

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

Application of San Diego Gas & Electric Company
(U 902 E) for Authority to Acquire the CalPeak
El Cajon Energy Facility

Application 11-01-_____
(Filed January 5, 2011)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY
(U 902 E) FOR AUTHORITY TO ACQUIRE THE CALPEAK
EL CAJON ENERGY FACILITY**

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**I.
INTRODUCTION**

Pursuant to California Public Utilities Code Sections 454.5 and 701, the Commission’s Rules of Practice and Procedure and Commission Decision (D.) 07-12-052, as amended, San Diego Gas & Electric Company (“SDG&E”) hereby files this application (“Application”) for authority to acquire the CalPeak El Cajon Energy Facility (“ECEF”).

ECEF is an existing peaker power plant located on SDG&E’s property at its El Cajon substation. ECEF was developed in response to the energy crisis of 2000/2001, when the California Department of Water Resources (DWR) awarded contracts to generators in an effort to alleviate the impacts of the energy crisis.^{1/} At the time this project came into existence, SDG&E offered its property for siting of generation units in an effort to reduce the time required to site and build new generation. In return, SDG&E secured the opportunity to purchase this facility at the conclusion of the lease term. The purchase option was intended to benefit

^{1/} In early 2001, California enacted legislation authorizing the DWR to make certain electricity purchases for the purpose of selling electricity to utility retail customers. Pursuant to this authority, the DWR entered into several procurement contracts with multiple generator counter-parties (each a “DWR contract”). In D.02-09-053, the DWR allocated each DWR contract to a particular IOU to manage as an integral component of its resource portfolio. (*Mimeo*, pp. 16-17)

ratepayers by ensuring the availability of this well-priced resource; it was an integral component of the compensation received by SDG&E ratepayers for making utility land available.

SDG&E proposes to now acquire ECEF for a total purchase price of \$16.8 million, to be recovered in rates with an annual revenue requirement of \$4.4 million in 2012. As described in more detail below and in the testimony supporting this Application,^{2/} while ECEF was not selected through a Request for Offers (“RFO”) process, it represents a “unique opportunity”^{3/} to acquire a resource at extremely low cost that will provide significant benefits to SDG&E ratepayers.

The option to purchase ECEF is included in the land lease agreement that was entered into by SDG&E and CalPeak Power LLC (“CalPeak”) in 2001, prior to the construction of ECEF. SDG&E currently receives the generation produced at ECEF pursuant to a contract between CalPeak and the DWR that is administered by SDG&E on behalf of the DWR. CalPeak’s contract with the DWR expires on January 1, 2012. SDG&E seeks to take ownership of the facility immediately thereafter. Accordingly, it respectfully requests Commission approval of this Application no later than October 6, 2011 to permit sufficient time to conduct all activities required to transfer the facility.

II. BACKGROUND AND SUMMARY OF REQUEST

As is described in more detail in the testimony provided in support of this Application, ECEF is located at SDG&E’s El Cajon substation and is surrounded by the SDG&E Eastern

^{2/} This Application is supported by the testimony of four SDG&E witnesses set forth in the Commission-approved “RFO Solicitation Contract Approval Request” template (“RFO Template”). Each section of the RFO Template is sponsored by an SDG&E witnesses. Accordingly, the RFO Template, as a whole, represents the testimony of all SDG&E witnesses. As described in greater detail below, the RFO Template is being served (not filed) in conjunction with the filing of this Application.

^{3/} See D.07-12-052, *mimeo*, pp. 210-213, as amended by D.08-11-008, *mimeo*, pp. 20-23.

Operating and Maintenance Center. It is a single unit simple-cycle peaking power plant. The facility has a CAISO Net Qualified Capacity (“NQC”) rating of 42.2 MW. ECEF has an existing interconnection agreement. No transmission upgrades are required for this facility. The unit began commercial operations on May 20, 2002.

The resource was constructed in response to rolling blackouts experienced throughout California in 2000. In August, 2000, in an effort to bring additional peaking capacity online, SDG&E made certain substation locations available to respondents to a Request for Bids (“RFB”) issued by the California Independent System Operator (“CAISO”). A contract to provide peaking generation to the CAISO was ultimately awarded to one of the respondents to the RFB, DG Power Corporation (“DG Power”); DG Power subsequently assigned its CAISO contract rights and obligations to CalPeak. CalPeak sought to lease space for its peaking generation units at two of SDG&E’s properties. In June, 2001, the Commission approved SDG&E’s application for authority to lease space at its El Cajon and Mission^{4/} substations to CalPeak for the installation and operation of electric generation units.^{5/} The land lease agreement includes a purchase option, which gives SDG&E the right to purchase the unit based upon a fair market value assessment of predetermined plant components, less estimated site remediation costs. The option represents a “unique opportunity” to acquire a generation facility at a cost substantially below other market alternatives.

A. Approval of ECEF is Consistent with SDG&E’s LTPP

As discussed more fully in the accompanying testimony, the ECEF unit is fully consistent with the portfolio needs outlined in SDG&E’s Commission-approved long-term procurement

^{4/} The unit to be located at the Mission substation was never constructed.

^{5/} The Commission granted an exemption from the requirements of Public Utilities Code § 851 for SDG&E’s lease of space at its El Cajon substation to CalPeak for the installation of an electric generation unit. D.01-06-006, *mimeo*, p. 9.

plan (“LTPP”).^{6/} SDG&E’s 2006 LTPP identifies a need for existing units that meet local and system resource adequacy (“RA”) requirements. In addition, it identifies a need for certain ancillary services, including quick start natural gas-fired resources to back up intermittent resources such as renewable resources.

The ECEF is currently utilized by SDG&E to meet existing bundled customer local and system RA need. Acquisition of ECEF will help SDG&E meet its continuing need for bundled customer local and system RA requirements. The proposed purchase of the ECEF is intended to fill some of the need SDG&E targeted for Product 5 in its 2009 RFO.^{7/} SDG&E procurement has been focused primarily on the need for local resources to meet local RA requirements. This purchase will maintain and provide RA to SDG&E’s bundled customers as a local unit for the remaining life of the facility estimated to be at least 15 years.

In addition, SDG&E’s LTPP identifies a need for quick start units that can be used to support intermittent renewable resources and to provide reliable capacity at time of peak load. Indeed, in D.07-12-052 the Commission expressly directed SDG&E to procure dispatchable ramping resources that can be used to adjust for the morning and evening ramps created by intermittent resources.^{8/} The Commission explained that such resources are necessary to further the State’s goals of reducing greenhouse gas (“GHG”) emissions.^{9/} ECEF satisfies this requirement. The unit is a quick start unit that can be used to mitigate the impacts of intermittency associated with renewable generation. In addition, it has in the past and will continue in the future to be used to provide reliable capacity at time of peak load.

^{6/} SDG&E’s 2006 LTPP was approved with modifications in D.07-12-052. SDG&E filed its Conformed 2006 LTPP on April 18, 2008 (Advice Letter 1983-E).

^{7/} Product 5 requested 10-year contracts for existing units that meet local and system RA requirements.

^{8/} D.07-12-057, *mimeo*, p. 110.

^{9/} *Id.*

B. Approval of ECEF is Consistent with the Commission’s Energy Action Plan and the Greenhouse Gas Emissions Performance Standard.

As described in more detail in the accompanying testimony, SDG&E’s energy planning focuses first on energy efficiency, demand response and renewable generation. These options are considered prior to adding any gas-fired generation. This approach is reflected in SDG&E’s Commission-approved 2006 LTPP. Even after planning for these resources, however, SDG&E has determined that there will be a need for additional capacity to meet customers’ needs. Acquisition of ECEF will allow SDG&E to maintain existing local capacity required in order to meet peak energy needs.

In D.07-01-039, the Commission adopted standards that set limits on the GHG emissions profiles of long-term contracts entered into by investor-owned utilities (“IOUs”). Under these standards, a long-term commitment by a load-serving entity to take power from a power plant must demonstrate compliance with the Emissions Performance Standard (“EPS”) if the power plant is (i) a baseload facility (with an estimated annual capacity factor greater than 60%); or (ii) if the power plant is designed to augment the output or extend the operating life of an existing baseload or non-baseload plant.^{10/} In the instant case, the ECEF facility is a peaking power project with an estimated annual capacity factor far less than 60%. It is not designed or intended to augment the output or extend the operating life of the existing power plant. Thus, the purchase of the ECEF facility complies with D.07-01-039.

C. Approval of ECEF is Consistent with the Commission’s Policies Regarding Utility-Owned Generation

In D.07-12-052, as amended by D.08-11-008, the Commission adopted rules to govern the circumstances under which IOUs would be permitted to take ownership of generation assets

^{10/} D.07-12-052, mimeo, p. 7.

outside of a competitive process. Under these rules, if an IOU proposes utility-owned generation (“UOG”) outside of a competitive RFO, the IOU must demonstrate that the circumstance falls into one of four specified categories, which are described in detail in D.07-12-052: (1) market power mitigation; (2) preferred resources; (3) unique opportunity; or (4) reliability.^{11/}

The purchase option contained in the land lease agreement with CalPeak was negotiated nearly seven years prior to the Commission’s adoption of these rules related to UOG and clearly fits within the “unique opportunity” category. As is discussed in greater detail in the supporting testimony, the ECEF is a low-cost, high viability project that offers significant benefits to ratepayers. It is an existing plant powered by commercially-proven technology that is located in SDG&E’s load pocket on SDG&E-owned property. As a project located in SDG&E’s service territory, ECEF provides full deliveries and is thus able to provide full resource adequacy. There are no incremental transmission impacts or costs associated with the transfer of ownership from CalPeak to SDG&E. Finally, the quick start capability of ECEF is consistent with the type of unit characteristics that the Commission has found to be desirable in order to mitigate the intermittency of renewable resources.^{12/} Thus, while it is not itself a “preferred resource,” the public policy rationale supporting favored treatment of preferred resources would apply here where the resource is necessary to facilitate the addition of larger amounts of renewable resources.

The Commission indicated in D.07-12-052 that an application for UOG that falls into one of the categories described above should hold a competitive RFO, unless to do so would be infeasible.^{13/} In the instant case, it would be virtually impossible for any seller to offer a fully

^{11/} See D.07-12-052, *mimeo*, pp. 210-213, as amended by D.08-11-008, *mimeo*, pp. 20-23.

^{12/} See D.07-12-057, *mimeo*, p. 110.

^{13/} D.07-12-052, *mimeo*, p. 211, note 241.

constructed, operational facility with equivalent benefits at a lower cost. As demonstrated in the accompanying testimony, ECEF is very attractively priced when compared against the results of SDG&E's most recent all-source RFO. Given the benefits offered by ECEF and the advantageous price terms, conducting an RFO to solicit similar projects would serve little purpose. The Commission should, instead, compare the ECEF purchase option against the results of SDG&E's 2009 RFO soliciting long-term offers for local resources. As the supporting testimony demonstrates, this comparison provides an effective "market test" that establishes the value and favorable pricing of the ECEF resource.^{14/}

D. Pricing Comparison with 2009 RFO Results

When compared against the offers received in SDG&E's most recent all-source RFO, exercise of the purchase option to acquire ECEF is the lowest-cost option and will result in substantial savings to ratepayers. This comparison is discussed in Part Two, Section III of the supporting testimony.

E. Several Qualitative Factors Support Commission Approval of Acquisition of ECEF

- *Project Viability*: As a fully-constructed, operational facility employing commercially-proven technology, ECEF is a highly viable project.
- *Resource Diversity*: SDG&E's LTPP describes a portfolio of resources, each of which meets one or more specific requirements. There is no single resource that, by itself, is suited to meet all portfolio needs. Therefore, SDG&E procures a variety of capacity resources. The ECEF is a peaking plant designed to meet specific portfolio needs. It is a dispatchable unit designed for low-run hours to serve during peak hours

^{14/} See D.07-12-052, *mimeo*, note 241.

or as required to adjust for demands placed on system operations by increasing amounts of intermittent resources.

- *Brownfield Site*: ECEF is located on existing SDG&E property. The property was a brownfield site at the time the unit was constructed in 2001.
- *Environmental/Economic Justice*: As discussed above and in the supporting testimony, the ECEF facility complies with the Commission’s current rules regarding GHG mitigation. Furthermore, ECEF is fully permitted for all required air and water uses. It is located in industrial land and is surrounded by various light to heavy industrial properties. The quick start capability of ECEF is consistent with the type of unit characteristics that the Commission has found to be desirable to facilitate the addition of larger amounts of intermittent resources.

III. RELIEF REQUESTED

SDG&E respectfully requests that, in accordance with the proposed schedule, the Commission issue a decision finding that:

1. SDG&E’s bundled customers need the ECEF resource;
2. The price and terms set forth in the Purchase Option Implementation Agreement (“POIA”) are just and reasonable;
3. Full cost recovery in rates, as requested by SDG&E, should be granted; and
4. Such other relief as is necessary and proper.

**IV.
RFO TEMPLATE/IE TEMPLATE
(TESTIMONY/ATTACHMENTS SERVED WITH THE APPLICATION)**

As noted above, this Application is supported by the testimony contained within the RFO Template, which is being served, but not filed, in conjunction with this Application.^{15/} Each section of the RFO Template is sponsored by one of the following four SDG&E witnesses: Robert Anderson, Frank Thomas, Michael Foster and Greg Shimansky. Various documents and tables supporting such testimony are attached to the RFO Template as Appendices 1 through 10. Where appropriate, confidential information is redacted, as described in the witnesses' confidentiality declarations attached to the testimony. With respect to the IE report, it is contained in the IE Template (both confidential and public versions, Attachment 9) that is being served, but not filed, in conjunction with this Application.^{16/}

**V.
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

^{15/} In D.07-12-052 (*mimeo*, pp. 150-151) the Commission directed the Energy Division to develop a "project application template through a public process." The RFO Template is the product of this process and, according to the direction in D.07-12-052, SDG&E used the RFO Template as a means to present the testimony of its witnesses in support of this Application.

^{16/} In D.07-12-052 (at p. 141-142) the Commission directed the Energy Division to "develop a template for IEs to use when developing their reports." The IE Template is the product of this process and, according to the direction in D.07-12-052, SDG&E's IE used the IE Template in creating an IE report for this Application.

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.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Wendy Keilani
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, California 92123
Telephone: (858) 654-1185
Facsimile: (858) 654-1788
WKeilani@semprautilities.com

with a copy to:

Aimee Smith
Attorney for:
San Diego Gas & Electric Company
101 Ash Street, HQ-12
San Diego, CA 92101-3017
Telephone: (619) 699-5042
Facsimile: (619) 699-5027
AMSmith@semprautilities.com

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 costs incurred for purchase of ECEF from its ratepayers, the costs will result in an increase of 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. SDG&E, nevertheless, sets forth below a schedule that includes hearings, in the event hearings are deemed to be necessary.

c. Issues to be Considered

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

d. Proposed Schedule

As noted above, SDG&E does not believe hearings will be necessary, but proposes alternate schedules to address either scenario:

PROPOSED SCHEDULE - NO HEARINGS	
<u>ACTION</u>	<u>DATE</u>
Application filed	January 5, 2011
Responses/Protests	February 4, 2011
Reply to Responses/Protests	February 14, 2011
Prehearing Conference (if necessary)	February 23, 2011
Scoping Memo Issued	March 4, 2011
Intervenor Testimony	April 4, 2011
Rebuttal Testimony	May 2, 2011
Opening Briefs	May 31, 2011
Reply Briefs	June 28, 2011
Proposed Decision	August 22, 2011
Comments on Proposed Decision	September 12, 2011
Reply Comments on Proposed Decision	September 19, 2011
Commission Decision Adopted	September 22, 2011

PROPOSED SCHEDULE – HEARINGS REQUIRED	
<u>ACTION</u>	<u>DATE</u>
Application filed	January 5, 2011
Responses/Protests	February 4, 2011
Reply to Responses/Protests	February 14, 2011
Prehearing Conference (if necessary)	February 23, 2011
Scoping Memo Issued	March 4, 2011
Intervenor Testimony	April 4, 2011
Rebuttal Testimony	May 2, 2011
Evidentiary Hearings	May 12-13, 2011
Opening Briefs	June 9, 2011
Reply Briefs	July 7, 2011
Proposed Decision	September 6, 2011
Comments on Proposed Decision	September 26, 2011
Reply Comments on Proposed Decision	October 3, 2011
Commission Decision Adopted	October 6, 2011

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 filed with the Commission on August 31, 2009 in connection with SDG&E's Application No. 09-08-019, and is incorporated herein by reference.

C. Rule 3.2 (a) – (d) – Authority to Increase Rates^{17/}

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

1. Rule 3.2 (a) (1) – balance sheet

SDG&E’s financial statement, balance sheet and income statement 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 www.sdge.com/regulatory/tariff/current_tariffs.shtml. Attachment B to this Application provides the table of contents from SDG&E’s electric tariffs on file with the Commission.

3. Rule 3.2 (a) (3) – statement of proposed increases

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 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 the nine month period ending September 30, 2010, is included as Attachment E to this Application.

^{17/} Rule 3.2(a) (9) is not applicable to this Application.

6. Rule 3.2 (a) (7) – statement re 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 SDG&E’s most recent proxy statement, dated April 29, 2010, as sent to all shareholders of SDG&E’s parent company, Sempra Energy, was provided to the California Public Utilities Commission on May 13, 2010, and is incorporated herein by reference.

8. Rule 3.2 (a) (10) – statement re pass through to customers

Any increase in rates that may eventually be caused by approval of this Application will be a result of the passing through to customers of increased procurement costs incurred by SDG&E to provide electric service to customers as authorized by SDG&E’s ERRRA tariff.

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 ten 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, within ten days after the filing of this Application, will post in its offices and 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, within 45 days of the filing of this Application, will 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 revenue requirement changes addressed in this Application.

**VI.
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 the testimony of each witness and submitted in conformance with D.06-06-066 and D.08-04-023. In short, confidential treatment and redaction of such information is necessary in this proceeding to prevent improper disclosure of confidential, commercially-sensitive information (pertaining to SDG&E’s electric procurement resources and strategies) that SDG&E witnesses must provide in support of this Application.

**VII.
SERVICE**

This is a new application. No service list has been established. Accordingly, SDG&E will serve the public versions of this Application, testimony and related exhibits on parties to the service list for R.10-05-006 (Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans). Hard copies will be sent by overnight mail to the Assigned Commissioner and Assigned Administrative Law Judge (“ALJ”) in R.10-05-006 and Chief ALJ Karen Clopton.

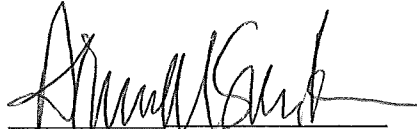
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VIII.

CONCLUSION

WHEREFORE, SDG&E requests that the Commission grant SDG&E's Application as described herein.

Respectfully submitted this 5th day of January 2011.



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ATTACHMENT A

SDG&E Balance Sheet, Income Statement & Financial Statement

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
SEPTEMBER 30, 2010

1. UTILITY PLANT		<u>2010</u>
101	UTILITY PLANT IN SERVICE	\$10,515,445,272
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	37,154,255
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	737,607,404
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,334,502,994)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(290,098,773)
118	OTHER UTILITY PLANT	692,767,534
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(158,437,836)
120	NUCLEAR FUEL - NET	<u>52,671,867</u>
TOTAL NET UTILITY PLANT		<u>7,252,606,729</u>
 2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	5,165,500
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(548,766)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>738,447,644</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>743,064,378</u>

Data from SPL as of Nov 15, 2010

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
SEPTEMBER 30, 2010

3. CURRENT AND ACCRUED ASSETS		2010
131	CASH	2,834,950
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	305,750,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	157,749,078
143	OTHER ACCOUNTS RECEIVABLE	34,377,502
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(2,948,492)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	2,841,523
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	3,798,425
151	FUEL STOCK	4,144,414
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	60,178,058
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	293,801
165	PREPAYMENTS	172,135,992
171	INTEREST AND DIVIDENDS RECEIVABLE	4,086,671
173	ACCRUED UTILITY REVENUES	61,089,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	152,832,606
175	DERIVATIVE INSTRUMENT ASSETS	33,496,749
TOTAL CURRENT AND ACCRUED ASSETS		992,660,777
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	30,138,511
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,916,424,625
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	4,315,237
184	CLEARING ACCOUNTS	404,733
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	3,532,080
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	23,862,168
190	ACCUMULATED DEFERRED INCOME TAXES	231,021,254
TOTAL DEFERRED DEBITS		2,209,698,608
TOTAL ASSETS AND OTHER DEBITS		11,198,030,492

Data from SPL as of Nov 15, 2010

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
SEPTEMBER 30, 2010

5. PROPRIETARY CAPITAL

	<u>2010</u>
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	(78,475,400)
207 PREMIUM ON CAPITAL STOCK	(592,222,753)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(279,665,368)
214 CAPITAL STOCK EXPENSE	25,688,571
216 UNAPPROPRIATED RETAINED EARNINGS	(1,875,418,561)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>9,074,902</u>
TOTAL PROPRIETARY CAPITAL	<u>(3,082,477,004)</u>

6. LONG-TERM DEBT

221 BONDS	(2,686,905,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(253,720,000)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>9,484,356</u>
TOTAL LONG-TERM DEBT	<u>(2,931,140,644)</u>

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(734,405,917)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(47,431,101)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(359,964,280)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	<u>(604,736,628)</u>
TOTAL OTHER NONCURRENT LIABILITIES	<u>(1,746,537,926)</u>

Data from SPL as of Nov 15, 2010

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
SEPTEMBER 30, 2010**

8. CURRENT AND ACCRUED LIABILITES		2010
231	NOTES PAYABLE	0
232	ACCOUNTS PAYABLE	(271,903,589)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(24,047,488)
235	CUSTOMER DEPOSITS	(53,477,960)
236	TAXES ACCRUED	(16,692,642)
237	INTEREST ACCRUED	(50,230,199)
238	DIVIDENDS DECLARED	(1,204,917)
241	TAX COLLECTIONS PAYABLE	(4,806,579)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(474,076,752)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(36,767,283)
244	DERIVATIVE INSTRUMENT LIABILITIES	(248,440,120)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	0
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,181,647,529)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(15,983,099)
253	OTHER DEFERRED CREDITS	(133,719,553)
254	OTHER REGULATORY LIABILITIES	(937,193,446)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(25,816,860)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	(5,201,256)
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(884,118,414)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(254,194,761)
TOTAL DEFERRED CREDITS		(2,256,227,389)
TOTAL LIABILITIES AND OTHER CREDITS		(\$11,198,030,492)

Data from SPL as of Nov 15, 2010

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2010

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$2,289,982,057
401	OPERATING EXPENSES	\$1,398,548,768	
402	MAINTENANCE EXPENSES	116,403,172	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	263,659,047	
408.1	TAXES OTHER THAN INCOME TAXES	56,674,981	
409.1	INCOME TAXES	6,517,496	
410.1	PROVISION FOR DEFERRED INCOME TAXES	154,556,353	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(35,062,098)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(448,667)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT		
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>1,960,849,052</u>
	NET OPERATING INCOME		329,133,005

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(47,878)	
418	NONOPERATING RENTAL INCOME	333,462	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	2,146,221	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	30,228,694	
421	MISCELLANEOUS NONOPERATING INCOME	666,506	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>33,327,005</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	266,883	
	TOTAL OTHER INCOME DEDUCTIONS	<u>266,883</u>	
408.2	TAXES OTHER THAN INCOME TAXES	277,191	
409.2	INCOME TAXES	(659,649)	
410.2	PROVISION FOR DEFERRED INCOME TAXES		
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	5,409,032	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>5,026,574</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>28,033,548</u>
	INCOME BEFORE INTEREST CHARGES		357,166,553
	NET INTEREST CHARGES*		<u>89,963,507</u>
	NET INCOME		<u><u>\$267,203,046</u></u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (10,071,740)

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2010**

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$1,611,830,266
NET INCOME (FROM PRECEDING PAGE)	267,203,046
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(3,614,751)
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$1,875,418,561</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
SEPTEMBER 30, 2010

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000	shares	Par Value \$27,500,000
Preferred Stock	10,000,000	shares	Without Par Value
Preferred Stock	Amount of shares not specified		\$80,000,000
Common Stock	255,000,000	shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK

5.0%	375,000	shares	\$7,500,000
4.50%	300,000	shares	6,000,000
4.40%	325,000	shares	6,500,000
4.60%	373,770	shares	7,475,400
\$1.70	1,400,000	shares	35,000,000
\$1.82	640,000	shares	16,000,000

COMMON STOCK

116,583,358 shares 291,458,395

(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009 and 06-05-015, to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application No. 06-05-015 and 08-07-029 to which reference is hereby made.

(d) 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 2009</u>
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	1,877,679
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	1,724,949
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	1,502,592
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,067,817
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,494,416
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	295,705
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	947,581
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	9,850,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	0
4.50% Series III, due 2040	08-15-40	500,000,000	500,000,000	0
 <u>Unsecured Bonds:</u>				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000

**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
SEPTEMBER 30, 2010**

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2009</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$39,858

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>12-31-09</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
5.0%	375,000	\$375,000	\$375,000	\$375,000	\$375,000	\$375,000
4.50%	300,000	270,000	270,000	270,000	270,000	270,000
4.40%	325,000	286,000	286,000	286,000	286,000	286,000
4.60%	373,770	343,868	343,868	343,868	343,868	343,868
\$ 1.7625	0	1,321,875	1,145,625	969,375	242,344	0
\$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000	2,380,000	2,380,000
\$ 1.82	640,000	1,164,800	1,164,800	1,164,800	1,164,800	1,164,800
	<u>3,413,770</u>	<u>\$6,141,543</u>	<u>\$5,965,293</u>	<u>\$5,789,043</u>	<u>\$5,062,012 [2]</u>	<u>\$4,819,668</u>

Common Stock

Amount	\$75,000,000	\$0	\$0	\$0	\$150,000,000 [1]
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A balance sheet and a statement of income and retained earnings of Applicant for the nine months ended September 30, 2010, are attached hereto.

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

[2] Includes \$242,344 of interest expense related to redeemable preferred stock.

ATTACHMENT B

SDG&E Statement of Currently Effective Rates



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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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Advice Ltr. No. 2167-E

Decision No. 10-01-022

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Apr 21, 2010

Effective Jan 21, 2010

Resolution No. _____



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A-TOU	General Service - Small - Time Metered	21992, 20502, 20503, 21433-E	T
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DA	Transportation of Electric Power for Direct Access Customers	17679, 14953, 14954, 21894, 15111, 16976-E 21454, 21895-E	
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Senior Vice President
Regulatory Affairs

Decision No. _____

Resolution No.

E-4283



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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 22055-E

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101-3052B	3-69	Temporary "After Hour" Turn On Notice.....	2512-E	
101-15152B		Door Knob Meter Reading Card.....	2515-E	
107-04212	4-99	Notice of Temporary Electric Service Interruption (English & Spanish).....	12055-E	
115-00363/2	9-00	Sorry We Missed You.....	13905-E	
115-002363	9-00	Electric Meter Test.....	13906-E	
115-7152A		Access Problem Notice.....	3694-E	
124-70A		No Service Tag.....	2514-E	

13C6

Advice Ltr. No. 2177-E-A

Decision No. 10-06-002

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Sep 23, 2010

Effective Oct 23, 2010

Resolution No. _____

ATTACHMENT C

SDG&E Statement of Proposed Increases

**SAN DIEGO GAS & ELECTRIC COMPANY —ELECTRIC DEPARTMENT
ILLUSTRATIVE ELECTRIC RATE IMPACT**

Customer Class	9/01/10 Class Average Rates (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Changes (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change %
Residential	17.998	18.021	0.023	0.13%
Small Commercial	18.044	18.069	0.025	0.14%
Medium and Large C&I	14.537	14.561	0.024	0.17%
Agricultural	17.561	17.584	0.023	0.13%
Lighting	15.643	15.660	0.017	0.11%
System Total	16.170	16.194	0.024	0.15%

ATTACHMENT D

SDG&E Statement of Original Cost and Depreciation Reserve

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF SEPTEMBER 30, 2010

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	\$ 222,841	\$ 202,900
303	Misc. Intangible Plant	27,754,034	26,131,011
	TOTAL INTANGIBLE PLANT	27,976,875	26,333,911
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	48,096,009	13,397,239
312	Boiler Plant Equipment	116,848,558	23,253,649
314	Turbogenerator Units	100,427,265	21,783,772
315	Accessory Electric Equipment	34,290,100	7,035,133
316	Miscellaneous Power Plant Equipment	19,416,523	3,093,264
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	333,604,973	68,609,576
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	274,825,610	269,639,243
322	Boiler Plant Equipment	471,171,171	395,779,986
323	Turbogenerator Units	142,178,958	136,111,998
324	Accessory Electric Equipment	169,510,955	166,714,137
325	Miscellaneous Power Plant Equipment	299,433,335	224,708,975
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,357,403,706	1,193,238,017
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	16,787,741	1,641,550
342	Fuel Holders, Producers & Accessories	19,170,415	2,556,314
343	Prime Movers	51,569,644	5,687,904
344	Generators	201,222,167	23,253,085
345	Accessory Electric Equipment	18,502,203	1,994,753
346	Miscellaneous Power Plant Equipment	401,807	75,797
	TOTAL OTHER PRODUCTION	307,799,881	35,211,831
	TOTAL ELECTRIC PRODUCTION	1,998,808,560	1,297,059,424

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 39,667,593	\$ 0
350.2	Land Rights	61,919,904	11,066,785
352	Structures and Improvements	99,088,580	31,612,563
353	Station Equipment	658,076,755	144,286,072
354	Towers and Fixtures	108,849,196	81,751,687
355	Poles and Fixtures	182,087,307	42,075,324
356	Overhead Conductors and Devices	266,574,286	160,697,004
357	Underground Conduit	129,984,674	17,959,880
358	Underground Conductors and Devices	116,064,364	20,314,189
359	Roads and Trails	26,246,362	5,915,091
	TOTAL TRANSMISSION	1,688,559,022	515,678,595
360.1	Land	16,176,228	0
360.2	Land Rights	71,396,198	30,162,736
361	Structures and Improvements	3,284,866	1,368,300
362	Station Equipment	355,186,383	71,540,433
364	Poles, Towers and Fixtures	462,474,976	202,365,212
365	Overhead Conductors and Devices	362,447,058	131,518,708
366	Underground Conduit	888,466,153	334,676,822
367	Underground Conductors and Devices	1,172,513,238	659,002,761
368.1	Line Transformers	449,101,983	75,001,979
368.2	Protective Devices and Capacitors	16,278,584	(6,471,138)
369.1	Services Overhead	112,005,072	121,004,689
369.2	Services Underground	292,713,241	190,002,186
370.1	Meters	166,786,242	7,257,473
370.2	Meter Installations	50,015,240	(5,709,453)
371	Installations on Customers' Premises	6,287,202	10,432,620
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	24,096,903	16,802,104
	TOTAL DISTRIBUTION PLANT	4,449,229,568	1,838,955,431
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,776,375	15,472,836
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	58,146	(3,069)
393	Stores Equipment	19,150	16,238
394.1	Portable Tools	16,883,359	5,186,739
394.2	Shop Equipment	350,581	177,875
395	Laboratory Equipment	320,845	15,449
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	124,007,303	56,756,814
398	Miscellaneous Equipment	462,560	76,017
	TOTAL GENERAL PLANT	179,481,519	77,897,918
101	TOTAL ELECTRIC PLANT	8,344,055,544	3,755,925,279

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	\$ 86,104	\$ 86,104
303	Miscellaneous Intangible Plant	713,559	574,758
	TOTAL INTANGIBLE PLANT	799,663	660,862
360.1	Land	0	0
361	Structures and Improvements	43,992	43,992
362.1	Gas Holders	0	0
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	0
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	1,843,078	492,098
	TOTAL STORAGE PLANT	1,887,070	536,090
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,133,130
366	Structures and Improvements	11,523,041	8,656,526
367	Mains	125,461,801	55,321,885
368	Compressor Station Equipment	71,390,258	48,589,034
369	Measuring and Regulating Equipment	17,683,217	12,926,177
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	232,924,647	126,626,751
374.1	Land	102,187	0
374.2	Land Rights	8,053,680	5,600,436
375	Structures and Improvements	43,447	61,253
376	Mains	529,050,388	298,621,777
378	Measuring & Regulating Station Equipment	10,236,086	6,181,382
380	Distribution Services	236,264,837	269,111,170
381	Meters and Regulators	111,666,848	30,013,268
382	Meter and Regulator Installations	75,887,878	22,353,828
385	Ind. Measuring & Regulating Station Equipm	1,516,811	915,973
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,274,409	4,588,977
	TOTAL DISTRIBUTION PLANT	978,096,571	637,448,065

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	\$ 0	\$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	6,839,524	2,659,802
394.2	Shop Equipment	84,181	22,775
395	Laboratory Equipment	283,094	149,856
396	Power Operated Equipment	162,284	52,107
397	Communication Equipment	1,751,741	1,030,482
398	Miscellaneous Equipment	269,875	99,793
	TOTAL GENERAL PLANT	9,465,199	4,114,819
101	TOTAL GAS PLANT	1,223,173,150	769,386,587

COMMON PLANT

303	Miscellaneous Intangible Plant	244,071,125	186,662,711
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,612,511	0
389.2	Land Rights	1,385,339	27,275
390	Structures and Improvements	195,362,413	78,963,041
391.1	Office Furniture and Equipment - Other	26,309,764	14,457,208
391.2	Office Furniture and Equipment - Computer E	46,646,405	17,132,318
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(36,463)
393	Stores Equipment	133,501	(2,824)
394.1	Portable Tools	1,033,986	51,215
394.2	Shop Equipment	287,325	150,877
394.3	Garage Equipment	1,558,794	269,041
395	Laboratory Equipment	2,408,787	844,343
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	88,647,031	46,161,944
398	Miscellaneous Equipment	2,259,218	540,713
118.1	TOTAL COMMON PLANT	615,783,512	344,689,491
	TOTAL ELECTRIC PLANT	8,344,055,544	3,755,925,279
	TOTAL GAS PLANT	1,223,173,150	769,386,587
	TOTAL COMMON PLANT	615,783,512	344,689,491
101 & 118.1	TOTAL	10,183,012,206	4,870,001,357
101	PLANT IN SERV-SONGS FULLY RECOVER	\$ (1,164,131,236)	\$ (1,164,131,236)
101	PLANT IN SERV-ELECTRIC NON-RECON Common	\$ 0	\$ 0
118	PLANT IN SERV-COMMON NON-RECON Common - Transferred Asset Adjustment	\$ (17,525,963)	\$ (17,525,963)

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	Accrual for Retirements		
	Electric	\$ (28,691,232)	\$ (28,691,232)
	Gas	(124,053)	(124,053)
	TOTAL PLANT IN SERV-NON RECON ACC[(28,815,284)	(28,815,284)
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	0	0
105	Plant Held for Future Use		
	Electric	37,154,255	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	37,154,255	0
107	Construction Work in Progress		
	Electric	754,370,353	
	Gas	9,274,275	
	Common	76,203,570	
	TOTAL CONSTRUCTION WORK IN PROGRESS	839,848,198	0
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	221,468
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	2,164,801
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	658,656,063
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0	658,656,063
101.1	ELECTRIC CAPITAL LEASES	778,390,265	23,588,132
118.1	COMMON CAPITAL LEASE	20,901,237	4,530,169
		799,291,502	28,118,301
120	NUCLEAR FUEL FABRICATION	59,098,846	32,464,203
143	FAS 143 ASSETS - Legal Obligation	114,954,310	(548,535,435)
	FIN 47 ASSETS - Legal Obligation	34,751,219	14,593,867
143	FAS 143 ASSETS - Non-legal Obligation	0	(1,193,385,773)
	TOTAL FAS 143	149,705,529	(1,727,327,341)
	UTILITY PLANT TOTAL	\$ 10,857,638,052	\$ 2,653,826,368

ATTACHMENT E

SDG&E Summary of Earnings

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
NINE MONTHS ENDED SEPTEMBER 30, 2010
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$2,290
2	Operating Expenses	<u>1,961</u>
3	Net Operating Income	<u><u>\$329</u></u>
4	Weighted Average Rate Base	\$4,646
5	Rate of Return*	8.40%

*Authorized Cost of Capital

ATTACHMENT F

SDG&E City/County/State Service List

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of Fallbrook
Attn. City Clerk
233 E. Mission Road
Fallbrook, CA 92028

City of Fallbrook
Attn. City Attorney
233 E. Mission Road
Fallbrook, CA 92028

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

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

City of Julian
Attn. City Clerk
P.O. Box 1866
2129 Main Street
Julian, CA

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

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

City of Laguna Niguel
Attn. City Attorney
22781 La Paz Ste. B
Laguna Niguel, CA 92656

City of Laguna Niguel
Attn. City Clerk
22781 La Paz Ste. B
Laguna Niguel, CA 92656

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
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
202 C Street.
San Diego, CA 92101

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

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

City of San Diego
Attn. City Manager
202 C Street
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

Valley Center Chamber of
Commerce
Attn. City Clerk
P.O. Box 8
Valley Center, CA 92082

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

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

Spring Valley Chamber of
Commerce
Attn. City Clerk
3322 Sweetwater Springs Blvd,
Ste. 202
Spring Valley, CA 91977-3142

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


OFFICER VERIFICATION

I, James Avery, declare 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 FOR AUTHORITY TO ACQUIRE THE CALPEAK EL CAJON ENERGY FACILITY** 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 to the best of my knowledge.

Executed this 5th day of January, 2011, at San Diego, California.



James Avery
Senior Vice President - Power Supply
SAN DIEGO GAS & ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR AUTHORITY TO ACQUIRE THE CALPEAK EL CAJON ENERGY FACILITY** on all parties identified in Docket No. R.10-05-006 by U.S. mail and electronic mail, and by Federal Express to the assigned Commissioner(s) and Administrative Law Judge(s).

Dated at San Diego, California, this 5th day of January, 2011.

/s/ JOEL DELLOSA

Joel Dellosa