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Director – Regulatory Affairs
8330 Century Park Court
San Diego, CA 92123-1548

January 16, 2019

ADVICE LETTER 3333-E
(U 902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: ESTABLISHMENT OF THE FIRE RISK MITIGATION MEMORANDUM ACCOUNT
PURSUANT TO PUBLIC UTILITIES CODE SECTION 8386(j)**

PURPOSE

San Diego Gas & Electric Company (SDG&E) hereby requests California Public Utilities Commission (Commission or CPUC) approval to establish the Fire Risk Mitigation Memorandum Account (FRMMA) to “track costs incurred for fire risk mitigation that are not otherwise covered in the electrical corporation’s revenue requirements,” as directed in Senate Bill (SB) 901.¹ This memorandum account is necessary because it will allow SDG&E to immediately begin recording costs for critical and urgent fire risk mitigation activities that are not otherwise in rates. Additions to SDG&E’s electric tariffs are shown in Attachment A.

BACKGROUND

SB 901 was signed by Governor Brown on September 21, 2018. SB 901, among other things, amends Section 8386 of the P.U. Code to require electric corporations, including SDG&E, to “annually prepare and submit a wildfire mitigation plan to the commission for review and approval, according to a schedule established by the commission.”² SB 901 describes what shall be included in each electric corporation’s Wildfire Mitigation Plan (Plan) to ensure that the electric corporation’s systems “achieve the highest level of safety, reliability and resiliency.”³ Additionally, SB 901 requires SDG&E to establish this memorandum account so that a specified subset of fire mitigation costs can be tracked. Specifically, P.U. Code § 8386(j) states:

Each electrical corporation shall establish a memorandum account to track costs incurred for fire risk mitigation that are not otherwise covered in the electrical corporation’s revenue requirements.

¹ Stats. 2018, Ch. 626, codified at Public Utilities (P.U.) Code § 8386(j).

² P.U. Code § 8386(b).

³ P.U. Code § 8386(c)(12).

P.U. Code § 8386(j) also notes that the CPUC shall review the costs in the memorandum accounts and disallow recovery of those costs the Commission deems unreasonable.⁴

DISCUSSION

Pursuant to SB 901, the Plans must include operations, maintenance and infrastructure improvements to reduce wildfire risk.⁵ Investments in reducing the risk of wildfires from utility equipment are an absolute must. Like the other electric utilities, SDG&E must continue to make its electric systems more resilient and resistant to damage from wildfires.⁶

SDG&E takes wildfire risk mitigation very seriously and has the responsibility to rapidly respond, consistent with D.16-08-018. The threat of wildfire has increased throughout California over the past several years, which may be attributed to a variety of factors such as drought, climate change, bark beetle infestations, and population growth in fire-prone areas. SDG&E has taken significant steps to address wildfire risks and continues to evaluate opportunities to mitigate the risk. To that end, SDG&E has proposed several wildfire risk mitigation programs and activities in its Test Year (TY) 2019 GRC (A.17-10-007), which is still pending. Given that devastating wildfires have become a regular occurrence in California, SDG&E will not wait to begin implementing programs to reduce wildfire risk. Rather, in accordance with P.U. Code § 8386(j), SDG&E requests to establish the FRMMA to transparently record costs incurred to reduce wildfire risk that are not otherwise covered in its revenue requirement.⁷

As mentioned above, SDG&E has wildfire mitigation projects and programs pending before the Commission in its TY 2019 GRC. If such projects and programs are approved in the TY 2019 GRC or other applicable proceedings, SDG&E will reconcile the activities recorded in the FRMMA with final CPUC decisions so that there is no overlap in cost recovery.

While tracking costs of fire mitigation efforts is necessary and appropriate under the law, it does not guarantee in any way recovery of those costs. The CPUC will review the costs incurred and tracked before including any of those costs in rates. Accordingly, the Commission should not delay approving SDG&E's request for the FRMMA. By including language in SB 901 that allows the utility to establish a memorandum account to separately records costs not otherwise covered by the utility's revenue requirement that are incurred *prior* to CPUC approval of SDG&E's Plan, the Legislature anticipated and encouraged utilities to immediately begin spending money on wildfire mitigation.

⁴ P.U. Code § 8386(g) provides that the just and reasonableness of wildfire mitigation plan implementation costs will be considered in the utility's general rate case (GRC).

⁵ See P.U. Code §§ 8386(a) and (c)(12).

⁶ SDG&E's request is similar to the recent memorandum account requests of Pacific Gas and Electric Company (PG&E) in Advice Letter 5419-E (submitted November 1, 2018) and of Southern California Edison Company (SCE) in Application (A.) 18-09-002. While PG&E's Advice Letter remains pending, SCE's request was recently approved by the Commission on January 10, 2019 in D.19-01-019.

⁷ SB 901 also addresses tracking of costs incurred to implement the wildfire mitigation plan, in P.U. Code § 8386(e). SDG&E notes that there have been arguments raised as to whether one or two memorandum accounts are appropriate pursuant to these two provisions in SB 901. SDG&E does not believe that this debate needs to be resolved in order to approve the instant request, as SB 901 clearly requires each electric corporation to have at *least* one memorandum account.

EFFECTIVE DATE

SDG&E believes that this advice letter submittal is subject to Energy Division approval and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this advice letter become effective February 15, 2019, 30 days from the date submitted.

PROTEST

Anyone may protest this advice letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received by February 5, 2019, which is 20 days from the date this advice letter was submitted to the Commission. There is no restriction on who may submit a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Megan Caulson
Regulatory Tariff Manager
E-mail: MCaulson@semprautilities.com

NOTICE

A copy of this advice letter has been served on the utilities and interested parties shown on the attached list, including interested parties to service lists R.18-10-007 and A.17-10-007 by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Please direct any address changes to SDG&E's Regulatory Tariff group by e-mail at: SDG&ETariffs@semprautilities.com.

CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: San Diego Gas & Electric Company (U902-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Megan Caulson

Phone #: 858-654-1748

E-mail: MCAulson@SempraUtilities.com

E-mail Disposition Notice to: MCAulson@SempraUtilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3333-E

Tier Designation: 2

Subject of AL: Establishment of the Fire Risk Mitigation Memorandum Account (FRMMA) Pursuant to Public Utilities Code Section 8386(j)

Keywords (choose from CPUC listing): Memorandum Account

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: PUC Section 8386(j)

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 2/15/19

No. of tariff sheets: 5

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Electric Fire Risk Mitigation Memorandum Account, Electric Listing of Memorandum Accounts, and Electric Table of Contents

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Megan Caulson
Title: Regulatory Tariff Manager
Utility Name: San Diego Gas & Electric
Address: 8330 Century Park Court; CP 31F
City: San Diego
State: California Zip: 92123
Telephone (xxx) xxx-xxxx: 858-654-1748
Facsimile (xxx) xxx-xxxx: N/A
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Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

Office of Ratepayer Advocates (ORA)

R. Pocta

Energy Division

M. Ghadessi

M. Salinas

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R. Ciupagea

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CA Energy Commission

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C. Farrell

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M. Cade

K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Braun & Blasing, P.C.

S. Blasing

D. Griffiths

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

City of Poway

Poway City Hall

City of San Diego

F. Ortlieb

B. Henry

L. Azar

Y. Lu

Clean Power Research

T. Schmid

G. Novotny

Davis Wright Tremaine LLP

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Ellison Schneider Harris & Donlan LLP

E. Janssen

C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

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B. Cragg

J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

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K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing
Communities Association

S. Dey

Interested Parties in:

R.18-10-007

A.17-10-007

ATTACHMENT A
ADVICE LETTER 3333-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 31448-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, DESCRIPTION/LISTING OF ACCOUNTS, Sheet 3	Revised 30850-E
Original 31449-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, FIRE RISK MITIGATION MEMORANDUM ACCOUNT (FRMMA) , Sheet 1	
Revised 31450-E	TABLE OF CONTENTS, Sheet 1	Revised 31438-E
Revised 31451-E	TABLE OF CONTENTS, Sheet 2	Revised 31183-E
Revised 31452-E	TABLE OF CONTENTS, Sheet 3	Revised 31211-E



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 31448-E

Canceling Revised Cal. P.U.C. Sheet No. 30850-E

PRELIMINARY STATEMENT

Sheet 3

III. MEMORANDUM ACCOUNTS
DESCRIPTION/LISTING OF ACCOUNTS

Listing of Accounts (Continued)

- Customer Information Systems Memorandum Account (CISMA)
- Integration Capacity and Locational Net Benefit Analysis Memorandum Account (ICLNBMA)
- Wildfire Consumer Protections Memorandum Account (WCPMA)
- Adaptive Streetlight Implementation Memorandum Account (ASLIMA)
- Adaptive Streetlight Maintenance Memorandum Account (ASLMMA)
- Integrated Resource Plan Costs Memorandum Account (IRPCMA)
- General Rate Case Memorandum Account 2019 (GRCMA2019)
- Emergency Customer Protections Memorandum Account (ECPMA)
- Power Charge Indifference Adjustment Customer Outreach Memorandum Account (PCIACOMA)
- Disadvantaged Communities Single Family Solar Homes Memorandum Account (DACSASHMA)
- Fire Risk Mitigation Memorandum Account (FRMMA)

N

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Advice Ltr. No. 3333-E

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Dan Skopec
Vice President
Regulatory Affairs

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PRELIMINARY STATEMENT

Sheet 1

III. MEMORANDUM ACCOUNTS
FIRE RISK MITIGATION MEMORANDUM ACCOUNT (FRMMA)

1. Purpose

The purpose of the Fire Risk Mitigation Memorandum Account (FRMMA) is to record, pursuant to Public Utilities Code Section 8386 (j), as modified by Senate Bill (SB) 901, costs associated with fire risk mitigation work that is not otherwise covered in SDG&E's authorized revenue requirements.

2. Applicability

This account shall apply to all electric customers except those specifically excluded by the Commission.

3. Rates

The FRMMA does not have a separate rate component.

4. Accounting Procedures

SDG&E shall maintain the FRMMA by making entries at the end of each month as follows:

- a. A debit entry to record the Operating and Maintenance (O&M) and capital-related costs (i.e. depreciation, return, and taxes) associated with fire risk mitigation work that is not covered in SDG&E's authorized revenue requirements;
- b. A credit entry to remove costs, previously recorded in this account, for activities included in SDG&E's General Rate Case (GRC) or other proceeding, once the revenue requirements are authorized and implemented;
- c. An entry to reflect any transfers to or from other regulatory accounts as authorized by the Commission; and
- d. An entry equal to the interest on the average of the balance at the beginning of the month and the balance in this account after the above entries, at a rate equal to one-twelfth of the interest rate on three-month nonfinancial Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

5. Disposition

The disposition of the FRMMA will be addressed in SDG&E's next General Rate Case proceeding or other proceeding deemed appropriate by the Commission.

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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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