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

Application of SAN DIEGO GAS & ELECTRIC)
COMPANY for Review of its Proactive De-)
Energization Measures and Approval of Proposed)
Tariff Revisions)
(U 902-E))
_____)

Application No. 08-12-____

**APPLICATION OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)**

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December 22, 2008

#225091

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

3
4 Application of SAN DIEGO GAS & ELECTRIC)
5 COMPANY for Review of its Proactive De-) Application No. 08-12-____
6 Energization Measures and Approval of Proposed)
7 Tariff Revisions)
8 (U 902-E))
9 _____)

10 **APPLICATION OF**
11 **SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)**

12 **I.**

13 **INTRODUCTION**

14 Pursuant to Public Utilities Code § 451 and Rule 2.1 of the California Public
15 Utilities Commission (“CPUC” or “Commission”) Rules of Practice and Procedure, San
16 Diego Gas & Electric Company (“SDG&E”) files this Application for Commission
17 review of the proactive de-energization measures in SDG&E’s Fire Preparedness Plan.
18 Proactive de-energization, as discussed in this Application, refers to those situations
19 where under certain extreme weather conditions and in limited high risk fire areas
20 SDG&E will shut-off power to certain distribution and/or tie lines. SDG&E has already
21 implemented the majority of its Fire Preparedness Plan, which includes various system
22 modifications to help ensure reliable and safe system operations related to heightened fire
23 risk situations. To provide adequate customer outreach and communications, as well as
24 an opportunity for Commission review, however, SDG&E has not yet implemented the
25 proactive de-energization portion of the Fire Preparedness Plan. SDG&E intends to
26 implement that portion of the Fire Preparedness Plan by no later than September 1, 2009.

1 As discussed in Section V below, SDG&E also seeks in this Application
2 Commission approval of changes to its Tariff Rule 14, which addresses responsibility for
3 losses in the event there is an interruption of electricity delivery. The modifications to
4 Tariff Rule 14 provide more detail regarding (1) the circumstances that could lead to an
5 interruption and (2) the customer's responsibility for losses in the event of an interruption
6 of electricity delivery. The changes also conform SDG&E's Tariff Rule 14 to Pacific
7 Gas and Electric Company's (PG&E).
8

9 Due to the importance of fire preparedness and the limited nature of this
10 Application, SDG&E requests that the Commission expeditiously complete its review of
11 this Application and issue a final decision on this Application by no later than July 9,
12 2009. A proposed schedule and comprehensive showing regarding the topics
13 summarized above are discussed in more detail below and in the testimony that is also
14 being served on this day.
15

16 II.

17 EXECUTIVE SUMMARY

18 There are a number of significant changes in the conditions that are prevalent in
19 Southern California and/or SDG&E's service territory that support implementation of
20 proactive de-energization. For example, there have been near-drought conditions for the
21 past eight to ten years, and the fire agencies have declared that the "fire season" has
22 become a virtually year-round phenomenon. Cyclic climate change has also contributed
23 to the circumstance where measures such as proactive de-energization are appropriate for
24 SDG&E's service territory. Since the October 2007 fires, SDG&E has undertaken
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26
27

1 numerous additional steps to help ensure safe and reliable operations under a variety of
2 high fire risk situations.

3
4 Along these lines, SDG&E petitioned last year for the Commission to undertake
5 an Order Instituting Rulemaking (OIR) to determine the extent to which additional
6 measures might be necessary for disaster preparedness related to operation of the
7 electrical system.¹ Additionally, SDG&E has revised a number of its operating protocols
8 and programs as part of its Fire Preparedness Plan, including a wood-to-steel pole
9 replacement program and modification of its re-closer policy to limit or eliminate line re-
10 energization after an outage, depending on fire weather conditions. A final portion of the
11 Fire Preparedness Plan is proactive de-energization, where under certain limited
12 circumstances of extremely high fire risk and for a limited period of time SDG&E will
13 shut-off power to certain distribution and/or tie lines. In 2009, approximately 60,000²
14 customers could be potentially impacted by proactive de-energization. If there is a de-
15 energization event, however, it is expected that a much small number of customers would
16 be impacted at a given time, as explained in the testimony of Mr. Yari. Past fires, high
17 winds, and sustained drought conditions are increasingly common weather factors in the
18 San Diego region, so SDG&E considers these operational revisions an important step in
19 helping to protect against the dangers these conditions present. As the Commission is
20 also aware, these conditions can cause damage to property and power lines, and helping
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23

24
25 ¹ See P.07-11-007, filed November 6, 2007, and subsequent filings. See also D.05-08-030. The
26 Commission has since issued R.08-11-005 regarding safety of electric utility and communications
27 infrastructure provider facilities.

28 ² The 60,000 customer number is based on preliminary data which will be finalized in the first four months
of 2009. In 2008, approximately 45,000 customers lived in or near the Highest Risk Fire Areas and would
have been potentially impacted by proactive de-energization.

1 to ensure safety and reliability is a cornerstone of SDG&E’s mission and Fire
2 Preparedness Plan.
3

4 **A. STATUS OF SDG&E’s 2008 FIRE PREPAREDNESS PLAN**

5 As noted above, SDG&E’s Fire Preparedness Plan has numerous elements that
6 are already being implemented today. Proactively shutting off power in high risk fire
7 areas during extreme weather has been suspended, however, until September 1, 2009, to
8 allow for additional community input, customer outreach, and review of this Application.
9

10 **B. SDG&E IS STRENGTHENING POWER LINES**

11 One aspect of SDG&E’s Fire Preparedness Plan that is already being
12 implemented is replacing certain wood poles with steel poles. These hardened facilities
13 should be more resistant to damage in a wildfire and also should also reduce the time
14 required to restore power after a large fire. Key wood to steel replacements underway are
15 near Fallbrook, Ramona and Campo/Boulevard. SDG&E is also expanding ground and
16 aerial inspections of power lines and poles. These inspections help SDG&E to prioritize
17 and repair problems promptly for safety and reliability. To date, SDG&E has inspected
18 more than 40,000 distribution poles and approximately 7,000 transmission poles.
19

20 **C. SDG&E DISABLES AUTOMATIC SWITCHES UNDER RED FLAG**
21 **WARNING**

22 Under normal operating conditions, power lines have switches (known as
23 re-closers) that are designed to automatically restore power after an outage occurs. For
24 dry conditions that SDG&E calls the “Elevated Fire Condition,” but without a Red Flag
25 Warning being declared by the National Weather Service, the operation of re-closers will
26

1 be limited in SDG&E’s Highest Risk Fire Areas.³ Under the Fire Preparedness Plan,
2 these re-closers are disabled in SDG&E’s Wildland Fire Area⁴ when a Red Flag Warning
3 is issued so that power will be restored only after visual inspections show it is safe.
4

5 Outages are typically caused by lightning, dust storms, accidents, and other contact with
6 equipment. SDG&E also will stage crews in the backcountry during Red Flag Warnings.
7 Ramona and Mountain Empire along with other operation centers will be on high-alert
8 during Red Flag Warnings. These actions should allow SDG&E to provide a quicker
9 response to emergencies, such as those that are caused by fires.
10

11 **D. SDG&E’S PROACTIVE SHUT-OFF OF POWER HAS BEEN**
12 **SUSPENDED FOR THIS YEAR**

13 SDG&E anticipates implementing the proactive de-energization portion of the
14 Fire Preparedness Plan on September 1, 2009. A de-energization event would most
15 likely occur during the months of September through December. These dates can vary,
16 however, according to the weather and fire risk conditions as discussed in Mr. Yari’s
17 testimony. Customer communications and outreach before, during, and after an event are
18 critical, and SDG&E has taken extensive steps in this area, as described in the testimony
19 of Mr. Velasquez.
20

21 **E. PROACTIVE DE-ENERGIZATION**

22 Before SDG&E would implement proactive de-energization, five conditions must
23 first be met:
24

25 _____
26 ³ Certain terms used in this Application, such as “Elevated Fire Condition,” “Wildland Fire Area,” and
“Highest Risk Fire Areas” are defined and explained in the testimony.

27 ⁴ The Wildland Fire Area includes all of the Highest Risk Fire Areas, but also goes beyond that territory, as
discussed in the testimony of Mr. Yari.
28

- 1 1. The moisture level in “non-living” materials (sticks, twigs and leaves) is less than 6%
2 (per weather stations);
- 3 2. The moisture level in “living” plants and bushes is less than or equal to 75% (per Cal
4 Fire);
- 5 3. The relative humidity (moisture in the air) is less than or equal to 20% (per weather
6 stations);
- 7 4. The National Weather Service has called a Red Flag Warning; and
- 8 5. Localized wind speeds in an area are greater than or equal to 35 mph sustained or
9 greater than or equal to 55 mph gusts when accompanied by sustained winds greater
10 than or equal to 30 mph (per weather stations).

11 Under SDG&E’s proactive de-energization procedure, not all potentially “at risk”
12 areas would be affected at the same time. SDG&E’s de-energization plan currently
13 utilizes 15 weather stations tied to specific areas (see map that follows).

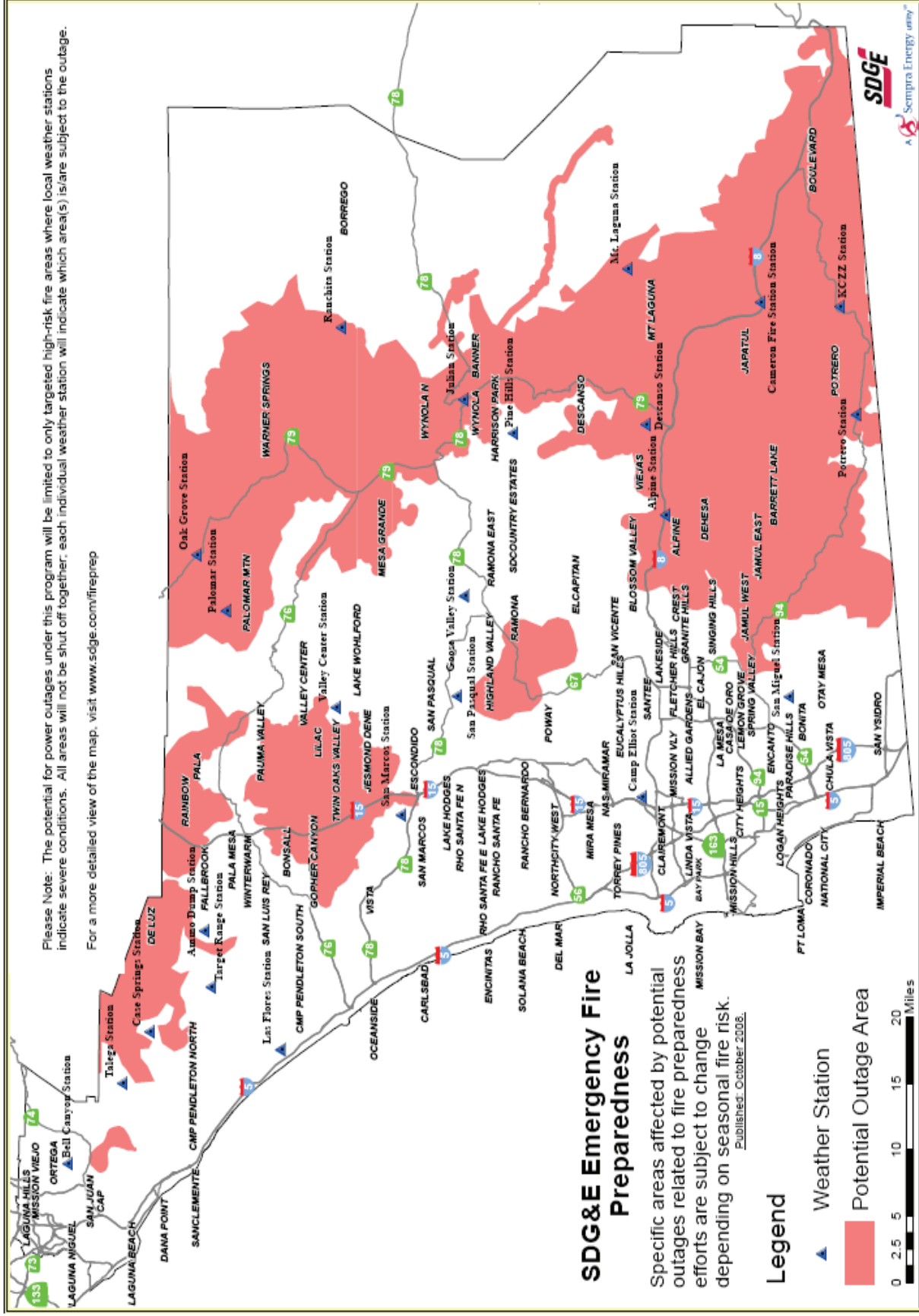
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Please Note: The potential for power outages under this program will be limited to only targeted high-risk fire areas where local weather stations indicate severe conditions. All areas will not be shut off together, each individual weather station will indicate which area(s) is/are subject to the outage. For a more detailed view of the map, visit www.sdge.com/fireprep



1 As the Highest Risk Fire Areas change, weather stations and customers will be
2 added or dropped out of the plan. SDG&E estimates that customers may experience
3 power outages of approximately 12 to 72 hours. Customers can use SDG&E's new web
4 page (www.SDGE.com/fireprep) to learn about and remain updated regarding SDG&E's
5 Fire Preparedness Plan, including implementation of proactive de-energization measures.
6 To do so, customers enter their addresses to determine whether they are in a Highest Risk
7 Fire Area and to look up weather station(s) nearby. Customers will be able to monitor all
8 five conditions that must be met for a de-energization to occur. If a power shut-off
9 emergency is likely, SDG&E will ask Reverse 9-1-1 (Alert San Diego) to notify affected
10 customers four - six hours in advance, and SDG&E will attempt to notify affected
11 customers two hours in advance. If weather conditions improve, SDG&E will also so
12 notify affected customers. If weather conditions do not improve and a power shut-off
13 emergency is called, SDG&E/Red Cross will open nearby Care Centers, medically
14 sensitive customers will be offered transportation, and special needs/low income
15 customers may qualify for modest financial support. Customers can call 2-1-1, 1-800-
16 411-7343, or check SDGE.com for more information.

17
18
19
20 SDG&E has undertaken an extensive communication and outreach effort
21 regarding its Fire Preparedness Plan, including direct mail to potentially impacted
22 customers, convening numerous customer meetings, participating in over 40 local
23 community events and organization meetings, and extensive contact with Special Needs
24 (low-income and medical baseline) and Essential customers. Additionally, SDG&E
25 estimates that it would be contacting Essential and Special Needs customers as many as
26

1 seven times throughout the various elements and stages of implementing the Fire
2 Preparedness Plan.
3

4 III.

5 SUMMARY OF RELIEF REQUESTED AND SUPPORTING TESTIMONY

6 As noted above, SDG&E is already undertaking numerous efforts as part of its
7 Fire Preparedness Plan to help ensure the safe and reliable operation of its electric system
8 during high fire risk situations. For example, SDG&E has implemented a wood-to-steel
9 pole conversion program, and it has also expanded aerial inspections of low-voltage and
10 high-voltage lines.⁵ Hardening of the system will provide improved performance during
11 severe conditions, such as Santa Ana wind events, and lessen the risk associated with
12 keeping the circuits in service during these conditions. In addition, the hardened facilities
13 should be more resistant to damage if a wildfire passes through the area, and the time
14 required to restore power in these areas after a large fire should be reduced. SDG&E has
15 also made changes in reprogramming or disabling the electrical switches (re-closers) that
16 automatically try to restore power after an outage, depending on the weather and fire
17 conditions.
18
19

20
21 On October 2, 2008, SDG&E announced that it would also turn off power
22 proactively in the Highest Risk Fire Areas when the National Weather Service advises
23 the conditions are ripe for fires, but only if all five weather triggers are met, and would
24 not restore service until the lines have been inspected. To better inform customers of this
25 change, however, and in response to a Commission letter inviting SDG&E to file this

26
27 ⁵ As noted above, SDG&E has inspected more than 40,000 distribution poles and approximately 7,000
transmission poles.

1 Application, on October 30, 2008, SDG&E announced the suspension until next year of
 2 its plan to shut-off power proactively during extreme weather conditions. Proactive de-
 3 energization is only one part of SDG&E's Fire Preparedness Plan targeted to increase
 4 community safety and reduce the likelihood of utility facilities being involved in
 5 wildfires. SDG&E is submitting this Application for Commission review of the
 6 proactive de-energization portion of SDG&E's Fire Preparedness Plan (in addition to
 7 seeking approval for proposed tariff changes). As further described in testimony also
 8 being served today, SDG&E is continuing to implement fire preparedness measures,
 9 including:
 10

- 11 1. Replacing wood poles with steel poles, increasing the distance between the power
 12 line conductors, and using heavier wire on part of the transmission system in rural
 communities;
- 13 2. Expanding aerial and ground inspections of distribution and transmission lines;
- 14 3. During dry or windy weather in which a Red Flag Warning is declared, disabling
 15 electrical switches (re-closers) that are designed to restore the power
 automatically after an outage; and
- 16 4. Proactively staging operations personnel in backcountry areas for quicker
 17 response during extreme weather conditions.

18 The following prepared direct testimony of SDG&E's witnesses is also being
 19 served today:

20 Exh. #	SDG&E TESTIMONY TOPIC	WITNESS
21 SDGE-1	Prepared Direct Testimony – Policy	David L. Geier
22 SDGE-2	Prepared Direct Testimony – Engineering and Operations	Sohrab A. Yari
23 SDGE-3	Prepared Direct Testimony – Customer Issues	Joe Velasquez
24 SDGE-4	Prepared Direct Testimony – Special Needs and Low-Income Customer Issues	Greg Lawless

25 The prepared direct testimony of David L. Geier provides an overview of
 26 SDG&E's testimony and addresses the policy issues underlying the proactive de-
 27 energization portion of SDG&E's Fire Preparedness Plan. The prepared direct testimony

1 of SDG&E witness Sohrab A. Yari explains the engineering and operational aspects of
2 SDG&E's Fire Preparedness Plan and proactive de-energization. The prepared direct
3 testimony of SDG&E witness Joe Velasquez presents the customer notification and
4 outreach issues of SDG&E's Fire Preparedness Plan, as well as a proposed, optional
5 Back-up Generation Tariff, demand normalization tariff revisions, and proposed revisions
6 to Tariff Rule 14. The prepared direct testimony of SDG&E witness Greg Lawless
7 presents the customer notification and outreach issues with regard to special needs and
8 low-income customers.
9

10 **IV.**

11 **IMPLEMENTATION**

12 SDG&E urges the Commission to resolve the issues raised in this Application no
13 later than July 9, 2009. Because some of the details of the Fire Preparedness Plan will
14 change as fire risk parameters change from year-to-year, SDG&E proposes filing an
15 informational advice letter annually specifying the details of its resulting fire preparedness
16 plan to be effective June 1 of that year.
17

18 **V.**

19 **PROPOSED MODIFICATIONS TO TARIFF RULE 14**

20 SDG&E also proposes modifications to its Tariff Rule 14 in this Application.
21 SDG&E filed Advice Letter (AL) 2025-E on September 26, 2008, requesting to modify
22 its Tariff Rule 14 to clarify and update the language regarding circumstances that may
23 lead to an interruption of electricity delivery, including for situations to protect public
24 safety, and the customer's responsibility for losses in the event of an interruption of
25 electricity.
26

1 Tariff Rule 14 (both existing and as proposed herein) requires SDG&E to exercise
2 due diligence and care to deliver a continuous supply of electricity to its customers and
3 indicates that the utility will not be liable for an interruption in service “caused by
4 inevitable accident, act of God, fire, strikes, riots, war or any other cause not within its
5 control.” The current rule, which has not been updated for approximately 25 years, is not
6 consistent with PG&E’s Tariff Rule 14. To achieve tariff consistency, AL 2025-E
7 requested SDG&E’s Tariff Rule 14 track the language included in PG&E’s Tariff Rule
8 14.
9

10
11 In its October 24, 2008 rejection of SDG&E’s AL, the Commission directed
12 SDG&E to file this request in an Application, and accordingly the proposed Tariff Rule
13 14 changes are included in Mr. Velasquez’ testimony. This tariff rule modification is
14 important for customers to understand more clearly those circumstances in which power
15 may be unexpectedly unavailable, such as where SDG&E interrupts delivery of
16 electricity to protect public safety or SDG&E’s distribution system. As with current
17 Tariff Rule 14, customers are responsible for losses that might result from an interruption
18 of electricity delivery. As is also explained in Mr. Velasquez’ and Mr. Lawless’
19 testimony, to the extent electricity delivery is unavailable due to proactive de-
20 energization, Essential, Special Needs, and Low-Income Customers have received
21 extensive notice and information regarding how to prepare for these events.
22

23
24 Given that the Commission has already approved nearly identical Tariff Rule 14
25 changes for PG&E, approving the proposed changes for SDG&E should not be
26 controversial. In addition, the proposed revisions to Tariff Rule 14 do not change the
27 fundamental allocation of responsibility for loss that exists in current Tariff Rule 14,
28

1 which is the primary purpose of that tariff rule. The additional examples and language
2 around the circumstances in which there may be an interruption of electricity delivery is
3 useful to customers and provides much more detailed information than the existing Tariff
4 Rule 14. SDG&E therefore urges the Commission to approve these proposed changes.
5

6
7 **VI.**

8 **COMPLIANCE WITH SENATE BILL 960 RULES,**
9 **INCLUDING PROPOSED SCHEDULE**

10 In compliance with Rule 6(a)(1), which was adopted in response to Senate Bill 960,
11 SDG&E is required to state “the proposed category for the proceeding, the need for hearing,
12 the issues to be considered, and a proposed schedule.” SDG&E proposes to categorize this
13 Application as a quasi-legislative proceeding. SDG&E anticipates that hearings may be
14 necessary. The principal issues to be considered are as follow:
15

- 16 1. The proactive de-energization portion of the Fire Preparedness Plan;
17 2. The proposed changes to Tariff Rule 14; and
18 3. SDG&E’s proposed tariff changes regarding Back-Up Generation and Demand
19 Normalization.

20 SDG&E suggests the following proposed schedule:

21 December 22, 2008 Application filed
22 January, 2009 Prehearing Conference
23 February, 2009 Intervenor Testimony served
24 March, 2009 Utility Rebuttal Testimony Served
25 April, 2009 Hearings if necessary
26
27

1 May, 2009 Opening and Reply Briefs filed
2 June, 2009 Proposed Decision
3 July, 2009 Commission Decision issued
4 August, 2009 Final Tariffs filed
5

6 **VII.**

7 **CORPORATE INFORMATION**

8
9 SDG&E is a public utility corporation organized and existing under, and by virtue
10 of, the laws of the State of California, and is engaged principally in the business of
11 providing electric service in a portion of Orange County and electric and gas service in San
12 Diego County.⁶ SDG&E's principal place of business is 8330 Century Park Court, San
13 Diego, California 92123, and its mailing address is Post Office Box 1831, San Diego,
14 California 92112.

15
16 All correspondence or communications regarding this Application should be
17 addressed to:

18 Rebecca W. Giles
19 Regulatory Case Administrator
20 San Diego Gas & Electric Company
21 8316 Century Park Court, CP-32D
22 San Diego, CA 92123
23 (858) 636-6876
24 RGiles@semprautilities.com

25
26 ⁶ SDG&E is a corporation created under the laws of the State of California. A certified copy of the Restated
27 Articles of Incorporation of San Diego Gas & Electric Company presently in effect and certified by the
28 California Secretary of State, was filed with the Commission on December 4, 1997 in connection with
SDG&E's Application 97-12-012 and is incorporated herein by reference.

1
2 with a copy to:

3 Lisa Urick
4 Keith W. Melville
5 Attorneys for San Diego Gas & Electric Company
6 101 Ash Street
7 P.O. Box 1831
8 San Diego, California 92101
9 (619) 699-5070 (Urick)
10 (619) 699-5039 (Melville)
11 (619) 699-5027 (facsimile)
12 Lurick@sempra.com
13 Kmelville@sempra.com

9
10 **VIII.**

11 **STATUTORY AND OTHER AUTHORITY**

12 This Application is made pursuant to Section 451 of the Public Utilities Code of the
13 State of California, the Commission's Rules of Practice and Procedure, and prior decisions,
14 orders and resolutions of this Commission.

15
16 **IX.**

17 **NOTICE**

18 SDG&E will within 10 days after this Application is filed with the Commission:

19 1. Mail a notice to cities and counties in SDG&E's service territory, stating in
20 general terms the proposed operational and rule revisions. The notice will also state that a
21 copy of this Application and related testimony will be furnished by SDG&E upon written
22 request;

23
24 2. The notice will also state that a copy of this Application and related exhibits
25 may be examined at the offices of the Commission and in such SDG&E offices as are
26 specified in the notice.

1 SDG&E will also provide a similar notice to all customers affected by the proposed
2 operational changes by including such notice with the regular bills transmitted to these
3 customers, or by mailing notices in the United States Mail.
4

5 In addition, SDG&E will serve a copy of this Application and related exhibits on all
6 persons designated in the Certificate of Service, which includes all parties to SDG&E's prior
7 General Rate Case proceeding (A.06-12-009) and the Commission's Fire Preparedness OIR
8 (R.08-11-005) service list.
9

10 **X.**

11 **ADDITIONAL DOCUMENTATION**

12 SDG&E's Prepared Direct Testimony as described above is being served on this
13 day.
14

15 SDG&E is ready to proceed with its showing.

16 **WHEREFORE**, San Diego Gas & Electric Company respectfully requests that the
17 Commission:

- 18 1. Review this Application;
19 2. Issue necessary tariff approvals by July 9, 2009;
20 3. Issue an Order authorizing SDG&E to make such changes to SDG&E's tariffs as are
21 consistent with the relief requested herein; and

22 ///

23 ///
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1
2 4. Grant such other and further relief as the Commission finds to be just and reasonable.
3

4 Dated at San Diego, California this 22nd day of December, 2008.

5
6 Respectfully submitted,

7 SAN DIEGO GAS & ELECTRIC COMPANY

8
9 By: /s/ LEE SCHAVRIEN

10 Lee Schavrien
11 Senior Vice President -
12 Regulatory & Finance

13 San Diego Gas & Electric Company

14 By: /s/ KEITH W. MELVILLE

15 LISA G. URICK
16 KEITH W. MELVILLE
17 Attorneys for
18 SAN DIEGO GAS & ELECTRIC COMPANY

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23 (619) 699-5039 (Melville)
24 (619) 699-5027 facsimile

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26 Kmelville@sempra.com

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VERIFICATION

I, Lee Schavrien, am an officer of the applicant corporation herein, to wit: Senior Vice President - Regulatory & Finance – San Diego Gas & Electric Company, and am authorized to make this verification on its behalf. The content of this document is true, except as to matters that are stated on information and belief. As to those matters, I believe them to be true.

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

Executed on December 22, 2008 at San Diego, California.

/s/ LEE SCHAVRIEN

Lee Schavrien
Senior Vice President –
Regulatory & Finance

1
2
3 **CERTIFICATE OF SERVICE**

4 I hereby certify that a copy of **APPLICATION OF SAN DIEGO GAS &**
5 **ELECTRIC COMPANY (U 902-E)** has been electronically mailed to each party of
6 record of the service list in A.06-12-009 and R.08-11-005. Any party on the service list
7 who has not provided an electronic mail address was served by placing copies in properly
8 addressed and sealed envelopes and by depositing such envelopes in the United States
9 Mail with first-class postage prepaid.

10 Executed this 22nd day of December, 2008 at San Diego, California.

11
12 /s/ LISA FUCCI-ORTIZ
13 Lisa Fucci-Ortiz
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