

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2018 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 17-04-____
(Filed April 14, 2017)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF ITS 2018 ELECTRIC PROCUREMENT REVENUE
REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS**

PUBLIC VERSION

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I. INTRODUCTION

In compliance with California Public Utilities Commission (“Commission”) Decisions (“D.”) 02-10-062, D.02-12-074, D.04-01-050, D.13-09-003, and D.14-10-033, as well as the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby submits this Application for Approval of its 2018 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Competition Transition Charge (“CTC”) revenue requirement; (3) the Local Generation (“LG”) revenue requirement; (4) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement; and (5) the GHG allowance revenues and return allocations (“Application”). In this Application, SDG&E also requests approval to recover undercollected balances recorded to the Local Generating Balancing Account (“LGBA”). Lastly, SDG&E requests approval for its proposed 2018 (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables Program. SDG&E respectfully requests that the Commission approve the forecasts and proposals in this Application for recovery in rates beginning January 1, 2018.

As discussed in greater detail below and in the testimony accompanying this Application, SDG&E hereby requests approval of a total 2018 forecasted revenue requirement of \$ 1,397.512 million.¹ This total forecast is comprised of 2018 forecasts of the following:

- (1) the ERRA revenue requirement: \$1,297.545 million (includes 2018 forecast GHG costs of \$55.942 million);
- (2) the CTC revenue requirement: \$16.329 million;
- (3) the LG revenue requirement: \$169.921 million (includes LGBA undercollection of \$0.497 million);
- (4) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement: \$1.086 million; and
- (5) the following GHG allowance revenue return allocations:
 - (a) (\$0.715) million for energy-intensive trade-exposed (“EITE”) customers;
 - (b) (\$3.905) million for small businesses; and
 - (c) (\$82.750) million for residential California Climate Credit (“CCC”).²

Those GHG allowance revenue return allocations are based on the following 2018 forecasts of GHG revenues and expenses, for which SDG&E also requests approval:

- (1) the GHG allowance revenues: \$89.488 million;

¹ This forecasted revenue requirement includes Franchise Fees and Uncollectibles (“FF&U”). The EITE return allocation is also included in this amount because it is part of the 2018 forecast revenue requirement, although it is not returned to customers in rates.

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

- (2) the GHG allowance revenue set aside for clean energy/energy efficiency programs of \$1.342 million;
- (3) the GHG administration, customer education and outreach plan costs of \$0.190 million.

The 2018 revenue requirement forecasts for ERRRA, CTC, LG, SONGS Unit 1 Offsite Spent Fuel Storage Costs, the GHG allowance revenue return, and the sum of the 2015 LGBA activity result in a total revenue requirement increase of \$47.918 million compared to the amounts currently effective in rates.³ These components are shown in detail in Table 1, below.

³ On December 15, 2016, the Commission approved SDG&E's "Application of San Diego Gas & Electric Company (U 902-E) for Approval of its 2017 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts" (A.16-04-018) ("2017 Application"), as updated on November 7, 2016 in "San Diego Gas & Electric Company's (U 902-E) November Update to Application." See D.16-12-053. SDG&E implemented its approved forecasts in rates in Advice Letter 3034-E and 3034-E-A, approved April 5, 2017, 2017 and effective March 1, 2017.

TABLE 1
ERRA, CTC, LG, SONGS, and GHG Revenue Requirements Included in Rates
(Includes FF&U) (\$000)

Line	Description	Currently Effective Revenue Requirement	2018 Revenue Requirement	Change from Current
1	ERRA	\$1,357,197	\$1,297,545	\$(59,652)
2	CTC	\$23,681	\$16,329	\$(7,352)
3	LG	\$43,511	\$169,424	\$125,913
4	SONGS Unit 1 Spent Fuel	\$1,038	\$1,086	\$48
5	GHG Small Business	\$(2,702)	\$ (3,905)	\$(1,203)
6	GHG CCC	\$(77,866)	\$(82,750)	\$(4,885)
7	Subtotal	\$1,344,860	\$1,397,729	\$52,869
8	LGBA Undercollection	\$5,449	\$497	\$(4,952)
9	Total ⁴	\$1,350,309	\$1,398,227	\$47,918

In total, this would increase the current system average rates by 0.171 cents per kilowatt hours, or 0.77%. A typical non-CARE residential customer in the inland climate zone using 500 kilowatt-hours could see a monthly summer bill increase of 0.9%, or \$1.10 (from \$125.36 to \$126.46). A typical non-CARE residential customer in the inland climate zone using 500 kilowatt-hours could see a monthly winter bill increase of 0.9%, or \$1.16 (from \$122.40 to \$123.56)⁵

A key driver underlying the changes in the forecasted 2018 ERRA revenue requirement (as compared to the 2017 revenue requirement) is lower natural gas prices. In addition, the 2018

⁴ The total 2018 forecasted revenue of \$1,398,227 shown in this Table 1 is slightly greater than the total 2018 forecasted revenue requirement of \$1,397.512 million referenced on page 2 because the EITE return allocation (\$0.715 million) is not included in rates, and Table 1 compares 2018 forecasts with amounts currently effective in rates. The sums in Table 1 may not equal due to rounding.

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

LG revenue requirement forecast increased because costs for two new energy storage units will be included in the LGBA in 2018.

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

II. BACKGROUND

SDG&E's 2018 forecasts and proposals in this Application contain several categories of electric procurement activities, each of which is discussed below. Prior to 2016, SDG&E had filed an annual application seeking approval of its forecasted revenue requirements for ERRA, CTC and LG and a separate application regarding GHG-related forecasts. In accordance with D.14-10-033, in which the Commission directed the utilities to incorporate GHG-related forecasts and proposals into their annual ERRA forecast applications, SDG&E began including its GHG-related forecasts in its 2016 Application and is following that approach in this Application, as it did in its 2017 Application.⁶ Likewise, as in its 2016 and 2017 Applications, SDG&E is again proposing to incorporate its 2018 forecast of its SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – formerly an element of its General Rate Cases (“GRC”) – in this Application. This approach was approved in D.15-12-032 and D.16-12-053. Similarly, as it did in its 2017 Application, SDG&E seeks to recover its outstanding LGBA balance, as further described in Section II.C below. As in its 2017 Application, SDG&E has also included 2018 proposed rate components for the Green Tariff Shared Renewables Program, as further described in Section II.G below.

⁶ See A.15-04-014; A.16-04-018.

A. ERRA

In D.02-10-062, the Commission established the ERRA balancing account – the power procurement balancing account required by Public Utilities (“P.U.”) Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities (“IOUs”) with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator-related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers.⁷

The ERRA regulatory process consists of (1) an annual forecast proceeding to adopt a forecast of the utility’s electric procurement cost revenue requirement and electricity sales for the upcoming year; and (2) an annual compliance proceeding to review the utility’s compliance in the preceding year regarding energy resource contract administration, least cost dispatch, fuel procurement, and the ERRA balancing account. There is also an update process for new information – primarily fuel and purchased power forecasts, GHG verified volumes and associated costs, additional GHG estimates for current year and the ERRA mechanism – which takes place in November of each year (“November Update”).

P.U. Code Section 454.5(d)(3) also specified that the balance of the ERRA was not to exceed 5% of the IOUs actual recorded generation revenues for the prior calendar year, excluding revenues collected for the California Department of Water Resources (“DWR”).⁸ Accordingly, in D.02-10-062, the Commission established a trigger mechanism designed to avoid the 5% threshold point, pursuant to which IOUs must file an expedited application for

⁷ See D.02-10-062 at 60.

⁸ See D.02-10-062 at 62; *see also* D.11-05-005.

approval to adjust rates in 60 days from the filing date when their ERRA balance reaches an undercollection or overcollection of 4% and is projected to exceed the 5% trigger.⁹ As currently implemented, the trigger process exists independently of, but in conjunction with, the forecast process used for this Application. Thus, SDG&E does not currently include the prior year-end ERRA balance in its forecast applications as it is addressed via an ERRA trigger application or year-end consolidated advice letter filing.

B. CTC

The Transition Cost Balancing Account (“TCBA”), which is also reviewed in ERRA forecast proceedings, is designed to accrue all ongoing Competition Transition Charge (“CTC”) revenues and recover all ongoing CTC-eligible generation-related costs.¹⁰ In accordance with D.02-12-074 and D.02-11-022, payments to Qualifying Facilities (“QFs”) that are above the market benchmark proxy price (*i.e.*, above-market QF power costs) are charged to the TCBA. Eligible ongoing CTC expenses reflect the difference between the market benchmark proxy price and the costs associated with QF contracts.

C. LG

The Local Generation Balancing Account (“LGBA”) is designed to record the costs and revenues of Local Generation where the Commission has determined that the generation resource is subject to the Cost Allocation Mechanism (“CAM”).¹¹ Such generation may take the form of power purchase agreements, company-owned generation units associated with new generation

⁹ In D.07-05-008, the Commission modified D.02-10-062 by adding a new rule to the trigger procedures, pursuant to which SDG&E is permitted to file an advice letter seeking to maintain rates when it expects an undercollection or overcollection above the 4% trigger will self-correct within 120 days.

¹⁰ Assembly Bill 1890 established the expenses that are eligible for CTC recovery.

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

resources, or any other resources approved by the Commission for CAM treatment. The costs recorded in the LGBA are recovered via the Local Generation Charge (“LGC”), a rate component.

SDG&E is requesting recovery for costs related to peaker generators that have been previously approved for CAM treatment, including Carlsbad, Pio Pico, and Escondido. These plants are mentioned in both Ms. Montanez’s testimony and Ms. Miller’s testimony, along with the CAM-eligible combined heat & power plants. SDG&E is also requesting recovery for costs related to two new energy storage facilities located in El Cajon, California, and Escondido, California. These plants are also mentioned in both Ms. Montanez’s testimony and Ms. Miller’s testimony, and were approved for CAM treatment in Advice Letter 2924-E, pursuant to Resolution E-4791.

As noted above, SDG&E is also seeking recovery of an outstanding LGBA amount of \$0.491 million. This represents the uncollected LGBA activity during 2015. SDG&E previously explained this request for recovery in its June 1, 2016 “Application of SDG&E (U-902-E) for Approval of ERRA Compliance for 2015” (A.16-06-002) (“2015 ERRA Compliance Application”), in which SDG&E requested approval to defer recovery of the uncollected LGBA activity until its 2018 ERRA Forecast proceeding in order to avoid a rate increase for a relatively small amount, promoting rate stability. The Commission approved Application A.16-06-002 in Decision D.17-03-016, and SDG&E is therefore including the uncollected amount in this Application, to be collected in rates beginning January 1, 2018.

D. PCIA

The Power Charge Indifference Amount is another rate component of this Application. In D.06-07-030, as modified by D.07-01-030, the Commission resolved various issues relating to the cost responsibility surcharge applicable to Direct Access (“DA”) and Municipal Departing

Load customers¹² within the service territories of the IOUs. The PCIA component of the cost responsibility surcharge is intended to preserve bundled customer indifference to customers that migrate from bundled to DA load by ensuring that departing load customers pay their share of the cost responsibility associated with the above-market-costs of the utilities' total procurement portfolio. Under the methodology adopted by the Commission in D.08-09-012, the Commission refined the indifference amount methodology by introducing the requirement to vintage departing load customers, based on their departure date, when assigning responsibility for the total portfolio of resources.

The PCIA rates will be based on applicable costs from SDG&E's total portfolio of resources, including its forecasted ERRRA and CTC revenue requirements, as well as its authorized 2018 Non-Fuel Generation Balancing Account ("NGBA") revenue requirement and authorized 2018 DWR costs allocated to SDG&E. Although SDG&E proposes to update the currently effective PCIA rates in this Application, it will not be able to provide final PCIA rates until the 2018 NGBA and DWR revenue requirements (and certain market price information) become available, which is anticipated to be in the second half of 2018. Once the necessary information becomes available, SDG&E will update its proposed PCIA rates in the November Update.

In the proceeding involving SDG&E's 2017 Application (A.16-04-018), the Alliance for Retail Energy Markets ("AReM") and the Direct Access Customer Coalition ("DACC") took

¹² As noted in D.06-07-030, Direct Access load customers purchase electricity from an independent electric service provider and receive only distribution and transmission service from the utility, whereas bundled customers rely on the utility for all these services. Thus, distribution and transmission charges are "bundled" with a charge for the procurement of energy supplies. Departing Load generally refers to retail customers who were formerly IOU customers but now receive energy, transmission and distribution services from publicly owned utilities, self-generation, or other means. Municipal Departing Load refers to departing load served by municipal utilities and irrigation districts, for which a cost responsibility surcharge applies.

issue with SDG&E’s calculation of the PCIA charge for so-called pre-2009 vintage DA customers. SDG&E maintained that it appropriately calculated a PCIA charge for pre-2009 vintage DA customers. SDG&E and AReM/DACC briefed this issue. On November 1, 2016, Commissioner Florio issued an Amended Scoping Memo to create a second phase of A.16-04-018 to resolve that issue. In approving SDG&E’s 2017 Application, the Commission permitted SDG&E to implement the pre-2009 vintage PCIA rates, pending resolution of the second phase of that proceeding.¹³ In this Application, SDG&E proposes to follow that same approach.

E. SONGS Unit 1 Offsite Spent Fuel Storage Costs

SDG&E tracks the authorized revenue requirement in its Nuclear Decommissioning Adjustment Mechanism (“NDAM”) account. SDG&E is seeking authorization to recover these costs through the ERRA forecast application process, and it is thus seeking authorization of the forecast 2018 revenue requirement for SONGS Unit 1 Offsite Spent Fuel Costs in this Application, as it did in its 2017 and 2018 Applications.

F. GHG Costs and Allowance Revenues

Pursuant to the California Global Warming Solutions Act of 2006, Assembly Bill (“AB”) 32, the California Air Resources Board (“ARB”) designed a statewide GHG cap-and-trade program in which certain utilities are required to participate. The cap-and-trade program creates a cap on major sources of GHG emissions – including power plants, fuel suppliers and industrial facilities – to achieve GHG reduction goals.

Utilities incur costs both by purchasing allowances for their own compliance obligation under the cap-and-trade program and, indirectly, through GHG costs embedded in the wholesale price of electricity. These GHG costs are incorporated into the generation component of

¹³ D.16-12-053 at Ordering Paragraphs 3-5.

electricity rates through the ERRA process in the same manner as other procurement-related costs, and they result in a carbon price signal intended to incent an overall reduction in GHG emission. The state allocates GHG allowances to ratepayers with the utilities acting as an intermediary to hold and then sell the allowances for ratepayer benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that result from GHG compliance.

On December 28, 2012, the Commission issued D.12-12-033 in Rulemaking (“R.”) 11-03-012. In D.12-12-033, the Commission required utilities to file applications for approval of forecast GHG costs and revenues, including administrative and customer outreach expenses, sufficient to calculate the amount of GHG allowance revenue that should be returned to the different customer classes in 2014.¹⁴ While recognizing that ERRA forecast proceedings¹⁵ already examine the utilities’ forecast procurement costs for the purpose of ensuring recovery of costs associated with fuel and purchased power, the Commission required that GHG-related forecasts be filed separately so that it could take a “more comprehensive and detailed approach” to evaluating GHG costs and allowance revenues.¹⁶ The Commission directed the utilities to file these applications annually, with the forecasts to be included in the next year’s rates, and to

¹⁴ The Commission directed utilities to distribute GHG allowance revenues to customers using the following hierarchy: (1) emissions-intensive and trade-exposed (“EITE”) entities; (2) offset cap-and-trade program rate impacts for small business; (3) neutralize cap-and-trade program rate impacts for residential customers; and (4) semi-annual residential California Climate Credit. This hierarchy was recently revised in D.15-07-001 such that the revenue return allocated to residential customers now consists solely of the semi-annual California Climate Credit.

¹⁵ SDG&E included its initial (2013) GHG cost forecasts in its 2013 ERRA Forecast Application (A.12-10-002), but it ultimately requested to defer inclusion of GHG costs in rates and record the costs in a new GHG sub-balancing account until such time as the Commission finalized implementation of its GHG methodologies. The Commission approved this approach in D.13-10-053.

¹⁶ D.12-12-033 at 147.

include in the application a reconciliation¹⁷ of recorded costs and allowance revenues with forecasts from prior years. Further, the Commission directed the utilities to file an application setting forth their proposed customer outreach plans for 2014 and 2015.

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

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

The Commission issued its Phase 1 decision (D.13-12-041) on December 27, 2013. In that decision, the Commission authorized the utilities to incorporate GHG-related forecasts of costs and allowance revenues into 2014 rates. It also authorized the forecast amounts of the California Climate Credit to be returned to residential customers for the first time in 2014. Additionally, in D.13-12-041, the Commission ordered the utilities to true-up the 2013 forecasts against the 2013 actuals in connection with the filing of GHG Forecast Revenue and Reconciliation Applications later in 2014, and noted that this process would be repeated for 2014

¹⁷ This reconciliation refers to a true-up performed for the purpose of incorporating the revenue return (including California Climate Credit) into rates.

forecasts in 2015.¹⁸ In compliance with D.13-12-041, SDG&E filed its 2015 GHG Forecast Revenue and Reconciliation Application (A.14-04-018) concurrently with its 2015 ERRA Forecast Application (A.14-04-015) on April 15, 2014. SDG&E subsequently filed supplemental data on September 29, 2014; provided a fourth quarter update to this application on October 31, 2014; and submitted an amendment on January 16, 2015 to reflect updated information through the third quarter of 2014.

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

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

In accordance with D.14-10-033, SDG&E incorporated its 2016 GHG-related forecasts and proposals in its 2016 Application, and SDG&E updated the information in November 2015, as directed by that decision and to reflect changes to the structure of GHG allowance revenue return to residential customers authorized by the Commission in D.15-07-001 (Residential Rate

¹⁸ D.13-12-041 at 3, 7.

Reform) and to reflect the updated sales forecast pursuant to D.15-08-040 (2015 Rate Design Window). These GHG-related forecasts and proposals were approved in D.15-12-032. SDG&E followed the same approach in its 2017 Application, as approved in D.16-12-053.

As noted above, SDG&E is again incorporating its 2018 GHG-related forecasts and proposals in this Application, and it will further update the information in its forthcoming November Update. Attachment G to this Application contains the information that the Commission directed the utilities to use in D.14-10-033.

G. Proposed Rate Components for the Green Tariff and Enhanced Community Renewables Program

In 2013, California enacted the Green Tariff Shared Renewables Program, established in Senate Bill 43. That legislation intended to promote renewable energy by expanding access to renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation (*e.g.*, residential customers who could not install onsite solar panels). In D.15-01-051 – implementing Senate Bill 43 – the Commission required the three large California IOUs to establish the Green Tariff Shared Renewables Program. This program has two features administered by the utilities: (1) a Green Tariff component, which allows customers to purchase energy with a greater share of renewables; and (2) an Enhanced Community Renewables component, which allows customers to purchase renewable energy from community-based projects. In its decision, the Commission directed the utilities to procure renewable energy resources, subject to certain limitations. The Commission also made numerous determinations regarding rate design. SDG&E customers who elect into the Green Tariff Renewables program will pay a subset of SDG&E’s renewable energy procurement costs (which costs are in turn a subset of the total ERRRA costs), and SDG&E has thus developed 2018 forecasts of procurement

expenses under this program, as well as 2018 rate proposals for the various rate components of the Green Tariff Shared Renewables Program.

III. SUMMARY OF APPLICATION AND PREPARED TESTIMONY

In this Application,¹⁹ SDG&E identifies the forecast of its load, the resources available to meet the load, fuel costs, GHG costs, and costs for SDG&E's various energy resources for 2018. SDG&E used these forecasts to develop its 2018 forecast of its ERRA revenue requirement, CTC revenue requirement, and LG revenue requirement forecasts. SDG&E also forecasts the SONGS Unit 1 Offsite Spent Fuel Storage Costs revenue requirement. SDG&E seeks approval of each of these 2018 forecast revenue requirements.

In addition, SDG&E requests approval of its 2018 forecast of allowance revenues resulting from the consignment and sale of allowances in ARB's quarterly auctions. SDG&E has allocated the allowance revenues to various customer classes, and it seeks approval of these allocations. SDG&E further requests approval to recover the undercollection recorded to its LGBA.

Lastly, SDG&E requests approval of its proposed 2018 GHG Allowance Return rates; its proposal to update the currently-effective PCIA rates and to provide vintage 2018 PCIA rates; and its proposed 2018 Green Tariff Shared Renewables Program rate components.

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

¹⁹ SDG&E notes that Southern California Edison (SCE), on behalf of SDG&E and Pacific Gas and Electric Company (PG&E) served a petition for modification of R.02-01-011 to improve the transparency of the calculation underlying the PCIA on April 5, 2017. The effect of this PFM, if approved, would be standardization of common templates in future ERRA forecast proceedings.

A. Ms. Jennifer Montanez

Ms. Montanez's testimony describes the resources that SDG&E expects to use in 2018 to meet its forecast bundled customer load. Ms. Montanez then forecasts the procurement costs that SDG&E expects to record charges to the ERRA, TCBA, LGBA, as well as procurement costs related to the Green Tariff Shared Renewables program in 2018. In addition, Ms. Montanez provides a forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Ms. Montanez also presents SDG&E's forecast of 2018 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which (as noted below) Ms. Miller uses in her 2018 forecast of the ERRA revenue requirement. Lastly, Ms. Montanez provides a 2018 forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2018.

B. Ms. Sheri Miller

Ms. Miller's testimony describes the purpose of the ERRA, TCBA, and LGBA. Using cost information provided by Ms. Montanez, Ms. Miller then presents SDG&E's 2018 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; and (3) the LG revenue requirement. Ms. Miller also presents the sum of 2015 activity recorded to the LGBA that SDG&E seeks to recover in this Application. Additionally, Ms. Miller compares the 2016 year-end recorded balances with the 2016 year-end actual balances in the GHG balancing accounts used for GHG expenses (GHG Customer Outreach and Education Memorandum Account and GHG Administrative Costs Memorandum Account) and GHG allowance revenues (GHG Revenue Balancing Account). Ms. Miller's testimony also discusses the activity in the Green Tariff Shared Renewables balancing account. Finally, Ms. Miller presents SDG&E's 2018 forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement.

C. Ms. Cynthia Fang

Ms. Fang's testimony presents the rate and bill impacts associated with the cost recovery of SDG&E's 2018 forecast of its (1) ERRRA revenue requirement; (2) CTC revenue requirement; (3) LG revenue requirement; (4) SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement; (5) GHG allowance revenue return, and (6) the sum of the activity in the LGBA. Ms. Fang also proposes the 2018 PCIA component of the cost responsibility surcharge applicable to departing load customers. Further, Ms. Fang presents the methodology for the GHG allowance revenue returns, which involves identifying and supporting the 2018 forecast GHG allowance revenue return allocation amounts (including the California Climate Credit) in Templates D-1 and D-4 of Attachment G to this Application. Lastly, Ms. Fang proposes the 2018 rate components associated with the Green Tariff Shared Renewables program.

D. Mr. Rick Janke

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

E. Ms. Ana Garza-Beutz

Ms. Garza-Beutz's testimony presents SDG&E's 2016 costs for GHG compliance instruments used to satisfy obligations under the ARB's cap-and-trade program. Additionally, Ms. Garza-Beutz provides the 2016 revenues. Ms. Garza-Beutz's testimony also describes the cap-and-trade program and details the methodology behind SDG&E's calculation of its unadjusted 2016 actual revenues and estimated costs. These costs and revenues are adjusted to

recorded numbers by Ms. Chihwaro for the purposes of the reconciliation performed by Ms. Fang.

F. Ms. Monica Chihwaro

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

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

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

1. Rule 2.1 (a) - Legal Name

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

2. Rule 2.1 (b) Correspondence

Correspondence or communications regarding this Application should be addressed to:

Kellen C. Gill
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, California 92123
Telephone: (619) 696-2972
Fax: (858) 654-1788
KGill@semprautilities.com

with copies to:

Christopher M. Lyons
San Diego Gas & Electric Company
8330 Century Park Court, #CP32D
San Diego, CA 92123
Telephone: (858) 654-1559
Fax: (619) 699-5027
clyons@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 forecasted revenue requirements described in this Application from its ratepayers, and the costs will thus influence SDG&E's rates.

b. Need for Hearings

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

c. Issues to be Considered

The issues to be considered are described in this Application and the accompanying testimony and exhibits. SDG&E does not believe there are any issues related to safety considerations that need to be considered in this Application.

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
Application filed	April 14, 2017
Approx. End of Response Period (including Applicant Reply)	May 30, 2017
Prehearing Conference	June 12, 2017
ORA and Intervener Testimony	July 12, 2017
Rebuttal Testimony	August 4, 2017
Evidentiary Hearings (if needed)	August 23-25, 2017
Concurrent Opening Briefs	September 15, 2017
Concurrent Reply Briefs	October 6, 2017
SDG&E November Update	November 7, 2017
ORA/Intervenor Comments on November Update	November 10, 2017
SDG&E Reply Comments on November Update	November 14, 2017
Proposed Decision	November 28, 2017
Comments on Proposed Decision	December 4, 2017
Reply Comments on Proposed Decision	December 7, 2017
Commission Decision	December 14, 2017

B. Rule 2.2 – Articles of Incorporation

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014 in connection with SDG&E Application 14-09-008, and is incorporated herein by reference.

C. Rule 3.2 – Authority to Change Rates

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.²⁰

1. Rule 3.2 (a) (1) – Balance Sheet

SDG&E’s financial statement, balance sheet and income statement for the nine-month period ending September 30, 2016 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 on SDG&E’s website. Attachment B to this Application provides the current table of contents from SDG&E’s electric tariffs on file with the Commission.

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

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

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

SDG&E is in the business of generating, transmitting and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange and Imperial Counties. This includes a composite 92% ownership in the 500 kV Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500 kV Sunrise Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of the Moreno gas compressor station in Riverside County and

²⁰ Note Rule 3.2(a) (9) is not applicable to SDG&E.

the Rainbow compressor station located in San Diego County. The gas is transmitted through high and low-pressure distribution mains and service lines.

Applicant's original cost of utility plant, together with the related reserves for depreciation and amortization nine-month period ending September 30, 2016, is shown on the Statement of Original Cost and Depreciation Reserves included in Attachment D.

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

A summary of SDG&E's earnings (for the total utility operations for the company) for nine-month period ending September 30, 2016, is included as Attachment E to this Application.

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

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, "flow through accounting" has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

7. Rule 3.2 (a) (8) – Proxy Statement

A copy of the most recent proxy statement sent to all shareholders of SDG&E's parent company, Sempra Energy, dated March 24, 2017, was mailed to the Commission on April 10, 2017, and is incorporated herein by reference.

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

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

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

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

10. Rule 3.2 (c) – Newspaper Publication

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

11. Rule 3.2 (d) – Bill Insert Notice

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

V. CONFIDENTIAL INFORMATION

SDG&E is submitting the testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E's declarations of confidential treatment attached to each of the witnesses' testimonies and submitted in conformance with D.06-06-066 and D.08-04-023. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E's electric procurement resources and strategies) that SDG&E witnesses must identify to support SDG&E's revenue requirements forecasts for 2018. SDG&E is contemporaneously filing a motion for leave to file this confidential information under seal.

VI. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, testimony and related exhibits on parties to the service list for its 2017 Application (A.16-04-018). Hard copies will be sent via FedEx to Chief ALJ Karen Clopton and ALJ Gerald F. Kelly.

VII. CONCLUSION AND SUMMARY OF RELIEF REQUESTED

WHEREFORE, San Diego Gas & Electric Company requests that the Commission:

(1) grant authority to change rates by approving as reasonable SDG&E's 2018 forecast of its ERRA revenue requirement pertaining to SDG&E's load, the resources available to meet SDG&E's load, and various input assumptions regarding fuel costs, GHG costs, and costs for SDG&E's various electric resources;

(2) grant authority to increase rates by approving as reasonable SDG&E's 2018 forecast of its CTC revenue requirement;

(3) grant authority to increase rates by approving as reasonable SDG&E's 2018 forecast of its LG revenue requirement;

(4) grant authority to increase rates by approving as reasonable SDG&E's 2018 forecast of its SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement;

(5) approve SDG&E's 2018 forecast of its GHG allowance revenues;

(6) approve SDG&E's 2018 forecast for its GHG administration, customer education and outreach activities;

(7) adopt SDG&E's 2018 forecast of its GHG allowance revenue return allocations, including reconciliation adjustments, for EITE, small businesses, and residential California Climate Credit; and

(8) grant authority to increase rates by approving the collection in rates of the outstanding balances in SDG&E's LGBA;

(9) adopt SDG&E's proposed vintage PCIA rates, as will be provided in SDG&E's forthcoming November Update to this Application;

(10) adopt SDG&E's proposed 2018 rate components for the Green Tariff Shared Renewables Program; and


(11) grant such additional relief as the Commission believes is just and reasonable. SDG&E is ready to proceed with its showing in this Application.

Respectfully submitted,

By: /s/ Christopher M. Lyons
Christopher M. Lyons
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8330 Century Park Court, #CP32D
San Diego, CA 92123
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Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

By: 
Emily C. Shults
San Diego Gas & Electric Company
Vice President –Energy Procurement

DATED at San Diego, California, this 14th day of April 2017

OFFICER VERIFICATION

OFFICER VERIFICATION

Emily C. Shults declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF ITS 2018 ELECTRIC PROCUREMENT REVENUE REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on April 14, 2017 at San Diego, California.



Emily C. Shults
San Diego Gas & Electric Company
Vice President – Energy Procurement

ATTACHMENT A

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

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
September 30, 2016

	1. UTILITY PLANT	<u>2016</u>
101	UTILITY PLANT IN SERVICE	\$15,207,919,704
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	11,307,728
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	971,631,842
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,813,786,126)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(618,159,664)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,187,728)
118	OTHER UTILITY PLANT	1,085,541,058
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(264,789,245)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	<u>11,667,422,291</u>
	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	5,946,616
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(364,300)
158	NON-CURRENT PORTION OF ALLOWANCES	183,299,834
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,067,734,851
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	<u>89,061,624</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>1,345,678,625</u>

Data from SPL as of Dec 21, 2016

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
September 30, 2016

3. CURRENT AND ACCRUED ASSETS		2016
131	CASH	3,225,697
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	291,510,593
143	OTHER ACCOUNTS RECEIVABLE	17,281,917
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,867,475)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	107,624,758
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	666,036
151	FUEL STOCK	693,732
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	107,137,915
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	202,233,571
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(183,299,834)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	245,036
165	PREPAYMENTS	163,737,656
171	INTEREST AND DIVIDENDS RECEIVABLE	713,396
173	ACCRUED UTILITY REVENUES	70,730,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	5,230,284
175	DERIVATIVE INSTRUMENT ASSETS	111,852,857
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(89,061,624)
	TOTAL CURRENT AND ACCRUED ASSETS	806,655,015
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	33,259,838
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,271,977,857
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	174,137
184	CLEARING ACCOUNTS	1,810,748
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	25,469,365
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	12,805,692
190	ACCUMULATED DEFERRED INCOME TAXES	276,823,237
	TOTAL DEFERRED DEBITS	3,622,320,874
	TOTAL ASSETS AND OTHER DEBITS	17,442,076,805

Data from SPL as of Dec 21, 2016

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
September 30, 2016

5. PROPRIETARY CAPITAL

		2016
201	COMMON STOCK ISSUED	(\$291,458,395)
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	(591,282,978)
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	(479,665,368)
214	CAPITAL STOCK EXPENSE	24,605,640
216	UNAPPROPRIATED RETAINED EARNINGS	(4,159,610,448)
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	7,454,042
	TOTAL PROPRIETARY CAPITAL	(5,489,957,507)

6. LONG-TERM DEBT

221	BONDS	(4,348,934,000)
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	(53,652,271)
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	10,844,745
	TOTAL LONG-TERM DEBT	(4,391,741,526)

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(599,278,895)
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(27,487,869)
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(231,535,407)
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	(189,242,492)
230	ASSET RETIREMENT OBLIGATIONS	(830,185,747)
	TOTAL OTHER NONCURRENT LIABILITIES	(1,877,730,410)

Data from SPL as of Dec 21, 2016

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
September 30, 2016

8. CURRENT AND ACCRUED LIABILITES		2016
231	NOTES PAYABLE	0
232	ACCOUNTS PAYABLE	(458,932,832)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(30,369,955)
235	CUSTOMER DEPOSITS	(71,096,853)
236	TAXES ACCRUED	(31,114,618)
237	INTEREST ACCRUED	(51,875,190)
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	(4,345,924)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(158,209,952)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(42,637,444)
244	DERIVATIVE INSTRUMENT LIABILITIES	(235,052,849)
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	189,242,492
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	(894,393,125)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(58,572,012)
253	OTHER DEFERRED CREDITS	(396,625,895)
254	OTHER REGULATORY LIABILITIES	(1,432,723,743)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(21,296,716)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(2,140,209,421)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(738,826,450)
	TOTAL DEFERRED CREDITS	(4,788,254,237)
	TOTAL LIABILITIES AND OTHER CREDITS	(\$17,442,076,805)
		(\$4,788,254,237)

Data from SPL as of Dec 21, 2016

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Nine Months Ended September 30, 2016

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$3,516,532,527
401	OPERATING EXPENSES	\$2,138,908,385	
402	MAINTENANCE EXPENSES	112,553,955	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	452,335,935	
408.1	TAXES OTHER THAN INCOME TAXES	96,977,236	
409.1	INCOME TAXES	106,317,455	
410.1	PROVISION FOR DEFERRED INCOME TAXES	221,561,581	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(130,819,978)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	2,567,785	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		3,000,402,354
	NET OPERATING INCOME		516,130,173

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	10,231	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	25,243	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	4,792,144	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	35,256,954	
421	MISCELLANEOUS NONOPERATING INCOME	2,462,421	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	42,546,993	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	3,503,544	
	TOTAL OTHER INCOME DEDUCTIONS	3,691,080	
408.2	TAXES OTHER THAN INCOME TAXES	479,073	
409.2	INCOME TAXES	(272,297)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	5,805,031	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(1,535,703)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	4,476,104	
	TOTAL OTHER INCOME AND DEDUCTIONS		34,379,809
	INCOME BEFORE INTEREST CHARGES		550,509,982
	EXTRAORDINARY ITEMS AFTER TAXES		0
	NET INTEREST CHARGES*		131,467,842
	NET INCOME		\$419,042,140

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$11,633,689)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Nine Months Ended September 30, 2016

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,915,568,308
NET INCOME (FROM PRECEDING PAGE)	419,042,140
DIVIDEND TO PARENT COMPANY	(175,000,000)
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$4,159,610,448</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
Sep 30, 2016

(a) Amounts and Kinds of Stock Authorized:				
Common Stock		255,000,000	shares	Without Par Value
Amounts and Kinds of Stock Outstanding:				
Common Stock		116,583,358	shares	291,458,395

(b) Brief Description of Mortgage:

Full information as to this item is given in Application Nos. 93-09-069,04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, and 15-08-011 to which references are hereby made.

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

	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2015
First Mortgage Bonds:				
Var% Series OO, due 2027	12-01-92	0	0	7,002,188
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,938
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	3,000,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	2,650,187
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
.4677% Series OOO, due 2017	03-12-15	140,000,000	140,000,000	522,662
1.9140% Series PPP, due 2022	03-12-15	64,095,275	64,095,275	1,847,542
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	-
Total 1st. Mortgage Bonds:			4,216,600,275	170,265,647
<hr/>				
1.050% Commercial Paper	11-19-15	53,650,000	53,650,000	18,777
<hr/>				
TOTAL LONG-TERM DEBT			4,270,250,275	

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
Sep 30, 2016

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2016
Commercial Paper & ST Bank	Various	Various	Various	-	\$212,386

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

Preferred Stock	Shares Outstanding 12-31-14					
		2012	2013	2014	2015	2016
5.00%	-	\$375,000	\$281,250	-	-	-
4.50%	-	270,000	202,500	-	-	-
4.40%	-	286,000	214,500	-	-	-
4.60%	-	343,868	257,901	-	-	-
1.70%	-	2,380,000	1,785,000	-	-	-
1.82%	-	1,164,800	873,600	-	-	-
Total	-	\$4,819,668	\$3,614,751	-	-	-

Common Stock	2012	2013	2014	2015	2016
[1]	-	-	\$200,000,000	300,000,000	175,000,000

NOTE 11 PREFERRED STOCK 10K:

On October 15, 2013, SDG&E redeemed all six series of its outstanding shares of contingently redeemable preferred stock for \$82 million, including a \$3 million early call premium (pg 9.1).

A balance sheet and a statement of income and retained earnings of applicant for the nine months ended Sep 30, 2016 are attached hereto.

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

ATTACHMENT B

STATEMENT OF PRESENT 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. 2985-E-A

Decision No. 16-06-029

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Date Filed Mar 14, 2017

Effective Mar 17, 2017

Resolution No. _____



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Issued by

Date Filed

Nov 16, 2016

Advice Ltr. No. 2954-E-A

Dan Skopec

Effective

Dec 16, 2016

Decision No. _____

Vice President
Regulatory Affairs

Resolution No. _____

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ATTACHMENT C

STATEMENT OF PROPOSED RATES

ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

The charts shown below illustrate the changes in rates that would result from CPUC approval of this application, compared to current rate levels.

If the CPUC approves SDG&E's application, a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours per month could see a monthly winter bill increase of 0.9%, or \$1.16, from a typical current monthly bill of \$122.40 to \$123.56.

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

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

Customer Class	Class Average Rates Effective 03/01/17 ³ (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Increase Per application (¢/kWh)	Total Rate Increase (¢/kWh)	Percentage Rate Increase (%)
Residential	24.990	25.175	0.185	0.74%
Small Commercial	23.928	24.132	0.204	0.85%
Medium and Large C&I ⁴	19.850	20.009	0.159	0.80%
Agricultural	17.735	17.727	(0.008)	-0.05%
Lighting	19.917	20.114	0.197	0.99%
System Total	22.122	22.293	0.171	0.77%

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

² Commodity rates include DWR Power Charge credit.

³ Rates effective 3/1/17 per Advice Letter (AL) 3034-E/E-A.

⁴ C&I stands for Commercial and Industrial.

SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC UDC¹ RATE INCREASE

Customer Class	Class Average Rates Effective 03/01/17 ² (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Increase Per application (¢/kWh)	Total Rate Increase (¢/kWh)	Percentage Rate Increase (%)
Residential	14.302	14.857	0.555	3.88%
Small Commercial	13.495	14.034	0.539	3.99%
Medium and Large C&I ³	9.378	9.893	0.515	5.49%
Agricultural	8.992	9.286	0.294	3.27%
Lighting	12.862	13.304	0.442	3.44%
System Total	11.612	12.140	0.528	4.55%

¹ UDC rates include DWR Bond Charge.

² Rates effective 3/1/17 per AL 3034-E/E-A.

³ C&I stands for Commercial and Industrial.

ATTACHMENT D

COST OF PROPERTY AND DEPRECIATION RESERVE

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF SEPTEMBER 30, 2016

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	151,497,281.44	76,910,726.58
	TOTAL INTANGIBLE PLANT	151,720,122.80	77,113,626.88
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	95,407,714.47	42,036,800.17
312	Boiler Plant Equipment	166,576,622.04	71,369,682.34
314	Turbogenerator Units	138,276,234.03	48,371,852.67
315	Accessory Electric Equipment	85,716,403.89	34,996,227.99
316	Miscellaneous Power Plant Equipment	45,813,287.16	10,528,037.57
	Steam Production Decommissioning	0.00	0.00
	TOTAL STEAM PRODUCTION	546,316,779.88	207,349,119.03
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	8,868,527.59	2,658,162.87
322	Boiler Plant Equipment	223,650,959.30	21,662,290.99
323	Turbogenerator Units	26,982,364.66	2,370,893.39
324	Accessory Electric Equipment	10,877,777.76	1,458,232.53
325	Miscellaneous Power Plant Equipment	147,107,682.44	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	(417,487,311.75)	(76,957,383.29)
	TOTAL NUCLEAR PRODUCTION	0.00	0.00
340.1	Land	143,475.87	0.00
340.2	Land Rights	56,032.61	8,602.03
341	Structures and Improvements	22,703,423.92	6,962,378.61
342	Fuel Holders, Producers & Accessories	20,348,101.38	6,407,589.43
343	Prime Movers	87,218,053.23	33,265,038.10
344	Generators	343,011,248.58	130,485,405.08
345	Accessory Electric Equipment	32,506,374.56	12,251,605.77
346	Miscellaneous Power Plant Equipment	26,173,720.53	12,941,520.87
	TOTAL OTHER PRODUCTION	532,160,430.68	202,322,139.89
	TOTAL ELECTRIC PRODUCTION	1,078,477,210.56	409,671,258.92

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	66,531,300.86	0.00
350.2	Land Rights	155,345,383.03	19,955,301.81
352	Structures and Improvements	471,888,846.40	62,275,772.20
353	Station Equipment	1,385,119,627.62	259,363,669.30
354	Towers and Fixtures	895,788,350.41	155,140,329.22
355	Poles and Fixtures	452,300,668.48	90,120,532.80
356	Overhead Conductors and Devices	567,859,848.13	218,871,206.59
357	Underground Conduit	353,823,165.06	51,239,071.02
358	Underground Conductors and Devices	371,981,185.11	50,774,660.39
359	Roads and Trails	310,040,707.89	26,996,004.83
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	TOTAL TRANSMISSION	5,030,679,082.99	934,736,548.16
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	84,691,802.80	40,225,024.47
361	Structures and Improvements	4,082,530.20	1,802,486.28
362	Station Equipment	497,367,748.34	161,021,131.55
363	Storage Battery Equipment	38,262,102.18	5,716,135.82
364	Poles, Towers and Fixtures	663,481,765.82	263,601,476.38
365	Overhead Conductors and Devices	605,133,333.91	203,383,280.37
366	Underground Conduit	1,165,407,965.21	457,149,232.15
367	Underground Conductors and Devices	1,463,008,396.38	876,459,913.30
368.1	Line Transformers	588,041,021.42	134,682,439.30
368.2	Protective Devices and Capacitors	37,338,350.61	1,504,617.68
369.1	Services Overhead	144,352,314.28	120,439,566.04
369.2	Services Underground	340,113,496.50	239,571,414.99
370.1	Meters	192,531,745.82	74,493,798.59
370.2	Meter Installations	55,594,647.25	19,438,922.80
371	Installations on Customers' Premises	8,443,273.72	10,391,230.75
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	29,006,791.56	18,667,458.97
	TOTAL DISTRIBUTION PLANT	5,933,033,513.80	2,628,548,129.44
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	33,374,220.91	24,021,583.04
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	12,899.80
393	Stores Equipment	8,545.97	8,293.21
394.1	Portable Tools	24,742,917.67	8,401,335.51
394.2	Shop Equipment	341,135.67	251,293.60
395	Laboratory Equipment	5,152,106.01	409,899.19
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	266,347,749.23	100,224,791.72
398	Miscellaneous Equipment	5,781,694.61	912,712.52
	TOTAL GENERAL PLANT	343,179,187.21	134,410,194.47
101	TOTAL ELECTRIC PLANT	12,537,089,117.36	4,184,479,757.87

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,242,164.87	1,053,802.03
	TOTAL STORAGE PLANT	2,242,164.87	1,053,802.03
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,377,955.55
366	Structures and Improvements	15,181,057.58	9,953,684.86
367	Mains	222,335,086.03	73,755,335.96
368	Compressor Station Equipment	85,295,170.69	68,327,978.95
369	Measuring and Regulating Equipment	20,964,862.90	16,616,087.65
371	Other Equipment	117,058.52	2,799.57
	TOTAL TRANSMISSION PLANT	350,774,671.27	170,033,842.54
374.1	Land	102,187.24	0.00
374.2	Land Rights	8,311,050.46	6,850,716.04
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	781,868,494.99	364,616,145.66
378	Measuring & Regulating Station Equipment	18,055,275.18	7,936,503.03
380	Distribution Services	263,967,498.41	295,819,545.31
381	Meters and Regulators	156,137,040.56	52,991,938.75
382	Meter and Regulator Installations	94,943,092.67	38,264,534.32
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,192,265.42
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	5,223,271.51	4,948,553.11
	TOTAL DISTRIBUTION PLANT	1,330,168,168.63	772,681,454.74

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	74,500.55	74,500.68
394.1	Portable Tools	9,141,612.73	3,959,162.67
394.2	Shop Equipment	76,864.06	51,199.27
395	Laboratory Equipment	283,093.66	274,940.51
396	Power Operated Equipment	16,162.40	7,225.95
397	Communication Equipment	2,704,837.27	1,037,572.93
398	Miscellaneous Equipment	473,380.31	64,338.14
	TOTAL GENERAL PLANT	<u>12,770,450.98</u>	<u>5,494,443.15</u>
101	TOTAL GAS PLANT	<u>1,696,041,559.95</u>	<u>949,349,646.66</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	385,936,907.96	240,931,294.41
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,168,914.56	0.00
389.2	Land Rights	1,080,961.15	27,776.34
390	Structures and Improvements	346,847,731.11	146,150,039.23
391.1	Office Furniture and Equipment - Other	32,001,802.93	14,515,792.45
391.2	Office Furniture and Equipment - Computer E	49,714,206.29	28,703,180.78
392.1	Transportation Equipment - Autos	408,259.35	(338,930.17)
392.2	Transportation Equipment - Trailers	12,195.98	4,882.65
393	Stores Equipment	58,941.18	45,308.91
394.1	Portable Tools	1,232,026.51	354,029.69
394.2	Shop Equipment	191,385.80	120,840.69
394.3	Garage Equipment	1,560,326.28	193,362.05
395	Laboratory Equipment	2,095,455.34	959,645.22
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	188,487,014.40	71,976,054.03
398	Miscellaneous Equipment	2,441,440.75	438,266.81
118.1	TOTAL COMMON PLANT	<u>1,019,237,569.59</u>	<u>503,888,563.99</u>
	TOTAL ELECTRIC PLANT	12,537,089,117.36	4,184,479,757.87
	TOTAL GAS PLANT	1,696,041,559.95	949,349,646.66
	TOTAL COMMON PLANT	<u>1,019,237,569.59</u>	<u>503,888,563.99</u>
			<u>4,184,479,757.87</u>
101 & 118.1	TOTAL	<u>15,252,368,246.90</u>	<u>5,637,717,968.52</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-ASSETS HELD FOR SALE		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,627,745.96)	(1,627,745.96)
		<u>(1,627,745.96)</u>	<u>(1,627,745.96)</u>
101	Accrual for Retirements		
	Electric	(4,945,448.07)	(4,945,448.07)
	Gas	(321,418.44)	(321,418.44)
		<u>(5,266,866.51)</u>	<u>(5,266,866.51)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE		
		<u>(5,266,866.51)</u>	<u>(5,266,866.51)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
104	Electric	85,194,000.02	13,551,803.70
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>13,551,803.70</u>
	TOTAL PLANT LEASED TO OTHERS		
		<u>85,194,000.02</u>	<u>13,551,803.70</u>
105	Plant Held for Future Use		
	Electric	11,307,727.50	0.00
	Gas	0.00	0.00
		<u>11,307,727.50</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE		
		<u>11,307,727.50</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	734,092,930.18	
	Gas	237,538,912.28	
	Common	62,850,082.68	
		<u>1,034,481,925.14</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS		
		<u>1,034,481,925.14</u>	<u>0.00</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	1,066,826,142.09
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,066,826,142.09
101.1	ELECTRIC CAPITAL LEASES	852,823,281.00	211,348,459.00
118.1	COMMON CAPITAL LEASE	20,629,802.04	20,188,285.23
		873,453,083.04	231,536,744.23
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	(62,963,775.37)	(40,861,208.00)
143	FAS 143 ASSETS - Legal Obligation	1,379,851.00	(1,063,102,174.89)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	89,304,473.36	32,338,149.81
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,453,723,157.35)
	TOTAL FAS 143	90,684,324.36	(2,484,487,182.43)
	UTILITY PLANT TOTAL	17,340,594,694.49	4,458,250,863.64

ATTACHMENT E
SUMMARY OF EARNINGS

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
Nine Months Ended September 30, 2016
(DOLLARS IN MILLIONS)

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,516
2	Operating Expenses	<u>3,000</u>
3	Net Operating Income	<u><u>\$516</u></u>
4	Weighted Average Rate Base	\$7,859
5	Rate of Return*	7.79%

*Authorized Cost of Capital

ATTACHMENT F

GOVERNMENTAL ENTITIES RECEIVING NOTICE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Department of U.S. Administration
General Services Administration
300 N. Los Angeles St. #3108
Los Angeles, CA 90012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of San Diego
Attn. City Attorney
1200 Third Ave.
Suite 1620
San Diego, CA 92101

City of San Diego
Attn. City Clerk
202 C Street, 2nd Floor
San Diego, CA 92101

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

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

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

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

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

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

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

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

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

City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656

ATTACHMENT G

GHG REVENUE AND RECONCILIATION FORM

GHG Revenue and Reconciliation Application Form

Notes:

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

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

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

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

Line Description	2013		2014		2015		2016		2017		2018	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded	Forecast	Recorded	Forecast	Recorded ²	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A	12.09	N/A	13.13	N/A	13.23	N/A	14.06	N/A
2 Allocated Allowances (MT)	6,919,341	6,919,341	6,549,142	6,549,142	6,426,430	6,426,430	6,406,805	6,406,805	6,460,042	-	6,288,321	-
3 Revenues												
4 Prior Balance	N/A	N/A	(\$102,074,500)	(\$82,503,131)	(\$19,755,324)	(\$18,393,131)	\$31,586,221	\$31,892,368	\$3,775,309	\$4,334,942	\$559,633	\$0
5 Allowance Revenue	(\$103,302,000)	(\$82,453,505)	(\$94,570,000)	(\$76,756,698)	(\$77,695,500)	(\$79,929,224)	(\$84,121,350)	(\$81,558,628)	(\$85,466,355)	(\$85,466,355)	(\$88,413,793)	\$0
6 Interest	\$0	(\$49,626)	(\$28,773)	(\$47,002)	(\$76,463)	\$24,203	\$24,796	\$151,893	\$96,857	\$96,857	\$25,896	\$0
7 Franchise Fees and Uncollectibles	\$0	\$0	(\$1,771,359)	(\$1,706,341)	(\$1,190,048)	(\$1,581,513)	(\$1,026,495)	(\$661,789)	(\$1,013,589)	(\$1,013,589)	(\$1,055,077)	\$0
8 Subtotal Revenues	(\$103,302,000)	(\$82,503,131)	(\$198,444,632)	(\$161,013,172)	(\$98,717,335)	(\$99,879,665)	(\$53,536,828)	(\$50,176,155)	(\$82,607,777)	(\$82,048,145)	(\$88,883,341)	\$0
9 Expenses												
10 Outreach and Administrative Expenses ³	\$1,227,500	\$0	\$187,500	\$801,369	\$334,835	\$334,989	\$80,036	\$80,994	(\$2,063)	(\$2,063)	\$187,500	\$0
11 Franchise Fees and Uncollectibles	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12 Interest	\$0	\$0	\$0	(\$119)	\$0	(\$154)	\$0	(\$958)	\$0	\$0	\$0	\$0
13 Subtotal Expenses	\$1,227,500	\$0	\$187,500	\$801,250	\$334,835	\$334,835	\$80,036	\$80,036	(\$2,063)	(\$2,063)	\$187,500	\$0
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ⁴	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,281,995	\$1,281,995	\$1,326,216	\$0
15 Net GHG Revenues (Line 8 + Line 13 + Line 14)	(\$102,074,500)	(\$82,503,131)	(\$198,257,132)	(\$160,211,922)	(\$98,382,500)	(\$99,544,830)	(\$53,456,792)	(\$50,096,119)	(\$81,327,845)	(\$80,768,213)	(\$87,369,625)	\$0
16 GHG Revenues to be Distributed in Future Years	\$0	\$0	\$51,037,250	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(\$102,074,500)	(\$82,503,131)	(\$147,219,882)	(\$160,211,922)	(\$98,382,500)	(\$99,544,830)	(\$53,456,792)	(\$50,096,119)	(\$81,327,845)	(\$80,768,213)	(\$87,369,625)	\$0
18 GHG Revenue Returned to Eligible Customers												
19 EITE Customer Return ^{5,6,7}	\$0	\$0	\$1,583,553	\$0	\$1,384,559	\$0	\$4,238,010	\$2,599,416	\$760,200	\$760,200	\$714,613	\$0
20 Small Business Volumetric Return	\$0	\$0	\$10,982,219	\$11,533,823	\$6,954,493	\$13,247,750	\$3,648,498	\$4,062,057	\$2,701,990	\$2,701,990	\$3,904,666	\$0
21 Residential Volumetric Return	\$0	\$0	\$45,915,031	\$35,582,852	\$31,314,308	\$39,050,655	\$0	\$1,767,675	\$0	\$0	\$0	\$0
22 Subtotal EITE + Volumetric Returns	\$0	\$0	\$58,480,803	\$47,116,675	\$39,653,361	\$52,298,405	\$7,886,508	\$8,429,148	\$3,462,190	\$3,462,190	\$4,619,279	\$0
23 Number of Households Eligible for the California Climate Credit	-	-	1,224,253	1,306,520	1,224,251	1,313,989	1,306,630	1,319,006	1,314,398	1,314,398	1,325,052	-
24 Per-Household Semi-Annual Climate Credit ⁸ (-0.5 x (Line 17 + 22) ÷ Line 23)	\$0.00	\$0.00	\$36.24	\$36.24	\$23.99	\$23.99	\$17.44	\$17.44	\$29.62	\$29.62	\$31.23	\$0.00
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	\$0	\$0	\$88,739,079	\$94,702,116	\$58,729,139	\$79,138,793	\$45,570,284	46,001,913	\$77,865,656	\$77,865,656	\$82,750,346	\$0
26 Revenue Balance (Line 15 + Line 22 + Line 25)	N/A	(\$82,503,131)	N/A	(\$18,393,131)	N/A	\$31,892,368	N/A	\$4,334,942	N/A	\$559,633	N/A	\$0

¹ Includes 50% of 2013 allowance revenues and expenses.

² Recorded data is equal to forecast and will be updated with the November update.

³ Forecasted Outreach & Administrative Expenses are the forecasted expenses (from Template D-3) adjusted for any forecasted prior year's under/over-collection in the GHGCOEMA and GHGACMA.

⁴ The 2017 forecasted column includes the Multifamily Program set aside consistent with the March 18, 2016 Administrative Law Judge ruling in the Development of a Successor to Net Energy Metering proceeding (Rulemaking 14-07-002).

⁵ SDG&E's forecasted 2016 EITE Customer Return represents Prior Year EITE Customer Return of \$2,968,113 to be distributed in 2016, as well as the 2016 forecasted EITE Customer Return of \$1,269,897.

⁶ In accordance with the methodology approved in D. 15-01-024, the EITE Customer Return forecast for 2017 includes: a) 2016 EITE return, b) the 8-1-16 FF&U factor applied to the 2016 EITE return, and c) the 9-1-13 FF&U for EITE returns from 2013 to 2016.

⁷ In accordance with D.15-01-024, the 2018 EITE Customer Return forecast includes the 2016 revenue returned to EITE customers and will be updated with the November update.

⁸ Due to timing in receiving approval of D.15-03-019, the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household. The October residential CCC was based on the authorized 2015 residential CCC of \$23.99 per household.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016		2017		2018	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO₂e)												
2	Utility Owned Generation (UOG)												
3	Tolling Agreements												
4	Energy Imports (Specified)												
5	Energy imports (Unspecified)												
6	RPS Adjustment												
7	Qualifying Facility (QF) Contracts												
	Contract with Financial Settlement												
8	Subtotal												
9	Indirect GHG Emissions (MTCO₂e)												
10	CAISO Market Purchases												
11	Contract Purchases												
12	Subtotal												
13	Total Emissions (MTCO₂e)	5,596,398	5,678,547	5,473,713	5,590,681	4,811,519	5,013,983	4,203,567	3,225,440	4,243,313	4,243,313	4,190,238	-
14	Proxy GHG Price (\$/MT)	\$17.35	\$13.57	\$14.44	\$12.04	\$12.09	\$12.79	\$13.13	\$12.84	\$13.23	\$13.23	\$14.06	\$0.00
15	GHG Costs (\$)												
16	Direct GHG Costs ¹												
17	Direct GHG Costs - Financial Settlement												
18	Indirect GHG Costs												
19	Previous Year's Forecast Reconciliation ²	N/A	N/A	\$0	\$0	(\$25,881,702)	(\$35,475,620)	(\$7,345,192)	(\$16,295,922)	(\$24,658,736)	(\$24,658,736)	\$0	\$0
20	Total Costs (\$)	\$89,750,005	\$61,221,829	\$61,715,000	\$64,361,474	\$32,289,561	\$24,944,369	\$47,858,988	\$23,200,252	\$31,480,301	\$31,480,301	\$58,914,746	\$0
21	Forecast Variance³ (\$)	N/A	(\$28,528,177)	N/A	\$2,646,474	N/A	(\$7,345,192)	N/A	(\$24,658,736)	N/A	\$0	N/A	(\$58,914,746)

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

²The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition, due to updates to recorded 2013 and 2014 amounts, this figure has been updated.

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

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016		2017		2018	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded
1 Utility Outreach												
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-	-	-
3 Other (Consultant) ^{2,5}	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-	-	-
5 Utility Administrative												
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	30,912	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	-	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	35,000	51,342	35,000	25,512	35,000	35,000	35,000	35,000
10 Other ⁴	-	N/A	12,500	12,500	12,500	-	12,500	-	12,500	12,500	12,500	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	56,424	47,500	47,500	35,000	-
12 Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	88,683	47,500	56,424	47,500	47,500	35,000	-
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000	-	140,000	-	140,000	140,000	140,000	-
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	88,683	187,500	56,424	187,500	187,500	175,000	-

¹ Recorded data is equal to forecast and will be updated with the November update.

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

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

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

⁵ Bill inserts and emails costs of \$19,540 booked to GHGCOEMA in April/May/December 2014 were transferred to GHGACMA in October 2015.

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Status (Open/Closed) (B)	Bundled Customers				Unbundled Customers				Total
		Forecast MWh Sales (MWh) (C)	Forecast GHG Revenue Req (\$) ¹ (D)	Rate Impact (\$/kWh) ² (E)	Forecast GHG Revenue (\$) (F)	Forecast MWh Sales (MWh) (G)	Forecast GHG Revenue Req (\$) ¹ (H)	Rate Impact (\$/kWh) ² (I)	Forecast GHG Revenue (\$) (J)	Forecast GHG Revenue (\$) (K-F+J)
Residential		7,372,950	\$ 27,243,648	0.00370	\$ 82,637,171	111,342	N/A	N/A	\$ 113,786	\$ 82,750,957
DR	Open									
DR-LI	Open									
TOU-DR-E1	Open									
TOU-DR-E2	Open									
TOU-DR-E3	Open									
TOU-DR	Open									
DM	Open									
DS	Closed									
DT	Closed									
DT-RV	Open									
DR-TOU	Open									
DR-SES	Open									
EV-TOU	Open									
EV-TOU-2	Open									
Small Commercial		2,017,510	\$ 6,760,008	0.00335	\$ 3,629,252	27,186	N/A	N/A	\$ 46,862	\$ 3,676,113
A	Closed									
TOU-A	Open									
ATC	Open									
A-TOU	Open									
UM	Open									
Med/Large C&I³		6,872,291	\$ 24,461,326	0.00356	\$ 451,374	3,530,409	N/A	N/A	\$ 428,226	\$ 879,600
AD	Closed									
AD-TOU	Closed									
AL-TOU	Open									
AY-TOU	Closed									
DGR	Open									
A6-TOU	Open									
OL-TOU	Open									
VGI	Open									
Agricultural		301,799	\$ 912,332	0.00302	\$ 63,566	31,440	N/A	N/A	\$ -	\$ 63,566
PA	Closed									
TOU-PA	Open									
PA-T-1	Open									
Streetlighting		103,651	\$ 252,939	0.00244	\$ -	-	N/A	N/A	\$ -	\$ -
LS-1	Open									
LS-2	Open									
LS-3	Open									
OL-1	Open									
OL-2	Open									
DWL	Open									
System Total		16,668,202	\$ 59,630,253	0.00358	\$ 86,781,363	\$ 3,700,377	N/A	N/A	\$ 588,873	\$ 87,370,236

¹In accordance with Section 2.5. of the Amended Joint Investor - Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap and-trade costs incurred will be captured as part of the larger ERRR true-up process. SDG&E will true-up total ERRR balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRR Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column D does not include a GHG cost reconciliation.

²Rate impacts are based on customer class.

³The VGI rate is based on the Medium and Large Commercial and Industrial rate.

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

Line	Information	2013	2014	2015	2016 (forecast)	2017 (forecast)	2018 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,419,989	\$39,496,174	\$56,139,037	\$58,914,746
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$81,558,628)	(\$85,466,355)	(\$88,413,793)
3	Emissions Intensity (MTCO/MWh) *	0.322	0.284	0.269			

* SDG&E Emissions Intensities are calculated based on renewable energy consumed and RECs associated with consumption in that year. It is not adjusted for RPS Compliance banking or modifications to RPS Adjustments in that year.

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