Company: San Diego Gas & Electric Company (U902M)

Proceeding: 2016 General Rate Case

Application: A.14-11-003 Exhibit: SDG&E-39-R

REVISED

SDG&E

DIRECT TESTIMONY OF CYNTHIA S. FANG

(ELECTRIC REVENUES AND RATES)

March 2015

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



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APPENDIX A: Electric and Gas Revenues Reflecting Smart Pricing Program

SUMMARY

- System average electric rates revenue decreases -1.0% over 2015 rates.
- When comparing 2015 rates to the 2016 GRC Phase 1 rates, the typical Inland residential customer with basic service that uses 500 kWh per month would see a decrease in their electric bill of \$0.42 per month, or -0.4%, in the summer, and \$0.53 per month, or -0.5% in the winter under the current residential rate design structure. The typical Coastal residential customer with basic service that uses 500 kWh per month would see a decrease in their electric bill of \$0.85 per month, or -0.8% in the summer, and \$0.71 per month, or -0.7% in the winter.
- The residential bill impacts presented reflect the approved Settlement Agreement for SDG&E's Phase 2 Interim Residential Rate Design Changes (D.14-06-029) that was effective August 1, 2014.
- In the event that SDG&E does not receive a decision in its 2016 GRC Phase 1 in time to implement rates effective January 1, 2016, SDG&E proposes not to adjust rates for the roll-off (completion of the 28-month amortization ending December 31, 2015) of General Rate Case Memorandum Account ("GRCMA") balances associated with its 2012 GRC Phase 1 in order to avoid rate volatility for our customers.

SDG&E DIRECT TESTIMONY OF CYNTHIA S. FANG (ELECTRIC REVENUES AND RATES)

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I. INTRODUCTION

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The purpose of my testimony is to: (1) present a summary of the electric revenue and rate changes that would result from adoption of the Test Year 2016 General Rate Case ("GRC") proposals of San Diego Gas & Electric Company ("SDG&E"), and (2) present estimates of residential customer bill impacts. In addition, my testimony presents SDG&E's "rate stabilization" proposal wherein if SDG&E is not granted a final decision in its 2016 GRC in time to implement by January 1, 2016, SDG&E is proposing to maintain its GRC related revenue requirements, including the General Rate Case Memorandum Account ("GRCMA"), at the 2015 levels until such time as SDG&E's 2016 GRC revenue requirements are authorized by the California Public Utilities Commission ("Commission") and implemented in rates.

II. SUMMARY OF PRESENT AND PROPOSED ELECTRIC REVENUES AND **RATES**

The following tables show current and proposed revenues and rates by major customer class. SDG&E has five customer classes: residential, small commercial (generally defined as non-residential customers with demand less than 20 kW), medium and large commercial and industrial ("M/L C&I") (generally defined as non-residential customers with demand 20 kW and greater), agricultural, and streetlighting. SDG&E's proposals in this proceeding would result in changes to distribution, commodity and nuclear decommission rate components to reflect the requested change in revenue requirements. Ordering Paragraph 17 of Decision ("D.") 12-12-004 in SDG&E's Application for Approval of its Proposals for Dynamic Pricing and Recovery of Incremental Expenditures Required for Implementation (A.10-07-009), requires that "[c]osts related to this decision, ..., shall be collected from San Diego Gas & Electric Company customers through generation rates, to ensure that these costs are not collected from community choice aggregator and direct access customers." In compliance with that decision, the rates presented reflect the reclassification of the Smart Pricing Program ("SPP") related revenues such that the collection of these costs occurs through generation, otherwise known as commodity,

¹ This GRC Application addresses Phase 1 cost of service proposals. SDG&E separately files a GRC Application for Phase 2, which addresses electric marginal costs, revenue allocation and rate design.

rates. The revenue requirements presented in the testimony of SDG&E witness Khai Nguyen reflect costs related to the SPP revenues as part of distribution base margin. Appendix A reflects the reallocation of these costs to generation in order to comply with this decision. This does not change the overall revenue requirement. Furthermore, the rates presented reflect the update to authorized sales forecast for Test Year 2016 sales forecast sponsored by SDG&E witness Kenneth Schiermeyer (Ex. SDG&E-31). While SDG&E does not propose any changes to the allocation of revenues among the different customer classes as part of this proceeding, differences in the change by customer class from current authorized sales to updated authorized sales for Test Year 2016 will result in different levels of impact to class average rates. Revenue and rates changes include the impact of SDG&E's proposed Franchise Fee and Uncollectibles ("FF&U") revenue change.

Table 1 presents the comparison of 2015 revenues and SDG&E's 2016 GRC Phase 1 proposed electric revenues by customer class as well as the comparison of 2015 rates and SDG&E's proposed 2016 GRC Phase 1 rates by customer class. SDG&E's GRC Phase 1 as proposed would result in a decrease to electric revenues of \$38.2 million, or -1.0%, with a system average rate impact of (0.3) cents/kWh, or -1.3%, compared to 2015 rates.

Table 1

SDG&E – Electric Department Summary of Electric Revenue by Major Customer Class

Total Revenues¹ (\$Millions)

		2015 ²	2016 GRC Phase 1 ³	Chang	ge ⁴	
Line No.	Customer Class		Proposed	\$	<u></u> %	Line No.
1	Residential	1,535.4	1,518.5	(16.9)	-1.1%	1
2	Small Commercial	446.2	442.2	(4.0)	-0.9%	2
3	M/L C&I	1,582.4	1,565.9	(16.5)	-1.0%	3
4	Agriculture	59.2	58.5	(0.6)	-1.1%	4
5	Lighting	19.0	18.8	(0.2)	-0.9%	5
6	System	3,642.1	3,603.9	(38.2)	-1.0%	6

¹ Includes Utility Distribution Company revenues plus Generation/Commodity revenues based on TY 2016 Sales.

⁴ Totals may not sum due to rounding.

		Total Rates ¹ (Cents per kWh)				
		2015 ²	2016 GRC Phase 1 ³	Chanç	ge ⁴	
Line No.	Customer Class		Proposed	cents/kWh	<u></u> %	Line No.
1	Residential	20.0	19.8	(0.2)	-1.1%	1
2	Small Commercial	23.4	23.2	(0.2)	-0.9%	2
3	M/L C&I	19.7	19.4	(0.3)	-1.5%	3
4	Agriculture	19.4	19.2	(0.2)	-1.1%	4
5	Lighting	20.9	20.7	(0.2)	-0.9%	5
6	System	20.1	19.8	(0.3)	-1.3%	6

¹ Includes Utility Distribution Company revenues plus Generation/Commodity revenues based on TY 2016 Sales.

² 2015 base margin, effective as of 1/1/15 per Advice Letter ("AL") 2685-E, includes 1) only SONGS spent fuel storage and Master Insurance program ("MIP") Worker's Compensation costs, 2) Desert Star, 3) Cuyamaca and 4) Smart Pricing Program. In SDG&E's NOI filling, SDG&E assumed SONGS 2015 non-GRC related revenue requirements as zero since estimated amounts were not available at that time. For consistency, SDG&E is assuming SONGS 2015 non-GRC related revenue requirements as zero in this application.

SDG&E is assuming SONGS 2015 non-GRC related revenue requirements as zero in this application.

3 2016 GRC Phase 1 base margin includes 1) only SONGS Unit 1 spent fuel storage, SONGS Marine Mitigation and SONGS MIP Worker's Compensation costs, 2) Desert Star, 3) Cuyamaca and 4) Smart Pricing Program. In SDG&E's NOI filling, SDG&E assumed SONGS 2016 non-GRC related revenue requirements as zero since estimated amounts were not available at that time. For consistency, SDG&E is assuming SONGS 2016 non-GRC related revenue requirements as zero in this application.

² 2015 base margin, effective as of 1/1/15 per AL 2685-E, includes 1) only SONGS spent fuel storage and MIP Worker's Compensation costs, 2) Desert Star, 3) Cuyamaca and 4) Smart Pricing Program. In SDG&E's NOI filing, SDG&E assumed SONGS 2015 non-GRC related revenue requirements as zero since estimated amounts were not available at that time. For consistency, SDG&E is assuming SONGS 2015 non-GRC related revenue requirements as zero in this application.

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3 2016 GRC Phase 1 base margin includes 1) only SONGS Unit 1 spent fuel storage, SONGS Marine Mitigation and SONGS MIP Worker's Compensation costs, 2) Desert Star, 3) Cuyamaca and 4) Smart Pricing Program. In SDG&E's NOI filing, SDG&E assumed SONGS 2016 non-GRC related revenue requirements as zero since estimated amounts were not available at that time. For consistency, SDG&E is assuming SONGS 2016 non-GRC related revenue requirements as zero in this application.

⁴ Totals may not sum due to rounding

III. RESIDENTIAL CUSTOMER BILL IMPACTS

Illustrative bill impacts to residential customers of SDG&E's proposals in this proceeding are presented in Tables 2A and 2B of this testimony. Tables 2A and 2B reflect monthly electric bill impacts, variable by season, climate zone, service type and usage level for non-CARE² and CARE customers.

On August 1, 2014, SDG&E implemented D.14-06-029 which approved the Settlement Agreement for Phase 2 Interim residential Rate Design Changes for SDG&E in Rulemaking ("R.") 12-06-013, *Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities' Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations* ("RROIR"). Prior to the implementation of D.14-06-029, residential rates associated with Tier 1 and Tier 2 usage were subject to legislative caps under Senate Bill ("SB") 695 and Assembly Bill ("AB") 1X⁴ which were removed by AB 327 effective January 1, 2014. The residential bill impacts presented reflect residential rates consistent with the implementation of D.14-06-029.

As shown on Table 2A, when comparing the 2015 rates to the 2016 GRC proposed rates, the typical Inland residential customer with basic service that uses 500 kWh per month, would see a decrease of \$0.42 per month, or -0.4%, in the summer, and \$0.53 per month, or -0.5% in the winter under the current residential rate design structure. An Inland residential customer with basic service with monthly usage of 1,000 kWh per month would see a decrease of \$3.76 per month, or -1.3%, in the summer, and \$3.86 per month, or -1.4% in the winter.

As shown on Table 2B, when comparing the 2015 rates to the 2016 GRC proposed rates, the typical Coastal residential customer with basic service that uses 500 kWh per month would see a decrease of \$0.85 per month, or -0.8% in the summer, and \$0.71 per month, or -0.7% in the winter. A Coastal residential customer with basic service with monthly usage of 1,000 kWh per month would see a decrease of \$4.18 per month, or -1.4%, in the summer, and \$4.05 per month, or -1.5% in the winter.

² CARE stands for California Alternate Rates for Energy.

³ Advice letter 2617-E Implementation of San Diego Gas and Electric's Summer 2014 Rate Reform Pursuant to Decision (D.) 14-06-029 on Phase 2 Rate Change Proposal Settlement.

⁴ In addition, CARE rates associated with Tier 3 usage were subject to caps associated with D.09-09-036 and the adopted Settlement Agreement.

TABLE 2A

SDG&E- Electric Department Typical Monthly Residential Energy Charges at 2015 Estimated and Proposed Rates

(Inland Customers) Schedule DR (Summer Billing Period)

		0045	2016 GRC			
		2015	Phase 1 PROPOSED			
	ENERGY	BILL	BILL	CHANGE ¹	CHANGE ¹	
LINE	(KWH)	(\$)	(\$)	(\$)	(%)	LINE
<u>NO.</u>	<u>(A)</u>	<u>(B)</u>	<u>(C)</u>	<u>(D)</u>	<u>(E)</u>	<u>NO.</u>
1	25	5.12	5.12	0.00	0.0%	1
2	50	8.26	8.26	0.00	0.0%	2
3	75	12.40	12.40	0.00	0.0%	3
4	100	16.52	16.52	0.00	0.0%	4
5	150	24.79	24.79	0.00	0.0%	5
6	200	33.06	33.06	0.00	0.0%	6
7	250	41.32	41.32	0.00	0.0%	7
8	300	49.58	49.58	0.00	0.0%	8
9	350	58.17	58.17	0.00	0.0%	9
10	400	67.64	67.64	0.00	0.0%	10
11	450	79.39	79.30	(0.09)	-0.1%	11
12	500	97.68	97.26	(0.42)	-0.4%	12
13	600	134.26	133.17	(1.09)	-0.8%	13
14	700	171.41	169.66	(1.75)	-1.0%	14
15	800	210.00	207.58	(2.42)	-1.2%	15
16	900	248.59	245.51	(3.08)	-1.2%	16
17	1000	287.18	283.42	(3.76)	-1.3%	17
18	1500	480.12	473.03	(7.09)	-1.5%	18
19	2000	673.06	662.63	(10.43)	-1.5%	19
20	3000	1,058.94	1,041.84	(17.10)	-1.6%	20
21						21
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¹ Totals may not sum due to rounding.

22 23 24		Schedule	DR (Winter Billing	Period)		22 23 24
24			2016 GRC			24
25		2015	Phase 1			25
26			PROPOSED			26
27	ENERGY	BILL	BILL	CHANGE ¹	CHANGE ¹	27
28	(KWH)	(\$)	(\$)	(\$)	(%)	28
29	<u>(A)</u>	<u>(B)</u>	<u>(C)</u>	<u>(D)</u>	<u>(É)</u>	29
30						30
31	25	5.12	5.12	0.00	0.0%	31
32	50	8.26	8.26	0.00	0.0%	32
33	75	12.40	12.40	0.00	0.0%	33
34	100	16.52	16.52	0.00	0.0%	34
35	150	24.79	24.79	0.00	0.0%	35
36	200	33.06	33.06	0.00	0.0%	36
37	250	41.32	41.32	0.00	0.0%	37
38	300	49.58	49.58	0.00	0.0%	38
39	350	58.46	58.46	0.00	0.0%	39
40	400	67.93	67.93	0.00	0.0%	40
41	450	81.50	81.30	(0.20)	-0.2%	41
42	500	98.06	97.53	(0.53)	-0.5%	42
43	600	131.17	129.97	(1.20)	-0.9%	43
44	700	165.33	163.47	(1.86)	-1.1%	44
45	800	200.45	197.92	(2.53)	-1.3%	45
46	900	235.58	232.38	(3.20)	-1.4%	46
47	1000	270.69	266.83	(3.86)	-1.4%	47
48	1500	446.30	439.09	(7.21)	-1.6%	48
49	2000	621.89	611.35	(10.54)	-1.7%	49
50	3000	973.09	955.87	(17.22)	-1.8%	50

1 Totals may not sum due to rounding.

TABLE 2B

SDG&E - Electric Department Typical Monthly Residential Energy Charges at Estimated and Proposed Rates

(Coastal Customers) Schedule DR (Summer Billing Period)

		2015	2016 GRC Phase 1 PROPOSED			
	ENERGY	BILL	BILL	CHANGE ¹	CHANGE ¹	
LINE	(KWH)	(\$)	(\$)	(\$)	(%)	LINE
NO.	(A)	<u>(Φ)</u> <u>(B)</u>	(Φ) (C)	(Φ) (D)	(E)	NO.
<u>110.</u>	<u>(/ \/ \/ \/ </u>	<u>(D)</u>	(/	<u>(D)</u>	<u>(_)</u>	110.
1	25	5.12	5.12	0.00	0.0%	1
2	50	8.26	8.26	0.00	0.0%	2
3	75	12.40	12.40	0.00	0.0%	3
4	100	16.52	16.52	0.00	0.0%	4
5	150	24.79	24.79	0.00	0.0%	5
6	200	33.06	33.06	0.00	0.0%	6
7	250	41.32	41.32	0.00	0.0%	7
8	300	49.87	49.87	0.00	0.0%	8
9	350	59.32	59.32	0.00	0.0%	9
10	400	73.38	73.21	(0.17)	-0.2%	10
11	450	91.67	91.16	(0.51)	-0.6%	11
12	500	109.97	109.12	(0.85)	-0.8%	12
13	600	147.02	145.51	(1.51)	-1.0%	13
14	700	185.62	183.44	(2.18)	-1.2%	14
15	800	224.20	221.36	(2.84)	-1.3%	15
16	900	262.80	259.29	(3.51)	-1.3%	16
17	1000	301.38	297.20	(4.18)	-1.4%	17
18	1500	494.33	486.81	(7.52)	-1.5%	18
19	2000	687.26	676.41	(10.85)	-1.6%	19
20	3000	1,073.14	1,055.62	(17.52)	-1.6%	20
21						21
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¹ Totals may not sum due to rounding.

23		Schedul	e DR (Winter Billing	Period)		23
24						24
			2016 GRC			
25		2015	Phase 1			25
26			PROPOSED			26
27	ENERGY	BILL	BILL	CHANGE ¹	CHANGE ¹	27
28	(KWH)	(\$)	(\$)	(\$)	(%)	28
29	<u>(A)</u>	<u>(B)</u>	<u>(C)</u>	<u>(D)</u>	<u>(E)</u>	29
30						30
31	25	5.12	5.12	0.00	0.0%	31
32	50	8.26	8.26	0.00	0.0%	32
33	75	12.40	12.40	0.00	0.0%	33
34	100	16.52	16.52	0.00	0.0%	34
35	150	24.79	24.79	0.00	0.0%	35
36	200	33.06	33.06	0.00	0.0%	36
37	250	41.32	41.32	0.00	0.0%	37
38	300	49.58	49.58	0.00	0.0%	38
39	350	58.96	58.96	0.00	0.0%	39
40	400	69.28	69.24	(0.04)	-0.1%	40
41	450	85.83	85.46	(0.37)	-0.4%	41
42	500	102.40	101.69	(0.71)	-0.7%	42
43	600	135.50	134.13	(1.37)	-1.0%	43
44	700	170.51	168.47	(2.04)	-1.2%	44
45	800	205.63	202.92	(2.71)	-1.3%	45
46	900	240.75	237.37	(3.38)	-1.4%	46
47	1000	275.87	271.82	(4.05)	-1.5%	47
48	1500	451.48	444.09	(7.39)	-1.6%	48
49	2000	627.07	616.34	(10.73)	-1.7%	49
50	3000	978.27	960.86	(17.41)	-1.8%	50

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¹ Totals may not sum due to rounding.

IV. RATE STABILIZATION PROPOSAL

In SDG&E's 2012 GRC Phase 1 Application (A.10-12-005), SDG&E requested the implementation of rates effective January 1, 2012. SDG&E received a final Commission Decision (D.13-05-010) in May of 2013 and implemented rates September 1, 2013 to coincide with other schedule rate changes to minimize the number of rate changes for customers. Due to the delay, SDG&E did not implement the proposed 2012 GRC base margin revenue requirements on January 1, 2012 but instead sustained the revenue requirements in rates in 2012 at the lower 2011 levels. The 20-month delay in implementation resulted in a \$333 million shortfall in the electric GRCMA which needed to be included in customer rates for cost recovery. To lessen the rate impact to customers, SDG&E requested and received authorization from the Commission to amortize the \$333 million shortfall in rates over a 28-month period, or the equivalent of \$143 million on an annual basis, instead of the standard 12-month amortization period. SDG&E's implementation of its 2012 GRC Phase 1, as authorized in D.13-05-010, included both the updated authorized GRC revenue requirements as well as the "catch-up" portion in the GRCMA. This resulted in an overall system average rate impact of 10.9%, with 4.3% associated with the GRCMA portion.

In the event that SDG&E receives a final decision in time to implement rates effective January 1, 2016, customers will see an offsetting effect in rates as a result of the roll-off of the GRCMA balance associated with SDG&E's 2012 GRC Phase 1. In the event that SDG&E does not receive a decision in time to implement rates effective January 1, 2016, customers will see rates decrease with the roll-off of the GRCMA, only to see rates increase with the implementation of its 2016 GRC Phase 1. In order to avoid this potential rate volatility for our customers, SDG&E makes the following Rate Stabilization proposal:

- In the event that SDG&E does not receive a decision in time to implement rates effective January 1, 2016, SDG&E proposes to not adjust rates for the roll-off GRCMA balances associated with its 2012 GRC Phase 1 in order to avoid rate volatility for our customers and until such time the 2016 GRC is implemented.
- As part of the rate implementation of the 2016 GRC, SDG&E proposes that overcollections associated with maintaining rates at the higher level associated with not

⁵ D.13-05-010 was effective May 9, 2013.

⁶ From September 1, 2013 to December 31, 2015.

⁷ \$333 million / 28 months x 12 months.

rolling-off GRCMA be used to offset rate increases associated with the implementation of rates associated with this proceeding.

V. CONCLUSION

This concludes my revised prepared direct testimony.

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VI. WITNESS QUALIFICATIONS

My name is Cynthia S. Fang and my business address is 8330 Century Park Court, San Diego, California 92123. I am the Rate Strategy & Analysis Manager in the Customer Services Department of SDG&E. My primary responsibilities include the development of cost-of-service studies, determination of revenue allocation and electric rate design methods, analysis of ratemaking theories, and preparation of various regulatory filings. I began work at SDG&E in May 2006 as a Regulatory Economic Advisor and have held positions of increasing responsibility in the Electric Rate Design group. Prior to joining SDG&E, I was employed by the Minnesota Department of Commerce, Energy Division, as a Public Utilities Rates Analyst from 2003 through May 2006.

In 1993, I graduated from the University of California at Berkeley with a Bachelor of Science in Political Economics of Natural Resources. I also attended the University of Minnesota where I completed all coursework required for a Ph.D. in Applied Economics.

I have previously submitted testimony before the Federal Energy Regulatory Commission and have submitted testimony and testified before the California Public Utilities Commission regarding SDG&E's electric rate design and other regulatory proceedings. In addition, I have previously submitted testimony and testified before the Minnesota Public Utilities Commission on numerous rate and policy issues applicable to the electric and natural gas utilities.

APPENDIX A ELECTRIC AND GAS REVENUES REFLECTING SMART PRICING PROGRAM

2016 SDG&E GRC Revenue Requirement Schedule							
	(\$ in Thousands) 2016 SDG&E GRC (Application)						
	Elec. Dist. (includes SPP)	SONGS	Generation	Electric Dept.	Gas (Includes SPP)	Total SDG&E	
Base Margin w/o FF&U	1,301,693 48,627	3,223 121	203,299 7,595	1,508,215 56,343	314,400 7,226	1,822,615 63,569	
Subtotal Misc. Revenue	1,350,320 15,220	3,344	210,894	1,564,558 15,220	321,626 4,005	1,886,184 19,225	
Revenue Requirement	1,365,540	3,344	210,894	1,579,778	325,631	1,905,409	
	Smart	Pricing Pro	ogram (SPP) Red	classification for R	Rate Complian		
	Elec. Dist.	SONGS	Generation	Electric Dept.	Gas	Total SDG&E	
Base Margin w/o FF&U	(20,219) (755)		21,141 776	922 21	(922) (21)	-	
Subtotal Misc. Revenue	(20,974)		21,917	943	(943)	-	
Revenue Requirement	(20,974)	-	21,917	943	(943)	-	
	Adjust	ed 2016 SD	G&E GRC (App	lication), with SPP	Reclassificati	on	
			Generation (Includes			Total	
Base Margin w/o	Elec. Dist.	SONGS	SPP)	Electric Dept.	Gas	SDG&E	
FF&U	1,281,474 47,872	3,223 121	224,440 8,371	1,509,137 56,364	313,478 7,205	1,822,615 63,569	
Subtotal	1,329,346	3,344	232,811	1,565,501	320,683	1,886,184	
Misc. Revenue Revenue	15,220	-	-	15,220	4,005	19,225	
Requirement	1,344,566	3,344	232,811	1,580,721	324,688	1,905,409	

SDG&E 2016 GRC Testimony Revision Log – March 2015

Exhibit	Witness	Page	Line	Revision Detail
SDG&E-39	Cynthia Fang	CSF-ii		First bullet-point, changed "-0.5" to "-1.0"; deleted "estimated"; deleted everything after "2015 rates" (discussing 2014 rates)
SDG&E-39	Cynthia Fang	CSF-ii		Second bullet-point, removed "estimated"; changed "\$0.19" to "\$0.42"; changed "-0.2%" to "-0.4%"; changed "\$0.25" to "\$0.53"; changed "-0.3%" to "-0.5%"; changed "\$0.39" to "\$0.85"; changed "-0.4%" to "-0.8%"; changed "\$0.33" to "\$0.71"; changed "-0.3%" to "-0.7%"
SDG&E-39	Cynthia Fang	CSF-ii		Third bullet point (discussing 2014) removed
SDG&E-39	Cynthia Fang	CSF-2	12	Removed "estimated"
SDG&E-39	Cynthia Fang	CSF-2	13	Removed "estimated"
SDG&E-39	Cynthia Fang	CSF-2	15	Changed "\$18.5" to "\$38.2"; changed "-0.5%" to "-1.0%"
SDG&E-39	Cynthia Fang	CSF-2	16	Changed "0.1" to "(0.3)"; changed "-0.7%" to "-1.3%"; removed "estimated"
SDG&E-39	Cynthia Fang	CSF-2	17-28	Removed paragraphs discussing 2014
SDG&E-39	Cynthia Fang	CSF-3		Updated Table 1 and removed Tables 2 and 3 (showing 2014)
SDG&E-39	Cynthia Fang	CSF-4	3	Changed "4A, 4B, 5A and 5B" to "2A and 2B"; Changed "4A/4B and 5A/B" to "2A and 2B"
SDG&E-39	Cynthia Fang	CSF-4	15	Changed "4A" to "2A"; removed "estimated"
SDG&E-39	Cynthia Fang	CSF-4	17-20	Changed "\$0.19" to \$0.42"; changed "-0.2%" to "-0.4%"; changed "\$0.25" to "\$0.53"; changed "-0.3%" to "-0.5%"; changed "\$1.73" to "\$3.76"; changed "-0.6%" to "-1.3%"; changed "\$1.79" to "\$3.86"; changed "-0.7%" to "-1.4%"
SDG&E-39	Cynthia Fang	CSF-4	21	Changed "4B" to "2B"; removed "estimated"
SDG&E-39	Cynthia Fang	CSF-4	22-28	Changed "\$0.39" to "\$0.85"; changed "-0.4%" to "-0.8%"; changed "\$0.33" to "\$0.71"; changed "-0.3%" to "-0.7%"; changed "\$1.93" to "\$4.18"; changed "-0.6%" to "-1.4%"; changed "\$1.87" to "\$4.05"; changed "-0.7%" to "-1.5%"; removed subsequent paragraphs discussing 2014
SDG&E-39	Cynthia Fang	CSF-5 to 6		Changed title of "Table 4A" to "Table 2A" and updated Table 2A
SDG&E-39	Cynthia Fang	CSF-7 to 8		Changed title of "Table 4B" to "Table 2B" and updated Table 2B; removed subsequent tables (Table 5A and 5B) showing 2014
SDG&E-39	Cynthia Fang	CSF-11	3	Changed "Electric Rates Manager" to "Rate Strategy & Analysis Manager"
SDG&E-39	Cynthia Fang	CSF-A-1		Updated Appendix A