

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

_____))
In the Matter of the Application of San Diego Gas &)
Electric Company (U 902 E) for Approval of its)
Proposals for Dynamic Pricing and Recovery of)
Incremental Expenditures Required for)
Implementation.)
_____)

A.10-07-____
(Filed July 6, 2010)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR
APPROVAL OF ITS PROPOSALS FOR DYNAMIC PRICING AND RECOVERY OF
INCREMENTAL EXPENDITURES REQUIRED FOR IMPLEMENTATION**

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July 6, 2010

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In accordance with Public Utilities Code Section 454 and Rules 2.1, 2.2, 2.3, and 3.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), San Diego Gas & Electric Company (“SDG&E”) hereby submits this application (“Application”) for authorization to implement dynamic pricing rates for its small nonresidential and residential customer classes (as the default PeakShift at Work and the optional PeakShift at Home rates, respectively), implement its approved default Critical Peak Pricing to an estimated 22,000 medium nonresidential customers, and to recover associated incremental expenditures.

This dynamic pricing proposal is designed to allow SDG&E customers the opportunity to better assess and potentially reduce their overall annual electricity costs. Customers choosing the rates described herein will have the ability to make informed decisions about how and when to use electricity, based on the price of electricity at the time of the customer’s usage. Dynamic pricing rates are higher during peak periods, thus incenting customers to reduce their electricity usage. The rates are lower at all other times. Further, SDG&E’s proposal offers bill protection

so that customers may try out the dynamic rate risk-free for the first twelve months. The proposal will also make “shadow” bill information available to show what the customer would have paid on their alternative rate.

By encouraging demand response during peak usage periods, dynamic pricing allows individual customers to reduce their own electricity bills through informed choices. Dynamic pricing would also help SDG&E reduce the need to purchase high-priced energy for peak electric load service. In the long run, dynamic pricing can help defer the need to build new power plants and reduce all SDG&E customers’ electricity costs.

For these reasons and more, the Commission has encouraged the availability of dynamic pricing rates for all customers as an important policy objective.¹ In the Commission’s view, “[d]ynamic pricing can lower costs, improve system reliability, cut greenhouse gas emissions, and support modernization of the electric grid.”² The Commission previously authorized SDG&E to implement a dynamic pricing rate design structure as the default rate (*i.e.*, “Critical Peak Pricing – Default” or “CPP-D”) for medium and large nonresidential customers in SDG&E’s 2008 General Rate Case, Phase II decision.³ This Application respectfully requests that the Commission allow SDG&E to extend commodity rate options to its small nonresidential and residential customer classes, in furtherance of the Commission’s dynamic pricing policy objective.

I. BACKGROUND

SDG&E’s proposed rates in this Application constitute “dynamic” or “time-variant” pricing rates because they are priced based on electric usage according to the time-of-day and electric energy market conditions. SDG&E proposes use of the term “PeakShift” to refer to the

¹ See D.08-07-045, p.2 (In re Pacific Gas and Electric Company’s (“PG&E’s”) Electric Marginal Costs, Revenue Allocation, and Rate Design A.06-03-005).

² *Id.*

³ See D.08-02-034.

dynamic pricing rates previously referred to as Critical Peak Pricing (“CPP”) rates (in D.08-02-034). This Application proposes “PeakShift at Work” (“PSW”) dynamic rates for small nonresidential customers and “PeakShift at Home” (“PSH”) dynamic rates for residential customers. The PeakShift terminology is intended to be easily understood and user-friendly for use by these customer classes. For the same reason, SDG&E proposes use of the term “TimeOfDay” (“TOD”) in place of “Time-of-Use,” to refer to the relevant usage period for which the new rates will apply. For these small nonresidential customers, SDG&E is proposing a simplified two-period TOD.

A PeakShift energy rate is a dynamic pricing rate that is calculated to ensure the recovery of the marginal capacity cost revenues during PeakShift event hours, in addition to the on-peak marginal energy cost. Events (also referred to as “ReduceYourUse Days”) are most likely to occur when extremely hot weather prompts peak demand because air-conditioning use and/or system electricity resources are relatively strained. SDG&E can activate ReduceYourUse Days when it determines there is a need to call on customers for temporary reductions in electricity demand. The intent of PeakShift rates is to send customers a proxy price signal to encourage them to curtail usage when a ReduceYourUse Day is triggered.

A number of recent rate design decisions have formed the basis for the instant Application. As mentioned above, the Commission authorized SDG&E to implement a default CPP-D rate for its medium and large non-residential customers (with average monthly demand equal to or greater than 20 kW) in D.08-02-034. Those customers who would default to CPP-D were equipped with the appropriate metering devices (*i.e.*, interval meters with communication capability) at their facilities.⁴ In D.08-02-034, the Commission also adopted a peak-time rebate

⁴ Those customers without the appropriate metering devices would continue to be charged standard rates until the requisite metering was installed.

(“PTR”) program applicable to small nonresidential and residential customers. PTR is a program that provides a credit to customers who consume below the customer’s specific baseline (or “customer reference”) level during the highest system peak days (when “PTR Events” are called).⁵ Under the adopted PTR program, small nonresidential customers with a demand of less than 20 kW and residential customers would be placed on the PTR program following installation of their smart meter and once PTR billing on those meters is possible. Although PTR does not constitute time-variant pricing,⁶ SDG&E wanted to introduce its small nonresidential and residential customers to certain beneficial elements of dynamic pricing (*e.g.*, the benefits of reducing energy usage during high demand periods and thereby lowering their bills). In order to fully implement the Commission’s policy goal to make dynamic pricing available to all customers, SDG&E recognized that the PTR program for small nonresidential and residential customers would eventually be replaced by dynamic pricing.

In D.08-07-045, the Commission provided further dynamic pricing policy guidance by adopting the following provisions for PG&E:

- a timetable for implementing default dynamic pricing rates for small nonresidential customers with demand < 20 kW;
- a timetable for offering optional dynamic pricing rates with a time-of-use rate design structure for residential customers; and
- a mechanism to seek recovery of incremental expenditures required to implement dynamic pricing incurred before the utility’s next general rate case.⁷

⁵ PTR is not considered a dynamic pricing rate since customers receive bill credits for kWh reductions during high system peak days but incur no additional charges if consumption increases during these events.

⁶ SB 695, Stats. 2009-2010, Ch. 337 (Cal. 2009), as codified at Cal. Pub. Util. Code § 745.

⁷ See D.08-07-045, p. 82-83.

The Commission noted that “the policies adopted for PG&E could be applied to [Southern California Edison] and SDG&E in their future rate design proceedings.”⁸

SDG&E accordingly filed its 2008 Rate Design Window (“RDW”) Application⁹ to more closely align its existing rates with the Commission’s guidance. The Commission approved a joint-party settlement in that case, which included adoption of the following CPP-D and PTR proposals: (a) allowing the ability to call dynamic pricing events on any day of the week, year round; (b) defaulting medium and large nonresidential customers to CPP-D rates only after customers have had a smart meter and associated interval billing/usage data for at least 12 months; and (c) eliminating PTR for small nonresidential customers in light of the Commission’s intent to have all customers default to a dynamic pricing rate.¹⁰ This last provision effectively superseded D.08-02-034, which adopted PTR for small nonresidential customers. Given the Commission’s policy guidance stated in D.08-07-045 to eventually provide dynamic pricing rates for all customers, SDG&E and the settling parties believed it was logical to bypass the PTR program for small nonresidential customers and more appropriately devote resources to implementing dynamic pricing, thereby avoiding a confusing, costly, and short-lived PTR “detour.” SDG&E planned instead to provide a detailed rate design and implementation plan in its proposal for a default dynamic pricing rate for its small nonresidential customers.

II. SDG&E’S PSH AND PSW PROPOSALS

With this Application, SDG&E is hereby proposing its comprehensive default PeakShift rate for its small nonresidential customers (*i.e.*, PeakShift at Work or PSW) and an optional/opt-in PeakShift rate for its residential customers (*i.e.*, PeakShift at Home or PSH). Because this Application requests the adoption of rate designs that are substantially different from, and more

⁸ *Id.* at 83.

⁹ A.08-11-014.

¹⁰ See D.09-09-036, Appendix A, “Settlement Agreement,” p. 6.

complex than, the current flat rate structure for SDG&E customers, implementation of the requested rates will require significant customer support and education to ensure that customers have the opportunity to be informed of their new dynamic pricing options. Accordingly, this Application proposes an estimated project timeline and corresponding incremental costs reflective of the extensive and necessary undertaking to reach and educate customers, and to develop the extensive amount of customer tools necessary to implement and sustain the proposed dynamic rate options for SDG&E’s residential and non-residential customers.

SDG&E plans to implement its PSW and PSH rates prior to the summer of 2013. This implementation allows time for SDG&E to: (1) complete its Advanced Metering Initiative deployment of smart meters to all customers; (2) allow customers to access at least 12 months of historical interval usage data from smart meters; (3) conduct extensive customer and education efforts; and (4) design and deploy the information systems and web tools necessary to implement and support these customers. Below is a brief timeline of SDG&E’s implementation schedule:

2010 - 2011	Customer/Stakeholder Research, Systems Design and Build
2011 - 2012	Launch Customer Education and Outreach Effort
2012 - 2013	Test and Implement Systems
2013	Roll-out Dynamic Rate to Customers

Implementing dynamic pricing options for virtually all of SDG&E’s current flat-rate customers (a default PSW rate for nonresidential and an optional PSH rate for residential customers) will require approximately \$118 million in funding over a six-year period (2010-2015). These incremental costs are largely related to customer education and outreach, investments to information systems necessary to implement and provide the ongoing support for dynamic pricing to all customers, additional customer operations support and facilities costs, and for labor and contract services required to implement the program. The incremental costs in this Application represent a complete picture of the investment necessary to design, construct, and

ultimately provide communication and outreach for the requested dynamic pricing rates. In this Application, SDG&E is requesting funding for these incremental costs. The following table provides a summary of the overall costs associated with the implementation of this dynamic pricing proposal:

Summary of Implementation Costs

Costs	2010 (\$1,000)	2011 (\$1,000)	2012 (\$1,000)	2013 (\$1,000)	2014 (\$1,000)	2015 (\$1,000)	Total (\$1,000)
Capital							
Outreach & Education	-	\$954	\$1,071	-	-	-	\$2,025
IT	\$2,560	\$18,444	\$16,632	\$7,228	-	-	\$44,864
Operations	\$115	\$313	\$319	\$42	-	-	\$ 789
Facilities	-	\$4,036	-	-	-	-	\$4,036
AFUDC ¹¹	\$56	\$1,261	\$2,020	\$603	-	-	\$3,940
Total Capital	\$2,731	\$25,008	\$20,083	\$7,831	-	-	\$55,653
O&M							
Outreach & Education	\$290	\$3,001	\$4,297	\$7,318	\$6,366	\$4,572	\$25,844
IT	\$844	\$96	\$1,389	\$3,592	\$4,163	\$4,341	\$14,425
Operations	\$464	\$1,268	\$3,173	\$5,397	\$4,900	\$4,068	\$19,270
Facilities	\$102	\$714	\$734	\$755	\$288	\$295	\$2,888
Total O&M	\$1,700	\$5,079	\$9,593	\$17,062	\$15,717	\$13,276	\$62,427
Total Cost	\$4,431	\$30,087	\$29,676	\$24,893	\$15,717	\$13,276	\$118,080

SDG&E proposes to recover the incremental costs for implementing dynamic pricing from all of its ratepayers. This Application will provide a dynamic pricing option to virtually all of SDG&E's customers, including its estimated 1.2 million residential and 120,000 small nonresidential customers (*i.e.*, customers with maximum demand less than 20 kW). The funding and resources being requested in this Application will also allow SDG&E to implement its approved default CPP-D rate to an estimated 22,000 medium-sized nonresidential customers (*i.e.*, customers with maximum demand between 20kW and 200 kW). As such, the incremental costs for customer education and outreach, support, and information systems necessarily will be

¹¹ AFUDC (Allowance for Funds Used During Construction) per witness Frederick W. Myers (Ch. 6).

incurred to ensure that all customers have the information and support necessary to make informed decisions regardless of the options they elect. The billing and information systems will also be available to support customers who are currently eligible or may become eligible. SDG&E will also use these systems to continue to implement its dynamic pricing program to the existing 1700 customers currently on its CPP-D rate. Many of the processes used to manage dynamic pricing for the current small number of CPP-D customers are handled manually. These processes will be replaced and incorporated into the automated systems being developed for all of SDG&E's customers. Furthermore, any load reduction achieved during a ReduceYourUse Day will benefit all customers, even customers not participating on a dynamic pricing rate, through improved system reliability. Since the foundational systems proposed in this Application will or could be used by any of SDG&E's customers at anytime, regardless of the options they choose, it is reasonable that these costs be allocated to all customers.

In order to track costs necessary to implement dynamic pricing, SDG&E proposes use and modification of a memorandum account, its Critical Peak Pricing Small Customer Memorandum Account ("CPPSMA").¹² The original purpose of the CPPSMA was to track and record incremental costs related to the development and implementation of a default CPP rate proposal for small non-residential customers less than 20 kW that are not subject to default under CPP-D. Because the instant application includes Dynamic Pricing options for both nonresidential and residential customers, SDG&E is filing a concurrent advice letter to modify the CPPSMA. The modified account, renamed the Dynamic Pricing Memorandum Account ("DPMA"), will record the costs required to implement dynamic pricing for both small nonresidential and residential customers.

¹²The CPPSMA was approved as part of the settlement agreement approved in D.09-09-036, and included in SDG&E Advice Letter 2115-E.

III. REQUESTED RELIEF

In accordance with California law and Commission policy, SDG&E requests

Commission approval of the following (as described further in the attached testimony):

- Schedule EECC-PSW – a default dynamic pricing commodity tariff for small nonresidential customers (with average monthly demand of less than 20 kW);
- Schedules EECC-AS-TOD and EECC-PA-TOD – simplified two-period TOD commodity tariffs for small nonresidential customers who opt-out of PSW when defaulted;
- Schedule EECC-PSH – an opt-in dynamic pricing commodity tariff for residential customers;
- Schedule EECC-DR-TOD-C – an optional TOD commodity tariff for residential customers;
- Schedules DR-TOD-C – new Utility Distribution Company (“UDC”) tariff that will apply to residential customers served on EECC-PSH or EECC-DR-TOD-C.
- Schedules AS-TOD, A-TOD, AD-TOD and PA-TOD – new UDC tariffs that will apply to non-residential customers currently served on A, A-TOU, AD and PA, respectively.
- A reduction in the residential Peak Time Rebate (“PTR”) credit level in 2013 to incent customers from PTR to the PSH rate, from \$0.75 per kWh and \$1.25 per kWh for customers without and with qualifying enabling technology (respectively, to \$0.50 per kWh for customers without enabling technology and \$0.75 per kWh for customers with enabling technology);

- SDG&E’s implementation of its approved default Critical Peak Pricing (“CPP-D”) to approximately 22,000 medium-sized nonresidential customers;
- Modifications to SDG&E’s existing commodity rates for medium and large nonresidential customers, for consistency with SDG&E’s TOD rate design proposal; and
- Forecasted revenue requirements to implement SDG&E’s Dynamic Pricing proposals for the periods 2010-2015.

IV. SUPPORTING TESTIMONY

In support of the Application, SDG&E attaches the testimony of the following witnesses:

- **Chapter 1 (Joseph S. Velasquez)** – describes the policy and background supporting SDG&E’s PSW proposal.
- **Chapter 2 (Glen C. Breed)** – provides SDG&E’s estimate of incremental customer education, outreach, and support estimated expenses required to implement the PSW tariff.
- **Chapter 3 (William G. Saxe)** – describes the policy and background supporting SDG&E’s PSH and TOD opt-in proposals for Residential customers, and provides SDG&E’s incremental customer education, outreach, and support estimated expenses required to implement the PSH tariff.
- **Chapter 4 (Robert W. Hansen)** – provides the proposed rate designs associated with implementing the following rate choices proposed in this Application.

- **Chapter 5 (Daniel J. Shulman)** – provides the information technology changes and associated incremental estimated expenses required to implement the PSW and PSH rates.
- **Chapter 6 (Frederick W. Myers)** – provides the forecasted revenue requirements and their development for the periods 2010-2015.
- **Chapter 7 (Yvonne M. Le Mieux)** – addresses cost recovery for the periods 2010-2015.

V. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Category, Need for Hearings, Issues, and Schedule - Rule 2(1)(c)

1. Category

SDG&E proposes that this proceeding be categorized as “ratesetting.”

2. Need for Hearings

SDG&E believes that evidentiary hearings will be required.

3. Issues to be Considered

The issues to be considered in this proceeding are whether the Commission should provide the relief requested by SDG&E in this Application, pursuant to the Commission’s Section 454 authority.

4. Proposed Schedule

SDG&E proposes the following schedule:

<u>EVENT</u>	<u>DATE</u>
Application	July 6, 2010
Prehearing Conference	August 30, 2010
Scoping Memo	September 10, 2010
DRA and Intervenor Testimony	October 8, 2010
Concurrent Rebuttal Testimony	November 8, 2010

Evidentiary Hearings	Nov. 29 – Dec. 3, 2010
Opening Briefs	January 3, 2011
Reply Briefs	January 24, 2011
Proposed Decision	March 2011

B. Authority - Rule 2.1

This Application is filed in accordance with Section 454 the Commission's Rules of Practice and Procedure, and relevant decisions, orders, and resolutions of the Commission, including D.08-02-034 (SDG&E's GRC Phase 2 Decision), D.08-07-045 (PG&E's Dynamic Pricing Decision) and D.09-09-036 (SDG&E's Rate Design Window Decision).

C. Corporate Information and Correspondence - Rules 2.1(a) and 2.1(b)

SDG&E is a public utility organized and existing under the laws of the State of California. SDG&E's principal place of business and mailing address is 8306 Century Park Court, San Diego, California, 92123.

All correspondence and communications to SDG&E regarding this Application should be addressed to:

Todd Cahill
 Regulatory Case Manager
 8306 Century Park Court
 San Diego, California, 92123
 Telephone: (858) 654-1745
 Facsimile: (858) 654-1788
 E-mail: TCahill@semprautilities.com

with a copy to:

Carlos F. Pena
 Laura M. Earl
 Attorneys for
 San Diego Gas & Electric Company
 101 Ash Street
 San Diego, CA 92101
 Telephone: (619) 696-4320

Facsimile: (619) 699-5027
E-mail: CFPena@SempraUtilities.com
E-mail: LEarl@SempraUtilities.com

D. Organization and Qualification to Transact Business – Rule 2.2

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 August 31, 2009 in connection with SDG&E's Application No. 09-08-019, and is incorporated herein by reference.

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

Attachment A to this Application is SDG&E's Balance Sheet as of March 31, 2010. Attachment B to this Application is SDG&E's Income Statement for the three-month period ended March 31, 2010.

F. Rates - Rules 3.2(a)(2) and 3.2(a)(3)

The rate impacts for SDG&E that will result from this Application are described in Mr. Hansen's testimony and attachments. A statement of present and proposed rates and illustrative residential bill impact data are provided as Attachments C and D to this Application. A statement of all of SDG&E's presently effective electric rates is Attachment E to this Application.

G. Property and Equipment - Rule 3.2(a)(4)

A general description of SDG&E's property and equipment was previously filed with the Commission on October 5, 2001, in connection with SDG&E's Application No. 01-10-005 and is incorporated herein by reference. A statement of the original cost and depreciation reserve attributable thereto is Attachment F to this Application.

H. Summary of Earnings - Rules 3.2(a)(5) and (6)

Attachment G to this Application is a SDG&E Summary of Earnings for the three months ended March 31, 2010.

I. Depreciation - Rule 3.2(a)(7)

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

J. Proxy Statement - Rule 3.2(a)(8)

A copy of SDG&E’s most recent proxy statement, dated April 29, 2010, as sent to all shareholders of SDG&E’s Parent Company, Sempra Energy, was mailed to the California Public Utilities Commission on May 13, 2010, and is incorporated herein by reference.

K. Pass Through of Costs - Rule 3.2(a)(10)

This Application reflects and passes through to customers cost and revenue requirement requests for increased costs to SDG&E for services or commodities furnished by it, as described herein.¹³

L. Service and Notice - Rule 1.9

This Application will initiate a new proceeding. As such, there is currently no official service list in effect. Instead, SDG&E is serving this Application on all parties to A.06-12-009/A.06-12-010, SDG&E's most recent General Rate Case ("GRC") proceeding and to A.08-11-014, SDGE's most recent Rate Design Window ("RDW") proceeding. Within ten days of filing, SDG&E will mail notice of this Application to the State of California and to cities and counties served by SDG&E (in accordance with the service list provided in Attachment H), and SDG&E will post the notice in their offices and publish the notice in newspapers of general circulation in each county in their service territory. In addition, within forty-five days of filing, SDG&E will include notices with the regular bills mailed to all customers affected by the proposed rate changes.

¹³ SDG&E's Application requests recovery of costs that are incremental to cost estimates and revenue requirements previously adopted by the Commission in other proceedings, including D.08-02-034 and D.09-09-36. In PG&E's Dynamic Pricing Decision (D.08-07-045), the Commission stated an expectation that "there will be reasonable incremental costs associated with systems and billing changes and customer outreach and education." OP 49 of the Decision (p. 97) allowed PG&E to seek recovery of those incremental expenditures. In D.10-02-032, the Commission approved incremental cost recovery for PG&E's Peak Day Pricing implementation. D.10-02-032, p. 3, OP 24, p. 186.

VERIFICATION

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. The matters stated in the foregoing Application are true to my own knowledge, except as to matters that are stated therein on information and belief, and as to those matters I believe them to be true.

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

Executed this 6th day of July 2010, at San Diego, California.

/s/ Lee Schavrien

Lee Schavrien
Senior Vice President
Finance, Regulatory and
Legislative Affairs

ATTACHMENT A

SDG&E'S BALANCE SHEET

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2010**

	1. UTILITY PLANT	<u>2010</u>
101	UTILITY PLANT IN SERVICE	\$10,154,007,366
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	18,343,359
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	615,118,905
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,257,482,670)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(270,727,451)
118	OTHER UTILITY PLANT	683,088,004
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(152,192,654)
120	NUCLEAR FUEL - NET	<u>49,220,932</u>
	TOTAL NET UTILITY PLANT	<u>6,839,375,791</u>
	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	5,165,500
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(529,653)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>706,678,903</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>711,314,749</u>

Data from SPL as of May 28, 2010

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2010**

3. CURRENT AND ACCRUED ASSETS		2010
131	CASH	9,367,847
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	3,000
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	177,965,627
143	OTHER ACCOUNTS RECEIVABLE	63,798,926
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,189,707)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	16,024,261
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	936,122
151	FUEL STOCK	550,278
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	58,993,058
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	301,419
165	PREPAYMENTS	35,177,059
171	INTEREST AND DIVIDENDS RECEIVABLE	4,010,221
173	ACCRUED UTILITY REVENUES	53,406,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	197,151,076
175	DERIVATIVE INSTRUMENT ASSETS	36,491,600
TOTAL CURRENT AND ACCRUED ASSETS		650,986,786
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	23,615,905
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,570,026,675
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	2,412,194
184	CLEARING ACCOUNTS	134,263
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	3,402,869
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	25,678,176
190	ACCUMULATED DEFERRED INCOME TAXES	238,658,121
TOTAL DEFERRED DEBITS		1,863,928,202
TOTAL ASSETS AND OTHER DEBITS		10,065,605,529

Data from SPL as of May 28, 2010

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2010**

5. PROPRIETARY CAPITAL

	2010
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	(78,475,400)
207 PREMIUM ON CAPITAL STOCK	(592,222,753)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(279,618,042)
214 CAPITAL STOCK EXPENSE	25,688,571
216 UNAPPROPRIATED RETAINED EARNINGS	(1,694,678,348)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	9,402,776
	(2,901,361,591)
TOTAL PROPRIETARY CAPITAL	(2,901,361,591)

6. LONG-TERM DEBT

221 BONDS	(1,936,905,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(253,720,000)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	3,777,870
	(2,186,847,130)
TOTAL LONG-TERM DEBT	(2,186,847,130)

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(677,760,115)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(29,656,059)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(379,018,889)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	(599,115,481)
	(1,685,550,543)
TOTAL OTHER NONCURRENT LIABILITIES	(1,685,550,543)

Data from SPL as of May 28, 2010

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2010**

8. CURRENT AND ACCRUED LIABILITES		2010
231	NOTES PAYABLE	(23,700,000.00)
232	ACCOUNTS PAYABLE	(207,540,524)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(43,332,515)
235	CUSTOMER DEPOSITS	(57,005,027)
236	TAXES ACCRUED	(15,106,812)
237	INTEREST ACCRUED	(42,228,726)
238	DIVIDENDS DECLARED	(1,204,918)
241	TAX COLLECTIONS PAYABLE	(5,011,447)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(445,965,053)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(41,436,813)
244	DERIVATIVE INSTRUMENT LIABILITIES	(267,750,769)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	0
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,150,282,601)
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(16,359,835)
253	OTHER DEFERRED CREDITS	(136,077,984)
254	OTHER REGULATORY LIABILITIES	(951,688,510)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(25,606,904)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	(5,201,256)
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(763,139,793)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(243,489,382)
TOTAL DEFERRED CREDITS		(2,141,563,664)
TOTAL LIABILITIES AND OTHER CREDITS		(\$10,065,605,529)

Data from SPL as of May 28, 2010

ATTACHMENT B

SDG&E'S INCOME STATEMENT

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2010

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$745,704,347
401	OPERATING EXPENSES	\$465,099,780	
402	MAINTENANCE EXPENSES	43,084,720	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	85,101,209	
408.1	TAXES OTHER THAN INCOME TAXES	19,496,106	
409.1	INCOME TAXES	22,732,382	
410.1	PROVISION FOR DEFERRED INCOME TAXES	18,938,680	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(11,037,956)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(658,623)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT		
	TOTAL OPERATING REVENUE DEDUCTIONS		642,756,298
	NET OPERATING INCOME		102,948,049

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(15,845)	
418	NONOPERATING RENTAL INCOME	106,178	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	500,186	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	9,310,840	
421	MISCELLANEOUS NONOPERATING INCOME	200,028	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	10,101,387	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	(9,931)	
	TOTAL OTHER INCOME DEDUCTIONS	(9,931)	
408.2	TAXES OTHER THAN INCOME TAXES	93,562	
409.2	INCOME TAXES	(1,172,350)	
410.2	PROVISION FOR DEFERRED INCOME TAXES		
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	2,119,810	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	1,041,022	
	TOTAL OTHER INCOME AND DEDUCTIONS		9,070,296
	INCOME BEFORE INTEREST CHARGES		112,018,345
	NET INTEREST CHARGES*		27,965,346
	NET INCOME		\$84,052,999

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (10,071,740)

Data from SPL as of May 28, 2010

SB_GT&S_0003574

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2010**

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$1,611,830,266
NET INCOME (FROM PRECEDING PAGE)	84,052,999
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(1,204,917)
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$1,694,678,348</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2010

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000 shares	Par Value \$27,500,000
Preferred Stock	10,000,000 shares	Without Par Value
Preferred Stock	Amount of shares not specified	\$80,000,000
Common Stock	255,000,000 shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK

5.0%	375,000 shares	\$7,500,000
4.50%	300,000 shares	6,000,000
4.40%	325,000 shares	6,500,000
4.60%	373,770 shares	7,475,400
\$1.70	1,400,000 shares	35,000,000
\$1.82	640,000 shares	16,000,000
COMMON STOCK	116,583,358 shares	291,458,395

(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009 and 06-05-015, to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application No. 06-05-015 and 08-07-029 to which reference is hereby made.

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

	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2009
<u>First Mortgage Bonds:</u>				
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	1,877,679
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	1,724,949
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	1,502,592
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,067,817
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,494,416
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	295,705
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	947,581
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	9,850,000
<u>Unsecured Bonds:</u>				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2010

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2009</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$39,858

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

<u>Preferred Stock</u>	<u>Shares Outstanding</u>	<u>Dividends Declared</u>				
	<u>12-31-09</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
5.0%	375,000	\$375,000	\$375,000	\$375,000	\$375,000	\$375,000
4.50%	300,000	270,000	270,000	270,000	270,000	270,000
4.40%	325,000	286,000	286,000	286,000	286,000	286,000
4.60%	373,770	343,868	343,868	343,868	343,868	343,868
\$ 1.7625	0	1,321,875	1,145,625	969,375	242,344	0
\$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000	2,380,000	2,380,000
\$ 1.82	640,000	1,164,800	1,164,800	1,164,800	1,164,800	1,164,800
	<u>3,413,770</u>	<u>\$6,141,543</u>	<u>\$5,965,293</u>	<u>\$5,789,043</u>	<u>\$5,062,012 [2]</u>	<u>\$4,819,668</u>

Common Stock

Amount	\$75,000,000	\$0	\$0	\$0	\$150,000,000 [1]
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A balance sheet and a statement of income and retained earnings of Applicant for the three months ended March 31, 2010, are attached hereto.

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

[2] Includes \$242,344 of interest expense related to redeemable preferred stock.

ATTACHMENT C

STATEMENT OF PRESENT AND PROPOSED RATES

Attachment C
San Diego Gas & Electric Company - Electric Department
Summary of Average Electric Rates by Major Customer Class
Application A.

	Effective 5/1/10 (Based on Advice Letter 2066-E)			Proposed 2011			Total Rate Change (¢/KWhr)	Total Rate Change (%)
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)		
Residential	9.861	7.828	17.689	9.811	7.828	17.639	(0.050)	-0.28%
Small Commercial	9.230	8.435	17.665	9.191	8.435	17.626	(0.039)	-0.22%
Med. & Large C&I	5.850	8.373	14.223	5.830	8.373	14.203	(0.020)	-0.14%
Agriculture	9.115	8.059	17.174	9.077	8.059	17.136	(0.038)	-0.22%
Lighting	9.730	5.799	15.529	9.704	5.799	15.503	(0.026)	-0.17%
System Total	7.729	8.123	15.852	7.696	8.123	15.819	(0.033)	-0.21%

	Effective 5/1/10 (Based on Advice Letter 2066-E)			Proposed 2012			Total Rate Change (¢/KWhr)	Total Rate Change (%)
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)		
Residential	9.861	7.828	17.689	9.930	7.828	17.758	0.069	0.39%
Small Commercial	9.230	8.435	17.665	9.283	8.435	17.718	0.053	0.30%
Med. & Large C&I	5.850	8.373	14.223	5.879	8.373	14.252	0.029	0.20%
Agriculture	9.115	8.059	17.174	9.168	8.059	17.227	0.053	0.31%
Lighting	9.730	5.799	15.529	9.767	5.799	15.566	0.037	0.24%
System Total	7.729	8.123	15.852	7.776	8.123	15.899	0.047	0.30%

	Effective 5/1/10 (Based on Advice Letter 2066-E)			Proposed 2013			Total Rate Change (¢/KWhr)	Total Rate Change (%)
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)		
Residential	9.861	7.828	17.689	10.109	7.828	17.937	0.248	1.40%
Small Commercial	9.230	8.435	17.665	9.420	8.435	17.855	0.190	1.08%
Med. & Large C&I	5.850	8.373	14.223	5.951	8.373	14.324	0.101	0.71%
Agriculture	9.115	8.059	17.174	9.304	8.059	17.363	0.189	1.10%
Lighting	9.730	5.799	15.529	9.860	5.799	15.659	0.130	0.84%
System Total	7.729	8.123	15.852	7.895	8.123	16.018	0.166	1.05%

	Effective 5/1/10 (Based on Advice Letter 2066-E)			Proposed 2014			Total Rate Change (¢/KWhr)	Total Rate Change (%)
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)		
Residential	9.861	7.828	17.689	10.128	7.828	17.956	0.267	1.51%
Small Commercial	9.230	8.435	17.665	9.435	8.435	17.870	0.205	1.16%
Med. & Large C&I	5.850	8.373	14.223	5.960	8.373	14.333	0.110	0.77%
Agriculture	9.115	8.059	17.174	9.319	8.059	17.378	0.204	1.19%
Lighting	9.730	5.799	15.529	9.870	5.799	15.669	0.140	0.90%
System Total	7.729	8.123	15.852	7.909	8.123	16.032	0.180	1.14%

	Effective 5/1/10 (Based on Advice Letter 2066-E)			Proposed 2015			Total Rate Change (¢/KWhr)	Total Rate Change (%)
	Current Total UDC Rate (¢/KWhr)	Current Avg. Commodity (¢/KWhr)	Current Total Rate (¢/KWhr)	Proposed Total UDC Rate (¢/KWhr)	Proposed Avg. Commodity (¢/KWhr)	Proposed Total Rate (¢/KWhr)		
Residential	9.861	7.828	17.689	10.097	7.828	17.925	0.236	1.33%
Small Commercial	9.230	8.435	17.665	9.411	8.435	17.846	0.181	1.02%
Med. & Large C&I	5.850	8.373	14.223	5.947	8.373	14.320	0.097	0.68%
Agriculture	9.115	8.059	17.174	9.295	8.059	17.354	0.180	1.05%
Lighting	9.730	5.799	15.529	9.854	5.799	15.653	0.124	0.80%
System Total	7.729	8.123	15.852	7.888	8.123	16.011	0.159	1.00%

Notes:
DWR-BC is included in Current and Proposed Total UDC Rate

ATTACHMENT D

ILLUSTRATIVE RESIDENTIAL BILL IMPACT DATA

Attachment D
San Diego Gas & Electric Company
Bill Impacts of 2011 Revenue Requirement Change
Monthly Residential Bill Impacts at Present and Proposed Rates

Schedule DR (Inland Climate Zone, Summer Billing Period)
Application _____

LINE NO.	ENERGY (KWH) (A)	05/01/10 PRESENT BILL (\$) (B)	2011 PROPOSED BILL (\$) (C)	CHANGE (\$) (D)	CHANGE (%) (E)	LINE NO.
1	25	5.12	5.12	\$0.00	0.0%	1
2	50	6.73	6.73	0.00	0.0%	2
3	75	10.10	10.10	0.00	0.0%	3
4	100	13.45	13.45	0.00	0.0%	4
5	150	20.19	20.19	0.00	0.0%	5
6	200	26.91	26.91	0.00	0.0%	6
7	250	33.65	33.65	0.00	0.0%	7
8	300	40.38	40.38	0.00	0.0%	8
9	350	47.39	47.39	0.00	0.0%	9
10	400	55.17	55.17	0.00	0.0%	10
11	450	64.45	64.43	(0.02)	0.0%	11
12	500	78.07	77.97	(0.10)	-0.1%	12
13	600	105.30	105.04	(0.26)	-0.2%	13
14	700	133.11	132.69	(0.42)	-0.3%	14
15	800	162.35	161.77	(0.58)	-0.4%	15
16	900	191.59	190.86	(0.73)	-0.4%	16
17	1000	220.82	219.93	(0.89)	-0.4%	17
18	1500	367.02	365.33	(1.69)	-0.5%	18
19	2000	513.21	510.73	(2.48)	-0.5%	19
20	3000	805.60	801.53	(4.07)	-0.5%	20

Schedule DR (Inland Climate Zone, Winter Billing Period)

LINE NO.	ENERGY (KWH) (A)	05/01/10 PRESENT BILL (\$) (B)	2011 PROPOSED BILL (\$) (C)	CHANGE (\$) (D)	CHANGE (%) (E)	LINE NO.
21						21
22						22
23						23
24						24
25						25
26						26
27						27
28						28
29						29
30						30
31	25	5.12	5.12	0.00	0.0%	31
32	50	6.73	6.73	0.00	0.0%	32
33	75	10.10	10.10	0.00	0.0%	33
34	100	13.45	13.45	0.00	0.0%	34
35	150	20.19	20.19	0.00	0.0%	35
36	200	26.91	26.91	0.00	0.0%	36
37	250	33.65	33.65	0.00	0.0%	37
38	300	40.38	40.38	0.00	0.0%	38
39	350	47.64	47.64	0.00	0.0%	39
40	400	55.42	55.42	0.00	0.0%	40
41	450	66.10	66.05	(0.05)	-0.1%	41
42	500	78.90	78.77	(0.13)	-0.2%	42
43	600	104.49	104.21	(0.28)	-0.3%	43
44	700	131.13	130.69	(0.44)	-0.3%	44
45	800	158.74	158.14	(0.60)	-0.4%	45
46	900	186.34	185.59	(0.75)	-0.4%	46
47	1000	213.94	213.02	(0.92)	-0.4%	47
48	1500	351.94	350.23	(1.71)	-0.5%	48
49	2000	489.94	487.44	(2.50)	-0.5%	49
50	3000	765.94	761.86	(4.08)	-0.5%	50

Attachment D
San Diego Gas & Electric Company
Bill Impacts of 2011 Revenue Requirement Change
Monthly Residential Bill Impacts at Present and Proposed Rates

Schedule DR (Coastal Climate Zone, Summer Billing Period)
Application _____

LINE NO.	ENERGY (KWH) (A)	05/01/10 PRESENT BILL (\$) (B)	2011 PROPOSED BILL (\$) (C)	CHANGE (\$) (D)	CHANGE (%) (E)	LINE NO.
1	25	5.12	5.12	\$0.00	0.0%	1
2	50	6.73	6.73	0.00	0.0%	2
3	75	10.10	10.10	0.00	0.0%	3
4	100	13.45	13.45	0.00	0.0%	4
5	150	20.19	20.19	0.00	0.0%	5
6	200	26.91	26.91	0.00	0.0%	6
7	250	33.65	33.65	0.00	0.0%	7
8	300	40.63	40.63	0.00	0.0%	8
9	350	48.39	48.39	0.00	0.0%	9
10	400	59.21	59.17	(0.04)	-0.1%	10
11	450	72.82	72.70	(0.12)	-0.2%	11
12	500	86.44	86.24	(0.20)	-0.2%	12
13	600	114.15	113.79	(0.36)	-0.3%	13
14	700	143.40	142.88	(0.52)	-0.4%	14
15	800	172.64	171.96	(0.68)	-0.4%	15
16	900	201.88	201.05	(0.83)	-0.4%	16
17	1000	231.12	230.12	(1.00)	-0.4%	17
18	1500	377.31	375.52	(1.79)	-0.5%	18
19	2000	523.51	520.92	(2.59)	-0.5%	19
20	3000	815.90	811.72	(4.18)	-0.5%	20

Schedule DR (Coastal Climate Zone, Winter Billing Period)

LINE NO.	ENERGY (KWH) (A)	05/01/10 PRESENT BILL (\$) (B)	2011 PROPOSED BILL (\$) (C)	CHANGE (\$) (D)	CHANGE (%) (E)	LINE NO.
21						21
22						22
23						23
24						24
25						25
26						26
27						27
28						28
29						29
30						30
31	25	5.12	5.12	0.00	0.0%	31
32	50	6.73	6.73	0.00	0.0%	32
33	75	10.10	10.10	0.00	0.0%	33
34	100	13.45	13.45	0.00	0.0%	34
35	150	20.19	20.19	0.00	0.0%	35
36	200	26.91	26.91	0.00	0.0%	36
37	250	33.65	33.65	0.00	0.0%	37
38	300	40.38	40.38	0.00	0.0%	38
39	350	48.08	48.08	0.00	0.0%	39
40	400	56.46	56.45	(0.01)	0.0%	40
41	450	69.25	69.17	(0.08)	-0.1%	41
42	500	82.05	81.88	(0.17)	-0.2%	42
43	600	107.64	107.32	(0.32)	-0.3%	43
44	700	135.13	134.65	(0.48)	-0.4%	44
45	800	162.73	162.09	(0.64)	-0.4%	45
46	900	190.34	189.54	(0.80)	-0.4%	46
47	1000	217.93	216.97	(0.96)	-0.4%	47
48	1500	355.93	354.18	(1.75)	-0.5%	48
49	2000	493.93	491.39	(2.54)	-0.5%	49
50	3000	769.93	765.81	(4.12)	-0.5%	50

ATTACHMENT E

**SDG&E'S PRESENTLY EFFECTIVE
ELECTRIC RATES**



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San Diego, California

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Dec 22, 2009

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Lee Schavrien

Effective Jan 1, 2010

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Senior Vice President
Regulatory Affairs

Resolution No. E-4298



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 19529-E

Canceling Original Cal. P.U.C. Sheet No. 15392-E

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Regulatory Affairs

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ATTACHMENT F

**STATEMENT OF THE ORIGINAL COST AND DEPRECIATION
RESERVE**

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF MARCH 31, 2010

<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	\$ 202,900
303	Misc. Intangible Plant	27,996,892	25,648,030
	TOTAL INTANGIBLE PLANT	28,219,733	25,850,930
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	46,579,390	12,721,294
312	Boiler Plant Equipment	116,763,426	21,347,387
314	Turbogenerator Units	100,089,723	20,130,360
315	Accessory Electric Equipment	33,468,903	6,479,072
316	Miscellaneous Power Plant Equipment	18,895,260	2,762,972
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	330,323,220	63,487,603
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	274,526,649	269,428,812
322	Boiler Plant Equipment	397,221,503	393,147,583
323	Turbogenerator Units	140,259,938	135,890,627
324	Accessory Electric Equipment	167,916,346	166,708,073
325	Miscellaneous Power Plant Equipment	291,332,127	221,956,320
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,271,540,241	1,187,415,092
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	16,473,840	1,324,172
342	Fuel Holders, Producers & Accessories	15,295,980	2,136,690
343	Prime Movers	21,550,498	4,062,637
344	Generators	235,196,151	19,171,339
345	Accessory Electric Equipment	10,921,111	1,484,121
346	Miscellaneous Power Plant Equipment	359,058	67,045
	TOTAL OTHER PRODUCTION	299,942,542	28,248,431
	TOTAL ELECTRIC PRODUCTION	1,901,806,003	1,279,151,126

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 38,673,080	\$ 0
350.2	Land Rights	62,145,855	10,754,304
352	Structures and Improvements	98,248,243	30,456,254
353	Station Equipment	640,472,041	140,278,215
354	Towers and Fixtures	108,348,985	80,639,361
355	Poles and Fixtures	172,215,204	40,295,760
356	Overhead Conductors and Devices	257,332,129	158,459,902
357	Underground Conduit	129,526,601	16,305,402
358	Underground Conductors and Devices	111,895,144	18,729,621
359	Roads and Trails	25,733,635	5,713,898
	TOTAL TRANSMISSION	1,644,590,916	501,632,719
360.1	Land	16,176,228	0
360.2	Land Rights	70,341,070	29,431,790
361	Structures and Improvements	3,253,642	1,340,419
362	Station Equipment	342,992,562	70,485,165
364	Poles, Towers and Fixtures	444,339,660	198,838,514
365	Overhead Conductors and Devices	351,745,190	124,952,475
366	Underground Conduit	868,162,853	325,573,875
367	Underground Conductors and Devices	1,147,070,491	637,125,402
368.1	Line Transformers	436,419,197	74,750,561
368.2	Protective Devices and Capacitors	16,959,185	(4,853,779)
369.1	Services Overhead	109,709,475	120,540,046
369.2	Services Underground	287,449,885	183,685,530
370.1	Meters	138,108,256	33,982,970
370.2	Meter Installations	54,373,062	11,011,585
371	Installations on Customers' Premises	6,252,726	10,207,334
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	24,135,367	16,511,310
	TOTAL DISTRIBUTION PLANT	4,317,488,850	1,833,583,197
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,776,375	14,729,274
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	26,034	3,013
393	Stores Equipment	52,833	49,524
394.1	Portable Tools	16,417,305	5,088,415
394.2	Shop Equipment	350,581	168,497
395	Laboratory Equipment	320,845	3,658
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	119,354,315	54,186,270
398	Miscellaneous Equipment	462,560	55,780
	TOTAL GENERAL PLANT	174,364,048	74,483,450
101	TOTAL ELECTRIC PLANT	8,066,469,550	3,714,701,421

<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	\$ 86,104
303	Miscellaneous Intangible Plant	713,559	574,758
	TOTAL INTANGIBLE PLANT	799,663	660,862
360.1	Land	0	0
361	Structures and Improvements	43,992	43,992
362.1	Gas Holders	0	0
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	0
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	1,839,981	451,428
	TOTAL STORAGE PLANT	1,883,973	495,420
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,112,063
366	Structures and Improvements	11,517,963	8,441,628
367	Mains	125,606,085	53,937,472
368	Compressor Station Equipment	69,908,998	46,518,571
369	Measuring and Regulating Equipment	17,422,588	12,432,870
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	231,321,963	122,442,604
374.1	Land	102,187	0
374.2	Land Rights	8,051,718	5,487,680
375	Structures and Improvements	43,447	61,253
376	Mains	521,965,936	292,884,996
378	Measuring & Regulating Station Equipment	9,998,057	6,058,226
380	Distribution Services	234,766,332	266,079,391
381	Meters and Regulators	95,064,857	29,479,313
382	Meter and Regulator Installations	67,336,136	22,274,470
385	Ind. Measuring & Regulating Station Equipm	1,516,811	890,718
386	Other Property On Customers' Premises	0	0
387	Other Equipment	5,274,409	4,511,650
	TOTAL DISTRIBUTION PLANT	944,119,890	627,727,696

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	\$ 0	\$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	7,078,499	2,731,813
394.2	Shop Equipment	84,181	19,344
395	Laboratory Equipment	283,094	111,794
396	Power Operated Equipment	162,284	42,013
397	Communication Equipment	2,177,345	1,367,542
398	Miscellaneous Equipment	280,519	98,984
	TOTAL GENERAL PLANT	<u>10,140,423</u>	<u>4,471,494</u>
101	TOTAL GAS PLANT	<u>1,188,265,911</u>	<u>755,798,076</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	235,912,596	177,597,076
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,612,511	0
389.2	Land Rights	1,385,339	27,275
390	Structures and Improvements	185,700,405	72,935,324
391.1	Office Furniture and Equipment - Other	26,553,816	14,071,898
391.2	Office Furniture and Equipment - Computer E	47,410,246	15,585,253
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(46,029)
393	Stores Equipment	138,816	(28,344)
394.1	Portable Tools	707,800	31,221
394.2	Shop Equipment	310,478	166,843
394.3	Garage Equipment	1,603,804	223,264
395	Laboratory Equipment	2,538,331	921,060
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	86,461,629	47,992,146
398	Miscellaneous Equipment	2,261,924	440,853
118.1	TOTAL COMMON PLANT	<u>596,665,007</u>	<u>329,385,931</u>
	TOTAL ELECTRIC PLANT	8,066,469,550	3,714,701,421
	TOTAL GAS PLANT	1,188,265,911	755,798,076
	TOTAL COMMON PLANT	<u>596,665,007</u>	<u>329,385,931</u>
101 & 118.1	TOTAL	<u>9,851,400,467</u>	<u>4,799,885,429</u> <u>4,761,249,983</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>\$ (1,164,131,236)</u>	<u>\$ (1,164,131,236)</u>
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	<u>\$ 0</u>	<u>\$ 0</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	Accrual for Retirements		
	Electric	\$ (1,867,076)	\$ (1,867,076)
	Gas	(71,699)	(71,699)
	TOTAL PLANT IN SERV-NON RECON ACC	<u>(1,938,774)</u>	<u>(1,938,774)</u>
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	<u>0</u>	<u>0</u>
105	Plant Held for Future Use		
	Electric	18,343,359	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	<u>18,343,359</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	639,648,458	
	Gas	5,353,460	
	Common	85,605,396	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>730,607,314</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	221,468
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	3,998,499
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	630,162,713
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0</u>	<u>630,162,713</u>
101.1	ELECTRIC OMEC CAPITAL LEASE	717,747,941	17,534,842
118.1	COMMON CAPITAL LEASE	20,921,833	1,938,004
		<u>738,669,774</u>	<u>19,472,846</u>
120	NUCLEAR FUEL FABRICATION	<u>97,538,885</u>	<u>78,200,965</u>
143	FAS 143 ASSETS - Legal Obligation	126,668,513	(550,079,147)
	FIN 47 ASSETS - Legal Obligation	34,751,219	14,256,308
143	FAS 143 ASSETS - Non-legal Obligation	0	(1,164,607,080)
	TOTAL FAS 143	<u>161,419,732</u>	<u>(1,700,429,920)</u>
	UTILITY PLANT TOTAL	<u>\$ 10,431,909,520</u>	<u>\$ 2,665,441,990</u>

ATTACHMENT G

**SDG&E'S SUMMARY OF EARNINGS FOR THREE MONTHS
ENDING MARCH 31, 2010**

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
THREE MONTHS ENDED MARCH 31, 2010
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$746
2	Operating Expenses	<u>643</u>
3	Net Operating Income	<u><u>\$103</u></u>
4	Weighted Average Rate Base	\$4,454
5	Rate of Return*	8.40%

*Authorized Cost of Capital

ATTACHMENT H

CITY AND STATE SERVICE LIST

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

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

United States Government
General Services Administration
300 N. Los Angeles
Los Angeles, CA 90012

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

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

City of Carlsbad
Attn. City Clerk
1200 Carlsbad Village Drive
Carlsbad, CA 92008-1949

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

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

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505 S. Vulcan Ave.
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Attn. City Attorney
1050 Camino Del Mar
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201 N. Broadway
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635 S. Highway 101
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825 Imperial Beach Blvd
Imperial Beach, CA 92032

City of Laguna Beech
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Laguna Beach, CA 92651

City of Imperial Beach
Attn. City Attorney
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City of Mission Viejo
Attn City Clerk
200 Civic Center
Mission Viejo, CA 92691

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300 N. Coast Highway
Oceanside, CA 92054-2885

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National City, CA 92050

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Naval Facilities Engineering
Command
Navy Rate Intervention
1314 Harwood Street SE
Washing Navy Yard, DC 20374-5018

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San Clemente, CA 92672

City of San Diego
Attn. Mayor
202 C St.
San Diego, CA 92010

City of San Clemente
Attn. City Clerk
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San Clemente, CA 92672

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P.O. Box 121750
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Attn. County Counsel
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City of San Diego
Attn. City Manager
202 C St.
San Diego, CA 92101

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Vista, CA 92083

City of El Cajon
Attn. City Clerk
200 E. Main St.
El Cajon, CA 92020

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

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

City of Fallbrook
Attn. City Clerk
233 E. Mission Road
Fallbrook, CA 92028

City of Julian
Attn. City Clerk
P.O. Box 1866
2129 Main Street
Julian, CA

City of Alpine
Attn. City Clerk
2707 Alpine Blvd
Alpine, CA 91901

City of Rancho San Diego - Jamul
Attn. City Clerk
3855 Avocado Blvd.
Suite 230
La Mesa, CA 91941

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

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR APPROVAL OF ITS PROPOSALS FOR DYNAMIC PRICING AND RECOVERY OF INCREMENTAL EXPENDITURES REQUIRED FOR IMPLEMENTATION** by electronic mail to each party of record in A.06-12-009, A.06-12-010, and A.08-11-014 and by Federal Express to Chief Administrative Law Judge Karen Clopton.

Dated at San Diego, California this 6th day of July, 2010.

/s/ Jenifer E. Nicola

Jenifer E. Nicola