

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

Application of San Diego Gas & Electric
Company (U 902 M) for Authority, Among
Other Things, to Update its Electric and Gas
Revenue Requirement and Base Rates Effective
on January 1, 2019.

Application 17-10-_____
(Filed October 6, 2017)

**TEST YEAR 2019 GENERAL RATE CASE APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

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October 6, 2017

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**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019.

Application 17-10-_____
(Filed October 6, 2017)

**TEST YEAR 2019 GENERAL RATE CASE APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

In this General Rate Case (GRC) Application, San Diego Gas & Electric Company (SDG&E or Company) respectfully requests the California Public Utilities Commission's (CPUC or Commission) authority to update its electric and gas revenue requirement and base rates for Test Year 2019 (TY 2019).¹ SDG&E also seeks to implement a post-test year ratemaking mechanism that includes a return to a four-year GRC cycle. Specifically, SDG&E requests that the Commission authorize a combined \$2.199 billion revenue requirement (\$433 million gas and \$1.766 billion electric) to be effective January 1, 2019. If approved, this revenue requirement would be an increase of \$218 million over the as-expected authorized 2018 revenue requirement, or an 11% increase.²

When the impact of commodity costs and other ratemaking items such as regulatory account balances are included, these increases result in a 2019 system average electric rate revenue increase of \$208 million (+5.0%) and a system average gas rate revenue increase of \$112 million (or +18.1%), when compared to the as-expected authorized revenue requirement for 2018.

¹ Pursuant to the Rate Case Plan, Appendix A of Decision (D.) 07-07-004, as modified by D.14-12-025 (Table 4) and as set forth in D.16-08-018 (p. 154), SDG&E's TY 2019 GRC application would have been due September 1, 2017. However, on August 22, 2017, Executive Director Timothy Sullivan granted SDG&E an extension of time until October 6, 2017 to file this Application. This Application is timely filed in accordance with the August 22, 2017 grant of request for extension.

² This GRC Application requests approval of Phase 1 cost of service proposals. SDG&E separately files a GRC Application for Phase 2, which addresses electric marginal costs, revenue allocation and rate design. Cost of capital also is determined in a separate proceeding.

If the 2019 revenue requirement identified above is approved by the Commission, a typical electric residential customer³ will see a monthly bill increase of \$6.13 (+4.8%), as compared to as-expected authorized rates for 2018. For gas customers, a typical residential customer⁴ will see a monthly bill increase of \$7.57 (or +21.1%), as compared to as-expected authorized rates for 2018. On a combined electric and gas bill, a typical residential customer will see a monthly bill increase of \$13.70 (+8.4%), as compared to as-expected authorized rates for 2018.

In the sections below, SDG&E: (1) describes how its proposals should be considered in the context of the Commission’s new risk-informed GRC framework; (2) summarizes the relief it requests in this Application; (3) lists the exhibits SDG&E is submitting in support of this Application; (4) summarizes its proposed post-test year ratemaking mechanism; (5) summarizes SDG&E’s regulatory accounts proposals; and (6) provides the information necessary to comply with the statutory and procedural requirements associated with this Application, including a recommended procedural schedule.

SDG&E files this Application concurrently with Southern California Gas Company’s (SoCalGas) GRC filing, and will request consolidation of the proceedings initiated by these filings at the earliest possible opportunity, consistent with past practice and administrative efficiency.

I. THE RISK-INFORMED GRC PROCESS

In D.14-12-025, the Commission adopted a risk-based decision-making framework into the Rate Case Plan for the large energy utilities’ GRCs. This risk-based decision-making framework was developed as a result of Senate Bill (SB) 705, which declared in Public Utilities Code Section 963(b)(3) that “[i]t is the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority.” In 2014, the California Legislature amended the Public Utilities Code by adding Section 750, which directed the Commission to “develop formal procedures to consider safety in a rate case application by an electrical corporation or gas corporation.”

As a result of these directives, the Commission, in D.14-12-025, established two new procedures – a Safety Model Assessment Proceeding (S-MAP) and the Risk Assessment

³ Inland customer usage of 500 kWh.

⁴ 25 therms per month.

Mitigation Phase (RAMP) – which feed into the GRC applications in which the utilities request funding for such safety-related activities. The purpose of the RAMP is to provide information about the utility’s assessment of its key safety risks and its proposed programs for mitigating those risks.

In accordance with D.14-12-025 and D.16-08-018 (the interim S-MAP decision), SDG&E and SoCalGas were the first utilities in the State to file their RAMP Report,⁵ and are the first utilities in the State to incorporate their RAMP results into their GRC applications and associated testimony. SDG&E and SoCalGas also were the first utilities in the State to file their first interim spending accountability report, on June 30, 2017, in accordance with the decisions referenced above and D.16-06-054.⁶ A subsequent Commission decision, D.17-01-012, advised that that SDG&E and SoCalGas should file their second interim spending accountability report in their TY 2019 GRC proceedings.⁷ SDG&E and SoCalGas’ second interim spending accountability report is thus provided as an attachment to this Application (Appendix A).⁸

The Risk Management and Policy testimony of Diana Day (Exhibit SDG&E-02/SCG-02, Chapter 1) summarizes SoCalGas’ and SDG&E’s risk-informed GRC presentation, providing context within which SoCalGas’ and SDG&E’s funding requests should be viewed. Ms. Day provides a roadmap of the RAMP activities included in this GRC and in which of the operational witnesses’ testimony chapters these activities are represented. The RAMP to GRC Integration testimony of Jamie York (Exhibit SDG&E-02/SCG-02, Chapter 3) discusses the process used to integrate RAMP content into the individual GRC operational witnesses’ forecasts and testimony chapters. Each operational witness supporting RAMP costs describes the activities designed to mitigate the identified key safety risk(s). And, in accordance with Commission directives, witnesses supporting organizational costs throughout the Company provide testimony demonstrating how SDG&E has put forth significant efforts to build upon its already strong safety culture.

⁵ Investigation (I.) 16-10-015/16-10-016, Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company, November 30, 2016 (RAMP Report).

⁶ D.16-06-054 at 331-32, Ordering Paragraph (OP) 11.

⁷ D.17-01-012 at 7, OP 2.

⁸ For a more complete discussion of the accountability reporting requirements, see the Compliance testimony of Jamie York (Ex. SDG&E-44/SCG-45 and Appendix C to that exhibit).

II. SUMMARY OF RELIEF REQUESTED

As noted above, SDG&E seeks to revise its authorized revenue requirement, effective on January 1, 2019, to recover the reasonable costs SDG&E will incur in 2019 to own and operate the facilities that generate and distribute electricity to its customers, distribute gas, and to fulfill SDG&E's customer service functions. In general, SDG&E has examined the specific changes expected to occur over the term of this GRC and proposes corresponding investments in, among other things:

- **Safety and Reliability:** SDG&E will continue to invest in its gas and electric systems to enhance safety, reliability, and security and to manage risks. For example, SDG&E has focused on hardening its system against fire threats.
- **Customer Service:** SDG&E will continue to invest in the needs of its approximately 3.5 million consumers by, among other things, empowering customers with information and tools to better manage their gas and electricity use.
- **Environmental Stewardship:** SDG&E will continue to provide its services in an ecologically responsible manner, complying with an increasing number of regulations and requirements, factoring environmental impacts in its project planning, and investing in technologies that advance clean energy for its customers and the environment.
- **Investing in Our Workforce:** SDG&E will continue its strong commitment to investing in efforts and programs to maintain a highly-trained, qualified and diverse workforce.

III. LIST OF TESTIMONY EXHIBITS

Support for SDG&E's request is provided by the prepared direct testimonies from various witnesses sponsoring specific subjects pertaining to the Company's operations, functions, and/or activities. The table below lists the exhibit number, subject matter, and sponsoring witness.

SDG&E PREPARED DIRECT TESTIMONY EXHIBITS AND SPONSORING WITNESSES

EXH#	SUBJECT	WITNESS
SDG&E-01	Policy Overview	Caroline Winn
SDG&E-02, Chapter 1	Risk Management and Policy	Diana Day
SDG&E-02, Chapter 2	Enterprise Risk Management Organization	Gregory Flores

EXH#	SUBJECT	WITNESS
SDG&E-02, Chapter 3	RAMP to GRC Integration	Jamie York
SDG&E-03	Fueling Our Future Policy	Randall Clark
SDG&E-04	Gas Distribution	Gina Orozco-Mejia
SDG&E-05	Gas System Integrity	Omar Rivera
SDG&E-06	Gas Transmission Operation	Beth Musich
SDG&E-07	Gas Transmission Capital	Beth Musich/Michael Bermel
SDG&E-08	Reserved	Reserved
SDG&E-09	Gas Engineering	Deanna Haines
SDG&E-10	Reserved	Reserved
SDG&E-11	Pipeline Integrity for Transmission and Distribution	Maria Martinez
SDG&E-12	Electric and Fuel Procurement	Kendall Helm
SDG&E-13	Distributed Energy Resources Policy	Alan Dulgeroff
SDG&E-14	Electric Distribution – Capital	Alan Colton
SDG&E-15	Electric Distribution – O&M	William Speer
SDG&E-16	Electric Generation	Daniel Baerman
SDG&E-17	Customer Services – Field	Gwen Marelli
SDG&E-18	Customer Services – Office Operations	Jerry Stewart
SDG&E-19	Customer Services – Information & Technologies	Lisa Davidson
SDG&E-20	Supply Management & Logistics and Supplier Diversity	Denita Willoughby
SDG&E-21	Fleet Services	Carmen Herrera
SDG&E-22	Real Estate, Land Services & Facilities	R. Dale Tattersall

EXH#	SUBJECT	WITNESS
SDG&E-23	Environmental Services	Nancy Clancy
SDG&E-24	Information Technology	Christopher Olmsted
SDG&E-25	Cybersecurity	Gavin Worden
SDG&E-26	Corporate Center – Generation Administration	Mia DeMontigny
SDG&E-27	Corporate Center – Insurance	Neil Cayabyab
SDG&E-28	Corporate Center – Compensation & Benefits	Debbie Robinson
SDG&E-29	Corporate Center – Pension & PBOPs	Debbie Robinson
SDG&E-30	Human Resources Department, Safety, Long-Term Disability & Workers’ Compensation	Tashonda Taylor
SDG&E-31	Accounting and Finance/Legal/Regulatory Affairs/External Affairs	Sandra Hrna
SDG&E-32	Shared Services & Shared Assets Billing, Segmentation & Capital Reassignments	James Vanderhye
SDG&E-33	Rate Base	R. Craig Gentes
SDG&E-34	Depreciation	Matthew Vanderbilt
SDG&E-35	Tax	Ragan Reeves
SDG&E-36	Working Cash	Steven Dais
SDG&E-37	Gas Customer Forecast	Rose-Marie Payan
SDG&E-38	Electric Customer Forecast	Kenneth Schiermeyer
SDG&E-39	Cost Escalation	Scott Wilder
SDG&E-40	Miscellaneous Revenues	Eric Dalton
SDG&E-41	Regulatory Accounts	Norma Jasso
SDG&E-42	Summary of Earnings	Khai Nguyen
SDG&E-43	Post-Test Year Ratemaking	Ken Deremer
SDG&E-44	Compliance	Jamie York

EXH#	SUBJECT	WITNESS
SDG&E-45	Present and Proposed Gas Transportation Revenues & Rates	Sharim Chaudhury
SDG&E-46	Present and Proposed Electric Revenues & Rates	Jeffrey Shaughnessy
SDG&E-47	Mobilehome Park Utility Upgrade Program	Joseph Velasquez

WORKPAPERS

Witnesses who have workpapers supporting their testimony will have those workpapers offered into the evidentiary record. Workpapers will be numbered the same as each witness’ testimony exhibit, but ending with “-WP” or, for capital workpapers, “-CWP.” For example, O&M workpapers for SDG&E witness Maria Martinez (Pipeline Integrity for Transmission and Distribution) will be marked and offered as Exhibit SDG&E-11-WP, and her capital workpapers will be marked as Exhibit SDG&E-11-CWP.

IV. SUMMARY OF THE POST-TEST YEAR RATEMAKING MECHANISM

SDG&E is proposing a post-test year ratemaking mechanism that will provide sufficient revenues to meet the challenges the Company expects to face beyond TY 2019, while maintaining incentives to continue searching for operational efficiencies. SDG&E’s post-test year proposal features: (1) a return to a four-year GRC cycle (2019 – 2022), as the Commission followed in SDG&E’s 2004, 2008, and 2012 GRC proceedings;⁹ (2) a post-test year ratemaking mechanism to adjust authorized revenue requirements for operating and capital-related expenditures; and (3) the continuation of the currently-authorized Z-factor mechanism. (See the Post-Test Year Ratemaking testimony of Ken Deremer, Exhibit SDG&E-43.)

V. REGULATORY ACCOUNTS PROPOSALS

In the testimony of Norma Jasso (Exhibit SDG&E-41), SDG&E proposes the following actions with respect to regulatory accounts:

- SDG&E proposes that the following accounts be closed and that any residual balances be transferred to a fixed regulatory account upon the conclusion of this proceeding: The Assembly Bill 802 Memorandum Account, the Alternative Fuel

⁹ See D.04-12-015 (SDG&E’s 2004 GRC decision), D.08-07-046 (SDG&E’s 2008 GRC decision), and D.13-05-010 (SDG&E’s 2012 GRC decision). The issue of the length of the GRC cycle also is currently pending in R.13-11-006. See, e.g., the Second Amended Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge (March 17, 2017) at p. 4.

Vehicle Memorandum Account, the Community Choice Aggregation Implementation Balancing Account, the California Solar Initiative Performance-Based Incentive Memorandum Account, the Deductible Tax Repairs Benefits Memorandum Account, the Energy Data Request Memorandum Accounts, the Non-Residential Submetering Memorandum Account, the Residential Disconnect Memorandum Accounts, the Real-Time Energy Metering Memorandum Account, and the Smart Meter Opt-Out Balancing Accounts;¹⁰

- SDG&E proposes the continuation of the following accounts: The Fire Hazard Prevention Memorandum Account, the New Environmental Regulatory Balancing Account, the Pension Balancing Account, the Post-Retirement Benefits Other than Pensions Balancing Account, the Rate Reform Memorandum Account and the SONGS O&M Balancing Account;
- SDG&E proposes to modify the following accounts: The Net Energy Metering Aggregation Memorandum Account, the Transmission Integrity Management Program Balancing Account, the Post-2011 Distribution Integrity Management Program Balancing Account and the Tree Trimming Balancing Account; and
- SDG&E proposes to create three new accounts: The Liability Insurance Premium Balancing Account, the Otay Mesa Acquisition Balancing Account, and the Third-Party Claims Balancing Account.

VI. IMPLEMENTATION

This GRC Application will result in new rates, effective January 1, 2019. SDG&E may seek authorization to establish a regulatory account or mechanism to record the difference between the rates currently in effect for electric and gas service and the final rates adopted in this GRC. This regulatory account/mechanism would be effective January 1, 2019. Similar relief has been granted in SDG&E's past GRCs, as well as the GRCs of the other California investor-owned utilities.

Implementation of the post-test year ratemaking framework, as described in Exhibit SDG&E-43, will require SDG&E to file an advice letter in the third quarter of each year specifying the application of the post-test year formula and resulting rates to be effective January 1 of the following year.

¹⁰ As discussed in the testimony of Ragan Reeves (Exhibit SDG&E-35), SDG&E also is proposing to eliminate or revise the Tax Memorandum Account.

VII. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

This Application is filed pursuant to P.U. Code Sections 451, 454, 491, 701, 728, 729, 740.4, 750, and 795, the Commission’s Rules of Practice and Procedure and applicable prior Commission decisions, orders and resolutions.

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

SAN DIEGO GAS & ELECTRIC COMPANY 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.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Charles R. Manzuk
8330 Century Park Court, CP31E
San Diego, CA 92123-1530
(858) 654-1782 phone
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3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting.

b. Issues to be Considered and Relevant Safety Considerations

The principal issues to be considered in this proceeding are as follows:

1. Whether SDG&E's proposed TY 2019 revenue requirement is just and reasonable and should be adopted by the Commission and reflected in rates;
2. Whether SDG&E's proposed post-test year ratemaking mechanism is just and reasonable; and
3. Whether SDG&E's regulatory accounts proposals are just and reasonable.

With respect to relevant safety considerations, the issues above will be considered within the context of the Commission's new risk-informed GRC framework, as discussed above. The focus on safety and risk mitigation and how RAMP was integrated into the GRC will be major components of this GRC proceeding.

c. Need for Hearings

SDG&E anticipates that evidentiary hearings will be necessary.

d. Proposed Schedule

Pursuant to the Rate Case Plan, as modified by D.14-12-025 (Table 4), and the Executive Director's extension of the GRC filing to October 6, 2017, SDG&E proposes the following schedule:

October 6, 2017	Application filed
November 1, 2017	Workshop on Application
November 10, 2017	Protests due to Application
November 13-15, 2017	Additional Workshops on Application

December 2017	Prehearing Conference
April 13, 2018	ORA Report served
May 4, 2018	Intervenor Testimony served
April/May 2018	Public Participation Hearings
June 18, 2018	Concurrent Rebuttal Testimony
July/August 2018	Evidentiary Hearings
July/August 2018	Update Filing and Hearings, if necessary
September 2018	Opening Briefs filed
September/October 2018	Reply Briefs filed
November/December 2018	Proposed Decision
December 2018	Commission Decision
January 1, 2019	Implementation

SDG&E also recommends that, consistent with past practice, the Commission consolidate SDG&E’s Application with SoCalGas’ Application and that the Commission adopt the same procedural schedule for both utilities. This is reasonable because the utilities file their respective Applications at the same time and share common witnesses.

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 September 10, 2014 in connection with SDG&E’s Application No. 14-09-008, and is incorporated herein by reference.

C. Rule 3.2 (a) – (d) – Authority to Change Rates¹¹

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 balance sheet, income statement and financial statement for the six-month period ending June 30, 2017 are included with this Application as Appendix B.

¹¹ Rule 3.2 (a)(9) is not applicable to this Application.

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

A statement of all of SDG&E’s presently effective electric and gas rates can be viewed electronically on SDG&E’s website. Appendix C to this Application provides the table of contents from SDG&E’s electric tariffs on file with the Commission. Appendix D to this Application provides the table of contents from SDG&E’s gas tariffs on file with the Commission.

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

Appendix E includes Tables 1 and 2 showing the allocation of SDG&E’s electric revenues, by customer class, of proposed 2019 rates in comparison to as-expected 2018 rates and present 2017 rates. Appendix F includes Tables 1 and 2 showing the allocation of SDG&E’s gas rate revenues, by customer class, of proposed 2019 rates in comparison to as-expected 2018 rates and present 2017 rates. These are further discussed in Exhibits SDG&E-45 and SDG&E-46, which are being served concurrently with this Application.

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 500,000 volt 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 500,000 volt 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 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 for the six-month period ending June 30, 2017, is shown on the Statement of Original Cost and Depreciation Reserve attached as Appendix G.

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 six-month period ending June 30, 2017 is included as Appendix H 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 plant 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 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

This GRC Application will seek the Commission’s authorization to revise SDG&E’s current base rate revenue requirement to recover its projected costs of operations, as well as owning and operating its electricity and natural gas facilities and infrastructure, for the purposes of serving its customers. It is not only a pass through of costs.

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 Appendix I 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.

IX. ADDITIONAL DOCUMENTATION

Appendices A through K, described below are a part of this Application:

- Appendix A: Second Interim Spending Accountability Report
- Appendix B: Balance Sheet, Income Statement, and Financial Statement;
- Appendix C: Statement of Presently Effective Electric Rates;
- Appendix D: Statement of Presently Effective Gas Rates;
- Appendix E: Statement of Proposed Electric Rate Changes;
- Appendix F: Statement of Proposed Gas Rate Changes;
- Appendix G: Statement of Original Cost and Depreciation Reserve;
- Appendix H: Summary of Earnings;
- Appendix I: State, Counties, and Cities Service List;
- Appendix J: Service List; and
- Appendix K: Notice of Availability/Certificate of Service.

X. SERVICE

This is a new Application. No service list has been established for this proceeding. Accordingly, SDG&E will serve this Application, including its appendices, accompanying prepared direct testimony and related exhibits, on parties to the service lists for the consolidated 2016 General Rate Case proceeding for SDG&E and SoCalGas (A.14-11-003/A.14-11-004) and the SDG&E/SoCalGas RAMP proceeding (I.16-10-015/I.16-10-016). A copy of these service lists is attached to this Application as Appendix J. Pursuant to the Rate Case Plan, SDG&E will send via overnight mail two hard copies to Chief Administrative Law Judge (ALJ) Anne E. Simon and ten hard copies to the Office of Ratepayer Advocates (ORA). Pursuant to Commission Rule 1.9(c), service will be accomplished via a Notice of Availability (Appendix K to this Application).

XI. CONCLUSION

For all the foregoing reasons, SDG&E requests that the Commission:

1. Consider this Application and grant all the relief requested herein;
2. Issue an Order authorizing SDG&E to make such changes to its tariffs as are consistent with the relief requested herein; and
3. Grant such other and further relief as the Commission finds to be just and reasonable.

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Dan Skopec
Dan Skopec
San Diego Gas & Electric Company
Vice President - Regulatory Affairs

Signed in San Diego, California October 6, 2017

By: /s/ Steven C. Nelson
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OFFICER VERIFICATION

Dan Skopec declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on behalf of San Diego Gas & Electric Company. I am informed and believe that the matters stated in the foregoing **TEST YEAR 2019 GENERAL RATE CASE APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)** 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 October 6, 2017 at San Diego, California.

/s/ Dan Skopec _____
Dan Skopec
San Diego Gas & Electric Company
Vice President - Regulatory Affairs

APPENDIX A
SECOND INTERIM SPENDING ACCOUNTABILITY REPORT



Southern California Gas Company and San Diego Gas & Electric Company
Second Interim Spending Accountability Report

October 6, 2017

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1. Introduction

The California Public Utilities Commission (Commission) adopted Decision (D.) 16-06-054, issued on July 1, 2016, addressing the Test Year (TY) 2016 General Rate Case (GRC) of Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) (collectively, the Utilities). D.16-06-054 orders the following:

- a. SDG&E and SoCalGas shall each file a Spending Accountability Report within one year from the issuance date of D.16-06-054.
 - i. The Spending Accountability Report shall compare Test Year 2016 authorized spending to actual 2014 and 2015 spending on a limited set of risk mitigation projects, and to propose a methodology for reporting and comparing the projected versus actual benefits of its risk mitigation activities.¹ The proposed methodology with respect to benefits should include relevant performance metrics.²
- b. A second Spending Accountability Report shall be filed and served within two years from the issuance of D.16-06-054, which is to include actual 2016 spending.³
- c. SDG&E and SoCalGas are directed to discuss the format of these reports with the Safety and Enforcement Division (SED) and the Energy Division (ED) before the due dates of these reports.⁴

In accordance with D.16-06-054, the limited set of risk mitigation projects within the scope of these reports includes:⁵

For SDG&E's electric operations – the report shall include wildfire risk projects, activities and costs, and specific spending associated with mitigation projects SDG&E had identified as part of the wildfire mitigation program.^[6] For example, specific Fire Risk Management (FiRM) projects identified in testimony and in the SED report⁷ include, replace live front equipment; weather instrumentation; Powerworkz; C1215 Fire

¹ D.16-06-054, Ordering Paragraph (OP) 11.

² *Id.* at 39.

³ *Id.* at OP 11.

⁴ *Id.* at 41 and OP 11.

⁵ *Id.* at 39-41 (internal citations omitted).

⁶ Although this excerpt from D.16-06-054 identifies the listed projects as being part of SDG&E's wildfire mitigation program, SDG&E notes that not all of these programs are wildfire-related, or were identified as such in testimony, as described in Section 2.

⁷ SED prepared a safety report, which evaluated selected safety and risk program areas of the TY 2016 GRC applications of SDG&E and SoCalGas in Applications (A.) 14-11-003 and A.14-11-004.

Mitigation; FiRM Phases 1, 2 & 3, C441 Pole Loadings; Aerial marking; CNF Brakes; and SF6 [Sulfur Hexafluoride] switch replacement.

Among the metrics the utility might include in the report are the following: data on vegetation inspections, data on hardware failures, equipment failures, and wire failures.

Additionally, the report should cover the specific component replacement/maintenance programs that were identified in CCUE's [Coalition of California Utility Employees] direct testimony including: circuit breakers, capacitors, SF6 Switches, underground switches, and associated overhead.

Maintenance and repair/replacement of these components are considered mitigation for SDG&E's identified priority risk of electric service disruptions. Associated metrics should include a comparison of proposed versus actual replacement rates, as well as changes in relevant reliability index statistics. The level of spending the Commission has approved for these activities, as well as actual spending, should both be tracked.

For SDG&E's gas operations – The report should focus on the risks associated with gas safety incidents, especially third-party dig-ins, and elements of the Distribution Integrity Management Program (DIMP). In addition to DIMP, the report should include projects associated with replacing aging infrastructure, especially Aldyl-A pipe.

For SoCalGas – the report should include projects associated with reducing gas safety risks, including projects, activities, and costs associated with DIMP, Transmission Integrity Management Program (TIMP), and the Storage Integrity Management Program (SIMP).

With respect to proposing a methodology to “report and compare projected versus actual benefits of their risk mitigation activities”⁸ for the reported years, in these reports, the Utilities put forth metrics as a means to measure benefits. The metrics will serve two purposes: (1) explain variances in spending; and (2) provide insight into where improvements towards mitigating risks can be made. The proposed metrics are discussed in more detail in Section 1d.

A subsequent Commission decision, D.17-01-012, advised that SDG&E and SoCalGas should file their interim report in their Risk Assessment Mitigation Phase (RAMP) proceeding. After receiving email guidance on June 30, 2016 from Administrative Law Judge (ALJ) John Wong, the Utilities concurrently filed their first interim spending accountability report (referred to herein as the “First Interim Report”) both in Application (A.) 14-11-003/-004 (cons.) and in their pending RAMP proceeding, Investigation (I.) 16-10-015/-016 (cons.), and served the report upon the official service lists for those two proceedings. Further, D.17-01-012 requires that the second report (referred to herein as the “Second Interim Report”), which adds actual 2016 spending, shall now be filed in the TY 2019 GRC Applications of SDG&E and SoCalGas.⁹ The Utilities

⁸ D.16-06-054 at 39.

⁹ D.17-01-012 at OP 2.

submitted a letter to Executive Director Timothy Sullivan on August 15, 2017 requesting an extension of time to file their TY 2019 GRC applications from September 1, 2017 to October 6, 2017. Because D.17-01-012 requires the Utilities to file the Second Interim Report in their TY 2019 GRC, this extension will also impact the submission date of the accountability report. The extension request was granted on August 22, 2017.

Beginning with the information outlined in D.16-06-054, the Utilities met on March 6 and May 25, 2017 with SED and ED, and communicated in the interim, “to determine the exact format and content of these reports.”¹⁰ The format and content provided herein is a product of those discussions.

In this Second Interim Report, the Utilities have updated the First Interim Report to (1) include figures for 2016; (2) correct any identified errors; and (3) incorporate relevant feedback received to date based on follow-up meetings with SED, ED, and Office of Safety Advocates (OSA). The subsequent sections below (Sections 2, 3 and 4) provide a comparison of authorized spending to actual spending,¹¹ variance explanations and metrics for SDG&E’s Electric Operations, SDG&E’s Gas Operations and SoCalGas’ Gas Operations. This Second Interim Report is timely filed in accordance with D.16-06-054, D.17-01-012, and the Executive Director’s grant of the Utilities’ extension letter request.

a. Background

In D.14-12-025, the Commission adopted a risk-based decision-making framework into the Rate Case Plan (RCP) for the energy utilities’ GRCs. This risk-based decision-making framework was developed as a result of Senate Bill (SB) 705 (Statutes of 2011, Chapter 522), which declared in Public Utilities Code Section 963(b)(3):

It is the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority. The commission shall take all reasonable and appropriate actions necessary to carry out the safety priority policy of this paragraph consistent with the principle of just and reasonable cost-based rates.

In 2014, the California Legislature amended the Public Utilities Code by adding Section 750, which directed the Commission to “develop formal procedures to consider safety in a rate case application by an electrical corporation or gas corporation.”¹² As a result of these directives, D.14-12-025 adopted a risk-based decision-making framework for the large energy utilities, including SDG&E and SoCalGas. This framework consists of the following:

For the large energy utilities, this will take place through two new procedures, which feed into the GRC applications in which the utilities request funding for such safety-related

¹⁰ D.16-06-054 at 41.

¹¹ SoCalGas and SDG&E’s Second Interim Report reports regulatory account balances as recorded through December 31 of the applicable year. Any adjustments that may be necessary are recorded in the year the adjustment is discovered, which corrects the cumulative balance recorded at that point in time.

¹² SB 900 (Statutes of 2014, Chapter 552).

activities. These two procedures are: (1) filing of a Safety Model Assessment Proceeding (S-MAP) by each of the large energy utilities, which are to be consolidated; and (2) a subsequent Risk Assessment Mitigation Phase (RAMP) filing in an Order Instituting Investigation for the upcoming GRC wherein the large energy utility files its RAMP in the S-MAP reporting format describing how it plans to assess its risks, and to mitigate and minimize such risks. The RAMP submission, as clarified or modified in the RAMP proceeding, will then be incorporated into the large energy utility's GRC filing. In addition, the large energy utilities will be required to file annual reports following their GRC decisions.

It is our intent that the adoption of these additional procedures will result in additional transparency and participation on how the safety risks for energy utilities are prioritized by the Commission and the energy utilities, and provide accountability for how these safety risks are managed, mitigated and minimized.¹³

Although the Utilities filed their TY 2016 GRC prior to the issuance of D.14-12-025, D.16-06-054 ordered these interim accountability reports “[i]n order for the Commission and the Applicants to gain some familiarity and understanding with these reporting requirements during the TY 2016 GRC cycle, and to obtain the necessary data and metrics on safety, risk mitigation and accountability established by the framework in D.14-12-025.”¹⁴ Thus, the Commission focused on a limited set of risk mitigation projects for the TY 2016 GRC cycle, recognizing that future work would occur in Phase 2 of the S-MAP to refine future reporting requirements.

Thus, it is important to recognize that the First and Second Interim Reports cover years during the TY 2012 and TY 2016 GRC cycles, for which the Utilities filed applications before the risk-informed GRC framework was adopted, and during which the Utilities have undertaken the transitional process of implementing this framework. Accordingly, the reports reflect a transitional time period, and the risk mitigation projects in the reports predate the Utilities' November 30, 2016 RAMP Report under the new framework. Reports on risk mitigation projects here thus do not reflect the Utilities' comprehensive safety risk showing presented in their RAMP Report, nor the framework under which the Utilities developed that showing. Accountability reporting for the Utilities' first RAMP showing will not occur until 2020.¹⁵

¹³ D.14-12-025 at 2-3. These directives are also consistent with the Commission's Safety Action Plan and Regulatory Strategy, as updated in February 2016. The Commission's Safety Action Plan includes action items, such as Energy Division staff reports on safety-related expenditures, and safety review and activity reporting in GRCs by SED.

¹⁴ D.16-06-054 at 39.

¹⁵ D.14-12-025 states on p. 46 that the accountability reports “shall report on the activities and spending the utility undertook during the GRC test year, and during each attrition year.” D.14-12-025 on page 47 also sets a timeline for submitting the annual accountability reports: “SoCalGas' [accountability] reports to be filed by July 31 after the applicable reporting period; and SDG&E's reports to be filed by September 30 after the applicable reporting period.” Accordingly, the Utilities' first post-RAMP accountability reports will be submitted in 2020, after their 2019 GRC test years.

Furthermore, as explained in Sections 1b and 1c, the authorized and actual non-balanced spending in 2014 and 2015 was determined by the authorized revenue requirement established over two different GRC cycles (*i.e.*, TY 2012 GRC for Operations and Maintenance (O&M) and TY 2016 GRC for capital).

b. General Rate Case Cycles of the Utilities

The Utilities file GRC Applications with the Commission seeking authorization of a revenue requirement to recover the reasonable costs forecasted to incur in the test year,¹⁶ and a mechanism for adjusting the revenue requirement annually during the post-test years,¹⁷ for a total GRC period that typically spans three years. A revenue requirement is the amount of money the Utilities are allowed to collect, or recover, from their customers through rates.¹⁸

The final outcome of a GRC is a Commission-approved test year revenue requirement comprising of O&M and capital funding for the forecast years that compound annually up to the test-year. Additionally, a post-test year mechanism is approved generally for escalation on the test year revenue requirement. These approvals may or may not be the same as originally presented by the Utilities.

To illustrate the GRC cycles, the diagram below demonstrates the Utilities' last two GRC cycles as well as this TY 2019 GRC filed on October 6, 2017.

¹⁶ A GRC follows the Commission's approved Rate Case Plan, which outlines the required submittals, procedures, and deadlines associated with a GRC. The Rate Case Plan utilizes a "base-year/test-year" approach to GRC ratemaking. Pursuant to the Rate Case Plan, the GRC typically consists of testimony and workpapers justifying forecasted O&M and capital costs in a future period. The last recorded year available forms the "Base Year." The year for which the Commission is formally approving the revenue requirement, and when new rates are to take effect, is called the "Test Year." The Utilities' showing provides recorded amounts for the base year and annual forecasts as a means to get to the test year. The annual forecasts provided between the base year and test year are referred to as "Forecast Years."

¹⁷ For years 2 and 3 of the GRC cycle (and an additional year 4 proposed in this TY 2019 GRC filing), referred to as post-test years or attrition years, the Utilities also propose a post-test year mechanism. Ultimately, the GRC decision will prescribe how to adjust the test year revenue requirement for inflation and other factors that may affect costs, such as additional capital projects between test years.

¹⁸ Generally, the Utilities' GRCs are presented in direct, base year dollars and converted into a test year revenue requirement using a ratemaking model, the Results of Operation (RO) model. The process by which the RO model converts the direct, base year dollars into a test year revenue requirement includes the escalation of costs (converting base year dollars into test year nominal dollars), intercompany billings between the Utilities, applying overheads (such as benefits) to capital projects, and converting the capital forecasts into capital-related costs (depreciation, taxes, and return).

Diagram 1: GRC Cycles of SoCalGas and SDG&E¹⁹

2012 GRC Proceeding					
Base Year	2009				
Forecast Year	2010				
Forecast Year	2011	2016 GRC Proceeding			
Test Year	2012	Base Year	2013		
Post-Test Year	2013	Forecast Year	2014		
Post-Test Year	2014	Forecast Year	2015	2019 GRC Proceeding	
Post-Test Year	2015	Test Year	2016	Base Year	2016
		Post-Test Year	2017	Forecast Year	2017
		Post-Test Year	2018	Forecast Year	2018
				Test Year	2019
				Post-Test Year	2020
				Post-Test Year	2021

The Utilities provided the requested information, as discussed in Sections 1 and 1a herein, for the years 2014 through 2015, in the First Interim Report. The Utilities “shall compare Test Year 2016 authorized spending to actual 2014 and 2015 spending.”²⁰ As noted in Sections 1a and 1c, years 2014 and 2015 were authorized by the Commission during the TY 2012 GRC proceeding in D.13-05-010.²¹ However, the 2016 amounts for authorized were approved by the Commission in the 2016 GRC proceeding in D.16-06-054.²² Accordingly, as explained in Section 1c, the non-balanced capital projects were authorized over two different GRC cycles, causing the “authorized” three-year period (2014-2016) reported herein to not be an ideal comparison against “actual” capital spending over the same three-year period.

¹⁹ The Utilities are proposing a four-year term (2019-2022) for the TY 2019 GRC cycle, which would result in the next test year to be 2023. See the direct testimony of Post-Test Year Ratemaking witnesses Jawaad Malik (Ex. SCG-44) and Kenneth Deremer (Ex. SDG&E-43).

²⁰ D.16-06-054 at OP 11.

²¹ The applications of SDG&E and SoCalGas for the 2012 GRC cycle were A.10-12-005 and A.10-12-006, respectively.

²² The applications of SDG&E and SoCalGas for the 2016 GRC cycle were A.14-11-003 and A.14-11-004, respectively.

Further, the Utilities are presenting the non-balanced projects and metrics herein on a direct basis, which is the input into the revenue requirement, but not the revenue requirement itself, which is authorized in a GRC decision. By contrast, the balanced programs in this report (*i.e.*, TIMP, DIMP and SIMP) are presented on a revenue requirement basis, because the Utilities report on and manage to the authorized revenue requirement levels, not the direct spending.

c. Derivation of Authorized Dollars

For the majority of the “risk mitigation” projects covered in this report, the “authorized” amounts are discrete authorized funding values for those projects.²³ However, the Commission did not provide an authorized amount for SDG&E Dig-In-related activities. Therefore, the Utilities imputed the authorized values by using the amounts authorized in the Locate and Mark workpaper and adding Dig-In-related Public Awareness costs (*e.g.*, 811 Dig Alert Campaign).

For non-balanced spending in this report, O&M expenditures in 2014 and 2015 were authorized in the TY 2012 GRC, whereas the 2016 O&M spending was authorized in the TY 2016 GRC. However, the non-balanced capital spending for 2014, 2015, and 2016 was derived from the TY 2016 GRC, which includes approved capital projects in the forecast years (2014-2016) in the 2016 revenue requirement. The reason the Utilities used the “authorized” capital projects and activities from the TY 2016 GRC rather than the amounts from the TY 2012 GRC is because the projects required in this report in accordance with the TY 2016 GRC decision were not necessarily included in the TY 2012 GRC. For purposes of this report, the Utilities have presented the non-balanced information in direct nominal dollars (*i.e.*, the 2014, 2015, and 2016 authorized are in the 2014, 2015, and 2016 dollars, respectively).

To better illustrate this, consider the following example. In the TY 2012 GRC, specific capital forecasts were approved for years 2010-2012 to establish the revenue requirement for TY 2012. After the test year revenue requirement has been established, the revenue requirement going forward into the post-test years is based on an approved post-test year mechanism (usually an escalation factor), which gets applied to the total revenue requirement from the test year. Because the post-test year increase is based on a total revenue requirement instead of specific projects, the specific capital details in the post-test years for the TY 2012 GRC cycle are not available. In order to get specific capital details for 2014, 2015, and 2016, the Utilities had to use the forecast years from the TY 2016 GRC.

For the balanced programs, this report presents O&M and capital in revenue requirement terms because the programs are tracked on a revenue requirement basis, as required by the annual advice letter filings. Reviewing balanced programs in these terms, rather than in nominal direct dollars, reflects more accurately how the Utilities manage these programs and track costs. The purpose of managing to a revenue requirement is so that the Utilities stay within the authorized revenue requirement for the entire GRC cycle. While capital spend and the timing of capital becoming rate base are building blocks in creating an authorized revenue requirement, it is the authorized revenue requirement itself that utilities are measured against financially. Further,

²³ The Commission-approved final GRC decisions do not always provide authorized figures by project or activity, which may be needed for accountability reporting.

GRCs establish and authorize test year revenue requirements and apply an attrition year mechanism or escalator to build test year revenue requirements (please see Table 1, which illustrates this concept).

Table 1: Illustrative Example Timing of Capital

	Test year	Attrition Year 1***	Attrition Year 2***
Authorized Revenue Requirement	\$21	\$22	\$23
Authorized Capital Costs			
a. Depreciation at 10 years (10%)	\$10	\$11	\$11
b. Return (8%)	\$8	\$8	\$9
c. Taxes (apprx. 40% of Return)	\$3	\$3	\$4
Total Capital Costs	\$21	\$22	\$23
Forecast Capital Spend	\$100		
Implied Attrition allowed spend*		\$15	\$16
Forecasted Ratebase**	\$100	\$105	\$110
* In attrition years, a utility can spend what has been depreciated in prior years plus a small amount equal to what would add up to the capital costs equal to the increase in revenue due to attrition.			
**Assumes 100% weighting, January 1 close date. Reduces each year by depreciation and increases by capital spend.			
*** For simplicity, assumes 5% attrition			

Based on the foregoing, this report shows the balanced programs on a revenue requirements basis.

In summary, Tables 2 and 3 below present the projects in the scope of this report, whether the projects include O&M and/or capital, and how this information is presented herein.

Table 2: Derivation of 2014 and 2015 Authorized²⁴

<u>Data Source</u>				
	Projects	O&M	Capital	Presentation
	SDG&E Electric Operations	n/a	TY 2016 GRC	Nominal, Direct Dollars
	SDG&E Dig-Ins	TY 2012 GRC	TY 2016 GRC	Nominal, Direct Dollars
Balanced Programs	SoCalGas & SDG&E DIMP	TY 2012 GRC	TY 2012 GRC	Revenue Requirement
	SoCalGas TIMP	TY 2012 GRC	TY 2012 GRC	Revenue Requirement
	SoCalGas SIMP	n/a	n/a	Revenue Requirement

Table 3: Derivation of 2016 Authorized²⁵

<u>Data Source</u>				
	Projects	O&M	Capital	Presentation
	SDG&E Electric Operations	n/a	TY 2016 GRC	Nominal, Direct Dollars
	SDG&E Dig-Ins	TY 2016 GRC	TY 2016 GRC	Nominal, Direct Dollars
Balanced Programs	SoCalGas & SDG&E DIMP	TY 2016 GRC	TY 2016 GRC	Revenue Requirement
	SoCalGas TIMP	TY 2016 GRC	TY 2016 GRC	Revenue Requirement
	SoCalGas SIMP	TY 2016 GRC	TY 2016 GRC	Revenue Requirement

²⁴ Authorized amounts for SDG&E Associated Overhead and SDG&E Dig-In Damage Prevention Program were imputed using a portion of the applicable workpaper group based on subject matter expert judgment.

²⁵ Authorized amounts for SDG&E Associated Overhead and SDG&E Dig-In Damage Prevention Program were imputed using a portion of the applicable workpaper group based on subject matter expert judgment.

d. Derivation of Safety Performance Metrics for Risk Mitigation Benefits

Pursuant to D.16-06-054, the Utilities are proposing a methodology herein to satisfy the requirement of “how SDG&E and SoCalGas can report and compare projected versus actual benefits of their risk mitigation activities. The methodology should include relevant performance metrics...”²⁶ The Utilities’ proposed methodology for risk mitigation benefits is based on performance metrics discussed in the S-MAP as well as the metrics referenced in D.16-06-054. D.16-08-016 supports using metrics to evaluate performance/benefits stating “[o]ne method for analyzing the risk mitigation accountability report may be to track the performance metrics developed by the working group to assess the safety performance of the utilities over time.”²⁷

For metrics mentioned in D.16-06-054, this report presents actual and planned activity levels. Generally, the planned levels represent what the Utilities put forth, or “proposed,” in their direct testimony and workpapers from the TY 2016 GRC, which may be the underlying methodology or assumptions used to derive the Utilities’ GRC forecasts. In other words, the “planned” metrics are the planning or forecasting assumptions of SoCalGas and SDG&E. This means that the planned metrics are not reflective of either the final GRC decision or the adopted settlement. The basis for using planned rather than “authorized” metrics is that the final GRC decisions and applicable settlement did not necessarily provide authorized metrics. Further, if no “planned” column is included in the metrics table, this indicates that the Utilities did not propose or include a metric when deriving their original GRC forecasts. For example, the Utilities do not forecast that dig-ins or fire ignitions will occur in a given year.

For metrics discussed in the S-MAP, the Utilities have been actively participating in the working group on reporting metrics established in Phase 1 of the S-MAP. The purpose of the S-MAP metrics working group is “to develop a set of performance metrics to use as a baseline in the proceeding.”²⁸ The Utilities utilized the thought processes and work accomplished during Phase 1 of the S-MAP for these interim accountability reports by incorporating some of the performance metrics herein. Examples of these metrics include Transmission and Distribution Wires Down (Electric Operations), Total Damages (Third Party Dig-Ins) and In-Line Inspections (TIMP).

According to SED, “the working group has made strong progress and has reached the stage of refining a comprehensive and detailed set of performance metrics to offer in Phase Two of the first S-MAP.”²⁹ Because Phase 2 of the S-MAP is currently underway, the metrics presented herein should be considered preliminary and subject to change. While the Utilities have discussed the presented metrics with Commission staff, open discussions with parties and SED continue in the metrics working group. Further, a final decision in the S-MAP Phase 2 proceeding may affect final metrics reported and tracked. As such, it is premature at this time to

²⁶ D.16-06-054 at 39.

²⁷ D.16-06-018 at 159.

²⁸ *Id.* at 159-160.

²⁹ *Id.* at 158.

include all the metrics being discussed in the on-going S-MAP proceeding in these reports. Nonetheless, the Utilities have included in this report certain metrics in each of the sections below to measure safety performance over time.

The table below summarizes the metrics being provided in this report:

Projects	Metric	Origin
SDG&E Electric Operations	Component Replacement/Maintenance Programs – circuit breakers, capacitors, SF6 switches, underground switches, associated overhead	Metric and associated dollars ordered for inclusion in D.16-06-054 The planned metrics are the original planning assumptions for the associated forecasts.
	Metrics – vegetation inspections, data on hardware failures, equipment failures and wire failures	Included as described in D.16-06-054
	Fire ignitions, transmission & distribution wires down	Proposed metric in the S-MAP
	All other metrics	Included for measurement purposes
SDG&E Dig-Ins	Damages per 1,000 tickets	Proposed metric in the S-MAP
	All other data	Included for measurement purposes
SDG&E/SoCalGas DIMP	Aldyl-A replacements (SDG&E only)	Ordered for inclusion in D.16-06-054. The planned metrics are the original planning assumptions for the associated forecasts.
	All other metrics	Included for measurement purposes
SoCalGas TIMP	Total miles of high-pressure pipe inspected by in-line inspection	Proposed metric in the S-MAP
	All other metrics	Included for measurement purposes
SoCalGas SIMP	Wells inspected using an enhanced inspection protocol	Proposed metric in the S-MAP
	All other metrics	Included for measurement purposes

2. SDG&E Electric Operations – Wildfire Risk Projects and Electric Service Disruptions

In the TY 2016 GRC, SDG&E proposed various capital projects in the direct testimony of its Electric Distribution Capital witness that were categorized under “Safety and Risk Management.”³⁰ Although these projects were characterized as safety and risk management projects in testimony, it should be noted that the testimony was written prior to issuance of D.14-12-025, which established the RAMP process, and prior to development of SDG&E’s RAMP Report. Thus, only some of these projects are consistent with mitigation activities identified in SDG&E’s RAMP Report. The TY 2016 GRC testimony’s “Safety and Risk Management” categorization, which predated the now-established RAMP process, should not be mistaken as implying that all of these projects address SDG&E’s top risks.

Similarly, these “Safety and Risk Management” projects were identified in the SED Staff Report (presented as Exhibit 23 in A.14-11-003/-004) and in the final decision, D.16-06-054 (p. 39), as “part of [SDG&E’s] wildfire mitigation program.” However, this assertion is incorrect, as not all of the projects address the wildfire risk. Projects that do not address wildfire risk are included separately below, in compliance with D.16-06-054.

The identified projects that are a part of SDG&E’s wildfire mitigation program were described in testimony as follows:

SDG&E Weather Instrumentation Install (Budget Code 11243): This project is described as a collaborative effort with the National Weather Service, CAL FIRE [California Department of Forestry and Fire Protection], UCLA [University of California, Los Angeles], and the U.S. Forest Service included the procurement of two Atmospheric Profilers intended to increase SDG&E’s understanding of Santa Ana winds. This project supports the goals of safety and reliability by developing a tool to mitigate risks associated with extreme fire potential during Santa Ana Winds with a vision to provide a decision support tool to fire agencies and the general public to increase public safety and overall preparedness.

Circuit 1215 Fire Risk Mitigation Project (Budget Code 12265): This project replaces aged overhead conductor with new conductor, and replace wood poles with steel poles to enhance circuit reliability. The new facilities are designed using known local conditions as the basis for design; which, in the case of this circuit, includes extreme wind conditions. Re-conductoring wood to steel is intended to greatly reduce the risk of brush fires during high wind events in areas on Circuit 1215 known to have past wire-down events, and improve circuit reliability with the re-conductor.

³⁰ A.14-11-003, Ex. 134 SDG&E/Jenkins at 118-132.

Fire Risk Mitigation (FiRM) Phases 1 & 2 (Budget Code 13247) and FiRM Phase 3 (Budget Code 14247): FiRM is described as a program designed to aggressively address “fire risk by hardening critical areas by replacing antiquated line elements, utilizing advanced technology, and safeguarding facilities from known local weather conditions. FiRM is being broken into multiple phases, with the scope of work varying within each phase.”³¹ As FiRM began to ramp up and become a part of SDG&E’s day-to-day operations, the phased approach of the program evolved into a single comprehensive program. The phased approach prioritized work based on location. SDG&E now prioritizes work based on information from the Reliability Improvements in Rural Areas Team (RIRAT)³² and a probabilistic model, the Wildfire Risk Reduction Model (WRRM). SDG&E uses these “smarter” tools to replace its high-risk assets (*i.e.*, those that are likely more prone to failure and ignition) first rather than using location as the main criteria. This development is reflected in the descriptions and cost report tables below.

As presented in the TY 2016 GRC, FiRM consisted of three location-based phases with work planned through 2018. Phase 1 planned to address 7,200 poles that fall in the highest risk areas and was anticipated to take place between 2014 and 2015. Phase 2 of FiRM was planned to address the remaining 30,000 poles in the High-Risk Area and was planned to take place between 2014 and 2018. The activities for Phase 2 included targeted re-conductoring and hardening, based on history, known local conditions, and pole load information. Phase 3 of FiRM was planned to address the remaining poles in the Fire Threat Zone (approximately 40,000 poles). For this phase, the distribution facilities were intended to be LiDAR surveyed (Light Detection and Ranging) and PLS-CADD models will be developed for analysis.

Circuit 441 Pole Loading Study/Fire Risk Mitigation (Budget Code 13255): This project replaces 1.5 miles of aged overhead conductor with new conductor, and replaces wood poles with steel poles to enhance circuit reliability. The new facilities are designed using known local conditions as the basis for design, which for this circuit includes extreme wind conditions. This particular circuit is located in mountainous areas vulnerable to extreme winds and other storm events, which have resulted in outages related to fallen trees/branches, debris blowing into the energized conductors, wire-to-wire contact, and equipment failure.

Distribution Aerial Marking and Lighting (Budget Code 13266): The primary objective of this budget is to comply with FAA [Federal Aviation Administration] requirements, California State Aeronautics Code Title 21, and local Airport Land Use Commissions, in addition to increasing public and employee safety by installing aerial marking and

³¹ *Id.* at 123:21-23.

³² RIRAT is a multi-disciplinary technical team of subject matter experts within SDG&E that “focuses its attention on facilities and activities in these areas so as to assure that all prudent and cost-effective fire-prevention measures are promptly evaluated and implemented.” *Id.* at 7:11-13.

lighting. The alternative to this project is just merely complying with FAA regulations, but that does not address all areas where there is a risk of aviation collision with overhead electric facilities.

Cleveland National Forest (CNF) (Budget Code 13282): This budget is required as part of a legal agreement with the CNF to replace aging overhead infrastructure with new overhead and underground facilities. As part of the renewal of our Master Special Use Permit with CNF, SDG&E agreed to rebuild overhead power lines by replacing them with new overhead and underground facilities.

The projects described below were not specifically intended to address SDG&E's fire risk, but were identified as "Safety and Risk Management" projects in SDG&E's TY 2016 GRC testimony. Reporting on these projects is provided in compliance with D.16-06-054.

Replace for Live Front Equipment (Budget Code 6247): Live front replacement is an ongoing secondary capital project that replaces live front equipment with dead front pad-mounted equipment³³ in conjunction with other SDG&E work (e.g., cable replacement, circuit upgrades, etc.). Live front equipment was primarily installed on SDG&E's electric distribution system during the 1960's and 1970's, and has since become obsolete, being replaced by 'dead-front' equipment, which has additional safety barriers such as removable fiberglass or composite plates, protective covers or additional compartmentalization.

PowerworkZ (Budget Code 12256): The Powerworkz project is a one-time acquisition of three off-the-shelf software systems used for customized vegetation management purposes: a widely used Geographical Information System (GIS) platform, a mobile GIS solution, and asset management program.

Sulfur Hexafluoride (SF6) Switch Replacement (Budget Code 14249): The SF6 Switch Replacement is a project to remove or replace SF6 gas insulated distribution switchgear, to reduce environmental risks associated with the potential for SF6 emissions. Because SF6 emissions are known to have a global warming potential, leaking SF6 switches are subject to the federal Climate Action Plan goal (Environmental Protection Agency) and state (California Air Resources Board) AB 32 California Global Warming Solutions Act of 2006. AB 32 mandated efforts are expected to reduce greenhouse gas emissions to 1990 levels by 2020. The costs of the project were allocated over five years and projected to remove or replace switches beginning in 2016.

For the electric distribution capital projects identified for reporting in D.16-06-054, pages 39-40, the tables below show cost comparisons between actual and authorized amounts for the years 2014, 2015, and 2016, with explanations for the variances provided below each table.

³³ Live front electric distribution equipment is defined by having their primary connections exposed with no insulated covering. Thus, when the equipment is opened, there are energized, or "live," conductors present. By contrast, dead front equipment is where the energized primary conductors are insulated from contact.

Comparison of 2014 and 2015 Authorized Spending to 2014 and 2015 Actual Spending³⁴

Capital Project	2014	2014	2014
	Actuals	Authorized	Variance
Nominal Dollars (\$000)			
SDG&E Weather Instrumentation Install (BC 11243)	\$494	\$426	\$68
Circuit 1215 Fire Risk Mitigation Project (BC 12265)	\$59	\$61	(\$2)
FiRM Phases 1, 2, & 3 (BC 13247 & 14247)	\$16,729	\$18,209	(\$1,480)
Circuit 441 Pole Loading Study/Fire Risk Mitigation (BC 13255)	\$83	\$83	(\$0)
Distribution Aerial Marking and Lighting (BC 13266)	\$0	\$0	\$0
Cleveland National Forest (CNF) (BC 13282 & 081650)	\$88	\$112	(\$24)
Sub-Total Fire Specific	\$17,453	\$18,891	(\$1,438)
Replace for Live Front Equipment (BC 6247)	\$389	\$394	(\$5)
Powerworkz (BC 12256)	\$605	\$610	(\$5)
SF6 Switch Replacement (BC 14249)	\$0	\$0	\$0
Sub-Total Other TY2016 Elect Dist Safety & Risk Projects	\$994	\$1,004	(\$10)
Total TY2016 GRC Elect Dist Safety & Risk Projects	\$18,447	\$19,895	(\$1,448)

2014 Variance Explanation:

In SDG&E's TY 2016 GRC Settlement Comparison Exhibit, the 2014 authorized amounts were based upon the 2014 actual expenditures represented in 2013 constant dollars, with the exception of FiRM Phases 1 & 2. For FiRM Phases 1 & 2, the settlement was \$1.2M higher than actual incurred expenses. All other variances between 2014 actuals and 2014 authorized are due to escalation calculation differences.

	2014				
	Metrics		Nominal Dollars (\$000)		
	Actual Replacement Rate	Planned Replacement Rate	Actual Expense	Authorized Expense	Variance
Component Replacement & Maintenance Programs:					
Circuit Breakers (BC 992820)	34	4	\$282	\$284	(\$2)
Capacitors (BC 112490, 002090, 082530)	39	17	(\$980)	(\$1,771)	\$791
SF6 Switches (BC 14249A & 142490)	0	0	\$0	\$0	\$0
Underground Switches (BC 002890)	38	40	\$5,416	\$5,476	(\$60)
Associated Overhead (portions of BC 009010, 009040, 009050, 00906A, & 009060)	n/a	n/a	\$2,702	\$1,256	\$1,446

³⁴ The Cleveland National Forest project has been updated for years 2014 and 2015 to also include Actuals and Authorized from budget code 081650 that were previously omitted in error. BC 13282 was included in the TY 2016 GRC for the Cleveland National Forecast project under the Safety and Risk group of budget codes; however, when the Cleveland National Forecast project was implemented, all segments of the project are recorded to BC 081650. BC 081650 was originally authorized in the TY 2016 GRC as the CPUC jurisdiction portion of the Transmission/FERC Line Replacement.

2014 Variance Explanations:

Circuit Breakers – For purposes of clarifying the information being provided, SDG&E notes that it is reporting a higher replacement rate here than was provided in response to a data request from CCUE during the TY 2016 GRC. In that data request response, SDG&E only included planned replacements for circuit breakers on blanket substation reliability and capacity budgets. The replacement rate reported here also includes breakers being replaced on specific capital budgets such as the Cannon, Sunnyside, and Los Coches Rebuilds. Additionally, SDG&E reports that there are circuit breaker replacement costs contained within other budget codes that cannot be separated from new installations and are not included in the actual dollars being reported on this line.

Capacitors³⁵ – Capacitors are recorded to multiple budget codes. The actual type of capacitors installed differed from what was forecasted in the TY 2016 GRC and the average cost to install the capacitors varied accordingly. As an example, the forecasted level of Supervisory Control and Data Acquisition (SCADA) capacitors in the TY 2016 GRC was lower than actually installed in 2014. The credit in the actual spend was due to materials reconciliation between projects from previous years.

Overhead - variances associated with component replacement and maintenance programs are primarily driven by changes in capital expenditure results.

Capital Project	2015	2015	2015
	Actuals	Authorized	Variance
Nominal Dollars (\$000)			
SDG&E Weather Instrumentation Install (BC 11243)	(\$29)		(\$29)
Circuit 1215 Fire Risk Mitigation Project (BC 12265)			\$0
FiRM Phases 1, 2, & 3 (BC 13247 & 14247)	\$52,170	\$38,950	\$13,220
Circuit 441 Pole Loading Study/Fire Risk Mitigation (BC 13255)			\$0
Distribution Aerial Marking and Lighting (BC 13266)	\$0	\$147	(\$147)
Cleveland National Forest (CNF) (BC 13282 & 081650)	\$929	\$7,221	(\$6,292)
Sub-Total Fire Specific	\$53,070	\$46,318	\$6,752
Replace for Live Front Equipment (BC 6247)	\$414	\$885	(\$471)
Powerworkz (BC 12256)	(\$1)		(\$1)
SF6 Switch Replacement (BC 14249)			\$0
Sub-Total Other TY2016 Elect Dist Safety & Risk Projects	\$414	\$885	(\$471)
Total TY2016 GRC Elect Dist Safety & Risk Projects	\$53,483	\$47,203	\$6,280

³⁵ At the request of OSA, at the conclusion of our meeting on August 29, 2017, we have updated the Component Replacement & Maintenance Program tables to include the applicable budget codes that are being included. Additionally, the Proposed Capacitor numbers have been updated to include the capacitors that were requested by BC 082530 at 11 per year. Actual capacitors have also been updated.

2015 Variance Explanations:

FiRM Phases 1, 2 & 3 - variance totals \$13.2M and is mainly driven by a ramp-up in construction activities during 2015.

Cleveland National Forest - variance is due to delayed approval of Permit to Construct (PTC). SDG&E received the PTC from the Commission in D.16-05-038, dated May 26, 2016, which resulted in subsequent construction starting in September 2016.

Replace for Live Front Equipment - this a secondary project is used when live front equipment is replaced in conjunction with other capital work (e.g., cable replacement, circuit upgrades, etc.). The variance in completion of live front replacement is dependent on circumstances, such as where projects are being completed and whether those areas have live front equipment that needs to be replaced).

	2015				
	Metrics		Nominal Dollars (\$000)		
	Actual Replacement Rate	Planned Replacement Rate	Actual Expense	Authorized Expense	Variance
Component Replacement & Maintenance Programs:					
Circuit Breakers (BC 992820)	18	7	\$0	\$685	(\$685)
Capacitors (BC 112490, 002090, 082530)	18	17	(\$106)	\$4,049	(\$4,155)
SF6 Switches (BC 14249A & 142490)	0	0	\$0	\$0	\$0
Underground Switches (BC 002890)	48	60	\$5,519	\$7,874	(\$2,355)
Associated Overhead (portions of BC 009010, 009040, 009050, 00906A, & 009060)	n/a	n/a	\$1,967	\$7,455	(\$5,488)

2015 Variance Explanations:

Circuit Breakers – For purposes of clarifying the information being provided, SDG&E notes that this budget code is intended for Replacement of Obsolete Substation Equipment work of which Circuit Breakers are only a small portion. The actual replacement rate reported here also includes breakers being replaced on specific capital budgets such as the Cannon, Sunnyside, and Los Coches Rebuilds. Additionally, SDG&E reports that there are circuit breaker replacement costs contained within other budget codes that cannot be separated from new installations, and are not included in the actual dollars being reported on this line. *Note: The authorized and actual dollar values for circuit breaker replacements have been updated since the First Interim Report, which reported on all costs in the Replacement of Obsolete Equipment budget code, instead of reporting only on the circuit breaker component. The authorized dollars in the Second Interim Report include only the circuit breaker component. In addition, the actual expenses recorded on this budget code did not include any circuit breaker work, so that value has been changed to zero.*

Capacitors³⁶ – Capacitors are recorded to multiple budget codes. The actual type of capacitors installed differed from what was forecasted in the TY 2016 GRC and the average cost to install

³⁶ At the request of OSA at the conclusion of our meeting on August 29, 2017 we have updated the Component Replacement & Maintenance Program tables to include the applicable budget codes that are

the capacitors varied accordingly. As an example, the forecasted level of SCADA capacitors in the TY 2016 GRC was lower than actually installed in 2015. The credit in the actual spend was due to materials reconciliation between projects from previous years.

Underground Switches – The Do Not Operate Energized (DOE) switch replacement variance was due to a number of issues. Each switch replacement job is unique and will have different variables with land rights, environmental impacts and customer impacts. Some jobs had permit delays with the cities or municipalities, some had outage coordination issues with customers, and others were delayed by equipment availability from the manufacturer. Additionally, the original estimate for underground switches was based on two types of replacements, replacements with manual switches and replacements with SCADA switches. SCADA switches provide data for improved operator situational awareness, system planning load studies, and provide for remote and automated control operation, allowing for improved restoration response and reliability, but are more costly than manual switches for both materials and labor. The reality was that many of the DOE switch locations were not good fits for SCADA, so manual switches were designed and replaced at a proportionately higher rate than was assumed in the estimate. SDG&E is continuously improving strategies to work through the issues noted, to have more consistent switch replacement schedules from job to job. The lower cost of manual switch replacement leads to a portion of the overall budget underrun. *Note: The authorized and actual dollar values for DOE switch replacement have been updated since the First Interim Report. The First Interim Report reported on all costs contained in the CMP UG Switch Replacement and Manhole Repair budget code, of which underground switch replacement is only one component. Authorized dollars in this report include only the underground switch component. In addition, the actual expenses recorded on this budget code have also been updated to remove other work (such as overhead switch replacement and underground structures work) that is also included in this budget code.*

Overhead – variances associated with component replacement & maintenance programs are primarily driven by changes in capital expenditure.

being included. Additionally, the Proposed Capacitor numbers have been updated to include the capacitors that were requested by BC 082530 at 11 per year. Actual capacitors have also been updated.

Comparison of 2016 Authorized Spending to 2016 Actual Spending

Capital Project	2016	2016	2016
	Actuals	Authorized	Variance
Nominal Dollars (\$000)			
SDG&E Weather Instrumentation Install (BC 11243)			\$0
Circuit 1215 Fire Risk Mitigation Project (BC 12265)			\$0
FiRM Phases 1, 2, & 3 (BC 13247 & 14247)	\$54,134	\$61,714	(\$7,580)
Circuit 441 Pole Loading Study/Fire Risk Mitigation (BC 13255)			\$0
Distribution Aerial Marking and Lighting (BC 13266)	\$6	\$150	(\$144)
Cleveland National Forest (CNF) (BC 13282 & 081650)	\$8,976	\$11,451	(\$2,475)
Sub-Total Fire Specific	\$63,116	\$73,315	(\$10,199)
Replace for Live Front Equipment (BC 6247)	\$515	\$906	(\$391)
Powerworkz (BC 12256)	(\$1)		(\$1)
SF6 Switch Replacement (BC 14249)	\$459	\$10,623	(\$10,164)
Sub-Total Other TY2016 Elect Dist Safety & Risk Projects	\$973	\$11,529	(\$10,556)
Total TY2016 GRC Elect Dist Safety & Risk Projects	\$64,089	\$84,844	(\$20,755)

2016 Variance Explanations:

FiRM Phases 1, 2 & 3 - The 2016 FiRM variance is primarily related to phasing of construction activities; the GRC filing assumed steep increases between 2014-2016, while actual work activities peaked in mid-2015 and remained stable thereafter.

Distribution Aerial Marking and Lighting – This project has a similar version on the transmission side, Transmission Aerial Marking and Lighting. The majority of marking and lighting work will be completed on the transmission side as their structures are more likely to exceed the criteria for their need. The cost to install the aviation obstruction marking and lighting varies, ranging from five thousand up to seventy-five thousand dollars. Costs vary depending on whether lights or markers are used, the number of lights or markers and the complexity of the work. The number of jobs to be done per year is indeterminate, as SDG&E cannot foresee where the FAA or local Airports will determine installation of markers or lighting is required. The original forecast was based on four projects per year whereas only one project was needed in 2016.

Cleveland National Forest – The variance is due to delayed approval of PTC. SDG&E received the PTC from the Commission in D.16-05-038, dated May 26, 2016, which resulted in subsequent construction started in September 2016.

Replace for Live Front Equipment – as explained above, the Replace for Live Front Equipment project is a secondary project, which is used when live front equipment is replaced in conjunction with other capital work (e.g., cable replacement, circuit upgrades, etc.). The variance in completion of live front replacement is dependent on circumstances, such as where

projects are being completed and whether those areas have live front equipment that needs to be replaced.

SF6 Switch Replacement – To avoid duplication, since this project shows up in two places, please see the complete explanation below.

	2016				
	Metrics		Nominal Dollars (\$000)		
	Actual Replacement Rate	Planned Replacement Rate	Actual Expense	Authorized Expense	Variance
Component Replacement & Maintenance Programs:					
Circuit Breakers (BC 992820)	31	8	\$0	\$755	(\$755)
Capacitors (BC 112490, 002090, 082530, 13288A)	11	18	\$652	\$4,166	(\$3,514)
SF6 Switches (BC 14249A & 142490)	4	200	\$459	\$10,623	(\$10,164)
Underground Switches (BC 002890)	53	60	\$5,527	\$8,057	(\$2,530)
Associated Overhead (portions of BC 009010, 009040, 009050, 00906A, & 009060)	n/a	n/a	\$2,515	\$10,251	(\$7,736)

2016 Variance Explanations:

The “planned” replacement rates were planning or forecasting assumptions SDG&E used to derive the TY 2016 GRC forecasts. The “planned” values were not intended to be used as metrics for accountability reporting purposes. SDG&E is providing these replacement rates and the associated dollars in accordance with D.16-06-054.

Circuit Breakers – For purposes of clarifying the information being provided, SDG&E notes that this budget code is intended for Replacement of Obsolete Substation Equipment work, of which Circuit Breakers are only a small portion. For the replacement rate levels listed under “Metrics” in the table above, the Actual Replacement Rate includes both planned replacements for circuit breakers on blanket substation reliability and capacity budgets (*i.e.*, a routine circuit breaker replacement project) as well as circuit breakers being replaced on specific capital budgets or projects (*e.g.*, substation rebuilds such as the Los Coches Rebuild). Conversely, the Planned Replacement Rates as well as the Authorized Expense represent only the blanket or routine circuit breaker portion of this budget code. SDG&E wanted to show all the circuit breakers that were indeed replaced in 2016. However, for specific capital projects, SDG&E cannot isolate circuit breakers contained within specific capital projects or other budget codes. For example, if SDG&E has a project for a substation rebuild, it does not separately forecast or financially track the circuit breaker within the larger substation rebuild. Rather, SDG&E forecasts and tracks the entire capital project costs. As such, the actual dollars being reported in this report is not inclusive of all circuit breaker costs. No circuit breakers were replaced under this budget code during 2016; the dollar variance is a result of actual circuit breakers being replaced on other budget codes, however, and are not included in the Actual Expense column.

Capacitors – Capacitors are recorded to multiple budget codes. The actual type of capacitors installed differed from what was forecasted in the TY 2016 GRC and the average cost to install the capacitors varied accordingly. As an example, the forecasted level of SCADA capacitors in the TY 2016 GRC was lower than actually installed in 2016. The actual spend was lower than authorized due to materials reconciliation where capacitor expenses recorded in prior years were transferred to the jobs that actually utilized them.

SF6 Switch Replacement – This project was forecasted in the TY 2016 GRC to begin replacing 200 switches per year beginning in 2016. Only 4 switch replacements were completed in 2016. The SF6 program encountered several difficulties in ramping up to the forecasted high-volume replacements of 200 per year. First, SDG&E’s engineering team decided that a full system assessment was required to truly understand how many SF6 units were in service, the actual locations of the equipment, and the condition of these devices prior to commencing SF6 replacements. With that information, a true analytical approach could be applied to first remove all known “leakers,” followed by units that would have the greatest benefit to system operations, reliability, and overall worker safety. Second, during 2016, there were also several issues with SDG&E’s main manufacturer. These issues ranged from internal management conflicts to labor issues with their sheet metal workers. These issues greatly impacted their ability to fulfill their standard switch orders for all their utility customers for nearly a 2-year period. Engineering worked with a new organization, that was just beginning operations, to duplicate similar products for the entire product line (~ 20 different switches and associated form factors). Now, SDG&E has two manufacturers to fulfill the materials orders. Third, the replacement switches are very complicated and customized designs; off the shelf products are not readily available for purchase without going to larger footprint units that would impact design/construction/permitting due requiring more space, since they have a larger physical footprint. Fourth, these switches are often in very challenging environments when located underground where facilities may routinely be submerged in water after storms. Fifth, the existing manufacturers’ production lines typically run at 100%+ capacity due to the expertise and time required to construct these units, which have several long lead time components. Manufacturers are required to expand their existing operations to meet projected order quantities. Other technologies such as oil, air, and solid-dielectric medium switches have a larger foot print and usually require an increase in easement and franchise, resulting in approval delays in permitting due to right of way issues. One of the main benefits of a SF6 switch is the small physical foot print that allows maintaining designs within current franchise and easements. Additionally, the Americans with Disabilities Act’s (ADA) increased requirements of 48” for sidewalks brought additional challenges to SF6 equipment replacements that were already installed according to the previous 36” requirement. Lastly, these additional sources as well as getting the initial manufacturer back to normal operations were critical in order to match the expected volumes required to meet the objectives of this project. With a full system assessment now completed, a prioritization list identified, and with existing vendors ramping production schedules, SDG&E expects that all known units that are exhibiting pressure losses will be eliminated before the 2020 mandate. This project will require five years or more to truly achieve the goal to eliminate all SF6 products from the distribution network. Nonetheless, SDG&E is committed to removing or replacing the SF6 switches and its focus is working, over the following few years, to eliminate/replace all remaining facilities.

Underground Switches – SDG&E forecasted that it would replace 60 DOE switches in 2016. The DOE switch replacement variance was due to a number of issues. Each switch replacement job is unique and will have different variables with land rights, environmental impacts and customer impacts. Some jobs had permit delays with the cities or municipalities, some had outage coordination issues with customers, and others were delayed by equipment availability from the manufacturer. Additionally, the original estimate for underground switches was based

on two types of replacements, replacements with manual switches and replacements with SCADA switches. SCADA switches provide data for improved operator situational awareness, system planning load studies, and provide for remote and automated control operation, allowing for improved restoration response and reliability, but are more costly than manual switches for both materials and labor. The reality was that many of the DOE switch locations were not good fits for SCADA, so manual switches were designed and replaced at a proportionately higher rate than was assumed in the estimate. SDG&E is continuously improving strategies to work through the issues noted, to have more consistent switch replacement schedules from job to job. The lower cost of manual switch replacement leads to a portion of the overall budget underrun. The authorized dollars only include the underground switch component replacement. In addition, the actual expenses recorded exclude the overhead switch replacement and underground structures work that are also included in this budget code.

Overhead – Overheads are dependent on the amount of capital work performed. As such, the variances associated with component replacement & maintenance programs identified herein are primarily driven by changes in capital expenditure.

SDG&E Electric Operations Metrics Levels³⁷

SDG&E provides the proposed metrics below. Some of these metrics (such as Hardware and Equipment Failures) are being included pursuant to D.16-06-054, while others (such as Number of Fire Ignitions) are being provided for measurement purposes in these areas over time.

SDG&E Electric Operations Metrics	2014	2015	2016
	Actuals	Actuals	Actuals
Completed Vegetation Inspections	484,293	480,240	478,927
Vegetation Related Outages	48	37	55
Hardware Failures	49	58	53
Other Equipment Failures	183	181	269
Total Equipment Failures	232	239	322
Wire Down due to Equipment Failure	17	10	15
Wire Down due to Other Causes	49	52	91
Total Wire Down (Transmission & Distribution)	66	62	106
Number of Fire Ignitions	30	32	30
Reliability Index - SAIDI (minutes of sustained outages per customer per year)	64.59	57.92	72.74
Reliability Index - SAIFI (number of sustained outages per customer per year)	0.603	0.526	0.620

³⁷ The Electric Operations Metrics, with the exception of the completed vegetation inspections and number of fire ignitions, excludes events related to outages excluded through the major event day (MED) criteria defined by IEEE 1366. This reporting is consistent with other reliability metrics such as SAIDI and SAIFI. The format and numbers have been updated since the First Interim Report accordingly.

Explanations for Year over Year Changes:

2016 Weather Overview – Following the drought-stricken winters of 2014 and 2015, strong El Nino conditions developed in 2015, which resulted in the return of significant winter storms to the SDG&E service territory during 2016 and impacted 2016 actuals. Overall, 2014 was a warm and dry year with well below normal rainfall and storm activity. By the end of 2014, San Diego had experienced three winter storm systems over a five-day period, which generated rainfall and wind gusts exceeding 30 mph across highly populated areas. The warm and dry conditions intensified into 2015, when SDG&E experienced the warmest and fourth-driest start to the year in history. There were no significant winter storm events through the first half of 2015. The development of strong El Nino conditions caused a return to near-normal storm events, with four storm events spanning six days in November and December. The increasing number of coastal storm events continued into 2016, and for the first time since the winter of 2010-2011, SDG&E experienced near-average winter storm activity. During 2016, SDG&E experienced five significant winter storm events spanning thirteen days.

Completed Vegetation Inspections – Inspection numbers do not include off-cycle inspections (e.g., post-storm, post-fire, pre-fire season in highest risk fire areas and species-specific inspections). SDG&E physically inspects all spans of overhead line documenting and updating tree/vegetation that is contained within the PowerworkZ database on an annual basis. The SDG&E tree inventory is fluid, meaning that each year trees are removed, pruned, and added to the inventory. For these reasons, the number of trees in inventory will vary from year to year from 460,000 to 480,000. The SDG&E program removes incompatible trees and replaces them with trees that will not grow tall enough to become an inventory issue at its maturity. San Diego has a very diverse landscape where trees are continuously planted and removed by home owners and landscape businesses; therefore, this varying annual inventory is the main driver of the number of vegetation inspections completed each year.

Vegetation Related Outages – Vegetation Related Outages are outages of any duration that were caused by vegetation excluding vegetation caused outages on major event days. In 2016, SDG&E experienced an increase in vegetation caused outages due to severe coastal storms. These storms delivered high winds with heavy rain, and saturated soil. This resulted in several downed whole trees and large branch failures throughout the coastal areas of San Diego and Orange Counties. SDG&E also saw an increase in tree-caused outages from the private sector. SDG&E works hard to educate the private and local industry about the electrical hazards and risks of pruning and/or removing trees in proximity to overhead lines. SDG&E has a very aggressive tree trim and removal program that helps deliver reliable and safe services. *Note: The 2014 and 2015 vegetation-related outages have been updated since the First Interim Report. The First Interim Report reported on all vegetation-related outages; however, as described in footnote 37, MED have now been excluded. In addition, in 2015, daily system outage report coding changes were made to some outages, which are reflected here.*

Hardware Failures – Overhead system hardware failures include overhead connectors/jumpers, miscellaneous hardware, insulator/pin/wire floating and sub-hardware excluding failures during major event days. Hardware failures are a subset of total equipment failures. The year-over-year numbers are consistent with historical trends.

Other Equipment Failures – Overhead equipment failures include all overhead equipment categories within reliability (e.g., transformers, switches, capacitors, substation equipment, poles, etc.). The increase in 2016 equipment failures reflects the increase in outages in the coastal regions (outside of the fire threat zone (FTZ)) due to storms and the corrosive coastal environment. SDG&E plans to address this issue in numerous programs discussed in the testimony of Alan Colton (Exhibit SDG&E-14) and William Speer (Exhibit SDG&E-15), such as the 4kV modernization program, the overhead switch inspection and replacement program, and the pole risk mitigation and engineering (PRiME) program.

Wire Down due to Equipment Failures – This category consists of transformers, switches, structures, and hardware, etc., failures leading to a wire down. The year over year numbers are consistent with historical trends.

Wire Down due to Other Causes – A wire-down event can also be caused a variety of external events or forces. Third-party external forces cause wire-down events, such as car-to-pole contact, contact from vegetation from outside of SDG&E’s right of way, construction equipment, Mylar balloons, birds, etc., and this varies from year to year. Inclement weather events increase the number of wire-down events. In 2016, SDG&E experienced significant storms that caused an increase in wire-down events.

Number of Fire Ignitions³⁸ – D.14-02-015 requires SDG&E to report annually (on April 1) fires meeting the following criteria (i.e., “reportable fires”):

- Electric in origin
- Leaves the electric facility
- Travels more than one meter from the electric facility
- Is self-propagating (meaning if the energy is turned off, the fire will still burn).

The number of reportable fires is staying relatively flat, largely due to fire hardening efforts and the vegetation management program.

Reliability Index – System Average Interruption Duration Index (SAIDI): SAIDI represents the number of *minutes* of sustained outages per customer per year and is measured as the distribution and transmission components with Threshold Major Event Days (TMED) excluded.

- 2015 system SAIDI was low as compared to 2016 due a reduced number of outages in the following categories (listed in descending order):
 - o Distribution Equipment failures
 - o Foreign object contacting distribution lines (bird and balloon)
 - o Transmission and substation related outages
 - o Wildfires
 - o Weather related events

³⁸ The First Interim Report previously reported on fire ignitions solely due to wire-down incidents. In order to be consistent with D.14-02-015, this second report now reflects all reportable fires for 2014-2016.

- 2016 system SAIDI is higher than 2014 and 2015, largely due to an increase in connector failures in the underground systems and an increase in substation-caused outages.

Reliability Index – System Average Interruption Frequency Index (SAIFI): SAIFI represents the number of sustained *outages* per customer per year and is measured as the distribution and transmission components with TMED excluded.

- 2015 system SAIFI was low, largely due to the absence of major transmission and substation-related outages.
- 2016 system SAIFI is higher than 2014 and 2015, largely due to an increase in connector failures in the underground systems and an increase in substation-caused outages.

3. SDG&E Gas Operations – Gas Safety Incidents (Third-Party Dig-Ins and elements of DIMP including projects associated with replacing aging infrastructure)

a. Third-Party Dig-Ins

A third-party dig-in occurs when people or companies excavate in the vicinity of buried utility infrastructure without realizing the infrastructure is there or if proper excavation practices are not adhered to during the excavation.³⁹ These third parties can “dig-in” to the gas underground piping and facilities, which can cause catastrophic consequences. The primary mitigation activities in the Dig-In damage prevention program included in the Utilities’ previous GRC cycles are Locate and Mark (including pipeline observation (stand-by) and the Damage Prevention Public Awareness Campaign.

As explained by SDG&E in its 2016 GRC testimony and in its RAMP Report, Locate and Mark is the process mandated by 49 Code of Federal Regulations (CFR) 192.614 (Damage Prevention Program) and the California One-Call Law (Government Code Section 4216), where the owner of underground facilities, when notified by the Underground Service Alert (USA) One-Call Center of a planned excavation, must respond within two working days and mark the location of those underground facilities that are in conflict with the planned excavations. To comply with the Locate and Mark regulatory and legal requirements, employees use an electronic pipe-locating device to identify the location of SDG&E’s underground pipelines and utilize substructure maps and service history records to aid in verifying the location of the gas lines.⁴⁰ Conducting stand-by observations of other entities excavating in close proximity to SDG&E high priority pipelines is another important damage prevention activity. Generally, this involves an employee inspecting construction job sites to confirm that excavators are aware of the location of critical SDG&E gas facilities. The State of California enacted regulations in 2007 that mandate a preconstruction meeting with excavators requesting Locate and Mark support and require continuous monitoring of all excavations within ten feet of high-pressure pipelines.⁴¹

³⁹ RAMP Chapter SDG&E-2, *Catastrophic Damage Involving Third Party Dig-Ins* (November 30, 2016) at SDGE 2-2.

⁴⁰ *Id.*

⁴¹ *See* Cal. Code Regs., Tit. 8, § 1541(b)(1)(B) (2007).

The Public Awareness Campaign is mandated pursuant to Title 49 CFR 192.616. Its purpose is to develop and implement a continuous public education program focused on use of the One-Call notification system; hazards associated with the unintended release of gas; physical indications that an unintended release of gas has occurred; steps that should be taken to protect public safety in the event of gas release; and procedures for reporting unintended releases of gas. SDG&E utilizes multiple channels for this communication such as billboards, bill inserts, radio announcements, bumper stickers, safety events, press releases, social media, and sponsorships to capture a vast audience.⁴²

The tables below represent the cost of dig-in prevention for years 2014-2016. As described below, the variance for 2014-2016 is due to the difference between the forecast methodology (in the case of Locate and Mark, a five-year average) and the recorded level. The volume of required Damage Prevention activities is typically driven by general construction activity in public and private rights-of-way and customer growth. These factors generally fluctuate with economic conditions, which means the exact amount of dig-in-related activities in any given year is uncertain when managing incurred costs.

The Actual and Authorized amounts in the tables below leverage the Locate and Mark workpaper group and add the Public Awareness Dig-In Campaign, which is a portion of a different workpaper. The 2014 and 2015 O&M values were taken from the TY 2012 GRC workpapers; the 2016 O&M and all capital amounts were taken from the TY 2016 GRC Settlement Agreement.

Comparison of 2014 and 2015 Authorized Spending to 2014 and 2015 Actual Spending

(\$000) Nominal Dollars	2014 O&M Dollars			2014 Capital Dollars		
	Actuals	Authorized	Variance	Actuals	Authorized	Variance
Total Cost of Dig-In Damage Prevention Program	\$2,768	\$2,647	\$120	\$216	\$218	(\$2)

2014 Variance Explanations:

Locate and Mark costs fluctuate each year based on location, quantity, and complexity of jobs. As described in the narrative above because the volume of required Damage Prevention activities is typically driven by general construction activity in public and private rights-of-way and customer growth, which generally fluctuate with economic conditions, the exact amount of dig-in-related activities in a given year is uncertain when managing incurred costs.

(\$000) Nominal Dollars	2015 O&M Dollars			2015 Capital Dollars		
	Actuals	Authorized	Variance	Actuals	Authorized	Variance
Total Cost of Dig-In Damage Prevention Program	\$2,658	\$2,718	(\$61)	\$282	\$264	\$19

2015 Variance Explanations:

⁴² RAMP Chapter SDG&E-2, *Catastrophic Damage Involving Third Party Dig-Ins* (November 30, 2016) at SDGE 2-15.

The variance explanation for 2015 is the same as the 2014 variance explanation above.

Comparison of 2016 Authorized Spending to 2016 Actual Spending

(\$000) Nominal Dollars	2016 O&M Dollars			2016 Capital Dollars		
	Actuals	Authorized	Variance	Actuals	Authorized	Variance
Total Cost of Dig-In Damage Prevention Program	\$3,059	\$2,754	\$304	\$424	\$316	\$108

2016 Variance Explanations:

The variance explanation for 2016 is the same as the 2014 variance explanation above.

SDG&E Third-Party Dig-In Metrics Levels

	2014	2015	2016
	Actuals	Actuals	Actuals
Number of 3rd Party damages to High Pressure Pipe	0	0	0
Number of 3rd Party damages to Medium Pressure Pipe	318	364	405
Total Damages	318	364	405
Total Locate & Mark Tickets ⁽¹⁾	106,129	115,340	123,726
Damages per 1,000 USA Tickets ⁽²⁾	3.0	3.2	3.3

⁽¹⁾ The methodology for reporting "Total Locate & Mark Tickets" was modified in 2015 to report only "New" USA tickets instead of "All" types of tickets (New, renewal, job extensions, etc.). The 2015 Annual DOT report shows 65,096 as the Total number of USA tickets which is only the number of "New" USA tickets experienced at SDG&E. The number included in the table above is the total of "All" USA tickets that would have been reported had the methodology not changed. This allows for apples-to-apples comparison of the values and for trending purposes.

⁽²⁾ This is an industry wide metric used to evaluate Damage Prevention performance and routinely used on PHMSAs website when showing data and statistical information. The Calculation is (Total Damages / Total Tickets X 1,000)

Explanations for Year over Year Changes:

Although the number of damages and tickets have increased in each year, the rate of increase is slightly lower in 2016 (11%) than it was in 2015 (14%). The increase in the number of tickets can be attributable to an increase in construction/excavation activities and/or more contractors/excavators calling for tickets that might not have called in the past. Contractor/excavator awareness of the new requirements of the California Dig-Safe Law along with the focused efforts of SDG&E's Public Awareness Campaign could be increasing contractor/excavator awareness of the 811 Dig Alert service, which would increase the number of tickets.

b. SDG&E Distribution Integrity Management Program

SDG&E's DIMP is founded upon a commitment to provide safe and reliable energy at reasonable rates through a process of continual safety enhancement by proactively identifying

and reducing pipeline integrity risks for distribution pipelines.⁴³ DIMP activities are required to comply with 49 CFR Part 192, Subpart P—Gas Distribution Pipeline Integrity Management. Pipeline and Hazardous Materials and Safety Administration (PHMSA) established DIMP requirements to enhance pipeline safety by having operators identify and reduce pipeline integrity risks for distribution pipelines, as required under the Pipeline Integrity, Protection, Enforcement and Safety Act of 2006.⁴⁴

DIMP is a balanced program whereby the difference between actual and authorized O&M and capital-related costs are recorded to the Post-2011 DIMP balancing account (DIMPBA). For the years 2014 and 2015, DIMP-related costs were authorized to be recorded to the DIMPBA in accordance with OP 17 of D.13-05-010. For TY 2016, SDG&E recorded DIMP-related costs to the DIMPBA pursuant to D.16-06-054.

In the TY 2016 GRC, the direct testimony of the Pipeline Integrity for Transmission and Distribution witness presented Programs and Activities to Address Risk (PAAR). As stated in direct testimony, “PAARs are implemented through different avenues, depending on the threat being addressed... In alignment with PHMSA’s intent and recognition that a PAAR needs to be operator-specific, SDG&E develops PAARs that are specific to the SDG&E system.”⁴⁵ Since implementing DIMP, SDG&E has created several PAARs including:

- In 2013, SDG&E successfully completed a Sewer Lateral Inspection Program (SLIP) PAAR⁴⁶ and an evaluation of distribution anodeless risers. Completion of the project included records review and field inspections as required.
- The Distribution Risk Evaluation and Monitoring System (DREAMS) PAAR prioritizes certain early-vintage steel (pre-1960) and plastic (pre-1986), including Aldyl-A, for replacement. SDG&E will continue using risk evaluation to accelerate replacements on a targeted basis. The risk evaluation considers the leakage history, cathodic protection (for steel), vintage of the pipe, and the location.
- The Gas Infrastructure Protection Program (GIPP) PAAR addresses potential vehicular damage associated with above-ground distribution facilities. To address vehicular damage to Company facilities, SDG&E has identified, evaluated, and implemented a damage prevention solution that includes a collection of mitigation measures to address this threat.

The tables below illustrate the DIMP-related O&M and capital costs on a revenue requirement basis. As mentioned in Section 1c, the Utilities are presenting this balanced account program information in revenue requirement terms rather than direct expenditures to best represent how

⁴³ A.14-11-003, Ex. 53 SDG&E/Martinez at iii.

⁴⁴ *Id.* at 13-14.

⁴⁵ *Id.* at 15.

⁴⁶ The SLIP PAAR addresses an emerging issue concerning pipeline damage associated with sewer laterals. The integrity threat comes from the use of trenchless technology during installation of pipelines. Trenchless technology provides a means of installing a pipeline without having to excavate a trench along the entire length of the pipeline.

the DIMP program is managed and reported in advice filings. For the 2014 and 2015 showing, the Utilities are providing information for the entire TY 2012 GRC cycle (2012-2015) because DIMP O&M and capital are managed over the authorized full GRC cycle, so any one particular year could be over or under-collected. For 2016, the table provides only the 2016 information, which was only the first year of the TY 2016 GRC cycle (2016-2018), and for the reasons stated above, the 2016 variance alone is not representative of what was spent compared to what was authorized for the entire TY 2016 GRC cycle.

Comparison of Authorized and Actual Revenue Requirement for 2012-2015

DIMP Balancing Account Details Revenue Requirements (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
	Actual	Authorized ^{1/}	Under/ (Over) Collection	Interest	DIMPBA Balance
Year 2012:^{1/}					
O&M	6,545	3,770	2,775		2,775
Capital-Related Costs	-	190	(190)		(190)
Interest				2	2
Subtotal	6,545	3,960	2,585	2	2,587
Year 2013:					
O&M	4,072	3,870	202		202
Capital-Related Costs ^{2/}	51	195	(144)		(144)
Cost of Capital Adjust.		(13)	13		13
Interest				3	3
Subtotal	4,123	4,051	72	3	75
Year 2014:					
O&M	2,640	3,976	(1,336)		(1,336)
Capital-Related Costs ^{2/}	184	187	(3)		(3)
Cost of Capital Adjust.			-		-
Interest				1	1
2014 Subtotal	2,824	4,163	(1,339)	1	(1,338)
Year 2015:					
O&M	2,137	4,085	(1,948)		(1,948)
Capital-Related Costs ^{2/}	370	190	180		180
Cost of Capital Adjust.			-		-
Interest				1	1
2015 Subtotal	2,507	4,275	(1,768)	1	(1,767)
Total TY2012 GRC Cycle for Years 2012-2015:					
O&M	15,394	15,701	(307)		(307)
Capital-Related Costs	605	762	(158)		(157)
Cost of Capital Adjust.	-	(13)	13		13
Interest				6	6
Total	15,999	16,450	(451)	6	(445)

^{1/} Authorized O&M and capital-related revenue requirement increased by 2.65%/2.75% (2013/2014+) attrition adjustment adopted in 2012 GRC decision.

^{2/} Actual capital-related costs also include the capital-related costs associated with capital additions from 2012 - 2014 and impact of the 2013 Cost of Capital.

GRC Cycle Variance Explanations:

DIMP O&M and capital are managed over the TY 2012 GRC cycle (2012 - 2015), so any particular year could be over or underspent compared to authorized. Note that the authorized capital amount in the regulatory balancing account is not the capital spending level, but is the capital-related costs, which comprise return on rate base, taxes on return, depreciation, and ad valorem tax.

Comparison of 2014 and 2015 “Proposed” Metrics Levels to 2014 and 2015 Actual Metrics Levels

The metrics included herein are provided to compare actual activity levels against what were assumed levels of work, herein noted as “planned” activity levels, during the TY 2012 and TY 2016 GRCs. Where a planned activity level is provided, it is based on planning assumptions in the GRC forecast for that specific activity. For some programs, however, “not comparable” indicates that SDG&E could not discern an easily identifiable assumed level of work (e.g., each activity was not specifically forecasted or the planned activity changed when implemented). When the TY 2012 and TY 2016 GRCs were developed, the metrics or assumed level of activities supporting the forecasts were not anticipated to be used for these purposes, as the interim accountability reporting requirements were established after the fact in the TY 2016 GRC Decision. In addition, the metrics may have changed as the programs matured and the scope of planned activities changed over time. As an example, Excess Flow Valves were the exclusive remediation for the Gas Infrastructure Protection Program (GIPP) during the TY 2012 GRC. After further study and experience, the planned work that was then performed in 2014 and 2015 expanded to include gas infrastructure inspections, which also included bollards and relocations as remediation solutions. Thus, the number of GIPP inspections reported in the “Actual Activity Level” below, do not have a TY 2012 GRC “Planned Activity Level” for comparison. The anodeless riser program expanded to include steel riser inspection and mitigation. As such, the metrics in this report are not the optimal way to display this information. Future accountability reporting should consider better performance metrics to demonstrate progress over time as SDG&E gains long-term experience with such programs that evolve year over year, as well as knowledge through the TY 2019 GRC and S-MAP proceedings.

	2014 Metrics	
	Actual Activity Level	Planned Activity Level
SDG&E DIMP Operating & Maintenance (O&M)		
Sewer Lateral Inspection Program (SLIP)	Complete	Planned activity levels not comparable to actual activity levels
Gas Infrastructure Protection Program (GIPP)	470 Inspections	
Steel Riser Inspection & Mitigation	29,253 Inspections	
		36,000 Inspections
	2014 Metrics	
SDG&E DIMP Capital		
Gas Infrastructure Protection Program (GIPP)	470 Inspections	Planned activity levels not comparable to actual activity levels
DREAMS: Aldyl-A Replacements	2 miles	4.2 miles

SDG&E DIMP Operating & Maintenance (O&M)	2015 Metrics	
	Actual Activity Level	Planned Activity Level
	Complete	Planned activity levels not comparable to actual activity levels
	Inspections Complete	
Sewer Lateral Inspection Program (SLIP)	25,603 Inspections	36,000 Inspections
Gas Infrastructure Protection Program (GIPP)		
Steel Riser Inspection & Mitigation		
SDG&E DIMP Capital	2015 Metrics	
	Actual Activity Level	Planned Activity Level
	Inspections Complete	Planned activity levels not comparable to actual activity levels
	5 miles	4.2 miles
Gas Infrastructure Protection Program (GIPP)		
DREAMS: Aldyl-A Replacements		

GRC Cycle Variance Explanations:

As part of the DIMP TY 2012 GRC request for 2012-2015, SDG&E requested funding for Programs and Activities to Address Risk, as discussed above. These PAAR programs, as intended, address risk above and beyond current regulatory requirements (federal and state). SDG&E executed on these PAARs; however, since the development of the workpapers in 2010, the scope of the programs was modified based on continual evaluation and results of the programs. For example, as explained above, the GIPP expanded beyond the proposed scope of Excess Flow Valve installation within the original GRC workpapers to include bollard protection and re-location of meter set assemblies. This expanded scope more adequately addresses the threat of vehicular damage. As such, since the scope has changed, the initial planned activity levels are listed as “not comparable” on the summary tables above. For the TY 2012 GRC, SDG&E attempted to estimate the scope of these PAARs. However, given the infancy of each of the programs, it was expected that the programs would continually adapt to program findings to adequately mitigate the risk being addressed.

Comparison of Authorized and Actual Revenue Requirement for 2016

DIMP Balancing Account Details Revenue Requirements (\$000)					
	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
	Actual	Authorized	Under/ (Over) Collection	Interest	DIMPBA Balance
<u>Year 2016:</u>					
O&M	3,552	6,306	(2,754)		(2,754)
Capital-Related Costs	515	821	(306)		(306)
Interest				(12)	(12)
Total	4,067	7,127	(3,060)	(12)	(3,072)

2016 Variance Explanation:

DIMP O&M and capital are managed over the TY 2016 GRC cycle (2016 - 2018), so any particular year could be over or underspent compared to authorized. Note that the authorized capital amount in the regulatory balancing account is not the capital spending level, but is the

capital-related costs, which comprise return on rate base, taxes on return, depreciation, and ad valorem tax.

Comparison of 2016 “Proposed” Metrics Levels to 2016 Actual Metrics Levels

See explanation above for 2014 and 2015 comparison levels.

SDG&E DIMP Operating & Maintenance (O&M)	2016 Metrics	
	Actual Activity Level	Planned Activity Level
	63,875 Inspections	Planned activity levels not comparable to actual activity levels
Riser Analysis, Inspection and Mitigation		
SDG&E DIMP Capital	2016 Metrics	
	Actual Activity Level	Planned Activity Level
	10 miles	17 miles
DREAMS: Aldyl-A Replacements		

2016 Variance Explanations:

As part of the DIMP GRC request for the TY 2016 GRC Cycle (2016-2018), SDG&E requested funding for PAARs, as discussed above. These PAAR programs, as intended, address risk above and beyond current regulatory requirements (federal and state). SDG&E executed on these PAARs; however, since the development of the workpapers in 2014, the scope of the programs was modified based on continual evaluation and results of the programs. As such, since the scope changed, the initial planned activity levels are listed as “not comparable” on the summary table above. For the TY 2016 GRC, SDG&E attempted to estimate the scope of these PAARs. However, given the infancy of each of the programs, it was expected that the programs would continually adapt to program findings to adequately mitigate the risk being addressed.

4. SoCalGas Gas Operations – Gas Safety Risks, including projects, activities, and costs associated with DIMP, TIMP, and SIMP

a. SoCalGas Distribution Integrity Management Program

As described in the DIMP section for SDG&E, DIMP activities are required to comply with 49 CFR Part 192, Subpart P—Gas Distribution Pipeline Integrity Management. PHMSA established DIMP requirements to enhance pipeline safety by having operators identify and reduce pipeline integrity risks for distribution pipelines, as required under the Pipeline Integrity, Protection, Enforcement and Safety Act of 2006. DIMP-related costs are balanced and recorded in SoCalGas’ DIMPBA.

DIMP comprises many PAARs, as explained in the SDG&E DIMP section above. In alignment with PHMSA’s intent and recognition that a PAAR needs to be operator-specific, SoCalGas develops PAARs that are specific to the SoCalGas system. SoCalGas-specific PAARs include:

- DREAMS PAAR prioritizes certain early-vintage steel (pre-1960) and plastic (pre-1986), including Aldyl-A, for replacement. SoCalGas has implemented a risk evaluation system to accelerate replacements on a targeted basis. The risk evaluation considers the leakage history, cathodic protection (for steel), vintage of the pipe, and the location.
- The Distribution Riser Inspection Program (DRIP) PAAR addresses the threat of failures of anodeless risers. Anodeless risers are service line components that have shown a propensity to fail before the end of their useful lives.
- The GIPP PAAR addresses potential vehicular damage associated with above-ground distribution facilities. To address vehicular damage to Company facilities, SoCalGas has identified, evaluated, and implemented a damage prevention solution that includes a collection of mitigation measures to address this threat.
- The SLIP PAAR addresses an emerging issue concerning pipeline damage associated with sewer laterals. The integrity threat comes from the use of trenchless technology during installation of pipelines. Trenchless technology provides a means of installing a pipeline without having to excavate a trench along the entire length of the pipeline. The project includes records review and field inspections as required.

The tables below illustrate the DIMP-related O&M and capital costs on a revenue requirement basis. As mentioned in Section 1c, the Utilities are presenting this balanced account program information in revenue requirement terms rather than direct expenditures to best represent how the DIMP program is managed and reported in advice letter filings. For the 2014 and 2015 showing, the Utilities are providing information for the entire TY 2012 GRC cycle (2012-2015) because DIMP O&M and capital are managed over the authorized full GRC cycle, so any one particular year could be over or under-collected. For 2016, the table provides only the 2016 information, which was only the first year of the TY 2016 GRC cycle (2016- 2018), and for the reasons stated above, the 2016 variance alone is not representative of what was spent compared to what was authorized for the entire TY 2016 GRC cycle.

Comparison of Authorized and Actual Revenue Requirement 2012-2015

DIMP Balancing Account Details Revenue Requirements (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
	Actual	Authorized ^{1/}	Under/ (Over) Collection	Interest	DIMPBA Balance
Year 2012:^{2/}					
O&M	18,683	27,369	(8,686)		(8,686)
Capital-Related Costs	22	651	(629)		(629)
Interest				(14)	(14)
Subtotal	18,705	28,020	(9,315)	(14)	(9,329)
Year 2013:					
O&M	39,879	28,094	11,785		11,785
Capital-Related Costs ^{3/}	474	668	(194)		(194)
Cost of Capital Adjust.		(36)	36		36
Interest				(11)	(11)
Subtotal	40,353	28,727	11,626	(11)	11,615
Year 2014:					
O&M	25,800	28,867	(3,067)		(3,067)
Capital-Related Costs ^{3/}	1,329	650	679		679
Cost of Capital Adjust.			-		-
Interest				2	2
2014 Subtotal	27,129	29,517	(2,388)	2	(2,386)
Year 2015:					
O&M	23,531	29,661	(6,130)		(6,130)
Capital-Related Costs ^{3/}	3,209	668	2,541		2,541
Cost of Capital Adjust.			-		-
Interest				(5)	(5)
2015 Subtotal	26,740	30,329	(3,589)	(5)	(3,594)
Total TY2012 GRC Cycle for Years 2012-2015:					
O&M	107,893	113,991	(6,098)		(6,098)
Capital-Related Costs	5,034	2,637	2,397		2,397
Cost of Capital Adjust.	-	(36)	36		36
Interest				(28)	(28)
Total	112,927	116,592	(3,665)	(28)	(3,693)

^{1/} Recorded O&M expenses includes an adjustment for certain prior year expenses removed from DIMPBA as a result of the Energy Division's review of DIMP expenses.

^{2/} Authorized O&M and capital-related revenue requirement increased by 2.75% attrition adjustment adopted in 2012 GRC decision.

^{3/} Actual capital-related costs also include the capital-related costs associated with capital additions from 2012 - 2014 and impact of the 2013 Cost of Capital.

GRC Cycle Variance Explanations:

DIMP O&M and capital are managed over the TY 2012 GRC cycle (2012 - 2015), so any particular year could be over or underspent compared to authorized. Note that the authorized capital amount in the regulatory balancing account is not the capital spending level, but is the capital-related costs, which comprise return on rate base, taxes on return, depreciation, and ad valorem tax.

Comparison of 2014 and 2015 “Proposed” Metrics Levels to 2014 and 2015 Actual Metrics Levels

The metrics included herein are provided to compare actual activity levels against what were assumed levels of work, herein noted as “planned” activity levels, during the TY 2012 and TY 2016 GRCs. Where a planned activity level is provided, it is based on planning assumptions in the GRC forecast for that specific activity. For some programs, however, “not comparable” indicates that SoCalGas could not discern an easily identifiable assumed level of work (*e.g.*, each activity was not specifically forecasted or the planned activity changed when implemented). When the TY 2012 and TY 2016 GRCs were developed, the metrics or assumed level of activities supporting the forecasts were not anticipated to be used for these purposes, as the interim accountability reporting requirements were established after the fact in the TY 2016 GRC Decision. In addition, the metrics may have changed as the programs matured and the scope of planned activities changed over time. As an example, Excess Flow Valves were the exclusive remediation for the Gas Infrastructure Protection Program (GIPP) during the TY 2012 GRC. After further study and experience, the planned work that was then performed in 2014 and 2015 expanded to include gas infrastructure inspections, which also included bollards and relocations as remediation solutions. Thus, the number of GIPP inspections reported in the “Actual Activity Level” below, do not have a TY 2012 GRC “Planned Activity Level” for comparison. As such, the metrics in this report are not the optimal way to display this information. Future accountability reporting should consider better performance metrics to demonstrate progress over time as SoCalGas gains long-term experience with such programs that evolve year over year, as well as knowledge through the TY 2019 GRC and S-MAP proceedings.

SoCalGas DIMP Operating & Maintenance (O&M)	2014 Metrics	
	Actual Activity Level	Planned Activity Level
Sewer Lateral Inspection Program (SLIP) Cleared by Field Inspection	224,660 Services Cleared	75,859 Services Cleared
Gas Infrastructure Protection Program (GIPP) Mitigations (combined O&M and Capital)	123,300 Inspections	Planned activity levels not comparable to actual activity levels
Anodeless Riser Inspection & Mitigation	68,700 mitigations	
SoCalGas DIMP Capital	2014 Metrics	
	Actual Activity Level	Planned Activity Level
DREAMS: Early-vintage Steel Replacements	4 miles	30 miles
DREAMS: Early-vintage Aldyl-A Replacements	0 miles	15 miles
Gas Infrastructure Protection Program (GIPP) Mitigations (combined O&M and Capital)	123,300 Inspections	Planned activity levels not comparable to actual activity levels
SoCalGas DIMP Operating & Maintenance (O&M)	2015 Metrics	
	Actual Activity Level	Planned Activity Level
Sewer Lateral Inspection Program (SLIP) Cleared by Field Inspection	169,700 Services Cleared	75,859 Services Cleared
Gas Infrastructure Protection Program (GIPP) Mitigations (combined O&M and Capital)	7,800 Inspections	Planned activity levels not comparable to actual activity levels
Anodeless Riser Inspection & Mitigation	92,900 mitigations	
SoCalGas DIMP Capital	2015 Metrics	
	Actual Activity Level	Planned Activity Level
DREAMS: Early-vintage Steel Replacements	11 miles	30 miles
DREAMS: Early-vintage Aldyl-A Replacements	2 miles	15 miles
Gas Infrastructure Protection Program (GIPP) Mitigations (combined O&M and Capital)	7,800 Inspections	Planned activity levels not comparable to actual activity levels

GRC Cycle Variance Explanations:

As part of the DIMP TY 2012 GRC request for 2012-2015, SoCalGas requested funding for PAARs, as discussed above. These PAAR programs, as intended, address risk above and beyond current regulatory requirements (federal and state). SoCalGas executed on these PAARs; however, since the development of the workpapers in 2010, the scope of the programs was modified based on continual evaluation and results of the programs. For example, as explained above, for the SLIP, it was recognized that additional services would require review and the rate of services inspected per year would significantly increase. In addition, for the GIPP, the program expanded beyond the proposed scope of Excess Flow Valve installation to include bollard protection and re-location of meter set assemblies. This expanded scope more adequately addresses the threat of vehicular damage. As such, since the scope has changed, the initial planned activity levels are listed as “not comparable” on the summary tables above. For the TY 2012 GRC, SoCalGas attempted to estimate the scope of these PAARs. However, given the infancy of each of the programs, it was expected that the programs would adapt to program findings to adequately mitigate the risk being addressed.

Comparison of Authorized and Actual Revenue Requirement for 2016

DIMP Balancing Account Details Revenue Requirements (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
	Actual	Authorized	Under/ (Over) Collection	Interest	DIMPBA Balance
<u>Year 2016:</u>					
O&M	32,409	44,060	(11,651)		(11,651)
Capital-Related Costs	2,193	4,406	(2,213)		(2,213)
Interest				(63)	(63)
Total	34,602	48,466	(13,864)	(63)	(13,927)

2016 Variance Explanation:

DIMP O&M and capital are managed over the TY 2016 GRC cycle (2016 - 2018), so any particular year could be over or underspent compared to authorized. Note that the authorized capital amount in the regulatory balancing account is not the capital spending level, but is the capital-related costs, which comprise return on rate base, taxes on return, depreciation, and ad valorem taxes.

Comparison of 2016 “Proposed” Metrics Levels to 2016 Actual Metrics Levels

See explanation above for 2014 and 2015 comparison levels.

SoCalGas DIMP Operating & Maintenance (O&M)	2016 Metrics	
	Actual Activity Level	Planned Activity Level
Sewer Lateral Inspection Program (SLIP) Cleared by Field Inspection	61,180 Services Cleared	50,000 Services Cleared
Gas Infrastructure Protection Program (GIPP) Mitigations (combined O&M and Capital)	6,245 Inspections/Mitigations	6,558 Inspections/Mitigations
Distribution Riser Inspection Project (DRIP) Inspections/Mitigations	172,600 Inspections/Mitigations	225,000 Inspections/Mitigations
SoCalGas DIMP Capital	2016 Metrics	
	Actual Activity Level	Planned Activity Level
DREAMS: Early-vintage Steel Replacements	25 miles	37 miles
DREAMS: Early-vintage Aldyl-A Replacements	11 miles	18 miles
Gas Infrastructure Protection Program (GIPP) Mitigations (combined O&M and Capital)	6,245 Inspections/Mitigations	6,558 Inspections/Mitigations

2016 Variance Explanation:

As part of the DIMP GRC request for the TY 2016 GRC Cycle (2016-2018), SoCalGas requested funding for PAARs, as discussed above. These PAAR programs, as intended, address risk above and beyond current regulatory requirements (federal and state). SoCalGas executed on these PAARs; however, since the development of the workpapers in 2014, the scope of the programs was modified based on continual evaluation and results of the programs. For example,

for the SLIP, it was recognized that additional services would require review and the rate of services inspected per year would significantly increase. In addition, for the GIPP, the program expanded beyond the proposed scope of Excess Flow Valve installation to include bollard protection and re-location of meter set assemblies. This expanded scope more adequately addresses the threat of vehicular damage. As such, since the scope changed, the initial planned activity levels are listed as “not comparable” on the summary tables above. For the TY 2016 GRC, SoCalGas attempted to estimate the scope of these PAARs. However, given the infancy of each of the programs, it was expected that the programs would continually adapt to program findings to adequately mitigate the risk being addressed.

b. SoCalGas Transmission Integrity Management Program

TIMP supports SoCalGas’ goals of operating the system safely and with excellence by continually assessing, mitigating, and reducing system risk. To comply with 49 CFR 192, Subpart O—Gas Transmission Pipeline Integrity Management, SoCalGas is required to continually identify threats to transmission pipelines located in High Consequence Areas (HCAs), determine the risk posed by these threats, schedule and track assessments to address threats within prescribed timelines, collect information about the condition of the pipelines, take actions to minimize applicable threats and integrity concerns to reduce the risk of a pipeline failure, and report findings to regulators. TIMP-related costs are balanced and recorded in a regulatory balancing account, the TIMP Balancing Account (TIMPBA).

In the 2016 GRC testimony, SoCalGas presented various activities including an Assessment category. TIMP’s allowable options in Assessments are:

- In-line Inspection (ILI) - The in-line inspection method utilizes specialized inspection tools that travel inside the pipeline. ILI tools are often referred to as “smart pigs.” Smart pigs come in a variety of types and sizes with different measurement capabilities that assist in collecting information about the pipeline.⁴⁷
- Pressure Test - Pressure testing is a method that uses a hydraulic approach by filling the pipeline, usually with water, at a pressure greater than the maximum allowable operating pressure of the pipeline for fixed period of time. In certain circumstances, the pipeline may be temporarily removed from service post-construction, pressure-tested, and then returned to service. If a leak occurs during the pressure test, the leak is investigated and remediated prior to continuing or completing a pressure test.⁴⁸
- External Corrosion Direct Assessment (ECDA) - ECDA is a process that proactively seeks to identify external corrosion defects before they grow to a size that can affect the integrity of the inspected pipeline. The ECDA process requires integration of operating data and the completion of above-ground surveys. This information is used to identify

⁴⁷ A.14-11-004, Ex. 49 SCG/Martinez at 10.

⁴⁸ *Id.*

and define the severity of coating faults, diminished cathodic protection, and areas where corrosion may have occurred or may be occurring.⁴⁹

Similar to the SoCalGas DIMP showing above, the tables below illustrate the TIMP-related O&M and capital costs on a revenue requirement basis. As mentioned in Section 1c, the Utilities are presenting this balanced account program information in revenue requirement terms rather than direct expenditures to best represent how the TIMP program is managed and reported in advice letter filings. For the 2014 and 2015 showing, the Utilities are providing information for the entire TY 2012 GRC cycle (2012-2015) because TIMP O&M and capital are managed over the authorized full GRC cycle, so any one particular year could be over or under-collected. For 2016, the table provides only the 2016 information, which was only the first year of the TY 2016 GRC cycle (2016 – 2018), and for the reasons stated above, the 2016 variance alone is not representative of what was spent compared to what was authorized for the entire TY 2016 GRC cycle.

⁴⁹ *Id.* at 10-11.

Comparison of Authorized and Actual Revenue Requirement 2012-2015

TIMP Balancing Account Details Revenue Requirements (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
	Actual	Authorized ^{1/}	Under/ (Over) Collection	Interest	TIMPBA Balance
Year 2012:^{2/}					
O&M	40,816	28,612	12,204		12,204
Capital-Related Costs	102	948	(846)		(846)
Interest				3	3
Subtotal	40,918	29,560	11,358	3	11,362
Year 2013:					
O&M	45,252	29,370	15,882		15,882
Capital-Related Costs ^{3/}	2,673	973	1,700		1,700
Cost of Capital Adjust.		(52)	52		52
Interest				21	21
Subtotal	47,925	30,291	17,634	21	17,655
Year 2014:					
O&M	42,686	30,178	12,508		12,508
Capital-Related Costs ^{3/}	7,531	946	6,585		6,585
Cost of Capital Adjust.			-		-
Interest				37	37
2014 Subtotal	50,217	31,124	19,093	37	19,130
Year 2015:					
O&M	37,820	31,008	6,812		6,812
Capital-Related Costs ^{3/}	10,997	972	10,025		10,025
Cost of Capital Adjust.			-		-
Interest				79	79
2015 Subtotal	48,817	31,980	16,837	79	16,916
Total TY2012 GRC Cycle for Years 2012-2015:					
O&M	166,573	119,168	47,405		47,405
Capital-Related Costs	21,303	3,839	17,464		17,464
Cost of Capital Adjust.	-	(52)	52		52
Interest				140	140
Total	187,877	122,955	64,921	140	65,062

^{1/} Recorded O&M expenses includes an adjustment for certain prior year expenses removed from TIMPBA as a result of the Energy Division's review of TIMP expenses.

^{2/} Authorized O&M and capital-related revenue requirement increased by 2.75% attrition adjustment adopted in 2012 GRC decision.

^{3/} Actual capital-related costs also include the capital-related costs associated with capital additions from 2012 - 2014 and impact of the 2013 Cost of Capital.

GRC Cycle Variance Explanations:

For the TY 2012 GRC cycle, TIMP was overspent compared to its authorized revenue requirement, resulting in an under-collected balance in the TIMPBA. This occurred for three reasons. First, in D.13-05-010, the Commission did not authorize SoCalGas to recover the entire forecast cost of implementing its TIMP. Second, in early 2010, when SoCalGas prepared its TY 2012 GRC application, SoCalGas did not anticipate the resources that would later be required to address the heightened focus on transmission integrity as a consequence of the rupture of a Pacific Gas and Electric Company transmission pipeline on September 10, 2010. Since the pipeline rupture in San Bruno, California, regulations such as “The Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011,” have led the PHMSA to change its reporting requirements and review the existing transmission integrity requirements to identify areas for improvement. Third, there is an impact as a result of how capital expenditures are recovered and balanced. As discussed in Section 1c, the amount recovered by SoCalGas for TIMP-related capital is less than actual capital-related costs recorded to the TIMPBA.

It should be noted that SoCalGas has requested recovery of under-collected balances in the TIMBA through three advice letter filings during the 2012-2015 GRC cycle.⁵⁰

Comparison of 2014 and 2015” Proposed” Metrics Levels to 2014 and 2015 Actual Metrics Levels

The metrics included herein are provided to compare actual activity levels against what were assumed levels of work, herein noted as “planned” activity levels, during the TY 2012 and TY 2016 GRCs. Where a planned activity level is provided, it is based on planning assumptions in the GRC forecast for that specific activity. For some programs, however, “not comparable” indicates that SoCalGas could not discern an easily identifiable assumed level of work (*e.g.*, each activity was not specifically forecasted). When the TY 2012 and TY 2016 GRCs were developed, the metrics or assumed level of activities supporting the forecasts were not anticipated to be used for these purposes, as the interim accountability reporting requirements were established after the fact in the TY 2016 GRC Decision. In addition, the metrics may have changed as the programs matured and the scope of planned activities changed over time. As such, the metrics in this report are not the optimal way to display this information. Future accountability reporting should consider better performance metrics to demonstrate progress over time as SoCalGas gains long-term experience with such programs that evolve year over year, as well as knowledge through the TY 2019 GRC and S-MAP proceedings.

⁵⁰ Advice Letter 4632, approved in Resolution G-3499 (June 11, 2015); Advice Letter 4819, approved in Resolution G-3517 (May 12, 2016); and Advice Letter 5057, which was filed on November 4, 2016 and is currently pending.

SoCalGas TIMP Operating & Maintenance (O&M) and Capital	2014 Metrics	
	Actual Activity Level	Planned Activity Level
Assessment: In-Line Inspection	393 miles	Planned activity levels not comparable to actual activity levels
Assessment: Pressure Testing	0 miles	
Assessment: External Corrosion Direct Assessment	45 miles	

SoCalGas TIMP Operating & Maintenance (O&M) and Capital	2015 Metrics	
	Actual Activity Level	Planned Activity Level
Assessment: In-Line Inspection	246 miles	Planned activity levels not comparable to actual activity levels
Assessment: Pressure Testing	0 miles	
Assessment: External Corrosion Direct Assessment	27 miles	

GRC Cycle Variance Explanations:

For the TIMP, at a minimum, transmission pipelines within densely populated areas require an assessment (ILI, Pressure Test or ECDA) every 7 years. To meet deadlines for TIMP assessments, schedules may be modified each year to account for resource, inspection tools, and system availability. For the TY 2012 GRC, a zero-based forecast was provided for assessment projects intended to be completed in 2010 and 2011. SoCalGas and SDG&E used a zero-based forecast methodology because the number of assessment projects changes from year to year. SoCalGas and SDG&E have attempted to level out the number of assessment projects completed each year to avoid large fluctuations in cost from year to year, but fluctuations still exist; therefore, it is not useful to compare the planned activity level from 2010 and 2011 to 2014 and 2015 to measure performance for a program with a long-term assessment cycle. Accordingly, the “planned” metrics are listed as “not comparable.” It should be noted that all TIMP assessments were completed on time, meeting regulatory deadlines for 2014 and 2015.

Comparison of Authorized and Actual Revenue Requirement 2016

TIMP Balancing Account Details Revenue Requirements (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
	Actual	Authorized	Under/ (Over) Collection	Interest	TIMPBA Balance
<u>Year 2016:</u>					
O&M	40,023	57,571	(17,548)		(17,548)
Capital-Related Costs	744	1,363	(619)		(619)
Interest				139	139
Total	40,767	58,934	(18,167)	139	(18,028)

2016 Variance Explanation:

For the TY 2016 GRC cycle (2016 – 2018), TIMP was underspent compared to its authorized revenue requirement, resulting in an over-collected balanced in the TIMPBA. This occurred because as mentioned above, the Utilities manage the TIMP O&M and capital over the authorized full TY 2016 GRC cycle (2016 -2018), so any one particular year could be over or under-collected.

Comparison of 2016 “Proposed” Metrics Levels to 2016 Actual Metrics Levels

See explanation above for 2014 and 2015 comparison levels.

SoCalGas TIMP Operating & Maintenance (O&M) and Capital	2016 Metrics	
	Actual Activity Level	Planned Activity Level
Assessment: In-Line Inspection	333 miles	615 miles
Assessment: Pressure Testing	4 miles	0 miles
Assessment: External Corrosion Direct Assessment	30 miles	33 miles

2016 Variance Explanation:

For the TIMP, at a minimum, transmission pipelines within densely populated areas require an assessment (ILI, Pressure Test, or ECDA) every 7 years. To meet deadlines for TIMP assessments, schedules may be modified each year to account for resources, inspection tools, and system availability. For the TY 2016 GRC, a zero-based forecast was provided for assessment projects intended to be completed in the years TY 2016 through 2018. SoCalGas and SDG&E used a zero-based forecast methodology because the number of assessment projects changes from year to year. SoCalGas and SDG&E have attempted to level out the number of assessment projects completed each year to avoid large fluctuations in costs from year to year, but fluctuations still exist; therefore, where TY 2016 GRC planning assumptions were available for these activities, it is not useful to compare the planned activity level in 2016 alone to actual levels in 2016, to measure performance for a program with a long-term assessment cycle, until all three years are available. However, it should be noted that all TIMP assessments were completed on time, meeting regulatory deadlines for 2016 and additional inspections have been completed during 2017 and are planned for 2018 to ensure continued compliance.

Additionally, during 2016, the ILI rate was lower than planned due to multiple inspections that had to occur on the same lines, which extended the completion date to the following year. For example, during an ILI, the tool would become lodged and retrofitting of the pipeline needed to occur prior to attempting a second ILI. The mileage reflected in the accountability report is based on a successful ILI assessment and does not account for mileage attempted. As previously mentioned, it is expected that during this iterative process, the performance metrics will continue to improve to better demonstrate accountability.

c. SoCalGas Storage Integrity Management Program

SoCalGas proposed to institute a new approach to storage integrity management, the SIMP, modeled after the TIMP and the DIMP, in its Test Year 2016 GRC Application, A.14-11-004, filed in November 2014. The SIMP is a “proactive program of SoCalGas to ensure the integrity of SoCalGas’ underground gas storage facilities, and to detect and repair problems before they occur.”⁵¹ D.16-06-054, effective on January 1, 2016, approved the SIMP on June 23, 2016 and provided for the establishment of a two-way balancing account for SIMP expenditures.⁵²

In accordance with D.16-06-054, SoCalGas filed Advice Letter 5000 on July 29, 2016, effective on August 28, 2016, to establish the SIMP Balancing Account (SIMPBA). Pursuant to Ordering Paragraph 8 of D.16-06-054, the SIMPBA records the difference between actual and authorized costs associated with SoCalGas’ SIMP effective with the TY 2016 GRC cycle. The SIMPBA is authorized for the three-year GRC period from January 1, 2016 to December 31, 2018 or until the effective implementation date of SoCalGas’ next GRC.

Similar to the showing for TIMP and DIMP and as discussed in Section 1c, the Utilities are presenting this information in revenue requirement terms rather than direct expenditures to best represent how the SIMP program is managed.

As seen in the tables below, because the formal SIMP was not approved until June 23, 2016 in D.16-06-054 and effective January 1, 2016, there are not any recorded actuals or “SIMP”-related revenue requirement recorded to the SIMPBA in the years 2014 and 2015. However, while the TY 2016 GRC was pending, SoCalGas continued to undertake integrity management work at the storage facilities using traditional GRC funding.

Comparison of Authorized and Actual Revenue Requirement 2014-2015

SIMP Balancing Account Details Revenue Requirement (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
<u>Year 2014:</u> ^{1/}	Actual	Authorized ^{1/}	Under/ (Over) Collection	Interest	SIMPBA Balance
O&M	-	-	-	-	-
Capital-Related Costs	-	-	-	-	-
Interest	-	-	-	-	-
Subtotal	-	-	-	-	-

^{1/} Authorized O&M and capital-related revenue requirement were adopted in TY2016 GRC decision. SoCalGas was not authorized to record dollars to SIMPBA prior to 2016.

⁵¹ D.16-06-054 at 5.

⁵² *Id.* at OP 8.

2014 Variance Explanation:

In 2014, because the SIMP balancing account had not yet been authorized, no costs could be recorded in the SIMP account. Although SIMP had not yet been approved, SoCalGas undertook integrity management work at the storage facilities using traditional GRC funding. This work incorporated certain SIMP-planned activities and is identified as “Program Support” in the below metrics. In 2014, this work included the SIMP pilot program, which involved running integrity tests of the Frew 2 and Porter 42B wells at Aliso Canyon. The recorded capital expenses for the Frew 2 and Porter 42B pilot work totaled approximately \$1.67 million and \$1.27 million, respectively.

SIMP Balancing Account Details Revenue Requirement (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
Year 2015: ^{1/}	Actual	Authorized ^{1/}	Under/ (Over) Collection	Interest	SIMPBA Balance
O&M	-	-	-	-	-
Capital-Related Costs	-	-	-	-	-
Interest	-	-	-	-	-
Subtotal	-	-	-	-	-

^{1/} Authorized O&M and capital-related revenue requirement were adopted in TY2016 GRC decision. SoCalGas was not authorized to record dollars to SIMPBA prior to 2016.

2015 Variance Explanation:

In 2015, because the SIMP balancing account had not yet been authorized, no costs could be recorded in the SIMP account. SoCalGas did incur approximately \$180,000 in direct O&M expenses for Well View data entry efforts to prepare SoCalGas’ storage data and prioritize wells for SIMP testing.⁵³ These expenses were funded through traditional GRC funding.

The 2015 SIMP capital work was completed in parallel with ongoing traditional GRC Capital well activities. In 2015, well logging activities and well site enhancement projects⁵⁴ at the 4 SoCalGas storage facilities, or “fields” were identified as SIMP activities, since both result in data used for SIMP. These activities are identified below as “Program Support” for the metrics. The recorded direct capital costs associated with this work was \$214,000 and \$625,000, respectively.

⁵³ The purpose of this project was to enter historical well information/data into the well data management database called WellView. New well workover, drilling, and abandonment data is entered, maintained, and accessible via this database. The goal was to enter historical information into this database so it is a one stop shop for the team.

⁵⁴ This project raised and relocated the annulus gas venting system to above grade, and installed standardized racks for well pressure monitoring and installed continuous pressure monitoring on all wells. Real-time pressure monitoring provides continuous monitoring of well integrity, improved management of well performance, and optimization of field deliverability and facilitates well and pipeline integrity operations. Additionally, continuous pressure monitoring is an important component of the SIMP.

Comparison of 2014 and 2015 “Proposed” Metrics Levels to 2014 and 2015 Actual Metrics Levels

SoCalGas is providing the metrics below to illustrate the progress made with regard to storage integrity.

For the SIMP Capital metrics, the 2014 metrics for “Program Support” includes the SIMP pilot on one well. In the 2015 SIMP Capital metrics, “Program Support” includes capital work performed at all 4 fields in support of developing SIMP activities. SoCalGas’ capital funding proposals in 2014 and 2015 were made to develop the TY 2016 Revenue Requirement, but not technically implemented in rates until 2016. Work performed during 2014 and 2015 was performed under other Underground Storage GRC capital budgets.

For the SIMP O&M metrics, “Data Management” includes SoCalGas’ Well View data entry efforts that prepared SoCalGas’ storage data and prioritized wells for SIMP testing.

	2014 Metrics		2015 Metrics	
	Actual Activity Level	Planned Activity Level	Actual Activity Level	Planned Activity Level
SIMP Capital				
Company Labor (FTE's)	0	0.5	0	0.6
Program Support	1 Well	1 Well	4 Fields	4 Fields
	2014 Metrics ¹		2015 Metrics ¹	
	Actual Activity Level	Planned Activity Level	Actual Activity Level	Planned Activity Level
SIMP O&M				
Company Labor (FTE's)	0	not planned	0.2	not planned
Data Management	0	not planned	1 Field of Well View Data Entry	not planned

Note 1: O&M funding was not requested until TY2016.

Comparison of Authorized and Actual Revenue Requirement 2016

SIMP Balancing Account Details Revenue Requirement (\$000)

	(a)	(b)	(c) = (a) - (b)	(d)	(e)=(c)+(d)
<u>Year 2016:</u> ^{1/}	Actual	Authorized ^{1/}	Under/ (Over) Collection	Interest	SIMPBA Balance
O&M	11,814	5,910	5,904		5,904
Capital-Related Costs	672	361	311		311
Interest				7	7
Subtotal	12,486	6,271	6,215	7	6,222

2016 Variance Explanation:

Since the Commission’s authorization of SIMP in TY 2016, and to respond to new and proposed regulatory requirements on gas storage projects, SoCalGas has accelerated the pace of SIMP

inspections of the gas storage wells at Aliso Canyon, Honor Rancho, Playa de Rey, and La Goleta gas storage fields. O&M expenses primarily include mandated well inspections, wellbore inspection logs, noise and temperature surveys, and surface piping inspections. O&M expenses for TY 2016 also include: data management, reservoir and geologic studies, and labor. Capital expenses for 2016 are for gas storage well workovers⁵⁵ to prepare wells for inspection logging and to follow-up on the inspection logging. These workovers consist of mitigation for the safe return to operation, and are the definition of 2016 “Program Support” in the metrics below. Mitigation includes new tubing installed in all wells. If the well cannot be placed back in service, the work includes safely isolating the well from the gas storage reservoir until the well is plugged and abandoned. This accelerated pace of these activities resulted in TY 2016 SIMP recorded actuals exceeding the authorized funding level.

Comparison of 2016 Proposed Metrics Levels to 2016 Actual Metrics Levels

	2016 Metrics	
	Actual Activity Level	Planned Activity Level
SIMP Capital		
Company Labor (FTE's)	1.5	6.5
Program Support	33 wells	28 wells
	2016 Metrics	
	Actual Activity Level	Planned Activity Level
SIMP O&M		
Company Labor (FTE's)	14.3	5.5
Data Management	2 Fields of Well View Data Entry	1 Field of Well View Data Entry
Well Inspections	43 wells	40 wells

Note 1: O&M funding was not requested until TY2016.

2016 Variance Explanation:

As noted above, the SIMP “Program Support” metric evolved from a pilot in 2014, to field work in 2015, to well workover⁵⁶ activity in 2016. SIMP TY 2016 capital testimony forecasted 28 storage well workovers per year. Due to the accelerated pace as described above, the actual activity level in 2016 was 33 completed storage well workovers. The primary drivers for acceleration are new, emerging, and proposed regulations and industry best practices. The TY

⁵⁵ The Direct Testimony of Phillip Baker refers to this activity as “Wells Requiring Capital Mitigation Work.” See A.14-11-004, Ex. 45 SCG/Baker at 42.

⁵⁶ Preparation of wells for inspection logging, and follow-up on the inspection logging with mitigation, including tubing replacement.

2016 testimony also forecasted 6.5 FTEs, primarily contract administrators, with 1 FTE for a well mitigation project manager. The variance in labor is due to the use of contracted labor.

For SIMP O&M, the metrics used was for “Well Inspections” and “Data Management.” Well Inspection involved well integrity inspections conducted via utilizing a variety of tools to assess well casing integrity. SIMP TY 2016 O&M testimony forecasted 40 well inspections per year. Due to the accelerated pace as referenced previously, the actual activity level in 2016 was 43 full storage well inspections. There were also 105 partial inspections of gas storage wells that included noise and temperature surveys and pressure tests. The primary drivers for acceleration are new, emerging, and proposed regulations and industry best practices. Two of the storage fields’ datasets were entered into WellView in 2016, exceeding the plan of 1 storage field. This variance is consistent with the accelerated pace of other SIMP activities. The variance in FTEs reflects a focus on accelerated inspection work, and focus of company labor on supporting inspections. The variance in well numbers also reflects the accelerated pace.

GLOSSARY OF TERMS

A.	Application
ADA	American Disabilities Act
ALJ	Administrative Law Judge
CAL FIRE	California Department of Forestry and Fire Protection
CCUE	Coalition of California Utility Employees
CFR	Code of Federal Regulations
CNF	Cleveland National Forest
D.	Decision
DOE	Do Not Operate Energized
DIMP	Distribution Integrity Management Program
DIMPBA	Distribution Integrity Management Program Balancing Account
DREAMS	Distribution Risk Evaluation and Monitoring System
DRIP	Distribution Riser Inspection Project
ECDA	External Corrosion Direct Assessment
ED	Energy Division
FAA	Federal Aviation Administration
FiRM	Fire Risk Management
FTEs	Full-Time Equivalent
GIPP	Gas Infrastructure Protection Program
GIS	Geographic Information System
GRC	General Rate Case
HCA	High Consequence Areas
I.	Investigation
ILI	In-Line Inspection
LiDAR	Light Detection and Rating
O&M	Operations and Maintenance
OP	Ordering Paragraph
OSA	Office of Safety Advocates
PAAR	Programs and Activities to Address Risk
PHMSA	Pipeline and Hazardous Materials and Safety Administration

PLS-CADD	Power Line Systems – Computer Aided Design and Drafting
PTC	Permit to Construct
RAMP	Risk Assessment Mitigation Phase
RCP	Rate Case Plan
RIRAT	Reliability Improvements in Rural Areas Team
RO	Results of Operation
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SB	Senate Bill
SCADA	Supervisory Control and Data Acquisition
SDG&E	San Diego Gas & Electric
SED	Safety and Enforcement Division
SF6	Sulfur Hexafluoride
SIMP	Storage Integrity Management Program
SIMPBA	Storage Integrity Management Program Balancing Account
SLIP	Sewer Lateral Inspection Program
S-MAP	Safety Model Assessment Proceeding
SoCalGas	Southern California Gas Company
UCLA	University of California, Los Angeles
USA	Underground Service Alert
U.S. Forest	United States Forest Service
TIMP	Transmission Integrity Management Program
TIMPBA	Transmission Integrity Management Program Balancing Account
TMED	Threshold Major Event Days
TY	Test Year
WRRM	Wildfire Risk Reduction Model

APPENDIX B
BALANCE SHEET, INCOME STATEMENT
AND FINANCIAL STATEMENT

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
June 30, 2017

	1. UTILITY PLANT	<u>2017</u>
101	UTILITY PLANT IN SERVICE	\$ 16,513,440,119
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	5,302,629
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,209,833,401
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,077,315,986)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(706,634,782)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,375,264)
118	OTHER UTILITY PLANT	1,232,930,800
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(288,724,048)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	<u>\$ 12,976,401,591</u>
	 2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	\$ 5,790,994
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(364,300)
158	NON-CURRENT PORTION OF ALLOWANCES	189,839,827
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,028,081,830
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	<u>74,288,025</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>\$ 1,297,636,376</u>

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
June 30, 2017

3. CURRENT AND ACCRUED ASSETS		2017
131	CASH	\$ 2,274,181
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	310,617,726
143	OTHER ACCOUNTS RECEIVABLE	19,948,089
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,501,255)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	8,573
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,586,259
151	FUEL STOCK	525,924
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	123,461,757
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	206,101,784
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(189,839,827)
163	STORES EXPENSE UNDISTRIBUTED	306,762
164	GAS STORED	306,473
165	PREPAYMENTS	128,057,507
171	INTEREST AND DIVIDENDS RECEIVABLE	716,315
173	ACCRUED UTILITY REVENUES	60,828,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,294,000
175	DERIVATIVE INSTRUMENT ASSETS	102,790,995
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(74,288,025)
	TOTAL CURRENT AND ACCRUED ASSETS	\$ 692,195,738
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	\$ 34,594,708
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,925,428,704
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	338,964
184	CLEARING ACCOUNTS	(294,187)
185	TEMPORARY FACILITIES	20
186	MISCELLANEOUS DEFERRED DEBITS	23,171,630
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	10,395,430
190	ACCUMULATED DEFERRED INCOME TAXES	318,703,002
	TOTAL DEFERRED DEBITS	\$ 3,312,338,271
	TOTAL ASSETS AND OTHER DEBITS	\$ 18,278,571,976

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
June 30, 2017

5. PROPRIETARY CAPITAL

		2017
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	4,439,320,726
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(7,260,582)
	TOTAL PROPRIETARY CAPITAL	\$ 5,769,861,245

6. LONG-TERM DEBT

221	BONDS	\$ 4,591,077,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(12,072,563)
	TOTAL LONG-TERM DEBT	\$ 4,579,004,437

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,059,813,950
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	23,454,995
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	247,807,441
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	174,994,502
230	ASSET RETIREMENT OBLIGATIONS	839,206,532
	TOTAL OTHER NONCURRENT LIABILITIES	\$ 2,345,277,420

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
June 30, 2017

8. CURRENT AND ACCRUED LIABILITES

		2017
231	NOTES PAYABLE	\$ 4,599,706
232	ACCOUNTS PAYABLE	473,954,108
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	26,226,170
235	CUSTOMER DEPOSITS	77,486,341
236	TAXES ACCRUED	1,536,337
237	INTEREST ACCRUED	45,728,091
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	2,776,345
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	111,890,445
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	50,892,477
244	DERIVATIVE INSTRUMENT LIABILITIES	223,733,662
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(174,994,502)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 843,829,180

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 58,925,476
253	OTHER DEFERRED CREDITS	381,335,924
254	OTHER REGULATORY LIABILITIES	1,018,973,062
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	16,797,674
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	2,366,486,504
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	898,081,054
	TOTAL DEFERRED CREDITS	\$ 4,740,599,694

TOTAL LIABILITIES AND OTHER CREDITS \$ 18,278,571,976

\$4,740,599,694

Data from SPL as of August 18, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Six Months Ended June 30, 2017

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$ 2,299,314,811
401	OPERATING EXPENSES	\$ 1,345,039,484	
402	MAINTENANCE EXPENSES	71,067,061	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	314,453,375	
408.1	TAXES OTHER THAN INCOME TAXES	64,105,315	
409.1	INCOME TAXES	45,744,462	
410.1	PROVISION FOR DEFERRED INCOME TAXES	108,315,692	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(14,216,365)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	762,402	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>\$ 1,935,271,426</u>
	NET OPERATING INCOME		\$ 364,043,385

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	\$ 14,588	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	16,448	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	3,757,665	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	30,734,726	
421	MISCELLANEOUS NONOPERATING INCOME	158,110	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>\$ 34,681,537</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	\$ -	
425	MISCELLANEOUS AMORTIZATION	125,024	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	1,725,364	
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 1,850,388</u>	
408.2	TAXES OTHER THAN INCOME TAXES	\$ 326,971	
409.2	INCOME TAXES	362,641	
410.2	PROVISION FOR DEFERRED INCOME TAXES	24,402,273	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(21,440,137)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 3,651,748</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>\$ 29,179,401</u>
	INCOME BEFORE INTEREST CHARGES		393,222,786
	EXTRAORDINARY ITEMS AFTER TAXES		233,112
	NET INTEREST CHARGES*		<u>89,272,789</u>
	NET INCOME		<u><u>\$ 304,183,109</u></u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$9,812,680)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Six Months Ended June 30, 2017

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 4,310,137,617
NET INCOME (FROM PRECEDING PAGE)	304,183,109
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	0
DIVIDENDS DECLARED - COMMON STOCK	(175,000,000)
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 4,439,320,726</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
June 30, 2017

(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:

First Mortgage Bonds:	Nominal	Par Value		Interest Paid (updated in Q4' 20xx) as of Q4' 2016
	Date of Issue	Authorized and Issued	Outstanding	
Var% Series OO, due 2027	12-01-92	0	0	2,625,000
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,346
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,250
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,938
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	2,660,460
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
Variable Series OOO, due 2017	03-12-15	0	0	1,210,959
1.9140% Series PPP, due 2022	03-12-15	66,600,519	66,600,519	4,272,326
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	6,111,111
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	-
Total 1st. Mortgage Bonds:			4,479,105,519	175,122,889
Total Bonds:				175,122,889

TOTAL LONG-TERM DEBT			4,479,105,519	
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**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT**

June 30, 2017

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2017
Commercial Paper & ST Bank	Various	Various	Various	4,599,706	\$1,149,047

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	2013	2014	2015	2016	2017
5.00%	-	\$281,250	-	-	-	-
4.50%	-	202,500	-	-	-	-
4.40%	-	214,500	-	-	-	-
4.60%	-	257,901	-	-	-	-
1.70%	-	1,785,000	-	-	-	-
1.82%	-	873,600	-	-	-	-
Total	-	\$3,614,751	-	-	-	-

Common Stock	2013	2014	2015	2016	2017
[1]	-	\$200,000,000	300,000,000	175,000,000	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.

A balance sheet and a statement of income and retained earnings of applicant for the six months ended June 30, 2017 are attached hereto.

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

APPENDIX C
STATEMENT OF PRESENTLY EFFECTIVE ELECTRIC 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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DS	Submetered Multi-Family Service	29102, 29103, 29104, 29105, 24247, 29106-E 24249, 24250-E	T
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Advice Ltr. No. 2614-G
Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Date Filed Sep 29, 2017
Effective Oct 1, 2017
Resolution No. _____



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 22819-G

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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 19182-G

Canceling Revised Cal. P.U.C. Sheet No. 15760-G

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Advice Ltr. No. 2087-G

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Date Filed Jan 19, 2012

Effective Feb 15, 2012

Resolution No. _____

APPENDIX E
STATEMENT OF PROPOSED ELECTRIC RATE CHANGES

Tables 1 and 2 below show the allocation of SDG&E’s electric revenues, by customer class, of proposed 2019 rates in comparison to as-expected 2018 rates that reflect the as-expected authorized 2018 GRC revenue requirements and present 2017 rates, respectively.

Table 1
ELECTRIC REVENUES AT
AS-EXPECTED AUTHORIZED 2018¹ AND PROPOSED 2019¹ RATES

Class of Service	As-Expected Authorized 2018 Revenue ² (\$million)	Proposed 2019 Revenue (\$million)	% Change	As-Expected Authorized 2018 Rates ² (cents/kWh)	Proposed 2019 Rates (cents/kWh)	% Change
Residential	1,868.2	1,967.2	5.3%	25.1	26.4	5.3%
Small Commercial	489.0	514.8	5.3%	24.1	25.3	5.3%
Medium & Large Commercial & Industrial (“C&I”)	1,703.2	1,782.2	4.6%	19.9	20.8	4.2%
Agriculture	56.6	59.5	5.1%	17.8	18.7	4.9%
Lighting	20.7	21.5	3.8%	20.0	20.8	3.8%
System Total³	4,137.7	4,345.3	5.0%	22.2	23.3	4.8%

¹ Includes Utility Distribution Company revenues plus Generation/Commodity revenues based on current authorized sales.

² Current effective rates 9/1/2017 per AL 3055-E-A adjusted for expected 2018 GRC revenue requirements.

³ Totals may not sum due to rounding.

Table 2
ELECTRIC REVENUES AT
PRESENT 2017¹ AND PROPOSED 2019¹ RATES

Class of Service	Present 2017 Revenue ² (\$million)	Proposed 2019 Revenue (\$million)	% Change	Present 2017 Rates ² (cents/kWh)	Proposed 2019 Rates (cents/kWh)	% Change
Residential	1,858.5	1,967.2	5.9%	25.0	26.4	5.8%
Small Commercial	486.4	514.8	5.8%	23.9	25.3	5.8%
Medium & Large C&I	1,695.3	1,782.2	5.1%	19.9	20.8	4.7%
Agriculture	56.4	59.5	5.6%	17.7	18.7	5.5%
Lighting	20.6	21.5	4.2%	19.9	20.8	4.2%
System Total³	4,117.2	4,345.3	5.5%	22.1	23.3	5.3%

¹ Includes Utility Distribution Company revenues plus Generation/Commodity revenues based on current authorized sales.

² Current effective rates 9/1/2017 per AL 3055-E-A.

³ Totals may not sum due to rounding.

APPENDIX F

STATEMENT OF AND PROPOSED GAS RATE CHANGES

Tables 1 and 2 below show the allocation of SDG&E's gas rate revenues, by customer class, of proposed 2016 rates in comparison to as-expected 2015 rates and present 2014 rates.

Table 1
GAS REVENUES AT
AS-EXPECTED AUTHORIZED 2018 AND PROPOSED 2019 RATES

Rate Class	As-Expected Authorized 2018 Revenue \$ millions	Proposed Revenue \$ millions	% Change	As-Expected Authorized 2018 Rates \$/therm	Proposed Rates \$/therm	% Change
Residential	\$455	\$549	20.7%	\$1.42040	\$1.71485	20.7%
Core Commercial & Industrial	\$136	\$147	8.7%	\$0.74236	\$0.80721	8.7%
NGV	\$6	\$6	6.5%	\$0.31950	\$0.34019	6.5%
Total Core	\$596	\$702	17.9%	\$1.14366	\$1.34792	17.9%
Noncore C&I	\$6	\$7	13.6%	\$0.12879	\$0.14632	13.6%
EG	\$15	\$20	30.5%	\$0.02293	\$0.02992	30.5%
Noncore Average	\$21	\$27	25.9%	\$0.02959	\$0.03725	25.9%
SYSTEM TOTALS	\$617	\$729	18.1%	\$0.49932	\$0.58987	18.1%

Note: For comparison purposes, both present and proposed columns include public purpose program surcharges and gas costs at the same rates.

Table 2
GAS REVENUES AT
PRESENT 2017 AND PROPOSED 2019 RATES

Rate Class	Present Revenue \$ millions	Proposed Revenue \$ millions	% Change	Present Rates \$/therm	Proposed Rates \$/therm	% Change
Residential	\$444	\$549	23.6%	\$1.38745	\$1.71485	23.6%
Core Commercial & Industrial	\$134	\$147	10.1%	\$0.73334	\$0.80721	10.1%
NGV	\$6	\$6	7.6%	\$0.31618	\$0.34019	7.6%
Total Core	\$584	\$702	20.3%	\$1.12015	\$1.34792	20.3%
Noncore C&I	\$6	\$7	16.2%	\$0.12592	\$0.14632	16.2%
EG	\$14	\$20	41.3%	\$0.02117	\$0.02992	41.3%
Noncore Average	\$20	\$27	34.2%	\$0.02776	\$0.03725	34.2%
SYSTEM TOTALS	\$604	\$729	20.8%	\$0.48835	\$0.58987	20.8%

Note: For comparison purposes, both present and proposed columns include public purpose program surcharges and gas costs at the same rates.

APPENDIX G
STATEMENT OF ORIGINAL COST AND DEPRECIATION RESERVE

SAN DIEGO GAS & ELECTRIC COMPANY

**COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF JUNE 30, 2017**

<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	156,628,784.90	94,800,672.81
	TOTAL INTANGIBLE PLANT	156,851,626.26	95,003,573.11
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	96,334,558.86	44,862,417.28
312	Boiler Plant Equipment	169,331,217.70	75,963,449.80
314	Turbogenerator Units	138,276,524.45	52,081,765.18
315	Accessory Electric Equipment	85,742,414.73	37,651,783.18
316	Miscellaneous Power Plant Equipment	47,957,663.34	12,032,960.20
	Steam Production Decommissioning	0.00	0.00
	TOTAL STEAM PRODUCTION	552,168,897.37	222,638,893.93
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	27,285,711.08	2,658,162.87
322	Boiler Plant Equipment	243,225,717.06	21,662,290.99
323	Turbogenerator Units	26,982,364.66	2,370,893.39
324	Accessory Electric Equipment	10,878,214.63	1,458,232.53
325	Miscellaneous Power Plant Equipment	166,754,468.81	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	(475,126,476.33)	(76,957,383.29)
	TOTAL NUCLEAR PRODUCTION	(0.09)	0.00
340.1	Land	224,368.91	0.00
340.2	Land Rights	56,032.61	10,212.85
341	Structures and Improvements	22,998,121.16	7,679,414.56
342	Fuel Holders, Producers & Accessories	21,324,500.79	7,007,859.59
343	Prime Movers	94,574,417.87	36,327,625.63
344	Generators	362,782,673.34	140,496,193.64
345	Accessory Electric Equipment	32,510,919.85	13,289,015.40
346	Miscellaneous Power Plant Equipment	26,443,313.62	13,771,538.14
	TOTAL OTHER PRODUCTION	560,914,348.15	218,581,859.81
	TOTAL ELECTRIC PRODUCTION	1,113,083,245.43	441,220,753.74

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	72,524,698.96	0.00
350.2	Land Rights	160,619,278.55	21,371,427.72
352	Structures and Improvements	488,608,585.04	68,304,700.17
353	Station Equipment	1,510,349,481.65	291,715,644.87
354	Towers and Fixtures	895,095,669.89	166,170,633.30
355	Poles and Fixtures	471,267,279.29	101,037,242.10
356	Overhead Conductors and Devices	579,975,944.07	228,020,077.14
357	Underground Conduit	357,850,703.14	57,184,149.68
358	Underground Conductors and Devices	375,148,181.36	56,371,465.21
359	Roads and Trails	310,745,361.46	30,776,041.82
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	TOTAL TRANSMISSION	5,222,185,183.41	1,020,951,382.01
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	85,981,546.92	41,657,301.79
361	Structures and Improvements	4,650,797.97	1,797,870.83
362	Station Equipment	502,258,710.13	176,956,070.89
363	Storage Battery Equipment	114,543,154.82	11,035,235.80
364	Poles, Towers and Fixtures	689,774,048.87	270,474,444.15
365	Overhead Conductors and Devices	643,306,044.00	208,629,931.03
366	Underground Conduit	1,195,423,500.04	475,715,123.40
367	Underground Conductors and Devices	1,502,679,315.60	901,240,612.16
368.1	Line Transformers	609,320,047.17	150,126,700.43
368.2	Protective Devices and Capacitors	35,444,236.93	5,627,535.11
369.1	Services Overhead	153,915,548.66	119,842,009.73
369.2	Services Underground	346,628,155.70	245,380,312.12
370.1	Meters	191,398,908.77	83,779,656.60
370.2	Meter Installations	56,021,946.63	21,923,796.19
371	Installations on Customers' Premises	8,963,349.06	10,328,326.53
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	29,842,566.03	18,963,966.64
	TOTAL DISTRIBUTION PLANT	6,186,328,105.10	2,743,478,893.40
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	34,826,629.88	24,572,335.14
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	14,831.41
393	Stores Equipment	8,545.97	8,372.62
394.1	Portable Tools	26,342,331.91	9,121,753.55
394.2	Shop Equipment	341,135.67	259,010.20
395	Laboratory Equipment	5,152,106.01	589,188.43
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	277,874,435.92	110,051,000.90
398	Miscellaneous Equipment	6,863,576.90	1,180,137.60
	TOTAL GENERAL PLANT	358,839,579.40	145,964,015.73
101	TOTAL ELECTRIC PLANT	13,037,287,739.60	4,446,618,617.99

<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	<u>86,104.20</u>	<u>86,104.20</u>
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	1,129,198.45
	TOTAL STORAGE PLANT	<u>2,242,164.87</u>	<u>1,129,198.45</u>
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,408,195.74
366	Structures and Improvements	19,284,359.93	10,217,949.22
367	Mains	233,085,256.00	78,458,425.07
368	Compressor Station Equipment	90,673,807.33	69,389,421.99
369	Measuring and Regulating Equipment	23,190,739.00	16,900,829.84
371	Other Equipment	1,611,054.80	15,869.43
	TOTAL TRANSMISSION PLANT	<u>374,726,652.61</u>	<u>176,390,691.29</u>
374.1	Land	1,083,616.95	0.00
374.2	Land Rights	8,331,367.27	6,986,721.45
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,025,192,779.17	377,126,261.81
378	Measuring & Regulating Station Equipment	18,068,909.71	8,243,192.81
380	Distribution Services	274,810,914.16	296,901,174.40
381	Meters and Regulators	157,350,344.06	57,747,725.22
382	Meter and Regulator Installations	102,672,813.04	40,996,390.21
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,215,753.05
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	9,870,474.80	4,973,947.02
	TOTAL DISTRIBUTION PLANT	<u>1,598,941,476.77</u>	<u>794,252,419.07</u>

<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	44,627.10	44,627.23
394.1	Portable Tools	10,602,158.47	4,271,614.92
394.2	Shop Equipment	76,864.06	53,082.43
395	Laboratory Equipment	283,093.66	275,636.66
396	Power Operated Equipment	16,162.40	9,556.29
397	Communication Equipment	2,705,551.88	1,178,868.93
398	Miscellaneous Equipment	473,379.95	85,252.34
	TOTAL GENERAL PLANT	<u>14,201,837.52</u>	<u>5,944,141.80</u>
101	TOTAL GAS PLANT	<u>1,990,198,235.97</u>	<u>977,802,554.81</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	411,631,992.20	276,570,546.85
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	857,384.59	27,776.34
390	Structures and Improvements	389,278,337.16	153,210,933.62
391.1	Office Furniture and Equipment - Other	38,312,019.80	15,961,577.19
391.2	Office Furniture and Equipment - Computer E	52,514,351.92	34,696,791.01
392.1	Transportation Equipment - Autos	406,418.22	(285,191.36)
392.2	Transportation Equipment - Trailers	12,195.98	5,418.78
393	Stores Equipment	380,636.01	47,513.07
394.1	Portable Tools	1,454,417.13	396,222.44
394.2	Shop Equipment	191,385.80	135,484.56
394.3	Garage Equipment	1,626,443.82	284,576.94
395	Laboratory Equipment	2,095,455.34	1,031,661.54
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	188,431,411.62	82,628,661.10
398	Miscellaneous Equipment	2,464,827.17	548,065.59
118.1	TOTAL COMMON PLANT	<u>1,096,826,191.32</u>	<u>565,067,058.57</u>
	TOTAL ELECTRIC PLANT	13,037,287,739.60	4,446,618,617.99
	TOTAL GAS PLANT	1,990,198,235.97	977,802,554.81
	TOTAL COMMON PLANT	<u>1,096,826,191.32</u>	<u>565,067,058.57</u>
101 & 118.1	TOTAL	<u>16,124,312,166.89</u>	<u>5,989,488,231.37</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
	Common	(7,887,821.95)	(2,272,753.20)
		<u>(7,887,821.95)</u>	<u>(2,272,753.20)</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	(5,196,343.24)	(5,196,343.24)
	Gas	(175,218.45)	(175,218.45)
		<u>(5,371,561.69)</u>	<u>(5,371,561.69)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(5,371,561.69)</u>	<u>(5,371,561.69)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	85,194,000.02	15,679,524.03
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>15,679,524.03</u>
	TOTAL PLANT LEASED TO OTHERS	<u>85,194,000.02</u>	<u>15,679,524.03</u>
105	Plant Held for Future Use		
	Electric	5,302,629.50	0.00
	Gas	0.00	0.00
		<u>5,302,629.50</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>5,302,629.50</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,080,338,361.09	
	Gas	129,495,039.49	
	Common	139,684,928.07	
		<u>1,349,518,328.65</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,349,518,328.65</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	1,027,607,504.49
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,027,607,504.49
101.1	ELECTRIC CAPITAL LEASES	1,352,823,281.00	242,820,238.00
118.1	COMMON CAPITAL LEASE	21,349,549.44	20,646,165.53
		1,374,172,830.44	263,466,403.53
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	<u>(62,963,775.37)</u>	<u>(40,861,208.00)</u>
143	FAS 143 ASSETS - Legal Obligation	17,240,858.67	(1,023,385,718.05)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	84,742,931.67	35,884,951.13
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,522,144,031.35)
	TOTAL FAS 143	101,983,790.34	(2,509,644,798.27)
	UTILITY PLANT TOTAL	<u>19,025,596,616.24</u>	<u>4,777,324,804.30</u>

APPENDIX H
SUMMARY OF EARNINGS

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
Six Months Ended June 30, 2017
(\$ IN MILLIONS)

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$ 2,299
2	Operating Expenses	<u>1,935</u>
3	Net Operating Income	<u><u>\$ 364</u></u>
4	Weighted Average Rate Base	\$ 8,232
5	Rate of Return*	7.79%

*Authorized Cost of Capital

APPENDIX I
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Sacramento, CA 94244-2550

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Command
Navy Rate Intervention
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Washing Navy Yard, DC 20374

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

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33282 Golden Lantern
Dana Point, CA 92629

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Del Mar, CA 92014

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Attn. City Attorney
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Encinitas, CA 92024

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

City of Imperial Beach
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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
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West Sacramento, CA 95798-9052

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Markleeville, CA 96120

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General Services Administration
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Los Angeles, CA 90012

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Valley Center, CA 92082

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City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656

APPENDIX J
SERVICE LIST



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A1411003 - SDG&E - FOR AUTHORIT
FILER: SAN DIEGO GAS & ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: SEPTEMBER 14, 2017

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INTERDENOMINATIONAL ALLIANCE, CHRIST
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APPENDIX K
NOTICE OF AVAILABILITY/CERTIFICATE OF SERVICE

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

Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019.

Application 17-10-_____
(Filed October 6, 2017)

**NOTICE OF AVAILABILITY OF
TEST YEAR 2019 GENERAL RATE CASE APPLICATION OF SAN DIEGO GAS &
ELECTRIC COMPANY (U 902 M), TESTIMONY AND OTHER EXHIBITS**

Please take notice that on October 6, 2017, San Diego Gas & Electric Company (SDG&E) electronically filed its Test Year 2019 General Rate Case Application of San Diego Gas & Electric Company (U 902 M). Pursuant to Rule 1.9 of the Rules of Practice and Procedure of the California Public Utilities Commission, the Application, testimony, and other exhibits will be made available by 5:00 p.m. on October 6, 2017 on SDG&E's website at the following location:

<http://www.sdge.com/proceedings>

The complete application and testimony is several thousand pages long. SDG&E will upon request provide a copy of the application or any part thereof. SDG&E has all of the foregoing material available on compact disc (CD-ROM), which SDG&E would prefer to provide in lieu of hard copies for ease of handling and to conserve resources. SDG&E will however mail hard copies of documents to parties who request them. Copies of the GRC application, testimony, and other exhibits may be obtained by contacting:

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

Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019.

Application 17-10-_____
(Filed October 6, 2017)

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have this day served a true and correct copy of the attached **NOTICE OF AVAILABILITY OF TEST YEAR 2019 GENERAL RATE CASE APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M), TESTIMONY AND OTHER EXHIBITS** to each party named in the official service list for A.14-11-003/A.14-11-004, the consolidated 2016 General Rate Case proceeding for San Diego Gas & Electric and Southern California Gas Company, and the SDG&E/SoCalGas Risk Assessment Mitigation Phase proceeding (I.16-10-015/I.16-10-016). Those parties without an email address were served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Two hardcopies were also sent via Federal Express to Chief Administrative Law Judge Anne E. Simon. Ten hardcopies were sent to the Commission's Office of Ratepayer Advocates.

Executed this 6th day of October 2017, at San Diego, California.

/s/ Lisa Fucci-Ortiz

Lisa Fucci-Ortiz