could see a monthly summer bill increase of 1.2%, or \$1.23, from a current monthly bill of \$103.87 to \$105.10.

The first table below provides illustrative bill changes for bundled customers, while the second table presents illustrative bill changes for DA customers. For DA customers who do not pay commodity, the Utility Distribution Company (UDC) rate changes on a class average basis are presented below. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

SAN DIEGO GAS & ELECTRIC COMPANY ILLUSTRATIVE ELECTRIC BUNDLED RATE CHANGE (TOTAL RATES INCLUDE UDC¹ AND COMMODITY²)

Customer Class	Class Average Rates Effective 02/01/15 ³ (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Change Per Application (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
Residential	22.012	23.070	1.058	4.81%
Small Commercial	24.393	24.657	0.264	1.08%
Medium and Large C&I⁴	19.453	19.296	(0.157)	-0.81%
Agricultural	17.558	17.457	(0.101)	-0.58%
Lighting	18.016	17.895	(0.121)	-0.67%
System Total	20.849	21.191	0.342	1.64%

¹ UDC rates include Department of Water Resources (DWR) Bond Charge.

² Commodity rates include DWR Power Charge credit.

³ Rates effective 2/1/15 per Advice Letter (AL) 2695-E.

⁴ C&I stands for Commercial and Industrial.

**SAN DIEGO GAS & ELECTRIC COMPANY
ILLUSTRATIVE ELECTRIC UDC¹ RATE INCREASE**

Customer Class	Class Average Rates Effective 02/01/15² (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Increase Per Application (¢/kWh)	Total Rate Increase (¢/kWh)	Percentage Rate Increase (%)
Residential	11.556	12.804	1.248	10.80%
Small Commercial	13.933	14.388	0.455	3.27%
Medium and Large C&I³	9.139	9.167	0.028	0.31%
Agricultural	8.668	8.729	0.061	0.70%
Lighting	11.492	11.492	0.000	0.00%
System Total	10.505	11.034	0.529	5.04%

¹ UDC rates include DWR Bond Charge.

² Rates effective 2/1/15 per AL 2695-E.

³ C&I stands for Commercial and Industrial.

The following two tables provide illustrative bill changes for bundled customers and DA customers, respectively, excluding the residential California Climate Credit (CCC), for purposes of showing the impact of the residential CCC. The residential CCC is a semi-annual on-bill credit pursuant to which residential customers are allocated GHG allowance revenues available for return on an equal cents-per-residential-account basis.

**SAN DIEGO GAS & ELECTRIC COMPANY
ILLUSTRATIVE ELECTRIC BUNDLED RATE INCREASE
(TOTAL RATES INCLUDE UDC¹ AND COMMODITY²)
EXCLUDING CALIFORNIA CLIMATE CREDIT (CCC)**

Customer Class	Class Average Rates Effective 02/01/15³ (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Change Per Application (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
Residential⁴	23.144	23.454	0.310	1.34%
System Total	21.275	21.335	0.060	0.28%

¹ UDC rates include Department of Water Resources (DWR) Bond Charge.

² Commodity rates include DWR Power Charge credit.

³ Rates effective 2/1/15 per Advice Letter (AL) 2695-E.

⁴ UDC excludes residential California Climate Credit which is received semi-annually.

**SAN DIEGO GAS & ELECTRIC COMPANY
ILLUSTRATIVE ELECTRIC UDC¹ RATE INCREASE
EXCLUDING CALIFORNIA CLIMATE CREDIT (CCC)**

Customer Class	Class Average Rates Effective 02/01/15² (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Increase Per Application (¢/kWh)	Total Rate Increase (¢/kWh)	Percentage Rate Increase (%)
Residential³	12.688	13.188	0.500	3.94%
System Total	10.931	11.178	0.247	2.26%

¹ UDC rates include DWR Bond Charge.

² Rates effective 2/1/15 per AL 2695-E.

³ UDC excludes residential California Climate Credit which is received semi-annually.

ATTACHMENT D

COST OF PROPERTY AND DEPRECIATION RESERVE

SAN DIEGO GAS & ELECTRIC COMPANY

**COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF SEPTEMBER 30, 2014**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	<u>127,516,141.93</u>	<u>33,898,145.85</u>
	TOTAL INTANGIBLE PLANT	<u>127,738,983.29</u>	<u>34,101,046.15</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	94,085,697.51	34,790,069.71
312	Boiler Plant Equipment	166,507,440.76	59,528,992.29
314	Turbogenerator Units	131,066,744.63	39,247,753.27
315	Accessory Electric Equipment	82,076,227.97	28,377,956.52
316	Miscellaneous Power Plant Equipment	40,942,766.51	7,552,023.72
	Steam Production Decommissioning	<u>0.00</u>	<u>0.00</u>
	TOTAL STEAM PRODUCTION	<u>529,205,395.67</u>	<u>169,543,313.80</u>
320.1	Land	0.00	0.00
320.2	Land Rights	283,677.11	283,677.11
321	Structures and Improvements	277,056,869.05	271,035,015.47
322	Boiler Plant Equipment	594,340,599.48	414,490,986.47
323	Turbogenerator Units	144,904,256.04	137,460,463.10
324	Accessory Electric Equipment	173,367,620.53	168,082,213.69
325	Miscellaneous Power Plant Equipment	316,741,905.66	243,619,477.31
101	SONGS PLANT CLOSURE GROSS PLANT-	<u>(342,736,872.47)</u>	<u>(71,013,778.34)</u>
	TOTAL NUCLEAR PRODUCTION	<u>1,163,958,055.40</u>	<u>1,163,958,054.81</u>
340.1	Land	143,475.87	0.00
340.2	Land Rights	56,032.61	4,306.51
341	Structures and Improvements	22,703,423.92	5,033,784.18
342	Fuel Holders, Producers & Accessories	20,348,101.38	5,733,153.23
343	Prime Movers	83,912,588.36	25,844,689.26
344	Generators	335,592,339.05	104,367,428.88
345	Accessory Electric Equipment	32,506,374.56	9,552,360.18
346	Miscellaneous Power Plant Equipment	<u>24,160,286.03</u>	<u>10,859,450.90</u>
	TOTAL OTHER PRODUCTION	<u>519,422,621.78</u>	<u>161,395,173.14</u>
	TOTAL ELECTRIC PRODUCTION	<u>2,212,586,072.85</u>	<u>1,494,896,541.75</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	41,012,520.66	0.00
350.2	Land Rights	152,405,035.47	16,153,850.09
352	Structures and Improvements	357,199,704.57	48,250,442.63
353	Station Equipment	1,123,658,169.32	199,272,486.16
354	Towers and Fixtures	846,122,326.99	125,957,137.02
355	Poles and Fixtures	308,510,965.20	67,043,111.85
356	Overhead Conductors and Devices	496,754,019.12	197,221,962.96
357	Underground Conduit	255,457,596.10	36,636,154.25
358	Underground Conductors and Devices	287,368,103.41	37,927,315.16
359	Roads and Trails	265,263,253.52	17,288,840.47
101	SONGS PLANT CLOSURE GROSS PLANT-	<u>(5,943,752.68)</u>	<u>(5,943,752.68)</u>
	TOTAL TRANSMISSION	<u>4,127,807,941.68</u>	<u>739,807,547.91</u>
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	81,460,425.89	36,502,530.48
361	Structures and Improvements	4,014,064.63	1,739,746.33
362	Station Equipment	449,269,959.70	121,408,315.61
363	Storage Battery Equipment	6,892,564.47	620,300.29
364	Poles, Towers and Fixtures	582,544,712.67	248,041,094.77
365	Overhead Conductors and Devices	460,690,966.72	178,068,014.76
366	Underground Conduit	1,051,839,731.88	412,929,705.11
367	Underground Conductors and Devices	1,361,423,574.20	812,520,352.77
368.1	Line Transformers	530,271,342.42	103,721,987.34
368.2	Protective Devices and Capacitors	21,335,893.29	(4,805,748.60)
369.1	Services Overhead	129,419,280.41	121,052,766.52
369.2	Services Underground	322,377,712.17	226,877,256.51
370.1	Meters	189,823,586.60	50,733,838.29
370.2	Meter Installations	55,015,952.49	12,429,583.68
371	Installations on Customers' Premises	7,010,597.78	10,820,402.04
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	<u>26,375,801.79</u>	<u>19,163,684.32</u>
	TOTAL DISTRIBUTION PLANT	<u>5,295,942,394.91</u>	<u>2,351,823,830.22</u>
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	32,224,388.56	22,390,930.46
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	7,740.70
393	Stores Equipment	15,720.46	15,227.49
394.1	Portable Tools	22,371,863.28	7,067,417.10
394.2	Shop Equipment	341,135.67	223,202.53
395	Laboratory Equipment	2,240,574.26	69,150.83
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	220,729,200.86	80,789,206.55
398	Miscellaneous Equipment	<u>1,498,093.95</u>	<u>389,419.67</u>
	TOTAL GENERAL PLANT	<u>286,851,794.18</u>	<u>111,119,681.21</u>
101	TOTAL ELECTRIC PLANT	<u>12,050,927,186.91</u>	<u>4,731,748,647.24</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104.20	
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	0.00
360.1	Land	0.00	0.00
361	Structures and Improvements	43,992.02	43,992.02
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,052,614.24	881,977.89
	TOTAL STORAGE PLANT	2,096,606.26	925,969.91
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,218,048.05	1,297,329.17
366	Structures and Improvements	11,710,305.17	9,885,994.97
367	Mains	182,939,877.87	64,289,357.04
368	Compressor Station Equipment	83,537,457.65	65,805,072.56
369	Measuring and Regulating Equipment	19,991,929.34	15,637,441.47
371	Other Equipment	0.00	0.00
	TOTAL TRANSMISSION PLANT	305,046,761.83	156,915,195.21
374.1	Land	102,187.24	0.00
374.2	Land Rights	8,159,510.86	6,453,551.42
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	600,626,266.53	340,601,118.25
378	Measuring & Regulating Station Equipment	17,490,287.24	7,175,773.91
380	Distribution Services	248,923,877.04	288,572,418.53
381	Meters and Regulators	152,135,710.58	46,397,274.64
382	Meter and Regulator Installations	89,572,748.29	30,967,554.26
385	Ind. Measuring & Regulating Station Equipm	1,516,810.70	1,112,362.22
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	5,223,271.51	4,800,609.64
	TOTAL DISTRIBUTION PLANT	1,123,794,116.90	726,141,915.97

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	74,500.55	74,500.68
394.1	Portable Tools	7,908,416.53	3,533,355.12
394.2	Shop Equipment	76,864.06	41,520.76
395	Laboratory Equipment	283,093.66	265,818.29
396	Power Operated Equipment	162,284.40	140,775.23
397	Communication Equipment	2,649,798.75	864,666.61
398	Miscellaneous Equipment	198,324.54	85,471.92
	TOTAL GENERAL PLANT	11,353,282.49	5,031,611.61
101	TOTAL GAS PLANT	1,442,376,871.68	889,014,692.70
COMMON PLANT			
303	Miscellaneous Intangible Plant	242,465,445.60	160,825,108.81
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,168,914.56	0.00
389.2	Land Rights	1,080,961.15	27,775.74
390	Structures and Improvements	299,817,337.36	126,837,963.49
391.1	Office Furniture and Equipment - Other	25,689,409.87	11,992,942.53
391.2	Office Furniture and Equipment - Computer E	84,559,435.04	58,060,048.53
392.1	Transportation Equipment - Autos	273,263.97	(338,930.17)
392.2	Transportation Equipment - Trailers	33,369.38	21,585.28
393	Stores Equipment	79,141.34	55,370.79
394.1	Portable Tools	1,232,026.51	244,725.05
394.2	Shop Equipment	222,948.16	136,851.10
394.3	Garage Equipment	1,056,076.39	68,560.43
395	Laboratory Equipment	2,090,236.56	905,420.00
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	130,463,619.62	59,938,612.10
398	Miscellaneous Equipment	2,481,413.83	1,390,267.42
118.1	TOTAL COMMON PLANT	798,713,599.34	419,973,322.00
	TOTAL ELECTRIC PLANT	12,050,927,186.91	4,731,748,647.24
	TOTAL GAS PLANT	1,442,376,871.68	889,100,796.90
	TOTAL COMMON PLANT	798,713,599.34	419,973,322.00
101 & 118.1	TOTAL	14,292,017,657.93	6,040,822,766.14
101	PLANT IN SERV-SONGS FULLY RECOVER	(1,163,958,055.43)	(1,163,958,055.43)
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	(3,185,074.00)	0.00

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-ASSETS HELD FOR SALE		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-SUNRISE FIRE MITIGATION		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(2,094,664.96)	(2,094,664.96)
		<u>(2,094,664.96)</u>	<u>(2,094,664.96)</u>
101	Accrual for Retirements		
	Electric	(5,670,929.45)	(5,670,929.45)
	Gas	(66,894.14)	(66,894.14)
		<u>(5,737,823.59)</u>	<u>(5,737,823.59)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(5,737,823.59)</u>	<u>(5,737,823.59)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	85,194,000.02	7,435,486.46
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>7,435,486.46</u>
	TOTAL PLANT LEASED TO OTHERS	<u>85,194,000.02</u>	<u>7,435,486.46</u>
105	Plant Held for Future Use		
	Electric	13,092,995.37	0.00
	Gas	0.00	0.00
		<u>13,092,995.37</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>13,092,995.37</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	770,421,642.02	
	Gas	81,379,464.14	
	Common	125,022,915.69	
		<u>976,824,021.85</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>976,824,021.85</u>	<u>0.00</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	976,759,315.31
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	976,759,315.31
101.1	ELECTRIC CAPITAL LEASES	837,939,281.00	137,272,439.00
118.1	COMMON CAPITAL LEASE	19,150,085.19	17,679,124.20
		857,089,366.19	154,951,563.20
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	(62,963,775.37)	(40,861,208.00)
143	FAS 143 ASSETS - Legal Obligation	267,997,174.00	(911,097,810.82)
	SONGS Plant Closure - FAS 143 contra	(266,617,323.00)	(61,166,058.00)
	FIN 47 ASSETS - Non-Legal Obligation	67,384,474.15	26,900,088.59
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,313,209,265.35)
	TOTAL FAS 143	68,764,325.15	(2,258,573,045.58)
	UTILITY PLANT TOTAL	15,118,006,748.53	3,749,605,541.55

ATTACHMENT E
SUMMARY OF EARNINGS

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2014
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,888
2	Operating Expenses	<u>3,392</u>
3	Net Operating Income	<u><u>\$496</u></u>
4	Weighted Average Rate Base	\$7,102
5	Rate of Return*	7.79%

*Authorized Cost of Capital

ATTACHMENT F

GOVERNMENTAL ENTITIES RECEIVING NOTICE

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

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

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

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

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

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

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

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

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

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

Alpine County
Attn. County Clerk
99 Water Street, P.O. Box 158
Markleeville, CA 96120

City of Carlsbad
Attn. Office of the County Clerk
1200 Carlsbad Village Drive
Carlsbad, CA 92008-19589

City of Coronado
Attn. Office of the City Clerk
1825 Strand Way
Coronado, CA 92118

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

City of El Cajon
Attn. City Clerk
200 Civic Way
El Cajon, CA 92020

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

City of Fallbrook
Chamber of Commerce
Attn. City Clerk
111 S. Main Avenue
Fallbrook, CA 92028

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

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

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

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

City of Chula Vista
Attn: Office of the City Clerk
276 Fourth Avenue
Chula Vista, California 91910-2631

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

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

City of El Cajon
Attn. City Attorney
200 Civic Way
El Cajon, CA 92020

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

City of Fallbrook
Chamber of Commerce
Attn. City Attorney
111 S. Main Avenue
Fallbrook, CA 92028

Julian Chamber of Commerce
P.O. Box 1866
2129 Main Street
Julian, CA

City of Laguna Niguel
Attn. City Attorney
30111 Crown Valley Parkway
Laguna Niguel, California 92677

City of Laguna Niguel
Attn. City Clerk
30111 Crown Valley Parkway
Laguna Niguel, California 92677

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

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

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

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

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

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

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

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

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

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

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

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

County of Orange
Attn. County Clerk
12 Civic Center Plaza, Room 101
Santa Ana, CA 92701

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

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

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

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

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

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

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

City of San Diego
Attn. Mayor
202 C Street, 11th Floor
San Diego, CA 92101

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

City of San Diego
Attn. City Attorney
1200 Third Ave.
Suite 1620
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 Street, 2nd Floor
San Diego, CA 92101

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

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

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

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

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

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

City of Vista
Attn. City Attorney
200 Civic Center Drive, Bldg. K
Vista, CA 92084

City of Vista
Attn. City Clerk
200 Civic Center Drive
Vista, CA 92084

City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656

ATTACHMENT G

GHG REVENUE AND RECONCILIATION FORM

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Appendix D of the Proposed Decision mailed 9/12/14 in A.13-08-002 et al. Appendix D provides specific information on reporting methodology and confidentiality treatment of data.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

For Template D-4, each utility must provide the data in spreadsheet format, but may modify the template as appropriate to present the requested information by rate schedule.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	2013		2014		2015		2016	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded ²	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A	12.09	N/A	13.30	N/A
2 Allocated Allowances (MT)	6,919,341	-	6,549,142	-	6,426,430	-	6,406,805	-
3 Revenues								
4 Prior Balance	N/A	N/A	(102,074,500)	(82,503,131)	(19,755,324)	(18,393,131)	26,206,059	-
5 Allowance Revenue	(103,302,000)	(82,453,505)	(94,570,000)	(76,756,698)	(77,695,500)	(77,888,259)	(85,210,507)	-
6 Interest	-	(49,626)	(28,773)	(47,002)	(76,463)	14,846	14,846	-
7 Franchise Fees and Uncollectibles	-	-	(1,771,359)	(1,706,341)	(1,190,048)	(1,487,515)	(1,039,882)	-
8 Subtotal Revenues	(103,302,000)	(82,503,131)	(198,444,632)	(161,013,172)	(98,717,335)	(97,754,059)	(60,029,483)	-
9 Expenses								
10 Outreach and Administrative Expenses (from Template D3) ³	1,227,500	-	187,500	801,369	334,835	334,913	187,500	-
11 Franchise Fees and Uncollectibles	-	-	-	-	-	-	-	-
12 Interest	-	-	-	(119)	-	(78)	-	-
13 Subtotal Expenses ⁴	1,227,500	-	187,500	801,250	334,835	334,835	187,500	-
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs	-	-	-	-	-	-	-	-
15 Net GHG Revenues (Line 8 + Line 13 + Line 14)	(102,074,500)	(82,503,131)	(198,257,132)	(160,211,922)	(98,382,500)	(97,419,224)	(59,841,983)	-
16 GHG Revenues to be Distributed in Future Years	-	-	51,037,250	-	-	-	-	-
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(102,074,500)	(82,503,131)	(147,219,882)	(160,211,922)	(98,382,500)	(97,419,224)	(59,841,983)	-
18 GHG Revenue Returned to Eligible Customers								
19 EITE Customer Return ⁵	-	-	1,583,553	-	1,384,559	2,968,113	1,286,339	-
20 Small Business Volumetric Return	-	-	10,982,219	11,533,823	6,954,493	9,787,162	4,882,487	-
21 Residential Volumetric Return	-	-	45,915,031	35,582,852	31,314,308	37,130,763	23,630,146	-
22 Subtotal EITE + Volumetric Returns	-	-	58,480,803	47,116,675	39,653,361	49,886,038	29,798,972	-
23 Number of Households Eligible for the California Climate Credit	-	-	1,224,253	1,306,520	1,224,251	1,224,360	1,306,630	-
24 Per-Household Semi-Annual Climate Credit ⁶ (-0.5 x (Line 17 + 22) ÷ Line 23)	-	-	36.24	36.24	23.99	23.99	11.50	-
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	-	-	88,739,079	94,702,116	58,729,139	73,739,245	30,043,011	-
26 Revenue Balance (Line 15 + Line 22 + Line 25)	N/A	(82,503,131)	N/A	(18,393,131)	N/A	26,206,059	N/A	-

¹ Includes 50% of 2013 allowance revenues and expenses.

² Includes actual expenses January and February and forecasted expenses March through December.

³ SDG&E's forecasted 2015 GHG expense represents SDG&E's request of \$187,500 plus the forecasted undercollection in the GHGCOEMA of \$252,473 less the forecasted

⁴ Pursuant to SDG&E's Greenhouse Gas Revenue Balancing Account (GHGRBA) preliminary statement, SDG&E recorded the approved GHG revenue that is to be set aside for

⁵ EITE Customer Return for 2016 has been updated to reflect the methodology recently approved in Decision 14-12-037.

⁶ Due to timing in receiving approval of D. 15-03-019, the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)								
2	Utility Owned Generation (UOG)								
3	Tolling Agreements								
4	Energy Imports (Specified)								
5	Energy Imports (Unspecified)								
6	RPS Adjustment								
7	Qualifying Facility (QF) Contracts								
8	Contract with Financial Settlement								
8	Subtotal								
9	Indirect GHG Emissions (MTCO2e)								
10	CAISO Market Purchases								
11	Contract Purchases								
12	Subtotal								
13	Total Emissions (MTCO2e)	5,596,398	5,561,984	5,473,713	4,992,599	4,811,519	4,782,381	3,921,478	-
14	Proxy GHG Price (\$/MT)	\$ 17.35	\$ 13.57	\$ 14.44	\$ 12.04	\$ 12.09	\$ 12.95	\$ 13.30	-
15	GHG Costs (\$)								
16	Direct GHG Costs ¹								
17	Direct GHG Costs - Financial Settlement								
18	Indirect GHG Costs								
19	Previous Year's Forecast Reconciliation ²								
20	Total Costs (\$)	N/A	N/A	\$ -	\$ -	\$ (33,754,333)	\$ (33,754,333)	\$ (1,166,072)	\$ (1,166,072)
		89,750,005	60,334,626	61,715,000	57,376,046	24,416,930	23,250,858	50,989,591	(1,166,072)
21	Forecast Variance³ (\$)	N/A	(29,415,379)	N/A	(4,338,954)	N/A	(1,166,072)	N/A	(52,155,663)

CONFIDENTIAL INFORMATION

¹Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes

²The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts.

³Also reflects adjustment for shift in regulatory accounting from cash to accrual

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded
1 Utility Outreach								
2 Customer Call Center	-	N/A	-	-	-	-	-	-
3 Other (Consultant) ²	52,500	N/A	-	72,040	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	-	-	-
5 Utility Administrative								
6 General Program Management	-	N/A	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	-	-	35,000	-
10 Other ⁴	-	N/A	12,500	12,500	47,500	47,500	12,500	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	47,500	47,500	-
Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	47,500	47,500	-
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000	140,000	140,000	-
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	187,500	187,500	-

¹ Includes actual expenses January through February and forecasted expenses March through December.

² 2013 forecasted expenses were revised from D.13-12-041 to shift the \$52.5k for Targetbase costs from admin to outreach pursuant to Resolution E-4611.

³ 2014 forecasted expenses were revised from D.13-12-041 to shift the \$35K for marketing from outreach to administration pursuant to Resolution E-4611.

⁴ Direct labor costs associated with: (1) Subsequent pricing and credit updates to the billing system; (2) customer eligibility review and verification process; (3) Manual set-up and maintenance required for the identified EITE customers; and (4) Monitoring of check cutting activities related to Net Energy Metering customers.

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Bundled Customers				Unbundled Customers			
	Forecast MWh Sales ¹ (MWh) (B)	Forecast GHG Revenue Req ² (\$) ² (C)	Rate Impact (\$/kWh) ^{3,4} (D)	Forecast GHG Revenue (\$) ⁵ (E)	Forecast MWh Sales ¹ (MWh) (F)	Forecast GHG Revenue Req ² (\$) ² (G)	Rate Impact (\$/kWh) ^{3,4} (H)	Forecast GHG Revenue (\$) ⁵ (I)
DR	2,261,553	\$ 23,356,611	\$ 0.01052	\$ 51,815,201	4,835	N/A	N/A	\$ 87,725
DM	13,622	\$ 156,988	\$ 0.01052	\$ 511,574	40	N/A	N/A	\$ 1,001
DS	260	\$ 56,467	\$ 0.01052	\$ 128,876	0	N/A	N/A	\$ -
DT	6,453	\$ 479,088	\$ 0.01052	\$ 830,351	0	N/A	N/A	\$ -
DT-RV	281	\$ 12,268	\$ 0.01052	\$ 39,990	0	N/A	N/A	\$ -
DR-TOU	9,691	\$ 52,346	\$ 0.01052	\$ 132,124	33	N/A	N/A	\$ 438
DR-SES	1,640	\$ 4,031	\$ 0.00250	\$ 33,015	3	N/A	N/A	\$ 31
EV-TOU	1	\$ 1	\$ 0.00250	\$ 2	0	N/A	N/A	\$ -
EV-TOU-2	407	\$ 1,094	\$ 0.00250	\$ 92,766	0	N/A	N/A	\$ 63
A	1,830,317	\$ 5,683,292	\$ 0.00309	\$ 3,785,588	13,877	N/A	N/A	\$ 37,789
TOU-A	0	\$ -	\$ 0.00309	\$ 22,231	17	N/A	N/A	\$ 46
ATC	63,653	\$ 138,317	\$ 0.00309	\$ 152,632	303	N/A	N/A	\$ 819
A-TOU	43,160	\$ 163,049	\$ 0.00309	\$ 46,760	1,605	N/A	N/A	\$ 4,341
AD	41,961	\$ 131,561	\$ 0.00300	\$ -	0	N/A	N/A	\$ -
AL-TOU	6,969,707	\$ 20,817,567	\$ 0.00300	\$ 1,574,302	46,420	N/A	N/A	\$ 267,220
AY-TOU	172,754	\$ 559,091	\$ 0.00300	\$ 13,675	305	N/A	N/A	\$ 1,195
DGR	18,701	\$ 70,354	\$ 0.00300	\$ 713	0	N/A	N/A	\$ -
A6-TOU	25,500	\$ 75,689	\$ 0.00300	\$ 14,681	0	N/A	N/A	\$ 171,604
OL-TOU	416	\$ 1,432	\$ 0.00300	\$ 2,756	0	N/A	N/A	\$ -
PA	81,486	\$ 234,937	\$ 0.00262	\$ 63,163	425	N/A	N/A	\$ 1,035
TOU-PA	0	\$ -	\$ 0.00262	\$ 2	0	N/A	N/A	\$ -
PA-T-1	226,439	\$ 572,753	\$ 0.00262	\$ 7,965	126	N/A	N/A	\$ 308
Streetlighting	114,667	\$ 223,928	\$ 0.00195	\$ -	0	N/A	N/A	\$ -
Total	11,882,668	\$ 52,790,867	\$ 0.00444	\$ 59,268,368	67,990	N/A	N/A	\$ 573,615

¹ Residential MWh sales only apply to Non-CARE Customers with usage in Tiers 3 and 4.

² In accordance with Section 2.5. of the Amended Joint Investor-Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap and-trade costs incurred will be captured as part of the larger ERRA true-up process. SDG&E will true-up total ERRA balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRA Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column C does not include a GHG cost reconciliation.

³ Residential rate impacts only apply to Non-CARE customers with usage in Tiers 3 and 4.

⁴ Rate impacts are based on customer class.

⁵ Includes forecasted 2015 GHG revenue return, as well as 2014 reconciliation amount.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Information	2013	2014	2015 (forecast)	2016 (forecast)
1	Total GHG Costs (\$)	60,334,626	57,376,046	24,416,930	50,989,591
2	Total GHG Revenues (\$)	(82,453,505)	(76,756,698)	(77,695,500)	(85,210,507)
3	Emissions Intensity (MTCO/MWh)	0.325	0.283		

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