

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

Application of San Diego Gas & Electric
Company (U 902 M) for Establishment of an
Interim Rate Relief Mechanism for its
Wildfire Mitigation Plan Costs

Application A.21-07-017__

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR
ESTABLISHMENT OF AN INTERIM RATE RELIEF MECHANISM FOR ITS
WILDFIRE MITIGATION PLAN COSTS**

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I. INTRODUCTION

Pursuant to Sections 454 and 701 of the Public Utilities (“P.U.”) Code, and Article 2 of the Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby applies for the establishment of an interim rate relief mechanism for wildfire mitigation expenditures recorded in SDG&E’s Wildfire Mitigation Plan Memorandum Accounts (“WMPMAs”).¹ SDG&E is not seeking a reasonableness review or final recovery of any costs through this Application. Rather, SDG&E is requesting establishment of an interim rate relief mechanism whereby 50 percent of wildfire mitigation expenditures incremental to those authorized for recovery in SDG&E’s General Rate Case may be authorized for recovery each year. SDG&E proposes that WMPMA costs incurred between 2019 and 2021 would be amortized over 20 months, and subsequent expenditures amortized over an annual period, with all costs subject to a later reasonableness review and refund with interest

¹ SDG&E has two Wildfire Mitigation Plan Memorandum Accounts; one in the electric tariff books and one in the gas tariff books. Throughout this Application and the corresponding Testimony, SDG&E refers to these accounts as WMPMA or WMPMAs, interchangeably, given that the electric and gas WMPMAs collectively record costs to implement SDG&E’s WMPs.

of any disallowed costs in SDG&E’s next General Rate Case or in a separate application under Section 8386.4(b)(2) of the Public Utilities Code.

As of the end of the first quarter 2021, SDG&E has an under-collected balance of approximately \$107.2 million recorded to its WMPMAs, incremental to authorized amounts, and this balance is expected to grow. Interim rate relief, as proposed herein, is justified for several reasons. Such interim relief will permit SDG&E to begin collecting needed revenues more promptly than would otherwise occur – especially given that revenues associated with SDG&E’s next General Rate Case will not be implemented until 2024.² Just as importantly, customers will not be harmed by this proposal because the interim relief reflects rates that customers will ultimately pay upon authorization, and any potential disallowed amounts will be returned to customers. In fact, customers benefit from SDG&E’s proposed relief herein by avoiding the rate shock that could occur if substantial accumulated wildfire mitigation cost balances – recorded over a multi-year period – are implemented into rates at one time.³

SDG&E modeled its proposed interim rate relief mechanism on the mechanism that the Commission approved in Phase 2 of SDG&E’s and SoCalGas’ Pipeline Safety Enhancement Plan (“PSEP”) proceeding.⁴ In that proceeding, the Commission authorized SDG&E and SoCalGas interim rate increases for 50 percent of incurred annual costs recorded in three PSEP-related regulatory accounts, subject to refund and a reasonableness review. The PSEP interim

² In accordance with Decision (“D.”) 20-01-002, SDG&E will file its next General Rate Case Application on May 15, 2022 for a 2024 Test Year.

³ In D.20-02-045, the Commission authorized continuation of a shared gas rate design across both Southern California Gas Company (“SoCalGas”) and SDG&E for certain rate classes. As a result of implementing the shared rate design, the proposals herein to increase SDG&E’s gas rates will also impact certain SoCalGas rates.

⁴ See D.16-08-003.

cost recovery occurs on an annual basis, and the reasonableness review occurs in subsequent proceedings or in the applicants' next General Rate Case. The Commission approved this proposed interim mechanism based on its finding that it "reasonably balances mitigation of the potential for customer rate shock from large rate increases with the Commission's Constitutional and statutory duty to review and approve rate increases."⁵ The same rationale applies here. Customers will avoid rate shock through a smoother implementation of wildfire mitigation expenditures in rates on an annual basis. SDG&E will also benefit by getting 50 percent of the wildfire mitigation expenditures it has already spent, subject to review and refund.⁶ Other benefits include utilizing a routine advice letter process, thus limiting the need for filing and processing cost recovery applications, which require significant expenditures of resources by all stakeholders and the Commission. Moreover, this proposal leverages a Commission-approved mechanism that adopted a proposal put forth by Commission Staff. Accordingly, SDG&E respectfully requests that the Commission approve this Application.

II. BACKGROUND

Generally, SDG&E's wildfire mitigation forecasts are reviewed and approved in General Rate Cases. SDG&E's currently authorized revenue requirement for wildfire mitigation was included in SDG&E's Test Year 2019 GRC. These wildfire mitigation estimates were forecasted by SDG&E in the 2016-2017 timeframe for inclusion in SDG&E's 2019 GRC Application, filed in October 2017.

⁵ D.16-08-003, Findings of Fact 4 at 13.

⁶ On July 15, 2021, the Commission approved SDG&E's 2021 Wildfire Mitigation Plan ("WMP") at its Business Meeting.

Around this time, catastrophic wildfires occurred in the fall of 2017. Subsequently, the California Legislature enacted Senate Bill (“SB”) 901 in 2018.⁷ SB 901 required electrical corporations such as SDG&E to annually prepare and submit Wildfire Mitigation Plans (“WMPs”) to the Commission for review and approval. SDG&E submitted its 2019 WMP in February 2019. The Commission issued a Guidance Decision⁸ pertaining to all 2019 WMPs, and it concurrently issued a separate decision approving SDG&E’s 2019 WMP.⁹

SB 901 added two provisions regarding utility tracking of wildfire mitigation costs. First, Section 8386(j) to the Public Utilities Code (since superseded) directed each electric corporation to establish a memorandum account to track costs for fire risk mitigation – *i.e.*, Fire Risk Mitigation Memorandum Accounts – that are not otherwise covered in the electrical corporation’s revenue requirements. Section 8386(j) directed the Commission to review those costs and disallow any costs deemed unreasonable. Section 8386(g) provided that this review would occur in the electrical corporation’s General Rate Case.

Second, Section 8386(e) directed the Commission – at the time it approves each WMP – to authorize the utility to establish a memorandum account to track costs incurred to implement the WMP. The Commission allowed the establishment of this Section 8386(e) memorandum account in its decision on SDG&E’s 2019 WMP.¹⁰

In the 2019 Guidance Decision, the Commission made clear that it would not review costs or permit cost recovery in the context of WMP proceedings.¹¹ The Commission interpreted

⁷ SB 901 (Ch. 626, Stats. 2018).

⁸ *See* D.19-05-036.

⁹ *See* D.19-05-039.

¹⁰ D.19-05-039, Ordering Paragraph 13 at 31.

¹¹ D.19-05-036 at 20-25.

SB 901 to mean that it “should consider cost recovery related to WMPs in GRCs, not in this [WMP] proceeding.”¹²

The Legislature revised and amended statutory provisions related to WMPs in 2019, following catastrophic wildfires that ignited in the fall of 2018. In Assembly Bill (“AB”) 1054,¹³ which took effect on July 12, 2019, the Legislature added Section 8386.4 to the Public Utilities Code. Section 8386.4 addressed recovery of WMP costs by making clear that reasonableness reviews of the costs recorded in WMP memorandum accounts would occur either in the electrical corporations’ next General Rate Case or in a proceeding initiated by a separate application.

SDG&E filed Advice Letter (“AL”) 3333-E on January 16, 2019 requesting the establishment of a Fire Risk Mitigation Memorandum Account (“FRMMA”). The CPUC’s Energy Division approved SDG&E’s AL 3333-E via a non-standard disposition letter on March 12, 2019. Subsequently, SDG&E filed AL 3406-E on July 18, 2019 seeking to establish its electric WMPMA in accordance with D.19-05-039.

On October 31, 2019, SDG&E filed advice letters regarding its two wildfire memorandum accounts.¹⁴ In the advice letters, SDG&E sought to (1) establish electric and gas WMPMAs; and (2) modify the existing FRMMA to reflect the passage of AB 1054, as well as to clarify the relationship between these two accounts.¹⁵ Among other issues, SDG&E explained

¹² D.19-05-036 at 22.

¹³ AB 1054 (Ch. 79, Stats. 2019) was subsequently modified by AB 1513 (Ch. 396, Stats. 2019); a companion bill, AB 111 (Ch. 81, Stats. 2019), was also enacted.

¹⁴ SDG&E Advice Letters 3454-E and 2817-G (October 31, 2019).

¹⁵ On October 30, 2019, SDG&E filed a letter to withdraw AL 3406-E and indicated a subsequent advice letter would be filed on that matter.

that it proposed to record the authorized revenue requirement for wildfire-related activities as well as the expenses for the activities approved in a WMP in the WMPMA, and that “[t]his will result in a WMPMA balance that reflects costs net of revenue requirement authorized in a GRC.” SDG&E further noted that “if costs differ from authorized, the WMPMA balance will be a) the incremental costs above and beyond the amounts authorized for wildfire, or b) the amount of authorized revenue above and beyond actual costs.”¹⁶ These advice letters were approved by the Energy Division on January 23, 2020.

It is SDG&E’s intent that the wildfire expenses recorded to the FRMMA will be presented in future WMPs. Once approved in a future WMP, the associated costs would be transferred from the FRMMA to the WMPMA. As such, SDG&E is only seeking to apply the interim mechanism requested herein to those costs recorded in its WMPMAs, which have already been included in WMPs approved by the Wildfire Safety Division and ratified by the Commission.¹⁷

In January 2020, the Commission also approved D.20-01-002 extending the current GRC cycle of SDG&E by adding two additional attrition years 2022 and 2023 (now from 2019 through 2023) and ordering SDG&E to file a Petition for Modification of its 2019 GRC Decision to set revenue requirement for the newly established attrition years. In May 2021, the Commission approved SDG&E’s Petition for Modification and extends SDG&E’s wildfire mitigation-related revenue requirement through 2023. But the revenue requirement remains based on the underlying forecasts put forth by SDG&E in 2017. The incremental amounts

¹⁶ SDG&E AL 3454-E and 2817-G (October 31, 2019) at 2.

¹⁷ P.U. Code Section 8386.3(a).

between the costs associated with implementing SDG&E's Wildfire Mitigation Plan and authorized revenue requirements from the 2019 GRC cycle will be recorded in the WMPMAs.

III. RELIEF SOUGHT

In this Application, SDG&E seeks the establishment of an interim rate relief mechanism for wildfire mitigation expenditures recorded to its WMPMAs. Under this proposed interim mechanism, 50 percent of the actual recorded balance in the WMPMAs (which are incremental to those authorized for recovery in SDG&E's General Rate Case and other wildfire-related regulatory accounts) may be authorized for recovery each year (amortized over an annual period), subject to a later reasonableness review and refund with interest of any disallowed costs in SDG&E's next General Rate Case or in a separate application under Section 8386.4(b)(2) of the Public Utilities Code.

As noted above, SDG&E modeled this approach on the interim mechanism the Commission approved in D.16-08-003 with respect to the PSEP proceeding. SDG&E would include the recorded expenses in its annual regulatory account balance update process. Under this process, SDG&E submits a Tier 2 advice letter, filed in October of each year, that presents for recovery the balances in various regulatory accounts to be implemented in rates on January 1 of the following year. This regulatory account balance update process was also utilized in the authorized PSEP interim mechanism.¹⁸ Also consistent with the PSEP interim rate mechanism, SDG&E proposes to include only actual wildfire mitigation costs recorded to the WMPMAs that are available at the time of the regulatory account balance update filing and to exclude any

¹⁸ D.18-06-003 at 11.

forecasted expenditures.¹⁹ In this Application, SDG&E is not seeking a reasonableness review or final approval of WMP expenses.

There is no doubt that the Commission has authority to grant interim rate relief.²⁰ Recently, in a 2020 decision on Pacific Gas and Electric Company’s (“PG&E”) application for interim rate recovery of amounts recorded to its wildfire mitigation-related memorandum accounts, the Commission reiterated that it “has the authority to authorize interim rate recovery prior to reviewing the reasonableness of spending.”²¹

As the Commission discussed in D.19-04-039 – another case in which it granted interim rate recovery to PG&E²² –interim rate increases may be appropriate in a number of contexts and scenarios, including where (1) failure to do so would result in a financial emergency; (2) the reasonableness of the investment costs covered by the utility’s rates is undisputed; (3) it would promote fairness to the utility and public; (4) to reduce the potential for rate shock; and (5) to preserve the financial integrity of a utility, minimize costs incurred by ratepayers, and ensure rate stability.²³ The Commission has determined that “any one of those factors may be sufficient for the Commission to grant relief.”²⁴

¹⁹ *Id.* at 8.

²⁰ See *TURN v. PUC*, 44 Cal. 3d 870 877 (1988). See also D.19-04-039 at 5 and Conclusions of Law 2 at 13.

²¹ D.20-10-026 at 25. The Commission authorized interim rate recovery, subject to refund, of 55 percent of the identified revenue requirement recorded to various PG&E wildfire mitigation-related memorandum accounts.

²² More specifically, the Commission granted recovery of \$373 million, which equated to approximately 63% of the costs requested by PG&E. D.19-04-039 at 7.

²³ D.19-04-039 at 5-6. See also D.20-10-026 at 25-26.

²⁴ D.20-10-026 at 26 (citation omitted).

Consistent with prior instances in which interim recovery has been permitted – particularly the 2020 decision granting PG&E’s interim rate recovery – the proposed interim rate relief mechanism will benefit both SDG&E and its customers in important ways, by promoting fairness, minimizing costs to ratepayers, and promoting rate stability. In terms of fairness, the interim rate recovery mechanism reflects costs that customers will ultimately have to pay upon authorization, but to the extent disallowances occur, those amounts are returned to customers. Additionally, the proposed mechanism is consistent with cost causation and intergenerational equity principles: the wildfire mitigation costs would be allocated to customers in a manner that more closely aligns with the timing of when the costs were incurred than if recovery were fully deferred until the conclusion of SDG&E’s next GRC. Further, the costs included in the mechanism are costs that largely result from statutory requirements imposed by the Legislature – with the expectation that reasonable costs will be recovered²⁵ – and implemented by the Commission or Wildfire Safety Division as part of one of the most important safety programs in the state, namely wildfire mitigation.

In terms of ratepayer costs and rate stability, interim rate recovery as proposed herein will likely avoid a potentially larger rate increase on customers after a reasonableness review undertaken in SDG&E’s General Rate Case or in a separate application. By the time such a review is completed and costs are authorized for cost recovery, the accumulated balances will be more significant. Indeed, SDG&E projects a potential under-collected balance of nearly \$750 million by the end of 2023. The proposed interim rate relief mechanism would permit cost recovery to be spread out and mitigate the risk of rate shock.

²⁵ See P.U. Code Section 8386.4.

Absent approval of an interim rate relief mechanism, SDG&E anticipates it will need to issue long-term debt to offset the under-collected WMP balances. The funding requirements significantly exceed the entirety of SDG&E's typical annual debt issuance, resulting in incremental annual interest expenses. The proposed mechanism would allow SDG&E to reduce or avoid such expense, resulting in savings for customers.

For its part, SDG&E benefits because it can more quickly collect needed revenues than would otherwise be the case if it had to wait until after its next General Rate Case. The interim rate relief mechanism would reduce SDG&E's financial risk because it would help SDG&E avoid issuing additional debt. As debt obligations increase, more cash flows must be committed to debt payments. SDG&E's funds from operations ("FFO") to debt ratio – a key indicator of creditworthiness – could be negatively impacted if the interim rate relief mechanism were not adopted, leading to potential credit ratings downgrades and associated higher borrowing costs. In sum, SDG&E's request for interim rate relief is justified and should be approved.

In Table 1 below, SDG&E shows the balances in its WMPMAs that will be subject to this interim rate relief mechanism, if approved. As this table demonstrates, SDG&E anticipates that the balances in its WMPMAs will increase in the coming years as it takes further action to minimize the risk of wildfires and the impacts of Public Safety Power Shutoffs ("PSPS") in its service territory. To that end, SDG&E presented expenses in its 2020 WMP demonstrating the expected growth of wildfire expenses in the years 2020 through 2022. While the costs put forth in SDG&E's 2020 WMP represented forecasts for wildfire activities, the costs recorded to the WMPMAs are actual recorded expenditures. Accordingly, only those costs included in SDG&E's approved WMPs and implemented (rather than anticipated or forecasted) will be subject to this interim rate relief mechanism.

Subsequent to the filing of the 2020 WMP, SDG&E has recorded actual wildfire mitigation costs to its WMPMAs that have informed the illustrative numbers put forth in this Application. Table 1, also included in Mr. Butler’s testimony, provides recorded amounts from when the WMPMAs were effective beginning in May 2019 through fourth quarter (December) of 2020. SDG&E then presents forecasts for 2021 through 2023.

TABLE 1
Illustrative Incremental Forecasted Revenue Requirement Summary
(In Millions)

	2019	2020	2021	2022 ²⁶	2023 ²⁷	Total
CPUC WMP Revenue Requirement (excluding TTBA)	\$44.4	\$140.6	\$224.0	\$307.4	\$356.6	\$1,073.0
WMP GRC Revenue Requirement	(\$23.6)	(\$68.5)	(\$76.4)	(\$82.4)	(\$88.4)	(\$339.3)
Incremental WMP Revenue Requirement	\$20.8	\$72.1	\$147.6	\$225.0	\$268.2	\$733.7
Regulatory Interest²⁸	\$0.0	\$0.2	\$0.2	\$0.4	\$0.8	\$1.6
Total Incremental WMP Revenue Requirement	\$20.8	\$72.3	\$147.8	\$225.4	\$269.0	\$735.3

Table 1 excludes revenue requirement that are addressed through separate means. In particular, costs recorded to the Tree Trimming Balancing Account (“TTBA”) are included in SDG&E’s Wildfire Mitigation Plan, but because the TTBA has its own regulatory treatment, SDG&E excluded such costs from its proposed interim mechanism and Table 1 above. Similarly, AB 1054 included a provision that precluded an electrical corporation from including

²⁶ Amounts shown for 2022 and 2023 are consistent with Application 17-10-007/008, SDG&E’s Petition for Modification of Test Year 2019 General Rate Case Decision 19-09-051 (April 9, 2020). See also D.20-07-038, Order Modifying Decision (D.) 19-09-051 and Denying Rehearing, As Modified.

²⁷ *Id.*

²⁸ Based on SDG&E’s average regulatory interest rate (Commercial Paper Rate) of 0.13% over the period June 2020 – May 2021.

in equity rate base its share of the electric corporation’s fire risk mitigation capital expenditures. SDG&E filed an advice letter to implement this provision of AB 1054, also in accordance with a directive in its 2019 GRC Decision, which was subsequently approved by the Commission in Resolution E-5071. Resolution E-5071 found that SDG&E’s underlying calculation and revenue requirement reductions set forth through the advice letter process “appropriately capture the equity rate base exclusion requirements of AB 1054”²⁹ and such rate base exclusion will continue “until the end of the useful life of the assets.”³⁰ This rate base exclusion will reduce SDG&E’s base margin and will not directly reduce the balance in the WMPMAs. Accordingly, the AB 1054 equity exclusion is not included in Table 1 as it is addressed separately.

Lastly, in the interest of transparency, SDG&E notes that it is continuing to explore approaches to recovery and mitigating the impact of wildfire mitigation-related expenses to ratepayers. In the future, SDG&E may consider filing an application for securitization of certain wildfire mitigation-related expenditures.³¹ If SDG&E elects to pursue such securitization, SDG&E may elect to terminate the interim relief mechanism or reduce the amount of interim relief recovered, and will notify the Commission as such through its annual regulatory account balance update process.

IV. SUMMARY OF PREPARED TESTIMONY

A. Mr. Jonathan Woldemariam

Jonathan Woldemariam is SDG&E’s Director of Wildfire Mitigation & Vegetation Management. In his direct testimony, Mr. Woldemariam discusses the following subjects: (1)

²⁹ Resolution E-5071 (August 27, 2020), Findings 6 at 13.

³⁰ *Id.*, Ordering Paragraph 5 at 14.

³¹ Public Utilities Code Section 850 *et seq.* permits securitization of certain eligible wildfire mitigation expenditures.

SDG&E's wildfire mitigation and prevention activities, including its Wildfire Mitigation Plan; (2) recovery of costs associated with SDG&E's WMP; (3) SDG&E's anticipated forecast for the growth of WMP costs in direct costs; and (4) the similarities between WMP costs and PSEP costs.

B. Mr. Eric Dalton

Eric Dalton is SDG&E's Regulatory Reporting and Accounts Manager in its Controller's Division. In his direct testimony, Mr. Dalton describes the interim rate relief mechanism for wildfire mitigation-related costs recorded to the WMPMA that SDG&E is proposing in this Application. Mr. Dalton also provides background associated with the interim rate relief mechanism, including applicable Commission precedent upon which it is based.

C. Mr. Casey Butler

Casey Butler is a Manager in SDG&E's Financial and Business Planning Department. In his direct testimony, Mr. Butler provides the revenue requirement associated with the forecasted wildfire mitigation expenditures and explains potential impacts to SDG&E and customers associated with the proposed interim rate relief mechanism. In particular, Mr. Butler describes the cash flow impacts to SDG&E and potential rate shock to customers that would occur if implementation in rates of the costs at issue were to be delayed until SDG&E's next General Rate Case.

V. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1(a)-(c)

1. Rule 2.1(a) – Legal Name

SDG&E is a public utility 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, CA 92123.

2. Rule 2.1(b) – Correspondence

Correspondence or communications regarding this Application should be addressed to the following:

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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. While SDG&E is not proposing to recover a specific revenue requirement via this Application, it is seeking to establish an interim rate relief mechanism that will affect future SDG&E rates.

b. Need for Hearings

SDG&E submits that this Application will not require hearings. SDG&E has provided ample supporting testimony analysis and documentation that provide the Commission with a

sufficient record upon which to grant the relief requested. Further, since SDG&E is not seeking a factual determination regarding the reasonableness of the underlying costs, a hearing is not necessary.

c. Issues to Be Considered and Relevant Safety Considerations

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

d. Proposed Schedule

SDG&E proposes the following schedule for this proceeding. Since SDG&E is not seeking actual recovery of costs in this Application, SDG&E does not expect there will be material issues of factual dispute. Accordingly, and consistent with the schedule adopted in Application 20-02-003, SDG&E has not included dates for a hearing or further testimony.

ACTION ³²	DATE
Application Filed	July 30, 2021
Protests or Responses	Monday, August 30, 2021
Reply to Protests or Responses	Thursday, September 9, 2021
Prehearing Conference	Early October 2021
Comments on Proposed Scope (if necessary)	Mid-October 2021
Scoping Memorandum	Late October 2021
Concurrent Opening Briefs	November 2021

³² SDG&E, together with SoCalGas, will file its test year 2024 GRC Application on May 15, 2022. A final decision in this Application is necessary to finalize SDG&E's wildfire-related GRC cost recovery proposals, prior to filing a GRC Application. As such, as mentioned in Mr. Dalton's testimony, SDG&E proposes to implement this interim rate relief mechanism beginning on the first of the month following the effective date of a final decision, and therefore requests a final decision in this proceeding by mid-March 2022.

Concurrent Reply Briefs	December 2021
Proposed Decision	February 2022
Comments on Proposed Decision	Late February 2022
Reply Comments on Proposed Decision	Early March 2022
Final Decision	Mid-March 2022

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)

In accordance with Rule 3.2 (a) – (e) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.³³

1. Rule 3.2(a)(1) – Balance Sheet and Income Statement

SDG&E’s financial statement, balance sheet and income statement for the three-month period ending March 31, 2021 are included with this Application as Attachment A.

2. Rule 3.2(a)(2) and (3) – Statement of Present and Proposed Rates

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

³³ Rule 3.2(a)(9) is not applicable to SDG&E.

SDG&E's estimated proposed rates, effective on the first of the month following the effective date of a final decision (if the Commission were to approve SDG&E's proposed mechanism), are attached as Attachment C. Due to the Commission's continuation of shared rate design for certain rate classes in D.20-02-045, the SDG&E proposed rate change associated with this Application will also impact certain cost allocations that impact SoCalGas rates.

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

SDG&E is in the business of generating, transmitting and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange and Imperial Counties. This includes a composite 92% ownership in the 500 kV Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500 kV Sunrise Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of the Moreno gas compressor station in Riverside County and 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 three-month period ending March 31, 2021 is shown on the Statement of Original Cost and Depreciation Reserves included in Attachment D.

4. 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 three-month period ending March 31, 2021 is included as Attachment E to this Application.

5. Rule 3.2(a)(7) – Depreciation

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

6. Rule 3.2(a)(8) – Proxy Statement

A copy of the most recent proxy statement sent to all shareholders of SDG&E’s parent company, Sempra Energy, dated March 26, 2021, was mailed to the Commission on April 13, 2021, and is incorporated herein by reference.

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

While there are no rate changes proposed in this application, any rate changes resulting from it will ultimately reflect only increased costs to SDG&E for the services or commodities furnished by it.

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

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing this Application, mail a notice to the State of

California and to the cities and counties in its service territory and to all those persons listed in Attachment F to this Application.

9. 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.

10. 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.

11. Rule 3.2(e) – Proof of Compliance

In compliance with Rule 3.2 (e) of the Commission’s Rules of Practice and Procedure, SDG&E will, within 20 days after compliance with the last of these subsections that is applicable, file proof of compliance with the notice requirements of subsections (b), (c), and (d).

VI. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will electronically serve this Application, testimony, and related exhibits on parties to the service list for the Wildfire Mitigation Plan Rulemaking (R.18-10-007). Electronic copies will also be served on the Chief ALJ and the Director of the Wildfire Safety Division. Pursuant to the Commission’s *COVID-19 Temporary Filing and Service Protocol for Formal Proceedings*, paper copies of e-filed documents will not be mailed to the Administrative Law Judges or to parties on the service lists.

VII. CONCLUSION

WHEREFORE, SDG&E requests that the Commission grant this Application for interim rate relief for WMP expenditures.

Respectfully submitted,

By: /s/ Laura M. Fulton

Laura M. Fulton
San Diego Gas & Electric Company
8330 Century Park Court, #CP32D
San Diego, CA 92123
Telephone: (858) 654-1759
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Email: lfulton@sdge.com

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Dan Skopec

Dan Skopec
San Diego Gas & Electric Company
Senior Vice President – State Government Affairs &
Chief Regulatory Officer

DATED at San Diego, California, this 30th day of July, 2021

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 its behalf. I am informed and believe the matters stated in the foregoing APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) FOR ESTABLISHMENT OF AN INTERIM RATE RELIEF MECHANISM FOR ITS WILDFIRE MITIGATION PLAN COSTS are true to my own knowledge, except as to matters which are therein stated on information and belief, and 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 July 30, 2021 at San Diego, California.

By: /s/ Dan Skopec
Dan Skopec
San Diego Gas & Electric Company
Senior Vice President – State Government Affairs &
Chief Regulatory Officer

Attachment A

**Balance Sheet, Statement of Income and
Financial Statement**

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MAR 2021**

1. UTILITY PLANT		2021
101	UTILITY PLANT IN SERVICE	\$ 21,369,638,820
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	112,194,000
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,840,844,195
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(6,584,942,836)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(904,326,341)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(2,312,944)
118	OTHER UTILITY PLANT	1,763,896,929
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(369,649,078)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	\$ 17,229,093,467
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	\$ 6,027,761
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(326,050)
158	NON-CURRENT PORTION OF ALLOWANCES	83,449,123
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,013,663,012
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	92,827,182
	TOTAL OTHER PROPERTY AND INVESTMENTS	\$ 1,195,641,028

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MAR 2021

3. CURRENT AND ACCRUED ASSETS

		2021
131	CASH	\$ 9,168,876
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	611,839,729
143	OTHER ACCOUNTS RECEIVABLE	85,723,890
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(65,658,094)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	212,915
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	160,321,915
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	196,438,887
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(83,449,123)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	375,461
165	PREPAYMENTS	117,604,038
171	INTEREST AND DIVIDENDS RECEIVABLE	2,437,258
173	ACCRUED UTILITY REVENUES	76,609,507
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	32,679,971
175	DERIVATIVE INSTRUMENT ASSETS	146,945,826
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(92,827,182)
	TOTAL CURRENT AND ACCRUED ASSETS	\$ 1,198,424,374

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	\$ 38,399,693
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,518,680,052
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	1,320,381
184	CLEARING ACCOUNTS	(794,710)
185	TEMPORARY FACILITIES	369,303
186	MISCELLANEOUS DEFERRED DEBITS	410,809,589
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	7,394,135
190	ACCUMULATED DEFERRED INCOME TAXES	111,927,593
	TOTAL DEFERRED DEBITS	3,088,106,036
	TOTAL ASSETS AND OTHER DEBITS	\$ 22,711,264,905

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MAR 2021**

5. PROPRIETARY CAPITAL

		2021
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	802,165,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	6,291,586,954
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(9,798,422)
	TOTAL PROPRIETARY CAPITAL	\$ 7,942,089,633

6. LONG-TERM DEBT

221	BONDS	\$ 6,035,716,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(12,916,276)
	TOTAL LONG-TERM DEBT	\$ 6,022,799,724

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,317,129,404
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	27,439,742
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	100,386,388
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	41,466,277
230	ASSET RETIREMENT OBLIGATIONS	865,560,551
	TOTAL OTHER NONCURRENT LIABILITIES	\$ 2,351,982,362

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MAR 2021**

8. CURRENT AND ACCRUED LIABILITIES

		2021
231	NOTES PAYABLE	\$ 129,846,943
232	ACCOUNTS PAYABLE	559,568,242
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	79,291,934
235	CUSTOMER DEPOSITS	52,597,860
236	TAXES ACCRUED	90,204,338
237	INTEREST ACCRUED	71,839,443
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	9,507,886
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	203,003,946
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	51,292,251
244	DERIVATIVE INSTRUMENT LIABILITIES	71,947,456
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(41,466,277)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
		-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 1,277,634,022

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 108,854,693
253	OTHER DEFERRED CREDITS	437,159,541
254	OTHER REGULATORY LIABILITIES	2,381,543,465
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	13,375,429
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	1,854,646,517
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	321,179,519
		5,116,759,164
	TOTAL DEFERRED CREDITS	5,116,759,164
	TOTAL LIABILITIES AND OTHER CREDITS	\$ 22,711,264,905

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
December 31, 2020

(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 Decision Nos. 93-09-069, 96-05-066, 00-01-016, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, 15-08-011, 18-02-012 and 20-04-015 to which references are hereby made.

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

	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid as of Q4 2020
First Mortgage Bonds:				
5.875% Series VV, due 2034	06-17-04	43,615,000	0	2,683,106
5.875% Series WW, due 2034	06-17-04	40,000,000	0	2,460,718
5.875% Series XX, due 2034	06-17-04	35,000,000	0	2,153,128
5.875% Series YY, due 2034	06-17-04	24,000,000	0	1,476,431
5.875% Series ZZ, due 2034	06-17-04	33,650,000	0	2,070,079
4.00% Series AAA, due 2039	06-17-04	75,000,000	0	3,891,667
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
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
1.9140% Series PPP, due 2022	03-12-15	250,000,000	27,213,837 ¹	1,538,062
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	12,500,000
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	15,000,000
4.15% Series SSS, due 2048	05-17-18	400,000,000	400,000,000	16,600,000
4.10% Series TTT, due 2049	05-31-19	400,000,000	400,000,000	16,400,000
3.32% Series UUU, due 2050	04-07-20	400,000,000	400,000,000	6,935,111
1.70% Series VVV, due 2030	09-22-20	800,000,000	800,000,000	-
Total First Mortgage Bonds:			6,027,213,837	228,595,802
Total Unsecured Bonds				0
Total Bonds:				228,595,802
Line Of Credit Drawdown	03-16-20	200,000,000	0	1,056,694
TOTAL LONG-TERM DEBT			6,027,213,837	

1. Bond series PPP reduced by SONGS regulatory asset per 2014 SONGS settlement agreement.

**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT**

December 31, 2020

Other Indebtedness	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2020
Commercial Paper & ST Bank Loans	Various	Various	Various	200,000,000	\$2,586,282

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	2016	2017	2018	2019	2020
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
Total	-	-	-	-	-	-

Common Stock	2016	2017	2018	2019	2020
Dividend to Parent [1]	175,000,000	450,000,000	250,000,000	-	200,000,000

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

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
MAR 2021

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$ 1,416,836,048
401	OPERATING EXPENSES	794,409,439	
402	MAINTENANCE EXPENSES	60,870,621	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	208,170,837	
408.1	TAXES OTHER THAN INCOME TAXES	52,125,797	
409.1	INCOME TAXES	19,607,644	
410.1	PROVISION FOR DEFERRED INCOME TAXES	51,755,716	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(26,647,244)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(2,439)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>1,160,290,371</u>
	NET OPERATING INCOME		256,545,677

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(4,634,434)	
418	NONOPERATING RENTAL INCOME	9,195	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	1,966,032	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	23,246,751	
421	MISCELLANEOUS NONOPERATING INCOME	126,162	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	<u>20,713,706</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	62,512	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	7,996,083	
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 8,058,595</u>	
408.2	TAXES OTHER THAN INCOME TAXES	198,684	
409.2	INCOME TAXES	(1,156,024)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	14,100,095	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(12,336,127)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ 806,628</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>\$ 11,848,483</u>
	INCOME BEFORE INTEREST CHARGES		268,394,160
	EXTRAORDINARY ITEMS AFTER TAXES		-
	NET INTEREST CHARGES*		<u>55,953,888</u>
	NET INCOME		<u>\$ 212,440,272</u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$6,831,029)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
MAR 2021

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 6,079,146,682
NET INCOME (FROM PRECEDING PAGE)	212,440,272
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 6,291,586,954</u>

Attachment B
Statement of Present Rates

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SAMPLE FORMS

Applications

Medical Baseline Allowance Application (Form 4859-E, 03/20)	57169-G
Medical Baseline Allowance Self-Certification (Form 4860, 03/20)	57170-G
Application for California Alternate Rates for Energy (CARE) Program for Qualified Agricultural Employee Housing (Form 6632, 06/21)	58799-G
Application for California Alternate Rates for Energy (CARE) Program for Migrant Farmworker Housing Centers (Form 6635)	40407-G
Application for California Alternate Rates for Energy (CARE) Program for Qualified Nonprofit Group Living Facilities (Form 6571, 06/21)	58800-G
Application for CARE, General Purpose, Direct Mail (Form 6491-DM, 06/21)	58801-G
Self-Certification CARE Application - Individually Metered Residential (Form 6491, 06/21)	58802-G
Self-Recertification CARE Application - Individually Metered Residential (Form 6674, 06/21)	58803-G
Capitation Program CARE Application (Form 6491-CBO, 06/21)	58804-G
Post-Enrollment Verification CARE Application - Individually Metered Residential (Form 6675, 06/15)	51491-G
Post-Enrollment Verification CARE Application - Sub-Metered Residential (Form 6675S, 06/15)	51492-G
Self-Certification CARE Application - Submetered Residential (Form 6677, 06/21)	58805-G
Self-Recertification CARE Application - Submetered Residential (Form 6678, 06/21)	58806-G
Application for CARE, Bill Insert (Form 6491-BI, 06/21)	58807-G
Set and Turn-on Application (Form 1770H, 6-99)	32482-G
Statement of Applicant's Contract Anticipated Cost for Applicant Installation Project, Form 66602	37772-G
Mobilehome Park Utility Conversion Program Application (Form 8208)	58891-G

Receipts and Notices

Receipt for Payment (Form 481-8, Rev. 7/96 CIS)	35708-G
Miscellaneous Account Receipt (Form 315U)	35709-G
Deposit Warning Letters A and B (Form 437.1R, 11/02)	36782-G
California Penal Code Tag (Form 81-A)	36783-G

Surety or Guarantee for Account

Continuing Guarantee Letter (Form 6447, 1/94)	36785-G
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(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5819
 DECISION NO. 20-04-004

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Jun 4, 2021
 EFFECTIVE Jul 4, 2021
 RESOLUTION NO. _____

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(Continued)

SAMPLE FORMS (Continued)

Contracts

Cogeneration Contract Addendum (Form 5058)	16063-G
Stub Service Installation (Form 3607-A, Rev. 3-67)	11583-G
Core Transport Agent Agreement for Core Aggregation Service (Form 6536-A, 1/2015)	51172-G
Core Capacity Assignment Agreement for CTA (Form 6599, 1/2015)	51173-G
Customer Termination of CAT Program Contract (Form 6567-T)	56666-G
Authorization or Revocation of Authorization to Receive Customer Interval Usage Information (Form 8204)	49606-G
Authorization to Receive Customer Information or to Act on a Customer's Behalf (Form 8206)	49607-G
Authorization or Revocation of Authorization to Release Customer Usage Information (Form 7300)	52362-G
Cogeneration Standby Equipment Affidavit (Form 6419, 3/88)	18773.1-G
Storage Service Agreement (Form 6473).....	21473-G
Notice of Intrastate Curtailment Transfers (Form 6600, 11/16).....	53354-G
"As-Available" Storage Service Agreement (Form 6573)	22073-G
Bid Procedure (Form 6474, 4/89)	19214-G
Line Extension Contract (Form 3905-D, 03/20)	57204-G
Applicant Design Terms and Conditions (Form 6665, 5/98)	30295-G
Assignment of Contract (Form 3907-B, 10/03)	37014-G
Transfer of Service Pipe to Yard Piping (Form 1951-G, 10/17).....	54382-G
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Master Services Contract (Form 6597, 01/19)	55761-G
Master Services Contract, Schedule A, Intrastate Transmission Service (Form 6597-1, 01/19)	55762-G
Master Services Contract, Schedule A, Transportation Services Addendum (Form 6597-21, 2009)	44334-G
Master Services Contract, Schedule B, Marketer/Core Aggregator/Use-or-Pay Aggregator (Form 6597-2)	23605-G
Master Services Contract, Schedule D, Basic Storage Service (Form 6597-4, 7/96)	27911.1-G
Master Services Contract, Schedule E, Auction Storage Service (Form 6597-5)	23732-G
Master Services Contract, Schedule F, Long-Term Storage Service (Form 6597-6)	23733-G
Master Services Contract, Schedule H, Extended Balancing Service (Form 6597-8)	23735-G
Amendment to Master Services Contract, Schedule A, Intrastate Transmission Service (Form 6597-9, 2/17)	53706-G
Supplement to Master Services Contract Schedule A, Intrastate Transmission Service, (Form 6597-10, Rev. 5/97)	28713-G

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5585
 DECISION NO.

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 SUBMITTED Feb 13, 2020
 EFFECTIVE Mar 14, 2020
 RESOLUTION NO. _____

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(Continued)

SAMPLE FORMS (continued)

Contracts (continued)

Master Services Contract, Schedule I, Transaction Based Storage Service (Form 6597-11)	44335-G
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Master Services Contract, Schedule M, Receipt Point Master Agreement (Form 6597-18)	42488-G
Master Services Contract, Schedule N, Off-System Delivery Service Contract – Exhibit B (Form 6597-19 - 2012)	47371-G
Amendment to Master Services Contract, Schedule L, Backbone Transportation Service Contract (Form 6597-20, 5/2011)	47206-G
Master Services Contract, Schedule O, Operations Park and Loan Services Agreement (Form 6597-22)	43398-G
Operations Park and Loan Services Agreement, Exhibit A Transaction Confirmation (Form 6597-22a)	43399-G
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Vice President
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14C7

Advice Ltr. No. 3385-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Jun 14, 2019

Effective Dec 21, 2019

Resolution No. _____



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San Diego Gas & Electric Company
San Diego, California

Original Cal. P.U.C. Sheet No. 31176-E

Canceling _____ Cal. P.U.C. Sheet No. _____

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Advice Ltr. No. 3292-E

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Regulatory Affairs

Submitted Nov 1, 2018

Effective _____

Resolution No. _____

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Attachment C
Statement of Proposed Rate

The tables below illustrate the changes in the rates that would result from Commission approval of this Application, compared to current rate levels.

Estimated Impact on SDG&E Electric Rates

If the Commission approves SDG&E's request for a wildfire interim mechanism in this application, the average bill for a typical SDG&E bundled non-CARE residential customer¹ living in the inland and coastal climate zone and using 400 kWh per month would increase \$1.92 (or 1.4%) in 2022. Individual customer bills may vary.

**San Diego Gas & Electric Company
Estimated Increase in Electric Class Average Rates Due to
Proposed Wildfire Interim Rate Relief Effective April 1, 2022**

Line No.	Customer Class	Total Rates ²		Change	
		Current 1/1/2021 ³ (¢ / kWh)	Proposed 4/1/2022 (¢ / kWh)	¢ / kWh	%
1	Residential	31.348	31.849	0.501	1.60%
2	Small Commercial	28.052	28.531	0.479	1.71%
3	Medium & Large Commercial & Industrial	25.540	25.816	0.276	1.08%
4	Agriculture	19.522	19.806	0.284	1.45%
5	Lighting	25.430	25.994	0.564	2.22%
6	SYSTEM TOTAL	27.502	27.880	0.378	1.37%

Estimated Impact on SDG&E Gas Rates

If the Commission approves SDG&E's request for a wildfire interim mechanism in this application, the average bill for a typical SDG&E non-CARE residential customer using 23 therms per month would increase \$0.06 (or 0.1%) in 2022. Individual customer bills may vary.

**San Diego Gas & Electric Company
Estimated Increase in Gas Class Average Rates Due to
Proposed Wildfire Interim Rate Relief Effective April 1, 2022**

Line No.	Customer Class	Total Rates		Change	
		Current 1/1/2021 (\$ / therm)	Proposed 4/1/2022 (\$ / therm)	\$	%
1	Residential	\$1.84779	\$1.85042	\$0.00263	0.1%

¹ A bundled customer is one who takes both Utility Distribution Company (UDC) and commodity service from SDG&E, such as on rate Schedule TOU-DR1.

² Represents customers who take bundled service.

³ Rates effective 10/1/2020 per Advice Letter 3619-E.

2	Core Commercial & Industrial		\$0.87993	\$0.88064	\$0.00070	0.1%
3	NGV		\$0.39852	\$0.39855	\$0.00003	0.0%
4	Core Average		\$1.42782	\$1.42962	\$0.00181	0.1%
5	Noncore C&I		\$0.15111	\$0.15125	\$0.00013	0.1%
6	Sempra-Wide EG		\$0.04923	\$0.04923	\$0.00001	0.0%
7	Noncore Average		\$0.05752	\$0.05753	\$0.00002	0.0%
8	SYSTEM TOTAL		\$0.71485	\$0.71573	\$0.00087	0.1%

Estimated Impact on SoCalGas Gas Rates

If the Commission approves SDG&E's request for a wildfire interim mechanism in this application, the average bill for a typical SoCalGas non-CARE residential customer using 35 therms per month would increase \$0.00 (or 0%) in 2022. Individual customer bills may vary.

Southern California Gas Company Estimated Increase in Gas Class Average Rates Due to Proposed Wildfire Interim Rate Relief Effective April 1, 2022

Line No.	Customer Class	Total Rates		Change	
		Current 1/1/2021 (\$ / therm)	Proposed 4/1/2022 (\$ / therm)	\$	%
1	Residential	\$1.47477	\$1.47477	\$0.00000	0.0%
2	Core Commercial & Industrial	\$0.92685	\$0.92685	\$0.00000	0.0%
3	NGV	\$0.46390	\$0.46392	\$0.00003	0.0%
4	Core Average	\$1.26362	\$1.26362	\$0.00000	0.0%
5	Noncore C&I	\$0.14645	\$0.14645	\$0.00000	0.0%
6	EG	\$0.05018	\$0.05018	\$0.00001	0.0%
7	Noncore Retail Average	\$0.08627	\$0.08628	\$0.00001	0.0%
8	Wholesale	\$0.02870	\$0.02871	\$0.00000	0.0%
9	Backbone Transportation Service (BTS)	\$0.40141	\$0.40141	\$0.00000	0.0%
10	SYSTEM TOTAL	\$0.57323	\$0.57323	\$0.00000	0.0%

Attachment D

Statement of Original Cost and Depreciation Reserves

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF MARCH 31, 2021

<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	192,335,553.47	163,360,159.73
	Intangible Contra Accounts	(979,446.23)	(469,345.67)
	TOTAL INTANGIBLE PLANT	<u>191,578,948.60</u>	<u>163,093,714.36</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	91,410,208.94	52,234,220.30
312	Boiler Plant Equipment	162,192,323.31	94,993,159.36
314	Turbogenerator Units	132,174,774.48	64,298,909.24
315	Accessory Electric Equipment	86,962,687.73	50,892,397.15
316	Miscellaneous Power Plant Equipment	60,518,823.80	20,745,722.80
		0.00	0.00
	Palomar Contra E-316	(1,621,911.83)	(629,514.09)
	TOTAL STEAM PRODUCTION	<u>546,163,424.72</u>	<u>282,581,413.05</u>
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	24,894,063.62	11,876,532.78
342	Fuel Holders, Producers & Accessories	21,651,593.69	10,380,250.59
343	Prime Movers	94,500,568.27	53,857,142.85
344	Generators	365,499,026.67	193,622,591.39
345	Accessory Electric Equipment	32,888,872.55	18,566,932.02
346	Miscellaneous Power Plant Equipment	42,594,393.32	20,233,592.73
	TOTAL OTHER PRODUCTION	<u>582,255,314.99</u>	<u>308,539,470.32</u>
	TOTAL ELECTRIC PRODUCTION	<u>1,128,418,739.71</u>	<u>591,120,883.37</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	80,295,421.65	0.00
350.2	Land Rights	172,215,926.21	28,658,790.94
352	Structures and Improvements	669,619,161.50	110,659,217.52
353	Station Equipment	1,975,976,412.55	482,146,431.52
354	Towers and Fixtures	924,240,340.23	236,625,085.54
355	Poles and Fixtures	935,971,638.35	157,234,909.01
355	Pole retirement error correction-top side	(5,364,648.00)	(5,364,648.00)
356	Overhead Conductors and Devices	825,166,815.89	273,089,148.38
357	Underground Conduit	550,722,521.57	93,933,379.13
358	Underground Conductors and Devices	563,015,930.15	93,548,504.89
359	Roads and Trails	371,914,616.58	50,809,360.15
	TOTAL TRANSMISSION	7,063,774,136.68	1,521,340,179.08
360.1	Land	17,185,713.83	0.00
360.2	Land Rights	94,742,312.67	49,040,927.13
361	Structures and Improvements	12,478,931.87	2,330,110.49
362	Station Equipment	626,993,173.27	262,256,332.89
363	Storage Battery Equipment	125,967,477.35	57,545,400.10
364	Poles, Towers and Fixtures	949,735,577.08	305,368,962.58
364	Pole retirement error correction-top side	(681,956.00)	(681,956.00)
365	Overhead Conductors and Devices	1,002,572,671.80	254,553,256.84
366	Underground Conduit	1,619,134,372.45	585,143,051.92
367	Underground Conductors and Devices	1,794,837,863.39	1,034,100,506.22
368.1	Line Transformers	733,937,023.98	250,478,055.40
368.2	Protective Devices and Capacitors	33,645,123.39	14,082,260.95
369.1	Services Overhead	242,301,076.60	108,136,907.19
369.2	Services Underground	392,071,764.68	275,877,505.59
370.1	Meters	208,486,844.19	132,053,929.36
370.2	Meter Installations	69,420,743.79	35,544,026.31
371	Installations on Customers' Premises	74,610,283.33	25,378,080.19
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	34,402,972.59	23,085,382.95
		0.00	(3,646,785.30)
	TOTAL DISTRIBUTION PLANT	8,031,841,970.26	3,410,645,954.81
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	45,611,645.37	28,865,976.96
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	24,449.44
393	Stores Equipment	46,521.59	4,998.85
394.1	Portable Tools	38,635,752.58	12,028,675.51
394.2	Shop Equipment	278,147.42	228,401.58
395	Laboratory Equipment	5,336,019.09	1,508,565.40
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	391,179,177.84	158,889,787.23
398	Miscellaneous Equipment	3,205,914.57	1,301,897.62
	TOTAL GENERAL PLANT	491,723,995.60	203,020,138.47
101	TOTAL ELECTRIC PLANT	16,907,337,790.85	5,889,220,870.09

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,168,803.11	1,424,327.17
	TOTAL STORAGE PLANT	2,168,803.11	1,424,327.17
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,515,541.91	1,655,565.95
366	Structures and Improvements	22,242,747.05	11,786,679.00
367	Mains	402,962,645.35	95,632,429.63
368	Compressor Station Equipment	99,697,389.77	75,417,644.93
369	Measuring and Regulating Equipment	29,114,183.42	18,735,126.63
371	Other Equipment	2,800,148.54	311,707.23
	TOTAL TRANSMISSION PLANT	564,981,799.79	203,539,153.37
374.1	Land	1,514,509.70	0.00
374.2	Land Rights	8,518,993.64	7,525,554.91
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,405,640,416.56	451,407,080.30
378	Measuring & Regulating Station Equipment	20,837,438.67	9,869,796.76
380	Distribution Services	437,328,920.38	305,163,629.97
381	Meters and Regulators	183,015,550.57	78,766,038.07
382	Meter and Regulator Installations	110,295,325.98	47,142,608.10
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,328,200.37
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,402,034.82	6,722,926.48
	TOTAL DISTRIBUTION PLANT	2,180,113,447.93	907,987,088.06

<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	0.00	0.13
394.1	Portable Tools	21,634,533.67	4,877,115.12
394.2	Shop Equipment	70,439.04	37,836.21
395	Laboratory Equipment	0.00	(7,344.15)
396	Power Operated Equipment	0.00	(1,088.04)
397	Communication Equipment	2,256,560.40	1,008,498.86
398	Miscellaneous Equipment	465,784.09	174,036.92
	TOTAL GENERAL PLANT	<u>24,427,317.20</u>	<u>6,114,558.05</u>
101	TOTAL GAS PLANT	<u>2,771,777,472.23</u>	<u>1,119,151,230.85</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	2,458,945.83	211,959.10
303	Miscellaneous Intangible Plant	719,374,251.48	504,429,811.21
	Common Contra Account	(4,128,951.21)	(1,429,759.23)
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,792.37	0.00
389.2	Land Rights	27,776.34	27,776.34
390	Structures and Improvements	528,097,715.23	180,701,809.04
391.1	Office Furniture and Equipment - Other	42,808,802.44	16,121,459.76
391.2	Office Furniture and Equipment - Computer E	125,685,723.84	46,403,873.91
	Common Contra Account	(19,579.43)	(10,319.78)
392.1	Transportation Equipment - Autos	406,418.22	261,814.63
392.2	Transportation Equipment - Trailers	107,977.72	14,892.06
392.3	Transportation Equipment - Aviation	12,001,475.38	3,780,147.38
393	Stores Equipment	333,835.97	60,185.93
394.1	Portable Tools	1,520,858.30	628,913.62
394.2	Shop Equipment	142,759.33	96,943.78
394.3	Garage Equipment	1,837,009.58	587,399.09
395	Laboratory Equipment	1,731,116.64	960,288.46
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	313,261,371.59	117,607,385.44
398	Miscellaneous Equipment	3,587,314.42	655,357.35
118.1	TOTAL COMMON PLANT	<u>1,756,729,614.04</u>	<u>870,916,958.99</u>
	TOTAL ELECTRIC PLANT	16,907,337,790.85	5,889,220,870.09
	TOTAL GAS PLANT	2,771,777,472.23	1,119,151,230.85
	TOTAL COMMON PLANT	<u>1,756,729,614.04</u>	<u>870,916,958.99</u>
101 & 118.1	TOTAL	<u>21,435,844,877.12</u>	<u>7,879,289,059.93</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	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CONTRAS		
	Electric	0.00	0.00
	Common	(2,458,945.83)	(211,959.09)
		<u>(2,458,945.83)</u>	<u>(211,959.09)</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	(1,494,846.06)	(1,494,846.06)
		<u>(1,494,846.06)</u>	<u>(1,494,846.06)</u>
101	Accrual for Retirements		
	Electric	(18,354,645.61)	(18,354,645.61)
	Gas	(65,084.11)	(65,084.11)
		<u>(18,419,729.72)</u>	<u>(18,419,729.72)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(18,419,729.72)</u>	<u>(18,419,729.72)</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	112,194,000.02	28,010,807.97
	Gas	0.00	0.00
		<u>112,194,000.02</u>	<u>28,010,807.97</u>
	TOTAL PLANT LEASED TO OTHERS	<u>112,194,000.02</u>	<u>28,010,807.97</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,247,629,264.14	
	Gas	173,469,679.69	
	Common	418,535,250.43	
		<u>1,839,634,194.26</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,839,634,194.26</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	1,012,754,302.96
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,012,754,302.96
101.1	ELECTRIC CAPITAL LEASES	1,307,422,019.46	74,743,460.47
118.1	COMMON CAPITAL LEASE	62,509,043.87	19,219,011.88
		1,369,931,063.33	93,962,472.35
143	FAS 143 ASSETS - Legal Obligation	22,275,012.78	#####
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	139,869,876.96	50,975,543.97
143	FAS 143 ASSETS - Legal Obligation	0.00	#####
	TOTAL FAS 143	162,144,889.74	#####
	UTILITY PLANT TOTAL	24,897,375,502.86	6,134,345,111.63

Attachment E
Summary of Earnings

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
MAR 2021
(\$ IN MILLIONS)

Line No.	Item	Amount
1	Operating Revenue	\$ 1,417
2	Operating Expenses	<u>1,160</u>
3	Net Operating Income	<u>\$ 257</u>
4	Weighted Average Rate Base	\$ 11,356
5	Rate of Return*	7.55%

*Authorized Cost of Capital

Attachment F

Notice List to State, Cities & Counties

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of San Clemente
Attn. City Clerk
100 Avenida Presidio
San Clemente, CA 92672

City of San Clemente
Attn. City Attorney
100 Avenida Presidio
San Clemente, CA 92672

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

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

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

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

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

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

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

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

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

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

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

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

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

City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656