

Application No.: A.09-05-
Exhibit No.:
Witness: Michelle Somerville
Date: May 20, 2009

SAN DIEGO GAS & ELECTRIC COMPANY
PREPARED DIRECT TESTIMONY OF
MICHELLE SOMERVILLE

PUBLIC VERSION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

MAY 20, 2009



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1 **PREPARED DIRECT TESTIMONY OF**
2 **MICHELLE SOMERVILLE**
3 **ON BEHALF OF SDG&E**

4 **I. INTRODUCTION**

5 The purpose of my testimony is to address the recorded transactions and related cost
6 recovery in San Diego Gas & Electric Company's (SDG&E's) Energy Resource Recovery
7 Account (ERRA) and Transition Cost Balancing Account (TCBA). In addition, my testimony
8 addresses entries recorded to another electric commodity-related account, the Rate Reduction
9 Bond Memorandum Account (RRBMA). In summary, my testimony provides a summary of:

- 10 • transactions recorded to SDG&E's ERRA during 2008 (Attachment A);
11 • transactions recorded to SDG&E's TCBA during 2008 (Attachment B);
12 • transactions recorded to SDG&E's RRBMA from 1997 through 2008 (Attachment
13 C).

14 The direct testimony of SDG&E witness Sue Garcia contains descriptions of the electric
15 procurement and commodity expenses recorded to the ERRA and TCBA during the periods
16 mentioned above.

17 **II. ENERGY RESOURCE RECOVERY ACCOUNT**

18 Pursuant to D.02-10-062 and D.02-12-074, the purpose of the ERRA is to provide full
19 recovery of SDG&E's energy procurement costs associated with fuel and purchased power
20 (including renewable resources), utility electric generation (UEG), Independent System Operator
21 (ISO) related costs, and costs associated with the residual net short procurement requirements to
22 serve SDG&E's bundled service customers. The ERRA includes revenues from SDG&E's
23 Electric Energy Commodity Cost (EECC) rate schedule adjusted to exclude California

1 Department of Water Resources (CDWR) revenues for energy provided by CDWR to SDG&E
2 customers and non-fuel generation revenues allocated to the Non-fuel Generation Balancing
3 Account (NGBA). SDG&E's share of revenues from the sale of surplus energy is also reflected
4 in the ERRA.

5 On a monthly basis, the ERRA compares the energy procurement costs described above
6 with the revenue from Schedule EECC (excluding CDWR and NGBA revenue). Interest is
7 applied to any over or under collection balance at the three-month Commercial Paper rate.
8 SDG&E's adopted ERRA tariff describes the entries that are made to the account on a monthly
9 basis.

10 The ERRA balance as of December 31, 2008 was an \$18.9 million undercollection.
11 Attachment A summarizes the monthly entries to the ERRA used to calculate the ending balance.
12 The 2008 activity in the SDG&E ERRA as detailed in Attachment A is summarized in Table 1
13 below – under/(over) collection:

1 Table 1

December 31, 2007 ERRA Balance ¹	\$ (22,365,542)
Revenue	\$ (751,110,460)
Expenses	\$ 811,175,640
Other - net ²	\$ (19,672,941)
Interest	\$ 898,131
December 31, 2008 ERRA Balance	\$ 18,924,828

2
3 Ordering Paragraph 19 of D.02-12-074 directed PG&E, SCE and SDG&E to file a
4 monthly report with the Commission's Energy Division to include a summary of activity in the
5 ERRA balancing account, and to also submit original source documents pertaining to such
6 activities. D.07-04-020 modified this requirement to allow SDG&E to provide only a
7 breakdown of costs recorded to the ERRA in the monthly filings and make the supporting
8 documentation available to Commission staff and interested parties upon request. The modified
9 reporting requirement was effective with the April 2007 report. SDG&E submitted the monthly
10 report to the Energy Division and interested parties for the months January 1, 2008 through
11 December 31, 2008. The Energy Division responds by letter to SDG&E confirming for each
12 month reviewed that SDG&E has met the reporting requirement.³

¹ December 31, 2007 balance was approved in A.08-05-036/D.09-01-026.

² Includes FERC refunds.

³ As of the filing of this testimony, the Department of Water and Audits has completed this verification process through August 2008.

1 **III. TRANSITION COST BALANCING ACCOUNT**

2 In SDG&E's 2005 ERRA reasonableness review proceeding, the Commission authorized
3 the review of SDG&E's TCBA in future ERRA review proceedings.⁴ The annual ERRA review
4 is the appropriate forum to review the TCBA, since the costs that are recovered in the TCBA
5 generally relate to the above-market portion of certain Qualifying Facilities (QF) and purchase
6 power costs eligible for recovery under AB 1890.

7 The TCBA records the eligible above-market power costs and the revenues received from
8 SDG&E's Competition Transition Charge (CTC) rate. For 2008, the market benchmark of
9 \$73.99/MWh⁵ was used to calculate the above-market portion of AB 1890-eligible transition
10 costs. On a monthly basis, the TCBA compares the above-market power costs with the revenue
11 from the CTC rate component. Interest is applied to any over or under collection balance at the
12 three-month Commercial Paper rate.

13 The balance in the TCBA as of December 31, 2008 was a \$1.2 million undercollection.
14 Attachment B provides a monthly summary of the entries to the TCBA. The 2008 activity in the
15 SDG&E TCBA as detailed in Attachment B to my testimony is summarized in Table 2 below –
16 under/(over) collection:

⁴ See D.06-12-019, Ordering Paragraph 3.

⁵ Approved in SDG&E's 2008 ERRA Revenue Requirement Forecast proceeding, A.07-10-008/D.08-02-030.

1

Table 2

December 31, 2007 TCBA Balance ⁶	\$ (31,145,911)
Revenue	\$ (36,660,957)
Expenses	\$ 72,413,416
Other - net ⁷	\$ (3,046,581)
Interest	\$ (378,234)
December 31, 2008 TCBA Balance	\$ (1,181,733)

2

3 **IV. RATE REDUCTION BOND MEMORANDUM ACCOUNT (RRBMA)**

4 To facilitate the restructuring of California's electric industry, Assembly Bill (AB) 1890
 5 was signed into law on September 23, 1996. To implement the provisions of AB 1890, the
 6 Commission issued various decisions that, among other things, created the TCBA and provided
 7 for a 10% rate reduction for residential and small commercial customers as mandated by AB
 8 1890. To finance this rate reduction, SDG&E issued the Rate Reduction Bonds (RRBs) in the
 9 principal amount of \$658 million. In D.97-09-057, the Commission authorized SDG&E to
 10 establish the Fixed Transition Amount (FTA) charge to repay these bonds and establish the
 11 RRBMA to record the difference between the Rate Reduction Bond Savings and the 10% rate
 12 reduction, and related costs and credits. During the energy crisis in the early 2000's, the
 13 Commission implemented an Interim Bill Stabilization Plan⁸ which created a revenue shortfall
 14 that was recorded to the subaccount of the TCBA. Accordingly, in an attempt to reduce the
 15 undercollection accumulated as a result of the shortfall, SDG&E obtained authorization from the

⁶ December 31, 2007 balance was approved in A.08-05-036/D.09-01-026.

⁷ Includes transfers from the ABX1 subaccount and RRBMA and other accounting adjustments.

⁸ See CPUC D.00-08-037, modified by D.00-09-040 as prescribed by AB 265.

1 Commission to transfer overcollections in the RRBMA to the TCBA subaccount.⁹ The RRBMA
2 transfers to the TCBA have previously been reviewed by the Commission in SDG&E's 2006
3 ERRA Compliance Review.¹⁰

4 In September 2007, SDG&E retired its Rate Reduction Bonds¹¹ and in October 2008,
5 filed Advice Letter 2037-E requesting the Commission's authorization to transfer the residual
6 balance in the RRBMA to the TCBA and to eliminate the RRBMA.¹² On December 31, 2008,
7 the balance of \$2,732,395 in the RRBMA was transferred to the TCBA as authorized. As a
8 result of the pay-off of the RRB's and the termination of entries to the RRBMA, SDG&E
9 believes it is appropriate to have the RRBMA subject to a final review in this proceeding.

10 Attachment C of my testimony summarizes the monthly entries to the RRBMA used to calculate
11 the balance, including details of the monthly transactions from December 1997 through
12 December 2008. However, as noted above, since the residual balance in the RRBMA was
13 transferred to the TCBA, the current balance in the RRBMA is zero.

14 **V. CONCLUSION**

15 As directed in D.02-10-062 and D.02-12-074, SDG&E seeks approval of the entries and
16 calculations in its ERRA for the period January 2008 through December 2008 and requests that
17 the Commission find these entries and calculations reasonable. Furthermore, as directed in D.06-
18 12-019, SDG&E seeks approval of the entries recorded to the TCBA, also for the period January
19 2008 through December 2008. In addition, SDG&E requests that the Commission find the
20 entries recorded in the RRBMA, as presented in this proceeding, reasonable. SDG&E has made

⁹ Examples include Resolution E-3750 authorizing Advice Letter 1270-E (2000), Advice Letter 1439-E (2002) and Advice Letter 1624-E (2004).

¹⁰ Approved in A.07-06-005/D.08-01-027.

¹¹ Advice Letter 1911-E was approved on August 2, 2007.

¹² Advice Letter 2037-E was approved on December 1, 2008.

1 the entries to the aforementioned regulatory accounts in accordance with its adopted tariffs and
2 in compliance with relevant Commission decisions.

3 This concludes my prepared direct testimony.

1 **VI. QUALIFICATIONS OF MICHELLE SOMERVILLE**

2 My name is Michelle A. Somerville. I am employed by SDG&E as a Regulatory
3 Accounts Manager in the Tariffs and Regulatory Accounts Department. My business address is
4 8330 Century Park Court, San Diego, California 92123. My current responsibilities include
5 managing the process for the development, implementation, and analysis of regulatory balancing
6 and memorandum accounts. I assumed my current position in June 2007.

7 I received a Bachelors in Business Administration degree with an emphasis in accounting
8 as well as a Masters in Professional Accounting from the University of Texas at Austin in 1992.
9 I have been a Certified Public Accountant (CPA), licensed in the State of Texas, since 1994.

10 I have been employed with SDG&E and Sempra Energy since 2000. In addition to my
11 current position in Regulatory Affairs, I served as the Capital Asset Management Supervisor
12 from March 2005 to May 2007 where I supervised the process of recording and accounting for
13 capital costs throughout the life of the asset, including construction in process, asset
14 identification, depreciation, and removal/retirement. I have also held senior analyst positions in
15 the Business Planning Department at SDG&E (November 2002 – February 2004) and Internal
16 Audit Department at Sempra Energy's corporate offices (April 2000 – November 2002).

17 I have previously testified before this Commission.

Attachment A

Attachment B

San Diego Gas & Electric Company
Transition Cost Balancing Account

	Line #	Jan-AB	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Total 2008	
	1	Beginning Balance													
	2	\$ (31,145,911)	\$ (31,717,120)	\$ (32,634,291)	\$ (31,898,719)	\$ (29,185,673)	\$ (20,883,372)	\$ (14,034,770)	\$ (4,019,259)	\$ 5,050,227	\$ 8,039,902	\$ 6,183,194	\$ 4,864,532		
	3	CTC Revenue	\$ (3,924,126)	\$ (3,214,278)	\$ (3,124,529)	\$ (2,897,909)	\$ (4,068,164)	\$ (2,724,124)	\$ (2,058,415)	\$ (2,960,176)	\$ (3,148,065)	\$ (2,598,263)	\$ (2,640,789)	\$ (36,660,057)	
	4	CTC Costs	\$ 3,463,518	\$ 2,384,132	\$ 3,593,156	\$ 5,670,707	\$ 13,288,677	\$ 9,601,799	\$ 12,990,535	\$ 12,028,726	\$ 6,121,205	\$ 771,470	\$ 1,271,082	\$ 982,409	\$ 72,413,416
	5	(Over)Under collection	\$ (460,608)	\$ (830,146)	\$ 808,628	\$ 2,772,799	\$ 9,220,213	\$ 6,877,676	\$ 10,032,120	\$ 9,068,550	\$ 2,978,340	\$ (1,869,320)	\$ (1,323,182)	\$ (1,517,610)	
	6	Adjustments	\$ -	\$ -	\$ -	\$ -	\$ (976,331)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (876,431)	
	7	Current Month (over)under collection	\$ (460,608)	\$ (830,146)	\$ 808,628	\$ 2,772,799	\$ 8,343,782	\$ 6,877,676	\$ 10,032,120	\$ 9,068,550	\$ 2,978,340	\$ (1,869,320)	\$ (1,323,182)	\$ (1,517,610)	
	8	Interest Rate	4.23%	3.25%	2.72%	2.35%	1.99%	2.00%	2.21%	2.18%	2.08%	2.13%	2.07%	1.45%	
	9	Interest (Current Month)	\$ (110,801)	\$ (87,025)	\$ (73,055)	\$ (73,055)	\$ (59,753)	\$ (41,481)	\$ (29,074)	\$ (16,609)	\$ 936	\$ 11,335	\$ 12,612	\$ 9,520	\$ 4,961
	10	Current Month Balance With Interest	\$ (571,209)	\$ (917,171)	\$ 735,573	\$ 2,713,046	\$ 8,302,301	\$ 6,848,602	\$ 10,015,511	\$ 9,069,486	\$ 2,989,675	\$ (1,886,708)	\$ (1,318,662)	\$ (1,512,649)	
	11	Transfers/Adjustments	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (2,170,150)	\$ (2,170,150)
	11	Ending Balance - Cum. Bal. With Interest	\$ (31,717,120)	\$ (32,634,291)	\$ (31,898,719)	\$ (29,185,673)	\$ (20,883,372)	\$ (14,034,770)	\$ (4,019,259)	\$ 5,050,227	\$ 8,039,902	\$ 6,183,194	\$ 4,864,532	\$ 1,181,733	

Notes: Adjustment to correct the amount of revenue credit recorded to ABX1 43 subaccount. For the period January - April 2008, the credit was determined as a percentage of revenue. Starting in May 2008, the credit is determined by multiplying sales times the credit rate.

Line 5: Using the sales times rate method ensures the amount calculated is not impacted by uncollected adjustments to revenue.

Line 10: ABX1 Subaccount balance (\$562,245 undercollected) and RRBMA balance (\$2,732,395 overcollected) transferred to Ongoing TCBA account per AL 2037-E.

Attachment C

San Diego Gas & Electric Company
Rate Reduction Bond Memorandum Account
For the period December 1, 1997 through December 31, 1997

		Dec-97
1	Interest Rate	
2	Commercial Paper (3-month)	
3	SDG&E Authorized Pre-Tax Rate of Return	
4		
5	Ten Percent Rate Reduction Amount	
6		
7	LESS:	
8	Revenue Requirement Savings	5.60%
9	Avoided Revenue Requirements	
10	Rev. Rgmt. Financed Tax and Other	
11	Rev. Rgmt. Bond Payment	
12	Timing Difference (Line 5 minus Line 12)	Rev. Rgmt. Savings Total
13		
14		For Month
15		Cumulative
16		
17	A. RRB Proceeds Adjustment	
18	1. Timing Difference Interest Earned	
19	2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)	
20	3. Lump-sum TTA Credit Incremental Costs	
21	4. Adjustments	
22	5. UBFS Interest Earned per interest rate on line 3.	
23	Cumulative RRB Proceeds Adjustment Total	
24		
25	B. Sanctioning Fees	
26	1. Administration Fee (\$100,000 annually)	
27	2. Servicer Compensation (0.25%)	
28	Servicing Fees Total	
29		
30	C. Carrying Costs [TTA Transfer Amount (TTA) Collections]	
31		
32	D. Investment Earnings	
33		
34	E. Overcollateralization	
35		
36	F. Financed Tax Credit	
37		
38	Subtotal (Line 23 +28 +30 +32 +34 +36)	For Month
39		Cumulative
40		
41	RRB Savings Amount (Line 12 +38)	\$ _____
42	RRBMA Amortization	\$ _____
43	Current Month Activity [without interest] (Line 5 minus Line 41)	\$ _____
44		
45	PLUS:	
46	Adjustments	
47		
48	Interest ** <i>Also see line 22 **</i>	
49	For current month (Impacted by Lines 2, 23, 38, 39, 46)	(0)
50	For Adjustments	\$ _____ (0)
51		
52	Current Month Activity [with interest] (Line 43 +46 +51)	Interest Total
53		
54	PLUS:	
55	Previous Month Cumulative Balance	\$ _____
56	Adjustment after interest	
57	CUMULATIVE BALANCE (Line 52 +56)	\$ _____ (60)

San Diego Gas & Electric Company Rate Reduction Bond Memorandum Account For the Period January 1, 1999 through December 31, 1999										
	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99
1 Interest Rate	5.00%	4.77%	4.79%	4.81%	4.79%	4.81%	4.89%	5.11%	5.25%	5.32%
2 Commercial Paper (3-month)										
3 SD&E Authorized Pre-Tax Rate of Return										
4 Ten Percent Rate Reduction Amount										
5 LESS: Revenue Realignment Savings	\$ 16,144,156	16,078,680	16,013,203	15,947,726	15,882,250	15,820,202	15,758,657	\$ 1,742,653	\$ 3,768,567	\$ 5,689% 5.81%
6 LESS: Avoided Revenue Requirements	\$ (7,947,353)	(7,556,721)	(7,610,191)	(6,879,421)	(7,129,713)	(3,600,869)	(3,610,869)			
7 Rev. Rgmt. Board Payment	\$ 10,229,689	10,533,509	10,392,117	11,035,507	10,711,277					
8 Timing Difference [Line 5 minus Line 12]	\$ (2,052,197)	(2,780,361)	(3,591,655)	(3,298,624)	7,359,336					
9 Rev. Rgmt. Board Payment	\$ (3,129,246)	(5,909,607)	(8,501,500)	(12,432,155)	(8,371,343)	(8,371,343)	(8,371,343)			
10 Rev. Rgmt. Board Payment										
11 Rev. Rgmt. Board Payment										
12 Total For Month Cumulative	\$ (6,909)	12,517	23,737	33,935	49,625	64,899	35,299	36,136	36,834	37,462 41,629
13 A. RR&B Proceeds Adjustment										
14 1. Timing Difference Interest Earned										
15 2. Unpaid Rate Reduction Bond-Financed Savings (UBFS)										
16 3. Lump-sum TPA Credit Incremental Costs										
17 4. Adjustments										
18 5. UBRFS Interest Earned per Related Table on line 3										
19 RR&B Proceeds Adjustment Total										
20 Cumulative RR&B Proceeds Adjustment Total										
21 B. Servicing Fees										
22 1. Administration Fee (\$100,000 annually)										
23 2. Service Compensation (0.25%)										
24 28 Servicing Fees Total										
25 C. Sarbanes-Oxley Costs (Trust Transfer Amount (TTA) Colleagues)										
26 29 D. Investment Earnings										
30 E. Overcollection/Undercollection										
31 F. Elapsed Tax Credit										
32 37 Subtotal (Line 23 + 28 + 30 + 32 + 34 + 38)										
33 39 RR&B Savings Amount (Line 12 + 38)										
40 41 RR&B Amortization										
42 43 Current Month Activity (without interest) [Line 5 minus Line 41]										
44 45 PLUS: Adjustments (1)										
46 47 Interest **Also see line 22**										
48 49 For current month* (imputed by Lines 2, 23, 38, 39, -46)										
50 51 For Adjustments Interest Total										
52 53 Current Month Activity (with interest) [Line 43 + 46 + 51]										
54 55 PLUS: Previous Month Cumulative Balance										
56 Adjustment After Interest										
57 CUMULATIVE BALANCE (Line 52 + 55)										

(1) Includes accounting adjustments for servicing fees, carrying costs, investment earnings and other accounting related items.

San Diego Gas & Electric Company
Rate Reduction Bond Maintenance Account

Rate Reduction Bond Maintenance Account
 For the Period January 1, 2000 through December 31, 2000

	Jan-00	Feb-00	Mar-00	Apr-00	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00
1 Interest Rate												
2 Commercial Paper (3-month)	5.67%	5.74%	5.87%	6.00%	6.11%	6.14%	6.17%	6.20%	6.23%	6.26%	6.27%	6.29%
3 SDG&E Authorized Pre-Tax Rate of Return												
4												
5 Ten Percent Rate Reduction Amount												
6												
7 LESS: Revenue Requirement Savings												
8 Avoided Revenue Requirements												
9 Rev. Rgmt. Financed Tax and Other												
10 Rev. Rgmt. Bond Paymen												
11												
12 Rev. Rgmt. Savings Total												
13 Timing Difference (Line 5 minus Line 12)												
14 For Month												
15 Cumulative												
16												
17 A. RRB Proceeds Adjustment												
18 1. Timing Difference Interest Earned												
19 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)												
20 3. Lump-Sum TIA Credit Incremental Costs												
21 4. Adjustments												
22 5. OTHERS INTEREST Earned per interest rate on line 3.												
23 RRB Proceeds Adjustment Total												
24 B. Subsidies												
25 Cumulative RRB Proceeds Adjustment Total												
26 C. Administration Fees (\$100,000 annually)												
27 1. Administration Fee												
28 2. Service Compensation (0.25%)												
29 D. Servicing Costs (Trust Institute Annual TITA Collected)												
30 E. Investment Earnings												
31 F. Disbursement												
32 G. Outstanding Tax Credit												
33 H. Subtotal (Line 23 + 28 - 30 - 32 - 34 - 36)												
34 I. RRB Savings Amount (Line 12 - 30)												
35 J. RRBMA Amortization												
36 K. Current Month Activity (without interest) (Line 5 minus Line 41)												
37 L. PLUS: Adjustments (2)												
38 M. Interest * div ** /line 22 **												
39 N. For Current month (imported by Lines 2, 22, 38, 39, 46)												
40 O. For Adjustments												
41 P. Current Month Activity (with interest) (Line 43 + 46 + 51)												
42 Q. PLUS: Previous Month Cumulative Balance												
43 R. Adjustment after interest												
44 S. CUMULATIVE BALANCE (Line 52 + 55)												
45 T. (2,084,883) \$ (12,195,744) \$ (12,585,577) \$ (12,710,429) \$ (12,829,462) \$ (13,156,854) \$ (388,413,316) \$ (10,784,126) \$ (7,988,013) \$ (8,205,968) \$ (8,259,230) \$ (8,669,574)												
46 U. (2) Adjustments related to Service Compensation and other accounting related item												

San Diego Gas & Electric Company Rate Reduction Bond Memorandum Account												
For the period January 1, 2001 through December 31, 2001												
	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01
1 Interest Rate												
2 Commercial Paper (3-month)												
3 SDG&E Authorized Pre-Tax Rate of Return												
4												
5 Ten Percent Rate Reduction Amount												
6												
7 LESS:												
8 Revenue Requirement Savings												
9 Avoided Revenue Requirements												
10 Rev. Rgmt. Financed Tax and Other												
11 Rev. Rgmt. Bond Payment												
12 Timing Difference (Line 5 minus Line 12)												
13 Rev. Rgmt. Savings Total												
14 For Month												
15 Cumulative	0											
16												
17 A. RR&B Proceeds Adjustment												
18 1. Timing Difference Interest Earned												
19 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)												
20 3. Lump-sum T/A Credit Incremental Costs												
21 4. Adjustments												
22 5. UBFS Interest Earned per interest rate on line 3.												
23 RR&B Proceeds Adjustment Total												
24 13,755	1,775,733	1,794,423	1,810,364	1,829,418	1,845,672	1,867,809	1,881,468	1,899,599	1,915,659	1,931,943	(3,256)	(35)
25 1,757,342	1,775,733	1,794,423	1,810,364	1,829,418	1,845,672	1,867,809	1,881,468	1,899,599	1,915,659	1,931,943	(3,256)	(35)
26 B. Servicing Fees												
27 1. Administration Fee (\$100,000 annually)	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333
28 2. Service Compensation (0.25%)												
29 C. Carrying Costs [Trust Transfer Amount (TTA) Collections]												
30 41,849	42,818	39,034	34,584	27,635	24,571	23,999	23,689	20,572	16,163	15,309		
31 -	-	-	-	-	-	-	-	-	-	-		
32 D. Investment Earnings												
33 205,498	-	-	-	-	-	-	-	-	-	-		
34 E. Overcollateralization												
35 -	-	-	-	-	-	-	-	-	-	-		
36 F. Financed Tax Credit												
37 -	-	-	-	-	-	-	-	-	-	-		
38 Subtotal (Line 23 + Line 28 + Line 32 + Line 34 + Line 36)	63,937	69,542	71,760,903	71,073,975	71,50,978	7,809,836	55,022	46,912	51,469	51,981	156,139	303,085
39 7,107,361	-	-	-	-	-	-	8,329,770	8,381,239	8,432,920	8,432,920	436,735	739,800
40 R&B Savings Amount (Line 12 + Line 28)	\$ 63,937	\$ 69,542	\$ 574,075	\$ 58,858	\$ 58,858	\$ 55,022	\$ 46,912	\$ 51,469	\$ 51,981	\$ 156,139	\$ 303,085	
41 RRBMA Amortization												
42 Current Month Activity (without interest) (Line 5 minus Line 41)	\$ (63,937)	\$ (69,542)	\$ (574,075)	\$ (58,858)	\$ (58,858)	\$ (55,022)	\$ (46,912)	\$ (51,469)	\$ (51,981)	\$ (156,139)	\$ (303,085)	
43 44 PLUS:												
45 46 Adjustments (3)												
47 48 Interest ** Allocated line 22 **												
49 For "current month" (Impacted by Lines 2, 23, 38, 39, 46)	(28,133)	(24,602)	(24,324)	(23,812)	(22,265)	(20,496)	(19,871)	(19,534)	(559)	(947)	(816)	(971)
50 For Adjustments												
51 52 Current Month Activity [with interest] (Line 43 + Line 45 + Line 51)	\$ (28,133)	\$ (24,602)	\$ (24,324)	\$ (23,812)	\$ (22,265)	\$ (20,496)	\$ (19,871)	\$ (19,534)	\$ (559)	\$ (947)	\$ (816)	\$ (971)
53 54 PLUS:												
55 Previous Month Cumulative Balance	\$ (8,869,574)	\$ (8,961,644)	\$ (9,057,699)	\$ (9,655,098)	\$ (9,738,768)	\$ (9,816,055)	\$ (10,301,463)	\$ (10,372,802)	0	\$ (257,750)	\$ (414,635)	\$ (440,291)
56 Adjustment after Interest												
57 CUMULATIVE BALANCE (Line 52 + Line 55)	\$ (8,961,644)	\$ (9,057,699)	\$ (9,655,098)	\$ (9,738,768)	\$ (9,816,055)	\$ (10,301,463)	\$ (10,372,802)	0	\$ (257,750)	\$ (414,635)	\$ (440,291)	\$ (744,327)

(3) Adjustments include authorized account transfers and other accounting related items.

San Diego Gas & Electric Company												
Rate Reduction Bond Memorandum Account												
For the Period January 1, 2002 through December 31, 2002												
	Jan-02	Feb-02	Mar-02	Apr-02	May-02	Jun-02	Jul-02	Aug-02	Sep-02	Oct-02	Nov-02	Dec-02
1 Interest Rate												
2 Commercial Paper (3-month)	1.78%	1.70%	1.79%	1.86%	1.81%	1.78%	1.76%	1.75%	1.70%	1.72%	1.70%	1.36%
3 SDG&E Authorized Pre-Tax Rate of Return	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%	12.63%
4 Ten Percent Rate Reduction Amount	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5 LESS:												
6 Revenue Requirement Savings												
7 Avoided Revenue Requirements												
8 Rev. Rgmt. Financed Tax and Other												
9 Rev. Rgmt. Bond Payment												
10 Rev. Rgmt. Bond Payment												
11 Timing Difference [Line 5 minus Line 12]												
12 Rev. Rgmt. Savings Total												
13 Rev. Rgmt. Savings Total												
14 For Month												
15 Cumulative												
16 A. RRB Proceeds Adjustment												
1. Timing Difference Interest Earned												
2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)												
3. Lump-sum TTA Credit Incremental Costs												
4. Adjustments												
5. UBFS Interest Earned per interest rate on line 3.												
17 RRB Proceeds Adjustment Total												
18 (35) (\$2,360) (\$35) (\$3,395)												
19 Cumulative RRB Proceeds Adjustment Total												
20 (35) (\$2,360) (\$35) (\$3,395)												
21 B. Servicing Fees												
1. Administration Fee (\$10,000 annually)	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333
2. Service Compensation (0.25%)												
22 C. Carrying Costs [TIA Transfer Amount (TIA) Collections]												
23 14,428 15,719 15,575 14,618 13,787 13,211 13,550 14,266 14,473 15,032 11,537 11,007												
24 D. Investment Earnings												
25 - 42,418 - - -												
26 E. Overcollateralization												
27 - - - 4,554 - - -												
28 F. Financed Tax Credit												
29 - - - 4,503,148 - - -												
30 G. Subtotal [Line 23 +28 x30 +32 +34 +36]												
31 22,726 24,017 313,040 22,915 22,084 4,806,164 21,846 22,561 4,811,671 23,327 19,831 4,807,807												
32 765,526 786,543 1,059,563 1,122,498 1,144,582 5,951,046 5,972,892 5,985,453 10,807,124 10,850,451 10,850,282 15,658,089												
33 G. RRB Savings Amount [Line 12 +38]												
34 \$ 22,726 \$ 24,017 \$ 313,040 \$ 22,915 \$ 22,084 \$ 4,806,164 \$ 21,846 \$ 22,561 \$ 4,811,671 \$ 23,327 \$ 19,831 \$ 4,807,807												
35 H. RRBMA Amortization												
36 \$ (22,726) \$ (24,017) \$ (313,040) \$ (22,915) \$ (22,084) \$ (4,806,164) \$ (21,846) \$ (22,561) \$ (4,811,671) \$ (23,327) \$ (19,831) \$ (4,807,807)												
37 I. PLUS: Adjustments												
38 (1.119) (1.102) (1.412) (1.727) (1.715) (5.268) (8.749) (8.732) (11.907) (15.512) (15.362) (15.026)												
39 Interest ** Also see line 22 **												
40 For current month (Impacted by Lines 2, 23, 38, 39, 46)												
41 For Adjustments												
42 J. Current Month Activity [with interest] [Line 43 +46 +51]												
43 Previous Month Cumulative Balance												
44 Adjustment after Interest												
45 K. CUMULATIVE BALANCE [Line 52 +55]												
46 \$ (765,172) \$ (793,291) \$ (1,107,748) \$ (1,132,385) \$ (5,988,511) \$ (5,987,916) \$ (6,029,804) \$ (10,653,382) \$ (10,892,221) \$ (10,927,414) \$ (15,750,247)												

San Diego Gas & Electric Company Rate Reduction Bond Memorandum Account For the period January 1, 2003 through December 31, 2003										
	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Aug-03	Sep-03	Oct-03
	Dec-03	Nov-03	Oct-03	Sept-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Jan-03
1 Interest Rate										
2 Commercial Paper (3-month)	1.31%	1.26%	1.19%	1.20%	1.01%	1.04%	1.05%	1.04%	1.05%	1.06%
3 SDC&E Authorized Pre-Tax Rate of Return	12.75%	12.75%	12.75%	12.75%	12.75%	12.75%	12.75%	12.75%	12.75%	12.75%
4										
5 Ten Percent Rate Reduction Amount	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6										
7 LESS: Revenue Requirement Savings	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
8 Avoided Revenue Requirements										
9 Rev. Rmt. Financed Tax and Other										
10 Rev. Rmt. Bond Payment										
11										
12 Timing Difference (Line 5 minus Line 12)										
13 Rev. Rmt. Savings Total										
14 For Month										
15 Cumulative										
16										
17 A. RRB Proceeds Adjustment										
18 1. Timing Difference Interest Earned										
19 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)										
20 3. Lump-Sum TTA Credit Incremental Costs										
21 4. Adjustments										
22 5. UBFS Interest* Earned per interest rate on line 3.										
23										
24 RRB Proceeds Adjustment Total										
25 B. Servicing Fees										
26 1. Administration Fee (\$100,000 annually)	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333	\$ 8,333
27 2. Servicer Compensation (0.25%)		\$ 205,625	\$ 213,958	\$ 8,333	\$ 194,917	\$ 203,250	\$ 8,333	\$ 193,947	\$ 8,333	\$ 184,033
28 Servicing Fees Total	\$ 8,333	\$ 8,333								
29 C. Carrying Costs [Trust Transfer Amount (TTA) Collections]										
30										
31 10,576 9,995 8,647 7,976 7,556 6,998 6,415 7,054 7,466 7,510 7,078 7,191										
32 D. Investment Earnings										
33										
34 E. Overcollateralization										
35										
36 F. Financed Tax Credit										
37										
38 Subtotal (Line 23 + 28 + 30 + 32 + 34 + 36)	18,909 18,328 4,056,597 16,309 15,889 4,031,924 14,748 \$ 15,387 \$ 4,025,076 \$ 15,843 \$ 15,411 \$ 4,013,500									
39	18,909 37,237 4,093,834 4,110,143 4,128,032 8,157,556 8,172,704 8,188,091 12,213,167 12,229,010 12,244,421 16,257,921									
40 RRB Savings Amount (Line 12 + 38)	\$ 18,909 \$ 4,056,597 \$ 16,309 \$ 15,889 \$ 4,031,924 \$ 14,748 \$ 15,387 \$ 4,025,076 \$ 15,843 \$ 15,411 \$ 4,013,500									
41 RRB Amortization										
42										
43 Current Month Activity [without interest] (Line 5 minus Line 41)	\$ (18,909) \$ (18,328) \$ (4,056,597) \$ (16,309) \$ (15,889) \$ (4,031,924) \$ (14,748) \$ (15,387) \$ (4,025,076) \$ (15,843) \$ (15,411) \$ (4,013,500)									
44										
45 PLUS: Adjustments (3)										
46										
47 Interest ** Also see line 22 **										
48 For "current month" (Impacted by Lines 2, 23, 38, 39, 46)										
49 For Adjustments										
50										
51 Current Month Activity [with interest] (Line 43 + 46 + 51)										
52										
53 Previous Month Cumulative Balance										
54 PLUS:										
55 Adjustment after interest										
56										
57 CUMULATIVE BALANCE (Line 52 + 55)	\$ (16,389) \$ (28,738) \$ (4,087,494) \$ (4,107,886) \$ (4,127,871) \$ (8,165,888) \$ (8,187,560) \$ (8,187,888) \$ (8,209,845) \$ (8,209,845) \$ (12,243,780) \$ (12,270,241) \$ (12,270,241) \$ (12,296,395) \$									

(3) Adjustments include authorized account transfers and other accounting related items.

San Diego Gas & Electric Company
Rate Reduction Bond Memorandum Account
For the period January 1, 2004 through December 31, 2004

	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
1 Interest Rate Commercial Paper (3-month) SDG&E Authorized Pre-Tax Rate of Return	1.05%	1.01%	1.01%	1.00%	1.05%	1.07%	1.34%	1.50%	1.62%	1.75%	1.95%	2.18%
4 Ten Percent Rate Reduction Amount	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
7 LESS: Revenue Requirement Savings 8 Avoided Revenue Requirements 9 Rev. Rmt. Financed Tax and Other 10 Rev. Rmt. Bond Payment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11 Timing Difference (Line 5 minus Line 12)	Rev. Rqmt. Savings Total											
12 For Month	Rev. Rqmt. Savings Total											
13 Cumulative												
14 A. RRB Proceeds Adjustment												
15 1. Timing Difference Interest Earned 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS) 3. Lump-Sum TTA Credit Incremental Costs 4. Adjustments 5. UBFS interest earned per interest rate on line 3.												
16 RRB Proceeds Adjustment Total												
17 B. Servicing Fees												
18 1. Administration Fee (\$100,000 annually) 2. Service Compensation (0.25%)	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333
19 C. Carrying Costs [TTA Transfer Amount (TTA) Collections]	6,333	8,333	164,500	172,833	8,333	8,333	162,143	8,333	162,800	8,333	8,333	142,867
20 D. Investment Earnings												
21 E. Overcollateralization												
22 F. Financed Tax Credit												
23 Subtotal (Line 23 + 32 + 34 + 36)	15,629	15,718	3,165,518	3,196,865	15,136	14,858	3,157,495	16,998	18,587	3,167,390	22,155	3,187,423
24 G. RRB Savings Amount (Line 12 + 38)	\$ 15,629	\$ 15,718	\$ 3,165,518	\$ 3,196,865	\$ 15,136	\$ 14,858	\$ 3,157,495	\$ 16,998	\$ 18,587	\$ 3,167,390	\$ 22,155	\$ 3,187,423
25 H. RRBMA Amortization	\$ (15,629)	\$ (15,718)	\$ (3,165,518)	\$ (3,196,865)	\$ (15,136)	\$ (14,858)	\$ (3,157,495)	\$ (16,998)	\$ (18,587)	\$ (3,167,390)	\$ (22,155)	\$ (3,187,423)
26 I. Current Month Activity [without interest] (Line 5 minus Line 41)	\$ (15,629)	\$ (15,718)	\$ (3,165,518)	\$ (3,196,865)	\$ (15,136)	\$ (14,858)	\$ (3,157,495)	\$ (16,998)	\$ (18,587)	\$ (3,167,390)	\$ (22,155)	\$ (3,187,423)
27 J. PLUS: Adjustments	-	-	-	-	-	-	-	-	-	-	-	-
28 K. Interest ** Also see line 22 **	(7)	(20)	(1,359)	(2,672)	(2,821)	(4,291)	(7,151)	(8,036)	(10,840)	(14,052)	(15,718)	(20,516)
29 L. For current month (Impacted by Lines 2, 23, 38, 39, 46)	\$ (7)	\$ (20)	\$ (1,359)	\$ (2,672)	\$ (2,821)	\$ (4,291)	\$ (7,151)	\$ (8,036)	\$ (10,840)	\$ (14,052)	\$ (15,718)	\$ (20,516)
30 M. Interest Total	\$ (7)	\$ (20)	\$ (1,359)	\$ (2,672)	\$ (2,821)	\$ (4,291)	\$ (7,151)	\$ (8,036)	\$ (10,840)	\$ (14,052)	\$ (15,718)	\$ (20,516)
31 N. Current Month Activity [with interest] (Line 43 + 46 + 51)	\$ (15,636)	\$ (15,738)	\$ (3,166,877)	\$ (17,808)	\$ (17,679)	\$ (3,161,786)	\$ (24,149)	\$ (26,623)	\$ (31,782,230)	\$ (36,207)	\$ (39,015)	\$ (320,739)
32 O. PLUS: Previous Month Cumulative Balance	-	(15,636)	(31,374)	(3,198,251)	(3,216,059)	(3,233,738)	(6,395,524)	(6,419,673)	(6,446,296)	(9,630,733)	(9,639,748)	(9,639,748)
33 P. Adjustment after interest	\$ (15,636)	\$ (31,374)	\$ (3,198,251)	\$ (3,216,059)	\$ (3,233,738)	\$ (6,395,524)	\$ (6,419,673)	\$ (6,446,296)	\$ (9,632,526)	\$ (9,630,733)	\$ (9,639,748)	\$ (9,639,748)
34 Q. CUMULATIVE BALANCE (Line 52 + 55)	\$ (15,636)	\$ (31,374)	\$ (3,198,251)	\$ (3,216,059)	\$ (3,233,738)	\$ (6,395,524)	\$ (6,419,673)	\$ (6,446,296)	\$ (9,624,526)	\$ (9,630,733)	\$ (9,639,748)	\$ (9,639,748)

San Diego Gas & Electric Company Rate Reduction Bond Memorandum Account For the period January 1, 2005 through December 31, 2005												
	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05
1 Interest Rate Commercial Paper (3-month) SD&E Authorized Pre-Tax Rate of Return	2.34%	2.53%	2.75%	2.82%	2.97%	3.09%	3.27%	3.47%	3.64%	3.72%	4.01%	4.23%
4 Tan Percent Rate Reduction Amount												
6 LESS: Revenue Requirement Savings												
8 Avoided Revenue Requirements Rev. Rgmt. Financed Tax and Other Rev. Rgmt. Bond Payment												
10 Rev. Rgmt. Bond Payment												
11 Rev. Rgmt. Bond Payment												
12 Rev. Rgmt. Bond Payment												
13 Rev. Rgmt. Bond Payment												
14 Timing Difference (Line 5 minus Line 12)												
15 For Month												
16 Cumulative												
17 A. RRB Proceeds Adjustment												
18 1. Timing Difference interest Earned 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS) 3. Lump-Sum TTA Credit Incremental Costs 4. Adjustments 5. UBFS Interest Earned per interest rate on line 3.												
19 RRB Proceeds Adjustment Total												
20 B. Servicing Fees												
21 1. Administration Fee (\$100,000 annually) 2. Service Compensation (0.25%)												
22 C. Servicing Fees Total												
23 D. Investment Earnings												
24 E. Overcollateralization												
25 F. Flushed Tax Credit												
26 Subtotal (Line 23 +23 +32 +34 +36)												
27 25,373 \$ 26,177 \$ 2,399,190 \$ 25,577 \$ 25,443 \$ 2,444,197 \$ 27,609 \$ 30,073 \$ 2,484,901 \$ 33,847 \$ 33,726 \$ 2,515,933												
28 25,373 \$ 25,373 \$ 51,550 \$ 2,450,740 \$ 2,476,317 \$ 4,945,957 \$ 4,973,566 \$ 5,003,639 \$ 7,488,901 \$ 7,522,387 \$ 7,556,113 \$ 10,072,046												
29 34 E. Overcollateralization												
30 35 F. Flushed Tax Credit												
31 36 G. Current Month Activity [without interest] (Line 5 minus Line 41)												
32 37 H. Current Month Activity [with interest] (Line 5 minus Line 41)												
33 38 I. Interest ** Also see line 22 **												
39 40 I. Interest ** Also see line 22 **												
41 42 I. Interest ** Also see line 22 **												
43 44 I. Interest ** Also see line 22 **												
45 PLUS: Adjustments												
46 47 Interest ** Also see line 22 **												
48 49 For Current month" (Impacted by Lines 2, 23, 38, 39, 46) For Adjustments	(25,195) \$ (27,348) \$ (32,568) \$ (38,322) \$ (43,238) \$ (49,242) \$ (52,480) \$ (59,024) \$ (64,409) \$ (69,758) \$ (78,325)											
50 51 Current Month Activity [with interest] (Line 43 +46 +51)	\$ (50,568) \$ (25,195) \$ (27,348) \$ (32,568) \$ (38,322) \$ (43,238) \$ (49,242) \$ (52,480) \$ (59,024) \$ (64,409) \$ (69,758) \$ (78,325)											
52 53 PLUS: Previous Month Cumulative Balance	\$ (53,525) \$ (24,317,568) \$ (61,889) \$ (63,889) \$ (67,497,435) \$ (76,851) \$ (82,553) \$ (86,256) \$ (103,484) \$ (107,594) \$ (12,907,687) \$ (12,858,255) \$ (13,011,780) \$ (15,443,538) \$ (15,505,437) \$ (15,568,287) \$ (18,133,573) \$ (18,216,126) \$ (20,858,307) \$ (20,961,781) \$ (23,556,049)											
54 55 Adjustment after Interest												
56 57 CUMULATIVE BALANCE (Line 52 +55)												

San Diego Gas & Electric Company
Rate Reduction Bond Memorandum Account

For the period January 1, 2007 through December 31, 2007

	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
1 Interest Rate												
2 Commercial Paper (3-month)												
3 SDG&E Authorized Pre-Tax Rate of Return												
4												
5 Ten Percent Rate Reduction Amount												
6												
7 LESS:												
8 Revenue Requirements Savings												
9 Avoided Revenue Requirements												
10 Rev. Rgmt. Financed Tax and Other												
11 Rev. Rgmt. Bond Payment												
12 Timing Difference [Line 5 minus Line 12]												
13 Rev. Rgmt. Savings Total												
14												
15 For Month												
16 Cumulative												
17 A. RRB Proceeds Adjustment												
18 1. Timing Difference Interest Earned												
19 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)												
20 3. Lump-sum TTA Credit Incremental Costs												
21 4. Adjustments												
22 5. UBFS Interest [Earned per interest rate on line 3.												
23												
24 RRB Proceeds Adjustment Total												
25 B. Servicing Fees												
26 1. Administration Fee (\$100,000 annually)												
27 2. Service Compensation (0.25%)												
28 Servicing Fees Total												
29 C. Carrying Costs [TTA Transfer Amount (TTA) Collections]												
30 26,979 - 26,934												
31 D. Investment Earnings												
32												
33 E. Overcollateralization												
34												
35 F. Financed Tax Credit (5)												
36												
37 Subtotal [Line 23 + 28 + 30 + 32 + 34 + 36]												
38												
39 35,312 / 35,312 \$ 34,657 \$ 827,384 \$ 29,482 \$ 27,980 \$ 793,069 \$ 28,053 \$ 29,707 \$ 684,070 \$												
40 RRB Savings Amount [Line 12 + 38]												
41 RRBMA Authorization												
42 Current Month Activity [without interest] [Line 5 minus Line 41]												
43												
44												
45 PLUS: Adjustments (4)												
46												
47 Interest ** Also see <i>line 22</i> **												
48 For current month* (Impacted by Lines 2, 23, 38, 39, 46)												
49 For adjustments												
50												
51 Current Month Activity [with interest] [Line 43 + 46 + 51]												
52												
53 PLUS:												
54 Previous Month Cumulative Balance												
55 Adjustment after interest												
56 CUMULATIVE BALANCE [Line 52 + 55]												
57												

(4) September 2007 - reflects the early redemption of RRB's by funds from the RRBMA overcollection. See Advice Letter 1911-E.

San Diego Gas & Electric Company Rate Reduction Bond Manorandum Account												
For the period January 1, 2008 through December 31, 2008												
	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
1 Interest Rate												
2 Commercial Paper (3-month)												
3 SDG&E Authorized Pre-Tax Rate of Return												
4												
5 Ten Percent Rate Reduction Amount												
6												
7 LESS:												
8 Revenue Requirement Savings												
9 Avoided Revenue Requirements												
10 Rev. Rgmt. Financed Tax and Other												
11 Rev. Rgmt. Bond Payment												
12 Timing Difference (Line 5 minus Line 12)												
13 Rev. Rgmt. Savings Total												
14 For Month												
15 Cumulative												
16												
17 A. RRb Proceeds Adjustment												
18 1. Timing Difference Interest Earned												
19 2. Unrealized Rate Reduction Bond-Financed Savings (UBFS)												
20 3. Lump-Sum TTA Credit Incremental Costs												
21 4. Adjustments												
22 5. UBFS Interest ⁽⁵⁾ Earned per interest rate on line 3.												
23 RRb Proceeds Adjustment Total												
24 B. Servicing Fees Adjustment Total												
25 1. Administration Fee (\$100,000 annually)												
26 2. Servicer Compensation (0.25%)												
27 Servicing Fees Total												
28 C. Carrying Costs Trust Transfer Amount (TTA) Collections												
29												
30 D. Investment Earnings												
31 32 E. Overcollateralization												
33 34 F. Financed Tax Credit												
35 36 G. Subtotal (Line 23 + Line 30 + Line 32 + Line 34 + Line 36)												
37 Current Month Activity [without interest] (Line 5 minus Line 41)												
38												
39												
40 RRb Savings Amount (Line 12 - Line 38)												
41												
42 RRbMA Authorization (5)												
43												
44 PLUS: Adjustment (6)												
45												
46												
47 Interest ** Also see line 22 **												
48 For "current month" (implied by Lines 2, 23, 38, 39, 46)												
49 For Adjustments												
50 Current Month Activity [with interest] (Line 43 + Line 46 + Line 51)												
51												
52 Previous Month Cumulative Balance												
53 Adjustment after interest (7)												
54 PLUS: Cumulative Balance (Line 52 + Line 55)												
55												
56												
57 CUMULATIVE BALANCE (Line 52 + Line 55)												

(5) Reflects beginning of amortization of the RRbMA overcollection as authorized in AL 194-E.
(6) Adjustments to record TTA bond payment revenues and other accounting items.
(7) Pursuant to Advice Letter 2007-E, balance transferred to the Ongoing TCBA and account eliminated.

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

**DECLARATION
OF MICHELLE SOMERVILLE**

A.09-05—

Application of San Diego Gas & Electric Company (U 902 E)
For Approval of its Contract Administration, Least Cost Dispatch and Power Procurement Activities, and Costs Related to Those Activities, Incurred Between January 1, 2008 and December 31, 2008

I, Michelle Somerville, do declare as follows:

1. I am a Regulatory Accounts Manager for San Diego Gas and Electric Company (SDG&E). I have included my Direct Testimony (Testimony) in support of SDG&E's Application for Approval of Contract Administration, Least Cost Dispatch and Power Procurement Activities, and Costs Related to Those Activities, Incurred Between January 1, 2008 and December 31, 2008. Additionally, as a Regulatory Accounts Manager, I am thoroughly familiar with the facts and representations in this declaration and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information (Protected Information) in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix (Matrix) attached to the Commission's Decision (D) 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure set forth in the August 22, 2006 Ruling of ALJ Thomas, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and

- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The confidential information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.¹ As such, the Protected Information provided by SDG&E is allowed confidential treatment in accordance with Appendix I – IOU Matrix in D.06-06-066.

4. Monthly expenses recorded to the Energy Resource Recovery Account (ERRA) included in Attachment A to my testimony are protected under Matrix category XI “Monthly Procurement Costs” and is “confidential for three years”.

5. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

6. I will comply with the limitations on confidentiality specified in the Matrix for the type of data that is provided herewith.

7. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized and continue to provide the level of support to the Application as intended; however SDG&E is certainly willing to work with the Commission regarding possible aggregations if the Commission seeks to make any of the confidential information provided in the Testimony public.

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¹ In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-C. Accordingly, SDG&E seeks confidential treatment of this data under those provisions, as applicable.

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

Executed this 15 day of May, 2009, at San Diego, California.

Michelle Somerville
Michelle Somerville
Regulatory Accounts Manager
San Diego Gas & Electric Company