



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

Tel: 858.654.3563
Fax: 858.654.1788
cfaber@semprautilities.com

January 6, 2012

ADVICE LETTER 2325-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: MODIFICATIONS TO THE MARKET PRICE BENCHMARK TO ACCOUNT FOR RENEWABLE RESOURCE REQUIREMENTS PURSUANT TO DECISION 11-12-018

San Diego Gas & Electric Company (SDG&E) hereby submits to the California Public Utilities Commission (Commission) its data necessary to revise the Power Charge Indifference Amount (PCIA), Competition Transition Charge (CTC), and Temporary Bundled Service tariffs to account for renewable resource requirements and the US Department of Energy premiums as directed in Ordering Paragraph (OP) 4 of Decision (D.)11-12-018.

BACKGROUND

In D.02-11-022, the Commission established a Cost Responsibility Surcharge (CRS) methodology which incorporated an indifference amount. A revised methodology to determine the indifference amount was approved in D.06-07-030, (subsequently modified by D.07-01-030, D.07-05-022, and D.07-05-005). The indifference amount is updated annually in each Investor-Owned Utility's (IOU's) Energy Resource Recovery Account (ERRA) proceeding.

The Indifference principle involves the interaction of three elements;

- a) a non-bypassable surcharge which DA customers pay to offset any cost impacts on bundled customers associated with their departure from or return to bundled service;
- b) switching rules which govern the movement of customers between DA and bundled service; and
- c) Transition Bundled Service (TBS) rates which accommodate customer movement while allowing the utility to adjust its generation portfolio without cost impacts on bundled customers.

To derive the indifference amount, the market value of the IOU's supply portfolio is subtracted from the total portfolio cost. The Market Price Benchmark (MPB) is a calculated proxy which represents the market value of the IOU total energy resource portfolio. The IOU total portfolio includes IOU-owned generation, purchased power, DWR contracts, fuel costs, and California Independent System Operator (CAISO) costs. A positive indifference amount indicates that the

IOU portfolio cost is above-market for that year. The indifference amount is recovered from DA customers through a non-bypassable surcharge to maintain bundled service customer indifference.

The current indifference methodology only recognizes the IOUs' cost of renewable resources in the calculation of the Total Portfolio Cost, but does not account for the market value of renewable resources in the MPB.

All load serving entities are subject to increasing requirements to procure renewable resources pursuant to Pub. Util. Code, Article 16, commencing with § 399.1. Renewable resources are more costly than traditional gas-fired generation, and thus have a higher market price as compared to the embedded cost of the utilities' portfolios. As the utilities add renewable generation, their average portfolio costs will increase. ESPs are facing the same mandate to buy a certain percentage of their power from renewable generation sources, and their costs are affected as well. Both the utilities and the ESPs thus face new requirements to purchase renewable power for a certain percentage of their load, causing their average portfolio costs to increase.

To accurately reflect the market value of RPS-compliant renewables, the benchmark should reflect prices paid by buyers and sellers in recent transactions for delivery of RPS-compliant power in California for the forecast year.

The Commission determined a proxy to serve as a RPS value based upon a weighting of different data sources. The IOUs' shall make use of sources of RPS data that incorporate transactions of other load serving entities. In the absence of any superior source that has been identified for this purpose, the IOU's shall make use of the western regional renewable energy contract premiums published by U.S. Department of Energy (DOE).

68% of the IOU's costs for RPS will be based on their proposed methodology. The remaining 32% of the RPS adder will be allocated using the DOE data. This weighting corresponds to the percentage of the total load subject to RPS requirements currently represented by IOU load. The applicable percentages are subject to updated data in subsequent years.

Pursuant to OP 4 of D.11-12-018, SDG&E is providing the following data herein as Attachments A and B:

1. The most recent 12 months figures derived from US Department of Energy survey of Western US renewable energy premiums in calculating a weighted proxy for the Market Price Benchmark compiled by the National Renewable Energy Laboratory; and
2. All RPS-compliant resources that are used to serve customers during the current year (i.e., most recent 12 months) and those projected to serve customers during the next year, including both contracts and IOU-owned resources; and
3. The projected costs together with the net qualifying capacity of energy produced by each of these resources (providing relevant costs in dollars and volumes in MWh and qualifying capacity in kW).

RENEWABLE PORTFOLIO STANDARD ADDER

Attached are documents responding to the requests for RPS and DOE data in accordance with D.11-12-018 in order for the Energy Division to calculate an RPS adder. Attachment A is a calculation of the DOE component of the RPS premium. The data source is the most recent DOE/NREL report on the Green Pricing Options (2009) data. That report includes a link to the website on page iii which includes the most current program data. Only Western Electricity Coordinating Council (WECC) program data are included. Programs that do not include \$/kWh premiums or have voluntary contributions were excluded from the calculation. If a range was shown in the data, the average was calculated. Based on this data, SDG&E has calculated a DOE premium of \$18.15 per MWh.

Attachment B contains renewable contract data for the years 2011 and 2012. All RPS contracts that were included in SDG&E's 2011 and 2012 ERRA forecast filings, Application (A.) 10-10-001 and A.11-09-022 respectively, are shown in this spreadsheet. Attachment B contains data that is confidential and has been redacted to conceal SDG&E's renewable energy and cost information. An unredacted version will be provided to the Energy Division under confidential seal. Included are forecasts of RPS energy in MWh, costs in \$, and net qualifying capacity (NQC) in kW.

RESOURCE ADEQUACY CAPACITY ADDER

D.11-12-018 adopts Southern California Edison's proposal to update the RA capacity adder component of the MPB based on the most recent California Energy Commission (CEC) estimate of the going forward cost of a combustion turbine.¹ Based on the CEC's most recent estimate, the RA capacity adder would be \$50.17/kW-yr. This estimate is based on data from Table B-4 of the Final CEC 2009 Comparative Costs of California Central Station Electric Generation Report and is the summation of three components: (1) Insurance (\$9.63), (2) Ad Valorem (\$13.09) and (3) Fixed O&M (\$27.45) for a Small Simple Cycle plant.²

EFFECTIVE DATE

SDG&E believes this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this filing become effective on February 5, 2012, which is 30 days after the date filed.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than January 26, 2012, which is 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

¹ D.11-12-018 at p. 115.

² See: <http://www.energy.ca.gov/2009publications/CEC-200-2009-017/CEC-200-2009-017-SF.PDF>

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

Copies of the protest should also be sent via e-mail to the attention of both Honesto Gatchalian (inj@cpuc.ca.gov) and Maria Salinas (mas@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1879
E-mail: MCaulson@semprautilities.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties in R.07-05-025, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1879 or by email to SDG&ETariffs@semprautilities.com.

CLAY FABER
Director – Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Company name/CPUC Utility No. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Christina Sondrini

Phone #: (858) 636-5736

E-mail: csondrini@semprautilities.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2325-E

Subject of AL: Modifications to the Market Price Benchmark to Account for Renewable Resource Requirements Pursuant to Decision 11-12-018

Keywords (choose from CPUC listing): Compliance, Direct Access

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.11-12-018

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

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: N/A

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 2/5/12

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

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

**CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
mas@cpuc.ca.gov and jnj@cpuc.ca.gov**

**San Diego Gas & Electric
Attention: Megan Caulson
8330 Century Park Ct, Room 32C
San Diego, CA 92123
mcaulson@semprautilities.com**

¹ Discuss in AL if more space is needed.

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

cc: (w/enclosures)

Public Utilities Commission

DRA

S. Cauchois
R. Pocta
W. Scott

Energy Division

P. Clanon
S. Gallagher
H. Gatchalian
D. Lafrenz
M. Salinas

CA. Energy Commission

F. DeLeon
R. Tavares

Alcantar & Kahl LLP

K. Cameron

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham

City of Poway

R. Willcox

City of San Diego

J. Cervantes
G. Lonergan
M. Valerio

Commerce Energy Group

V. Gan

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill
J. Pau

Dept. of General Services

H. Nanjo
M. Clark

Douglass & Liddell

D. Douglass
D. Liddell
G. Klatt

Duke Energy North America

M. Gillette

Dynergy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell

M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg
J. Heather Patrick
J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

Pacific Gas & Electric Co.

J. Clark
M. Huffman
S. Lawrie
E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

San Diego Regional Energy Office

S. Freedman
J. Porter

School Project for Utility Rate Reduction

M. Rochman

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Sutherland Asbill & Brennan LLP

K. McCrea

Southern California Edison Co.

M. Alexander
K. Cini
K. Gansecki
H. Romero

TransCanada

R. Hunter
D. White

TURN

M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi
N. Furuta

L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties In:

R.07-05-025

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT A**

US Department of Energy - Energy Efficiency and Renewable Energy
Green Pricing Utility Programs by State - Data as of December 12, 2012
For States Comprising the CAISO, Northwest and Southwest Power Markets (Western Electric Coordinating Council)

<u>State</u>	<u>Utility Name</u>	<u>Program Name</u>	<u>Type</u>	<u>Start Date</u>	<u>Premium</u>	<u>\$/MWh</u>
AZ	Arizona Public Service	Green Choice	wind and geothermal	2007	0.4¢/kWh	4.00
AZ	Salt River Project	EarthWise Energy	central PV, wind, landfill gas, small hydro, geothermal	1998/2001	3.0¢/kWh	30.00
AZ	Tri-State Generation & Transmission: Columbus Electric Cooperative, Inc.	Renewable Resource Power Service	wind, hydro	2001	0.8¢/kWh	8.00
AZ	Tucson Electric	GreenWatts	landfill gas, PV	2000	10¢/kWh	100.00
AZ	UniSource Energy Services	GreenWatts	PV	2004	10¢/kWh	100.00
CA	Anaheim Public Utilities	Green Power for the Grid	wind, landfill gas	2002	1.5¢/kWh	15.00
CA	Burbank Water and Power	Green Energy Champion	various	2007	2.0¢/kWh	20.00
CA	Los Angeles Department of Water and Power	Green Power for a Green LA	wind, landfill gas	1999	3.0¢/kWh	30.00
CA	Marin Energy Authority: City of Belvedere, Town of Fairfax, County of Marin, City of Mill Valley, Town of San Anselmo, City of San Rafael, City of Sausalito, Town of Tiburon	Deep Green	100% renewable	2010	1.0¢/kWh	10.00
CA	PacifiCorp: Pacific Power	Blue Sky Block	wind	2000	1.95¢/kWh	19.50
CA	Palo Alto Utilities / 3Degrees	Palo Alto Green	wind, PV	2003 / 2000	1.5¢/kWh	15.00
CA	Pasadena Water & Power	Green Power	wind	2003	2.5¢/kWh	25.00
CA	Roseville Electric	Green Roseville	wind, PV	2005	1.5¢/kWh	15.00
CA	Sacramento Municipal Utility District	Greenergy	wind, landfill gas, hydro, PV	1997	1.0¢/kWh or \$6/month	10.00
CA	Sacramento Municipal Utility District	SolarShares	PV	2007	5.0¢/kWh or \$30/month	50.00
CA	Silicon Valley Power / 3Degrees	Santa Clara Green Power	wind, PV	2004	1.5¢/kWh	15.00
CA	Truckee Donner PUD	Voluntary Renewable Energy Certificates Program	wind	2008	2.0¢/kWh	20.00
CO	Colorado Springs Utilities	Green Power	wind	1999	3.0¢/kWh	30.00

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT A**

US Department of Energy - Energy Efficiency and Renewable Energy
Green Pricing Utility Programs by State - Data as of December 12, 2012
For States Comprising the CAISO, Northwest and Southwest Power Markets (Western Electric Coordinating Council)

<u>State</u>	<u>Utility Name</u>	<u>Program Name</u>	<u>Type</u>	<u>Start Date</u>	<u>Premium</u>	<u>\$/MWh</u>
CO	Colorado Springs Utilities	Renewable Energy Certificates Program	wind and geothermal	2008	0.34¢/kWh	3.40
CO	Xcel Energy	WindSource	wind	1997	-0.67¢/kWh	(6.70)
CO	Holy Cross Energy	Wind Power Pioneers	wind	1998	1.5¢/kWh	15.00
CO	Holy Cross Energy	Local Renewable Energy Pool	small hydro, PV	2002	2.33¢/kWh	23.30
CO	Intermountain Rural Electric Association / Sterling Planet	National Wind	wind	2006	1.0¢/kWh	10.00
CO	Intermountain Rural Electric Association / Sterling Planet	National Solar	solar	2006	5.5¢/kWh	55.00
CO	Platte River Power Authority: Estes Park, Fort Collins Utilities, Longmont Power & Communications, Loveland Water & Power	Wind Energy Premium	wind	1999	1.0¢/kWh-2.5¢/kWh	17.50
CO	Tri-State Generation & Transmission : Delta-Montrose Electric Association, Empire Electric Association, Inc., Gunnison County Electric Association, Inc., Highline Electric Association, La Plata Electric Association, Inc., Morgan County Rural Electric Association, Mountain Parks Electric, Inc., Mountain View Electric Association, Inc., Poudre Valley Rural Electric Association, Inc., San Isabel Electric Association, Inc., San Luis Valley Rural Electric Cooperative, Inc., San Miguel Power Association, Inc., Sangre de Cristo Electric Association, Inc., Southeast Colorado Power Association, United Power, Inc., White River Electric Association, Inc., Y-W Electric Association, Inc.	Renewable Resource Power Service	wind, hydro	1998	0.8¢/kWh	8.00
CO	Yampa Valley Electric Association	Wind Energy Program	wind	1999	0.6¢/kWh	6.00
ID	Avista Utilities	Buck-A-Block	wind	2002	0.33¢/kWh	3.30
ID	Idaho Power	Green Power Program	various	2001	0.98¢/kWh	9.80
ID	PacifiCorp: Rocky Mountain Power	Blue Sky	wind	2003	0.71¢/kWh-1.94¢/kWh	13.25
ID	Vigilante Electric Cooperative	Alternative Renewable Energy Program	wind	2003	1.1¢/kWh	11.00
MT	Basin Electric Power Cooperative: Flathead Electric Coop, Lower Yellowstone, Powder River Energy	Prairie Winds	wind	2000	0.5¢/kWh	5.00
MT	Northwestern Energy	E+ Green	wind, PV	2003	2.0¢/kWh	20.00
MT	Park Electric Cooperative	Green Power Program	various renewables	2002	1.02¢/kWh	10.20

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT A**

US Department of Energy - Energy Efficiency and Renewable Energy
Green Pricing Utility Programs by State - Data as of December 12, 2012

For States Comprising the CAISO, Northwest and Southwest Power Markets (Western Electric Coordinating Council)

<u>State</u>	<u>Utility Name</u>	<u>Program Name</u>	<u>Type</u>	<u>Start Date</u>	<u>Premium</u>	<u>\$/MWh</u>
MT	Southern Montana Electric Generation and Transmission Cooperative (5 coops offer program): Fergus Electric, Yellowstone Valley, Bear Tooth Electric, Mid Yellowstone, and Tongue River	Environmentally Preferred Power	wind, hydro	2002	1.05¢/kWh	10.50
MT	Tri-State Generation & Transmission: Big Horn Rural Electric Company	Renewable Resource Power Service	wind, hydro	2001	0.8¢/kWh	8.00
MT	Vigilante Electric Cooperative	Alternative Renewable Energy Program	wind	2003	1.1¢/kWh	11.00
NV	Deseret Power: Mt. Wheeler Power Cooperative	GreenWay	various	2005	1.95¢/kWh	19.50
NM	El Paso Electric	Renewable Energy Tariff	wind	2003	2.28¢/kWh	22.80
NM	Los Alamos Department of Public Utilities	Green Power	wind	2005	1.8¢/kWh	18.00
NM	Navopache Electric Cooperative	Voluntary Renewable Energy Program	TBD	2008	4.0¢/kWh	40.00
NM	Public Service of New Mexico	PNM Sky Blue	wind	2003	1.1¢/kWh	11.00
NM	Tri-State Generation & Transmission: Central New Mexico Electric Cooperative, Inc., Columbus Electric Cooperative, Inc., Continental Divide Electric Cooperative, Inc., Jemez Mountains Electric Cooperative, Inc., Kit Carson Electric Cooperative, Inc., Mora-San Miguel Electric Cooperative, Inc., Navopache Electric Cooperative, Northern Rio Arriba Electric Cooperative, Otero County Electric Cooperative, Inc., Sierra Electric Cooperative, Inc., Socorro Electric Cooperative, Inc., Southwestern Electric Cooperative, Inc., Springer Electric	Renewable Resource Power Service	wind, hydro	2001	0.4¢/kWh- 2.5¢/kWh	14.50
NM	Xcel Energy	WindSource	wind	1999	3.0¢/kWh	30.00
OR	City of Ashland / Bonneville Environmental Foundation	Renewable Pioneers	PV, wind	2003	2.0¢/kWh	20.00
OR	Columbia River PUD	Choice Energy	wind	2005	1.5¢/kWh	15.00
OR	Emerald People's Utility District/Green Mountain Energy	Choose Renewable Electricity	wind, geothermal	2003	1.2¢/kWh	12.00
OR	Eugene Water & Electric Board	EWEB Greenpower	various renewables	2007	1.0¢/kWh- 1.5¢/kWh	12.50
OR	Eugene Water & Electric Board	EWEB Wind Power	wind	1999	0.91¢/kWh	9.10
OR	Idaho Power	Green Power Program	various	2001	0.98¢/kWh	9.80
OR	Midstate Electric Cooperative	Environmentally-Preferred Power	wind	1999	2.5¢/kWh	25.00

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT A**

US Department of Energy - Energy Efficiency and Renewable Energy
Green Pricing Utility Programs by State - Data as of December 12, 2012

For States Comprising the CAISO, Northwest and Southwest Power Markets (Western Electric Coordinating Council)

<u>State</u>	<u>Utility Name</u>	<u>Program Name</u>	<u>Type</u>	<u>Start Date</u>	<u>Premium</u>	<u>\$/MWh</u>
OR	Oregon Trail Electric Cooperative	Green Power	wind	2002	1.5¢/kWh	15.00
OR	PacifiCorp: Pacific Power	Blue Sky Block	wind	2000	1.95¢/kWh	19.50
OR	PacifiCorp: Pacific Power / 3Degrees	Blue Sky Habitat	wind, biomass, PV	2002	0.78¢/kWh + \$2.50/mo. donation	7.80
OR	PacifiCorp: Pacific Power / 3Degrees	Blue Sky Usage	wind, biomass, PV	2002	0.78¢/kWh	7.80
OR	Pacific Northwest Generating Cooperative: Blachly-Lane Electric Cooperative, Central Electric Cooperative, Clearwater Power, Consumers Power, Coos-Curry Electric Cooperative, Douglas Electric Cooperative, Fall River Rural Electric Cooperative, Lost River Electric Cooperative, Raft River Rural Electric Cooperative, Umatilla Electric Cooperative, West Oregon Electric Cooperative, (11 of 15 coops offer program)	Green Power	landfill gas	1998	1.8¢/kWh-2.0¢/kWh	19.00
OR	Portland General Electric Company	Clean Wind for Medium to Large Commercial & Industrial Accounts	wind	2003	1.7¢/kWh	17.00
OR	Portland General Electric Company	Clean Wind Power	wind	2002	1.75¢/kWh	17.50
OR	Portland General Electric Company / Green Mountain Energy	Green Source	existing geothermal, hydro, new wind	2002	0.8¢/kWh	8.00
OR	Portland General Electric Company / Green Mountain Energy	Renewable Future	wind	2007	1.5¢/kWh	15.00
OR	Springfield Utility Board	ECOchoice	various	2007	1.0¢/kWh	10.00
UT	City of St. George	Clean Green Power	wind, small hydro	2005	2.95¢/kWh	29.50
UT	Deseret Power	GreenWay	various	2004	1.95¢/kWh	19.50
UT	PacifiCorp: Rocky Mountain Power	Blue Sky	wind	2003	0.71¢/kWh-1.94¢/kWh	13.25
UT	PacifiCorp: Utah Power	Blue Sky	wind	2000	1.95¢/kWh	19.50
UT	Tri-State Generation & Transmission: Empire Electric Association, Inc.	Renewable Resource Power Service	wind, hydro	2001	0.8¢/kWh	8.00
WA	Avista Utilities	Buck-A-Block	wind	2002	0.33¢/kWh	3.30
WA	Clallam County PUD	Clallam County PUD Green Power Program	landfill gas	2001	0.69¢/kWh	6.90

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT A**

US Department of Energy - Energy Efficiency and Renewable Energy
Green Pricing Utility Programs by State - Data as of December 12, 2012
For States Comprising the CAISO, Northwest and Southwest Power Markets (Western Electric Coordinating Council)

<u>State</u>	<u>Utility Name</u>	<u>Program Name</u>	<u>Type</u>	<u>Start Date</u>	<u>Premium</u>	<u>\$/MWh</u>
WA	Clark Public Utilities	Green Lights	PV, wind	2002	1.5¢/kWh	15.00
WA	Cowlitz PUD	Renewable Resource Energy	wind, PV	2002	2.0¢/kWh	20.00
WA	Grant County PUD	Alternative Energy Resources Program	wind	2002	2.0¢/kWh	20.00
WA	Grays Harbor PUD	Green Power	wind	2002	3.0¢/kWh	30.00
WA	Lewis County PUD	Green Power Energy Rate	wind	2003	2.0¢/kWh	20.00
WA	Mason County PUD No. 3	Mason Evergreen Power	wind	2003	1.0¢/kWh	10.00
WA	Northern Wasco County PUD	Pure Power	wind	2007	2.5¢/kWh	25.00
WA	Orcas Power & Light	Go Green	wind, hydro	1999	3.5¢/kWh	35.00
WA	Pacific County PUD	Green Power	landfill gas	2002	1.05¢/kWh	10.50
WA	Pacificorp: Pacific Power	Blue Sky Block	wind	2000	1.95¢/kWh	19.50
WA	Peninsula Light	Green by Choice	wind, hydro, biogas	2002	2.0¢/kWh	20.00
WA	Puget Sound Energy	Green Power Program	wind, PV, biogas	2002	1.25¢/kWh	12.50
WA	Seattle City Light	Green Up	wind	2005	1.5¢/kWh	15.00
WA	Snohomish County Public Utility District	Planet Power	wind	2002	2.0¢/kWh	20.00
WA	Tacoma Power	EverGreen Options	wind	2000	1.2¢/kWh	12.00
WY	Basin Electric Power Cooperative: Powder River Energy	Prairie Winds	wind	2000	0.5¢/kWh	5.00
WY	Cheyenne Light, Fuel and Power Company/Bonneville Environmental Foundation	Renewable Premium Program	99% new wind, 1% new solar	2006	3.5¢/kWh	35.00
WY	Lower Valley Energy	Green Power	wind	2003	1.167¢/kWh	11.67
WY	Pacificorp: Pacific Power	Blue Sky	wind	2000	1.95¢/kWh	19.50
WY	Tri-State Generation & Transmission: Carbon Power & Light, Inc.	Renewable Resource Power Service	wind, hydro	2001	0.8¢/kWh	8.00
WY	Yampa Valley Electric Association	Wind Energy Program	wind	1999	0.6¢/kWh	6.00

Source: National Renewable Energy Laboratory, Golden, Colorado.
Notes: Utility green pricing programs may only be available to customers located in the utility's service territory.

Average Premium = \$18.15

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT B (REDACTED - PUBLIC VERSION)
2011 ERRRA PROJECTED RENEWABLE ENERGY**

BIO GAS/BIO MASS	Energy (MWh)	Cost (\$)	NQC (kW)
GRS Sycamore Landfill Plant			1,260
MM Prima Deshecha Energy LLC			3,500
MM San Diego LLC - Miramar Landfill			2,900
MM San Diego LLC - North City Bio Plant			200
Covanta Otay 1			1,450
Covanta Otay 3			2,700
San Diego MWD			2,200
GRS Coyote Canyon			5,640
Covanta Delano			33,000
Blue Lake			-
Subtotal			52,850

GEOHERMAL	Energy (MWh)	Cost (\$)	NQC (kW)
Calpine Geysers			25,000
Subtotal			25,000

OTHER	Energy (MWh)	Cost (\$)	NQC (kW)
Rancho Penasquitos			2,600
Subtotal			2,600

SOLAR	Energy (MWh)	Cost (\$)	NQC (kW)
Solar_Stirling			15,000
Subtotal			15,000

WIND	Energy (MWh)	Cost (\$)	NQC (kW)
Kumeyaay			6,500
Alta Mesa			4,800
Oasis Power Partners			7,230
PPM Energy			-
WTE Monecito			-
Subtotal			18,530
Total Non-REC			113,980

WIND TREC*	Energy (MWh)	Cost (\$)	NQC (kW)
Glacier Wind			-
Shell Energy			-
Total TREC*			-

** only includes cost of renewable attribute; does not include cost of energy*

Confidential/Privileged Materials; Review and Access Restricted Subject to PU Code Sections 454.5(g), 583, 2111, G.O. 66-C and the Confidentiality Agreement with the CPUC.

**SAN DIEGO GAS & ELECTRIC
ADVICE LETTER 2325-E
ATTACHMENT B (REDACTED - PUBLIC VERSION)
2012 ERRR PROJECTED RENEWABLE ENERGY**

BIO GAS/BIO MASS	Energy (MWh)	Cost (\$)	NQC (kW)
GRS Sycamore Landfill Plant			1,260
San Marcos Landfill			700
Sycamore Landfill			430
MM Prima Deshecha Energy LLC			3,500
MM San Diego LLC - Miramar Landfill			2,900
MM San Diego LLC - North City Bio Plant			200
Covanta Otay 1			1,450
Covanta Otay 3			2,700
San Diego MWD			2,200
GRS Coyote Canyon			5,640
Covanta Delano			33,000
Blue Lake			-
Subtotal			53,980

GEO THERMAL			
Calpine Geysers			25,000
Subtotal			25,000

OTHER			
Proposed Portfolio deals (TREC + energy)			-
Rancho Penasquitos			2,600
Subtotal			2,600

SOLAR			
NRG Borrego Solar			15,600
Subtotal			15,600

WIND			
Generic Wind contracts (under negotiation)			5,150
Coram Energy			900
Pacific Wind			18,200
Kumeyaay			6,500
Alta Mesa			4,800
Oasis Power Partners			7,230
PPM Energy			-
WTE Monecito			-
Subtotal			42,780
Total Non-REC			139,960

WIND TREC*			
Glacier Wind			-
RimRock			-
Generic TREC (under negotiation)			-
Total TREC*			-

** only includes cost of renewable attribute; does not include cost of energy*