PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



June 9, 2011

Advice Letter 2243-E

Clay Faber, Director **Regulatory Affairs** San Diego Gas and Electric 8330 Century Park Court, CP32C San Diego, CA 92123-1548

Subject: Revenue Requirement Update Associated with the Steam Generator Replacement at San Onofre Nuclear Generating **Station Unit 3**

Dear Mr. Faber:

Advice Letter 2243-E is effective May 9, 2011.

Sincerely,

Jen A. HA

Julie A. Fitch, Director **Energy Division**



Clay Faber - Director Regulatory Affairs 8330 Century Park Court San Diego, CA 92123-1548

Tel: 858.654.3563 Fax: 858.654.1788 cfaber@semprautilities.com

April 8, 2011

ADVICE LETTER 2243-E (U 902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: REVENUE REQUIREMENT UPDATE ASSOCIATED WITH THE STEAM GENERATOR REPLACEMENT AT SAN ONOFRE NUCLEAR GENERATING STATION UNIT 3

<u>PURPOSE</u>

The purpose of this Advice Letter is to submit for California Public Utilities Commission (Commission) approval the updated revenue requirement associated with San Diego Gas and Electric (SDG&E) share of costs related to the steam generator replacement at San Onofre Nuclear Generating Station (SONGS) Unit 3. This Advice Letter is filed in compliance with Commission Decision (D.) 06-11-026.

BACKGROUND

On November 30, 2006, the Commission issued D.06-11-026, approving an unopposed settlement of the ratemaking treatment of SDG&E's share of costs related to the Steam Generator Replacement Program (SGRP) at SONGS. The settlement provided for ratemaking treatment of SDG&E's 20% share of SGRP costs in a manner consistent with the ratemaking treatment the CPUC authorized for Southern California Edison's (SCE) share of the SGRP costs in Decision (D.) 05-12-040.

DISCUSSION

This filing implements the additional revenue requirements associated with the SGRP. SONGS Unit 3 returned to operations for its load requirements on February 18, 2011. Consequently, SDG&E has updated its current total cost projection for SONGS Unit 3 and the associated revenue requirement, provided as Attachment A to this filing. This revenue requirement reflects changes to the following cost inputs filed in the application as summarized below:

Capital Construction Costs

SDG&E's share of the SGRP project costs for Unit 2 and 3 are currently projected to be \$142 million (2004\$'s) consisting of \$117 million for replacement steam generator installation and \$25 million for removal and disposal of the original steam generators, including allocated overheads

and excluding allowance for funds used during construction (AFUDC)¹. There currently is no break down of actual cost for fabrication/installation and removal/disposal by Unit available yet from SCE. Costs for SONGS Unit 3 are estimated to be at \$70 million excluding removal/disposal costs and AFUDC charges. After the commercial operation date of February 18, 2011, costs will continue to accrue due to yet to be undertaken/completed minor work items and yet to be determined removal/disposal costs for the Unit 2 and 3 steam generators. Upon the Unit 2 and 3 steam generators removal/disposal, SDG&E will file an advice letter with the estimated removal/disposal costs and the associated revenue requirement. SDG&E will include information that identifies final cost by category which will describe variances from its original application and the reasons therefore in SDG&E's Non-fuel Generation Balancing Account (NGBA) update advice letter filed in November 2011 for rates effective January 1, 2012.

Rate Making Treatment

Advice Letter (AL) 2122-E authorizes SDG&E to record the revenue requirement associated with its share of the SONGS steam generator installation costs and associated capital-related expenses to the SONGS MAAC Subaccount of the NGBA in compliance with D.06-11-026. Beginning February 18, 2011, SDG&E records the monthly revenue requirement filed herein to the SONGS MAAC Subaccount for recovery from bundled service customers and updated the NGBA transfer rate accordingly. However, SDG&E does not intend to adjust its retail electric rates for this additional revenue requirement at this time. Once all of the final costs are accumulated, SDG&E will update this cost projection and associated revenue requirement in the NGBA update advice letter filed in November, for rates effective January 1, 2012.² At that time, commodity rates contained in SDG&E's schedule Electric Energy Commodity Cost (EECC) will be adjusted to reflect recovery of the SONGS SGRP costs along with other approved NGBA related changes. In addition, SDG&E will prepare a true-up to the SONGS MAAC Subaccount to reflect the final revenue requirement.

EFFECTIVE DATE

SDG&E believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. Therefore, SDG&E respectfully requests that the Advice Letter become effective May 9, 2011, thirty days from the date filed.

<u>PROTEST</u>

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received by April 28, 2011, which is 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

¹ Decision 06-11-026 (November 30, 2006). Approved costs are in 2004\$'s.

² Upon approval of the final revenue requirement, SDG&E will also update the 2011 revenue requirement recorded to the SONGS MAAC Subaccount of the NGBA.

CPUC Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Honesto Gatchalian (<u>inj@cpuc.ca.gov</u>) and Maria Salinas (<u>mas@cpuc.ca.gov</u>) of the Energy Division. A copy of the protest should also be sent via both e-mail <u>and</u> facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Megan Caulson Regulatory Tariff Manager 8330 Century Park Court, Room 32C San Diego, CA 92123-1548 Facsimile No. (858) 654-1788 E-Mail: mcaulson@semprautilities.com

<u>NOTICE</u>

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including parties in A.08-06-017, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1788 or by email at SDG&ETariffs@semprautilities.com.

> CLAY FABER Director – Regulatory Affairs

(cc list enclosed)

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY

ENERGY UTILITY										
MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)										
Company name/CPUC Utility No. SAN DIEGO GAS & ELECTRIC (U 902)										
Utility type:	Contact Person: <u>Joff Morales</u>									
\boxtimes ELC \square GAS	Phone #: (858) <u>650-4098</u>									
PLC HEAT WATER	E-mail: jmorales@semprautilities.com									
EXPLANATION OF UTILITY TY	PE	(Date Filed/ Received Stamp by CPUC)								
ELC = ElectricGAS = GasPLC = PipelineHEAT = Heat	WATER = Water									
Advice Letter (AL) #: 2243-E										
Subject of AL: <u>Revenue Requirement Update Associated with the Steam Generator Replacement at</u> San Onofre Nuclear Generating Station Unit 3										
Keywords (choose from CPUC listing): Revenue Requirement, Facility										
AL filing type: 🗌 Monthly 🗌 Quarterly 🗌 Annual 🖾 One-Time 🗌 Other										
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: N/A										
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: None										
Summarize differences between the AL and the prior withdrawn or rejected AL ¹ : N/A										
Does AL request confidential treatment? If so, provide explanation: N/A										
Resolution Required? \Box Yes \boxtimes No		Tier Designation: $\Box 1 \boxtimes 2 \Box 3$								
Requested effective date: <u>5/9/2011</u>		No. of tariff sheets: <u>0</u>								
Estimated system annual revenue effect: (%): <u>N/A</u>										
Estimated system average rate effect										
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).										
Tariff schedules affected: <u>None</u>										
Service affected and changes proposed1: None										
Pending advice letters that revise the same tariff sheets: <u>None</u>										
Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:										
CPUC, Energy Division	S	San Diego Gas & Electric								
Attention: Tariff Unit 505 Van Ness Ave.,	c	Attention: Megan Caulson 8330 Century Park Ct, Room 32C								
San Francisco, CA 94102		San Diego, CA 92123								
mas@cpuc.ca.gov and jnj@cpuc.ca.gov		mcaulson@semprautilities.com								

 $^{^{\}scriptscriptstyle 1}$ Discuss in AL if more space is needed.

General Order No. 96-B ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission DRA D. Appling S. Cauchois J. Greig R. Pocta W. Scott **Energy Division** P. Clanon S. Gallagher H. Gatchalian D. Lafrenz M. Salinas CA. Energy Commission F. DeLeon R. Tavares Alcantar & Kahl LLP K. Harteloo American Energy Institute C. King APS Energy Services J. Schenk BP Energy Company J. Zaiontz Barkovich & Yap, Inc. B. Barkovich **Bartle Wells Associates** R. Schmidt Braun & Blaising, P.C. S. Blaising California Energy Markets S. O'Donnell C. Sweet California Farm Bureau Federation K. Mills California Wind Energy N. Rader Children's Hospital & Health Center T. Jacoby City of Chula Vista M. Meacham E. Hull City of Poway R. Willcox City of San Diego J. Cervantes G. Lonergan M. Valerio Commerce Energy Group V. Gan Constellation New Energy W. Chen CP Kelco A. Friedl Davis Wright Tremaine, LLP E. O'Neill J. Pau

Dept. of General Services H. Nanjo M. Clark Douglass & Liddell D. Douglass D. Liddell G. Klatt Duke Energy North America M. Gillette Dynegy, Inc. J. Paul Ellison Schneider & Harris LLP E. Janssen Energy Policy Initiatives Center (USD) S. Anders Energy Price Solutions A. Scott Energy Strategies, Inc. K. Campbell M. Scanlan Goodin, MacBride, Squeri, Ritchie & Day B. Cragg J. Heather Patrick J. Squeri Goodrich Aerostructures Group M. Harrington Hanna and Morton LLP N. Pedersen Itsa-North America L. Belew J.B.S. Energy J. Nahigian Luce, Forward, Hamilton & Scripps LLP J. Leslie Manatt, Phelps & Phillips LLP D. Huard R. Keen Matthew V. Brady & Associates M. Brady Modesto Irrigation District C. Mayer Morrison & Foerster LLP P. Hanschen MRW & Associates D. Richardson Pacific Gas & Electric Co. J. Clark M. Huffman S. Lawrie E. Lucha Pacific Utility Audit, Inc. E. Kelly R. W. Beck, Inc. C. Elder San Diego Regional Energy Office S. Freedman J. Porter School Project for Utility Rate Reduction M. Rochman

Shute, Mihaly & Weinberger LLP O. Armi Solar Turbines F. Chiang Sutherland Asbill & Brennan LLP K. McCrea Southern California Edison Co. M. Alexander K. Cini K. Gansecki H. Romero **TransCanada** R. Hunter D. White TURN M. Florio M. Hawiger UCAN M. Shames U.S. Dept. of the Navy K. Davoodi N. Furuta L. DeLacruz Utility Specialists, Southwest, Inc. D. Koser Western Manufactured Housing **Communities Association** S. Dey White & Case LLP L. Cottle **Interested Parties** A.08-06-017

San Diego Gas & Electric - Advice Letter 2243-E Attachment A San Onofre Nuclear Generating Station (SONGS) - Unit 3 SGRP Reactor Plant Equipment for Nuclear Production Plant Annual Revenue Requirement 4/8/2011

Account-322

Reactor Plant Equipment		2011	2012	2013	2014	2015	2016	Total
	1 1 9 0/	0.2	0.2	0.2	0.2	0.1	0.1	
Franchise Fees & Uncollectibles	1.18%	0.2	0.2	0.2	0.2	0.1	0.1	0.9
O&M expenses		-	-	-	-	-	-	-
Property Taxes	1.253%	0.7	0.8	0.7	0.6	0.6	0.5	4.0
Preferred Equity Interest	0.42%	0.2	0.3	0.2	0.2	0.2	0.2	1.3
Interest Expense	2.54%	1.5	1.6	1.4	1.3	1.2	1.0	8.0
Depreciation Expense		5.2	5.6	5.6	5.6	5.6	5.6	33.3
Federal Tax Expense		2.5	2.0	2.0	1.8	1.6	1.5	11.4
State Tax Expense		0.8	0.5	0.5	0.5	0.5	0.5	3.3
Return on Equity	5.44%	3.2	3.4	3.1	2.8	2.5	2.2	17.2
Revenue Requirement	=	14.3	14.4	13.8	13.1	12.3	11.7	79.5
Return on Ratebase (ROR)		5.0	5.3	4.8	4.3	3.8	3.4	26.6
Weighted Average Ratebase	49.00%	29.1	30.7	27.9	25.1	22.4	19.8	
ROE Proof		11.100%	11.100%	11.100%	11.100%	11.100%	11.100%	