BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least Cost Dispatch and Power Procurement Activities in 2011, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2011 and (iii) Costs Recorded in Related Regulatory Accounts in 2011

Application 12-06-xxx (Filed June 1, 2012)

APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF ERRA COMPLIANCE FOR 2011 AND RATE RECOVERY OF ERRA-RELATED ACCOUNTS

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COMPANY

June 1, 2012

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND	2
A.	SCOPE OF ERRA COMPLIANCE REVIEW	2
В.	ERRA	
C.	TCBA	
D.	MRTUMA	5
E.	IEMA	
III.	SUMMARY OF PREPARED TESTIMONY	7
IV.	REQUESTED RELIEF AND ISSUES TO BE CONSIDERED	8
V.	STATUTORY AND PROCEDURAL REQUIREMENTS	8
A.	Rule 2.1 (a) – (c)	8
1.	Rule 2.1 (a) - Legal Name	9
2.		9
3.		
a.		
b.		
c.		
d.	Proposed Schedule	10
В.	Rule 2.2 – Articles of Incorporation	10
C.	Rule 3.2 – Rate Increase Notice	11
1.	Rule 3.2 (a) (1) – balance sheet	11
2.	Rule 3.2 (a) (2) – statement of effective rates	11
3.		
4.		
5.	Rule 3.2 (a) (5) and (6) – summary of earnings	11
6.	Rule 3.2 (a) (7) – statement re tax depreciation	11
7.	Rule 3.2 (a) (8) – proxy statement	12
8.	Rule 3.2 (a) (10) – statement re pass through to customers	12
9.	Rule 3.2 (b) – notice to state, cities and counties	12
10		
11	1. Rule 3.2 (d) – bill insert notice	12
VI.	CONFIDENTIAL INFORMATION	13
VII.	SERVICE	13

VIII.	CONCLUSION	13
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I. INTRODUCTION

In compliance with California Public Utilities Code ("P.U. Code") Section 454.5, relevant Decisions ("D.") of the California Public Utilities Commission ("Commission" or "CPUC"), including, but not limited to, D.02-10-062, D.02-12-074, D.05-01-054, and D.05-04-036, and the Commission's Rules of Practice and Procedure, San Diego Gas & Electric Company ("SDG&E") hereby submits its Application for approval of: (i) contract administration, least cost dispatch and power procurement activities in 2011, (ii) costs related to those activities recorded to the Energy Resource Recovery Account ("ERRA") and Transition Cost Balancing Account ("TCBA") in 2011 and (iii) costs recorded in related regulatory accounts in 2011, including the Market Redesign and Technology Upgrade Memorandum Account ("MRTUMA") and Independent Evaluator Memorandum Account ("IEMA"). With respect to the ERRA, among other items, SDG&E is including for review entries for in-lieu gas franchise fees. As explained below and in more detail in the Direct Testimony of Ms. Amanda Jenison, these entries include costs and annual true-up entries for in-lieu gas franchise fees related to the Palomar Energy Center ("Palomar"), Miramar Energy Facility ("Miramar"), and the Otay Mesa Energy Center ("OMEC"). With respect to the MRTUMA and IEMA, SDG&E is requesting approval to increase its revenue requirement by \$2.9 million for recovery of the 2011 entries in these accounts.

Based on SDG&E's requested revenue requirement of \$2.9 million, if approved as proposed, a typical monthly summer electric bill (based on 500 kilowatt-hours ("kWh") of electricity) will increase from approximately \$81.32 to \$81.36 (or 0.05 percent) for inland customers and from approximately \$88.10 to \$88.17 (or 0.08 percent) for coastal customers. A typical monthly bill for residential customers who use 1,000 kWh per month will increase from approximately \$216.28 to \$216.58 (or 0.14 percent) for inland customers and from approximately \$224.98 to \$225.31 (or 0.15 percent) for coastal customers. SDG&E's small commercial customers will see an increase of approximately \$0.31 on their monthly summer electric bill (or 0.11 percent), based on 1,500 kWh of electricity for secondary service.

II. BACKGROUND

A. SCOPE OF ERRA COMPLIANCE REVIEW

The ERRA balancing account mechanism was established in D.02-10-062 to track fuel and purchased power billed revenues against actual recorded costs. That decision also required the electric utilities to establish a fuel and purchased power revenue requirement forecast, a trigger mechanism, and a schedule for semiannual ERRA proceedings. The first semiannual proceeding (the forecast application) consists of an application by the utility to establish annual fuel and purchased power forecasts for the upcoming 12 months. During the second semiannual proceeding, a compliance review of the utility's prior period energy resource contract administration, least cost dispatch, and ERRA balancing account is conducted.

In D.02-10-062, the Commission adopted minimum standards of conduct the utilities must follow in performing their procurement responsibilities. Standard of Conduct #4 ("SOC 4") describes the compliance review criteria for contract administration and economic dispatch of generation resources on which the utilities will be evaluated: "The utilities shall prudently administer all contracts and generation resources and dispatch the energy in a least cost manner. Our definitions of prudent contract administration and least cost dispatch are the same as our existing standard."²

The scope of compliance review described in D.02-10-062 and D.02-12-074 includes Commission review of utility retained electric generation ("URG") fuel expenses, contract administration, including administration of the California Department of Water Resources

¹ Customers' actual bill impacts will vary with usage per month, by season and by climate zone.

² D.02-10-062, Conclusion of Law 11.

("CDWR") contracts allocated to SDG&E in D.02-09-053, California Independent System Operator ("CAISO")-related costs, existing Qualified Facilities ("QF") contracts, other power purchase agreements (including renewable resource contracts) and economic dispatch of electric generation resources (including Miramar, Palomar, Desert Star Energy Center ["Desert Star"] and the San Onofre Nuclear Generating Station ["SONGS"]).

The Commission further stated in D.03-06-067 that in determining whether the utilities complied with the requirement to "dispose of economic long power and purchase economic short power in a manner that minimizes ratepayer costs," the Commission would examine "the prudence of each utility's decision to dispatch resources contained in the integrated CDWR-IOU portfolio and execute market transactions for economic purposes" Accordingly, the Commission's annual compliance review focuses on prudent contract administration, least cost dispatch and URG fuel procurement activities.

The appropriate scope and standard of review for these ERRA applications have also been addressed in D.05-04-036 and D.05-01-054. According to those decisions and pertinent to the scope of review of the utility's least cost dispatch obligation, the Commission will consider those decisions to dispatch the resources in the daily, hourly, and real-time markets. As for the standard of review of the utility's least cost dispatch, contract administration, and URG costs, the Commission reiterated in D.05-04-036 that its review is not a "reasonableness review," but is instead a "compliance review:"

We [the Commission] went on to state that the least cost dispatch review process is a compliance review, and that there are no ranges of possible outcomes. (D.05-01-054, pp. 13-14.) Instead, we stated in pertinent part that:

"The outcome or standard for review has been predetermined — that is the lowest cost. SCE must demonstrate that it has complied with this standard, by providing sufficient information and/or analysis in order for the Commission to verify that SCE's dispatch resulted in the most cost-effective mix of total resources, thereby minimizing the cost of delivering electric services. Based on analyses of SCE's showing and subsequent discovery, ORA or any other party may take the position that SCE did not fully comply with SOC 4. In such cases, we will judge the merits of the parties' positions and may impose disallowances and/or penalties.... This compliance

³ D.02-12-074 at 52-53.

⁴ D.03-06-067 at 10.

process encompasses much more than that characterized by ORA. Imposing a compliance process for least-cost dispatch under SOC 4, rather than a reasonableness review process, does not diminish our ability to ensure just and reasonable rates." (D.05-01-054, pp. 14-15.)⁵

In this same decision, the Commission goes on to say that:

D.05-01-054 did not adopt specific criteria for determining "what constitutes least-cost dispatch compliance or what the utility needs to provide to meet its burden to prove such compliance." (D.05-01-054, p. 15.) Instead, we stated that if ORA or another party can demonstrate that the utility "has not dispatched resources in a least-cost manner, the Commission will review that evidence and make appropriate adjustments for non-compliance." (D.05-01-054, p. 16.)⁶

Finally, the Commission stated that "if specific criteria for determining what constitutes least-cost dispatch compliance are needed, that such criteria "should be developed in a generic proceeding where all affected utilities, as well as interested parties, could participate. (D.05-01-054, p. 15.)"

B. ERRA

As noted above, the purpose of the ERRA is to provide full recovery of SDG&E's energy procurement costs associated with serving SDG&E's bundled service customers. Accordingly, SDG&E's ERRA revenue requirement includes specific recovery of CAISO energy and ancillary services load charges, contract costs, generation fuel costs, CAISO-related costs, hedging costs and previously approved equity rebalancing costs related to the financial statement consolidation of OMEC under Accounting Standards Codification 810 ("ASC 810"), formerly referred to as FASB Interpretation No. 46 (R) or "Fin 46 (R)". Pursuant to Section 5(d) of SDG&E's ERRA Tariff, the ERRA also includes "in lieu payments payable to communities where SDG&E-owned power plants are located pursuant to D.05-08-005 or other applicable Commission decisions." The ERRA also includes revenues from SDG&E's Electric Energy Commodity Cost ("EECC") rate schedule adjusted to exclude CDWR revenues for energy provided by CDWR to SDG&E

⁵ D.05-04-036 at 26 (emphasis added).

⁶ *Id.* at 27 (internal footnote omitted) (emphasis added).

^{&#}x27; *Id*. at fn. 13.

⁸ SDG&E Balancing Accounts: Energy Resource Recovery Account (ERRA) Tariff, Sections 1 ("Purpose") & 5 ("Accounting Procedures") (effective April 29, 2012) ("ERRA Tariff"); see also Advice Letter 1778-E; regarding equity rebalancing costs related to OMEC, see D.11-07-041, Ordering Paragraph 2.

customers and non-fuel generation revenues allocated to the Non-Fuel Generation Balancing Account ("NGBA").

On a monthly basis, the ERRA compares the energy procurement costs described above with the revenue from Schedule EECC (excluding CDWR and NGBA revenue). Interest is applied to any over or under collection balance at the three-month Commercial Paper rate. SDG&E's adopted ERRA tariff describes the entries that are made to the account on a monthly basis. SDG&E believes that the costs and expenses recorded to the ERRA are appropriate, correctly stated and recoverable in accordance with applicable Commission policy and decisions. The ERRA balance as of December 31, 2011 was a \$14.8 million overcollection.

C. TCBA

In D.06-12-019, the Commission determined that SDG&E's annual TCBA review should be included as part of the annual ERRA compliance review. The ERRA compliance review is the appropriate forum to review the TCBA because the costs that are recovered in the TCBA generally related to the above-market portion of certain QF and purchase power costs eligible for recovery under Assembly Bill ("AB") 1890. Specifically, the TCBA records the eligible above-market power costs and the revenues received from SDG&E's Competition Transition Charge ("CTC") rate. The TCBA balance as of December 31, 2011 was a \$9.1 undercollection.

D. MRTUMA

SDG&E filed Advice Letter 1867-E dated January 29, 2007 to request authority from the Commission to establish the MRTUMA to record costs associated with implementing the CAISO's Market Redesign Technology Upgrade ("MRTU") tariff. All market participants were required to comply with the CAISO's MRTU Tariff. The purpose of the MRTUMA is to record the incremental operation and maintenance and capital-related costs associated with implementing CAISO's MRTU tariff. Interest is applied to any over or under collection balance at the three-month Commercial Paper rate.

As explained in the Direct Testimony of Ms. Jenison, on June 1, 2011, SDG&E filed Application ("A.") 11-06-003 (ERRA Compliance Application for 2010) for, among other things, review and approval of its MRTU-related costs through December 31, 2010. A ruling issued on June 23, 2011 granted a motion to bifurcate and consolidate MRTU issues into a separate proceeding for 2010. As a result, Pacific Gas & Electric Company ("PG&E"), Southern

California Edison Company ("SCE") and SDG&E (collectively, the "Joint Utilities") filed joint application A.12-01-014 on January 31, 2012 for the adoption of electric revenue requirements and rates associated with the MRTU initiative. In that application, SDG&E requested Commission adoption of MRTU-related electric revenue requirement of \$1.6 million associated with cost undercollections recorded in 2010 in its MRTUMA, as originally presented in A.11-06-003. The Division of Ratepayer Advocates ("DRA"), the only intervening party to file comments, did not contest SDG&E's 2010 request for cost recovery, reasonableness review or to transfer the balance per the tariff disposition. As of this date, a final decision in A.12-01-014 has not been issued. However, the Joint Utilities did receive guidance from the Assigned Commissioner and Administrative Law Judge ("ALJ") at the MRTU Implementation Best Practices workshop, held on March 12, 2012 in A.12-01-014, to include SDG&E's 2011 MRTUMA cost recovery and reasonableness requests in its 2011 ERRA Compliance proceeding. Therefore, in this application, SDG&E's MRTU-related request is limited to 2011 activity. Specifically, SDG&E requests a reasonableness finding as to total MRTU-related costs and expenditures during the 2011 record period of \$2.839, as explained in Mr. Choi's Direct Testimony, and recovery of the net costs of \$2.312 million (incremental O&M and capital revenue requirement-related expenses) entered into the MRTUMA in 2011, as described in Ms. Jenison's Direct Testimony.

E. IEMA

In compliance with Senate Bill ("SB") 1078, D.03-06-071 and the requirements of Rulemaking ("R.") 01-10-024, SDG&E was required to implement Renewable Portfolio Standards ("RPS") programs. SDG&E's solicitations for the RPS programs required bidders to provide both turnkey or buyout options with purchase power agreements. In D.04-12-048, dated December 16, 2004, the Commission adopted a variety of safeguards and procedures that required the utilities to use independent evaluators if affiliated entities bid in a procurement solicitation or if the utility sought turnkey proposals. The Commission extended the requirement to use independent evaluators for SDG&E's RPS solicitations, in D.05-07-039 dated July 21, 2005.

The purpose of the IEMA is to record third party costs associated with the use of independent evaluators in the Utility's long-term procurement activities and RPS programs.

Interest is applied to any over or under collection balance at the three-month Commercial Paper

rate. The disposition of the IEMA, as approved in SDG&E's tariff, requires SDG&E to seek recovery of the balance in its ERRA proceeding. SDG&E believes that the costs and expenses recorded to the IEMA in 2011 were both accurate and reasonable. Accordingly, SDG&E requests recovery of the 2011 net costs entered into the IEMA of \$0.6 million undercollected.⁹

III. SUMMARY OF PREPARED TESTIMONY

In support of this Application, SDG&E provides the testimony of three witnesses. As SDG&E's testimony demonstrates, in 2011, SDG&E has fully complied with its Commission-approved electric procurement plans, ¹⁰ all relevant contract terms and conditions, SOC 4 and applicable Commission decisions. The testimony also shows the accuracy and reasonableness of SDG&E's 2011 ERRA, TCBA MRTUMA, and IEMA accounting entries. The testimony of SDG&E's witnesses, and the issues they address, are summarized below and incorporated by reference herein:

Mr. Tony Choi

Mr. Choi's testimony describes the various energy resources in SDG&E's electricity portfolio and addresses the manner in which SDG&E complied during the Record Period with its obligation to dispatch its energy portfolio in a least cost manner consistent with SDG&E's Commission-approved LTPP. As explained by Mr. Choi, for purposes of the Commission's review and the compliance findings requested herein, the relevant LTPP was approved in D.07-12-052 and Resolution E-4189.¹¹ This testimony also addresses SDG&E's 2011 MRTU-related O&M costs and capital expenditures..

Ms. Amanda Jenison

Ms. Jenison's testimony provides a description of the transactions and cost recovery for the 2011 entries to SDG&E's ERRA, TCBA, MRTUMA, and IEMA, as well as the basis for the requested disposition of those accounts. Ms. Jenison also describes SDG&E's

⁹ For the period prior to 2010, SDG&E sought approval for recovery of costs entered into the IEMA in last year's ERRA compliance Application (A.11-06-003). At the time of the instant Application, a decision in A.11-06-003 was still pending.

¹⁰ For purposes of the Commission's review and the compliance findings requested herein, the relevant Long-Term Procurement Plan ("LTPP") is SDG&E's 2006 LTPP, originally approved in D.07-12-052. The currently effective LTPP for the record period reflects updates which were approved in D.08-11-008 (effective November 6, 2008), and AL-2067-E (effective March 22, 2009).

¹¹ SDG&E's LTPP was subsequently modified in two Advice Letters ("AL"), AL 2061-E, and AL 2067-E in early 2009 both of which were approved by the Energy Division.

ERRA entries for in-lieu gas franchise fees. These entries include costs and annual trueup entries for in-lieu gas franchise fees related to the Palomar, Miramar, and OMEC. SDG&E seeks confirmation that its application of Commission-approved treatment of inlieu franchise fees for the Palomar plant is appropriate for the similarly-situated Miramar and OMEC facilities.

Ms. Sally Chen

Ms. Chen's testimony describes the expenses that were recorded to SDG&E's ERRA and TCBA accounts and explains the contract administration activities associated with SDG&E's power purchase agreements during 2011.

IV. REQUESTED RELIEF AND ISSUES TO BE CONSIDERED

The issues to be considered and the relief requested are contained in this Application, supporting testimony and related exhibits. In submitting this Application and supporting testimony, SDG&E demonstrates and requests express Commission findings that:

- during 2011, SDG&E prudently administered and dispatched its URG resources and portfolio of contracts, including SONGS, Miramar, Palomar, allocated CDWR contracts, power purchase agreements, QFs, non-QF resources, and renewable energy resources, in compliance with SDG&E's Commission-approved procurement plan;
- 2. all 2011 entries and costs recorded in SDG&E's ERRA (including in lieu gas franchise fees), TCBA, MRTUMA, and IEMA are appropriate and correctly stated;
- 3. rate recovery for 2011 costs entered in SDG&E's MRTUMA is authorized and SDG&E's other 2011 MRTU-related costs are reasonable;
- 4. rate recovery for 2011 costs entered in SDG&E's IEMA is authorized; and
- 5. confidential treatment of the unredacted versions of the testimony, as requested in the declarations accompanying the testimony, is appropriate and authorized.

V. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) - (c)

In accordance with Rule 2.1 (a) - (c) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.

1. Rule 2.1 (a) - Legal Name

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E's attorney in this matter is John A. Pacheco.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Jamie York
Regulatory Case Administrator
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, California 92123
Telephone: (858) 654-1739
Facsimile: (858) 654-1788
JYork@semprautilities.com

with copies to:

John A. Pacheco Attorney for: San Diego Gas & Electric Company 101 Ash Street San Diego, CA 92101-3017 Telephone: (619) 699-5130 Facsimile: (619) 699-5027 JPacheco@semprautilities.com

3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1 of the Commission's Rules of Practice and Procedure, SDG&E requests that this Application be categorized as ratesetting because the activities and costs that are the subject of this Application involve a review of costs that are included in customer rates and because SDG&E is seeking rate recovery for 2011 costs entered in SDG&E's MRTUMA and IEMA.

b. Need for Hearings

SDG&E does not believe that approval of this Application will require hearings. SDG&E has provided ample supporting testimony, analysis and documentation that provide the Commission with a sufficient record upon which to grant the relief requested.

c. Issues to be Considered

The issues to be considered are described in this Application and the accompanying testimony and exhibits (see Summary of Application and Summary of Testimony, above).

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	DATE
Application filed	June 1, 2012
Prehearing Conference	July 17, 2012
Intervener Testimony	August 7, 2012
Rebuttal Testimony	September 11, 2012
Hearings (if necessary)	October 11, 2012
Opening Briefs	October 25, 2012
Reply Briefs	November 6, 2012
ALJ Proposed Decision	December 6, 2012
Comments on Proposed Decision	December 16, 2012
Reply Comments	December 22, 2012
Commission Approval	January of 2013

B. Rule 2.2 – Articles of Incorporation

A copy of SDG&E's Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on August 31, 2009 in connection with SDG&E's Application No. 09-08-019, and is incorporated herein by reference.

C. Rule 3.2 – Rate Increase Notice

In accordance with Rule 3.2 (a) - (d) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.¹²

1. Rule 3.2 (a) (1) – balance sheet

SDG&E's financial statement, balance sheet and income statement for the twelve-month period ending December 31, 2011 are included with this Application as Attachment A.

2. Rule 3.2 (a) (2) – statement of effective rates

A statement of all of SDG&E's presently effective electric rates can be viewed electronically by accessing: http://www.sdge.com/regulatory/currentEffectiveTariffs.shtml. Attachment B to this Amendment provides the current table of contents from SDG&E's electric tariffs on file with the Commission.

3. Rule 3.2 (a) (3) – statement of proposed rate change

A statement of proposed increases is attached as Attachment C.

4. Rule 3.2 (a) (4) – description of property and equipment

A general description of SDG&E's property and equipment was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve for the twelvemonth period ending December 31, 2011 is attached as Attachment D.

5. Rule 3.2 (a) (5) and (6) – summary of earnings

A summary of SDG&E's earnings (for the total utility operations for the company) for twelve month period ending December 31, 2011, is included as Attachment E to this Amendment.

6. Rule 3.2 (a) (7) – statement re tax depreciation

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which

¹² Note Rule 3.2(a) (9) is not applicable to SDG&E.

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.

7. Rule 3.2 (a) (8) – proxy statement

A copy of SDG&E's most recent proxy statement, dated April 27, 2012, was mailed to the Commission on May 2, 2012 and is incorporated herein by reference.

8. Rule 3.2 (a) (10) – statement re pass through to customers

The rate increase reflected in this Amendment passes through to customers only increased costs to SDG&E for the services or commodities furnished by it.

9. Rule 3.2 (b) – notice to state, cities and counties

In compliance with Rule 3.2 (b) of the Commission's Rules of Practice and Procedure, SDG&E will, within ten days after the filing this Amendment, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in Attachment F to this Amendment.

10. Rule 3.2 (c) – newspaper publication

In compliance with Rule 3.2 (c) of the Commission's Rules of Practice and Procedure, SDG&E will, within ten days after the filing of this Amendment, publish in newspapers of general circulation in each county in its service territory notice of this Amendment.

11. Rule 3.2 (d) – bill insert notice

In compliance with Rule 3.2 (d) of the Commission's Rules of Practice and Procedure, SDG&E will, within 45 days after the filing of this Amendment, provide notice of this Amendment to all of its customers along with the regular bills sent to those customers that will generally describe the proposed rate changes addressed in this Amendment.

VI. CONFIDENTIAL INFORMATION

SDG&E is submitting the testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E's declarations of confidential treatment attached to the witnesses' testimony and submitted in conformance with D.06-06-066 and D.08-04-023. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E's electric procurement resources and strategies) that SDG&E witnesses must identify to support this Application.

VII. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application, testimony and related exhibits on parties to the service list for A.11-06-003 (last year's SDG&E ERRA compliance proceeding) and R.12-03-014 (OIR to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans). Hard copies will be sent by overnight mail to the Assigned ALJ in R.12-03-014 and Chief ALJ Karen Clopton.

VIII. CONCLUSION

WHEREFORE, SAN DIEGO GAS & ELECTRIC COMPANY requests that the Commission:

- (1) find that in 2011 SDG&E prudently administered its generation resources and portfolio of contracts and dispatched energy in a least cost manner, in compliance with SDG&E's Commission-approved procurement plan;
- (2) find that SDG&E's 2011 entries in its ERRA (including in-lieu gas franchise fees), TCBA, MRTUMA, and IEMA were accurate and reasonable;
- (3) grant authority to increase rates by approving cost recovery of 2011 amounts entered in SDG&E's MRTUMA and approve as reasonable SDG&E's other MRTU-related costs incurred in 2011;
- (4) grant authority to increase rates by approving cost recovery of 2011 amounts entered in SDG&E's IEMA; and
 - (5) grant such additional relief as the Commission believes is just and reasonable.

SDG&E is ready to proceed with its showing in this Application.

Respectfully submitted,

By: /s/ John A. Pacheco

John A. Pacheco

Attorney for:

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SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Robert M. Schlax
Robert M. Schlax
San Diego Gas & Electric Company
Southern California Gas Company
Vice President – Controller and Chief Financial Officer

DATED at San Diego, California, this 1st day of June 2012

OFFICER VERIFICATION

OFFICER VERIFICATION

Robert M. Schlax declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF ERRA COMPLIANCE FOR 2011 AND RATE RECOVERY OF ERRARELATED ACCOUNTS are true to my own knowledge, except as to matters which are therein

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

stated on information and belief, and as to those matters, I believe them to be true.

Executed on May 25, 2012 at San Diego, California.

/s/ Robert M. Schlax
Robert M. Schlax
San Diego Gas & Electric Company
Southern California Gas Company
Vice President-Controller and Chief Financial Officer

Attachment A

SAN DIEGO GAS & ELECTRIC COMPANY FINANCIAL STATEMENT **DECEMBER 31, 2011**

(a)	Amounts and Kinds of Stock Authorized: Preferred Stock Preferred Stock Preferred Stock Common Stock	1,375,000 10,000,000 Amount of shares 255,000,000	shares not specified	Par Value \$27,500,000 Without Par Value \$80,000,000 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

Terms of Preferred Stock:
Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009, 06-05-015 and 10-10-023 to which references are hereby made.

(c)

Brief Description of Mortgage:
Full information as to this item is given in Application Nos. 08-07-029 and 10-10-023 to which references are hereby made.

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

Number and Amount of Bonds Aut	Nominal	- Par Value		
	Date of	Authorized		Interest Paid
First Mortgage Bonds:	Issue	and Issued	Outstanding	in 2011
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	2,562,373
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,349,999
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,249
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,409,999
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,936
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	134,561
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	324,863
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-15-10	500,000,000	500,000,000	21,812,500
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	0
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	0
Unsecured Bonds:				
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
4.5 /0 CV3/A, uue 2023	10-31-31	20,000,000	23,000,000	1,220,000

SAN DIEGO GAS & ELECTRIC COMPANY FINANCIAL STATEMENT **DECEMBER 31, 2011**

	Date of	Date of	Interest		Interest Paid
Other Indebtedness:	<u>Issue</u>	<u>Maturity</u>	<u>Rate</u>	Outstanding	<u>2011</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$0

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

	Shares Dividends Declared						
Preferred Stock	Outstanding 12-31-11	2007	2008	2009	2010	2011	
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	969,375	242,344	0	0	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	
	3,413,770	\$5,789,043	\$5,062,012 [1]	\$4,819,668	\$4,819,668	\$4,819,668	

Common Stock Dividend to Parent

\$150,000,000 [2] \$0 \$0

A balance sheet and a statement of income and retained earnings of Applicant for the twelve months ended December 31, 2011 are attached hereto.

^[1] Includes \$242,344 of interest expense related to redeemable preferred stock. [2] San Diego Gas & Electric Company dividend to parent.

SAN DIEGO GAS & ELECTRIC COMPANY BALANCE SHEET ASSETS AND OTHER DEBITS DECEMBER 31, 2011

	1. UTILITY PLANT	2011
101 102 105 106	UTILITY PLANT IN SERVICE UTILITY PLANT PURCHASED OR SOLD PLANT HELD FOR FUTURE USE	\$11,473,464,003 23,628 72,657,994
107 108 111 118	COMPLETED CONSTRUCTION NOT CLASSIFIED CONSTRUCTION WORK IN PROGRESS ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT OTHER UTILITY PLANT	1,881,155,766 (4,668,702,166) (207,174,288) 686,452,522
119 120	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT NUCLEAR FUEL - NET	(180,442,429) 85,150,655
	TOTAL NET UTILITY PLANT	9,142,585,685
	2. OTHER PROPERTY AND INVESTMENTS	
121 122	NONUTILITY PROPERTY ACCUMULATED PROVISION FOR DEPRECIATION AND	5,134,697
123 124	AMORTIZATION OF NONUTILITY PROPERTY INVESTMENTS IN SUBSIDIARY COMPANIES OTHER INVESTMENTS	(563,398)
125 128	SINKING FUNDS OTHER SPECIAL FUNDS	804,052,604
	TOTAL OTHER PROPERTY AND INVESTMENTS	808,623,903

SAN DIEGO GAS & ELECTRIC COMPANY BALANCE SHEET ASSETS AND OTHER DEBITS DECEMBER 31, 2011

	3. CURRENT AND ACCRUED ASSETS	0044
	-	2011
131	CASH	2,559,656
132 134 135	INTEREST SPECIAL DEPOSITS OTHER SPECIAL DEPOSITS WORKING FUNDS	13,884,234 500
136 141	TEMPORARY CASH INVESTMENTS NOTES RECEIVABLE	14,000,000
142	CUSTOMER ACCOUNTS RECEIVABLE	201,962,791
143 144 145	OTHER ACCOUNTS RECEIVABLE ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	23,148,423 (3,606,250)
146 151	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES FUEL STOCK	64,640,130 6,113,859
152 154	FUEL STOCK EXPENSE UNDISTRIBUTED PLANT MATERIALS AND OPERATING SUPPLIES	73,377,571
156 163	OTHER MATERIALS AND SUPPLIES STORES EXPENSE UNDISTRIBUTED	5,945
164	GAS STORED	311,252
165 171	PREPAYMENTS INTEREST AND DIVIDENDS RECEIVABLE	136,953,363 4,038,243
173	ACCRUED UTILITY REVENUES	60,831,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	13,430,767
175	DERIVATIVE INSTRUMENT ASSETS	33,398,839
	TOTAL CURRENT AND ACCRUED ASSETS	645,050,331
	4. DEFERRED DEBITS	
181	UNAMORTIZED DEBT EXPENSE	33,297,650
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,346,413,370
183 184	PRELIMINARY SURVEY & INVESTIGATION CHARGES CLEARING ACCOUNTS	4,546,570 330,310
185 186 188	TEMPORARY FACILITIES MISCELLANEOUS DEFERRED DEBITS RESEARCH AND DEVELOPMENT	22,249,416
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	19,627,244
190	ACCUMULATED DEFERRED INCOME TAXES	212,020,753
	TOTAL DEFERRED DEBITS	2,638,485,313
	TOTAL ASSETS AND OTHER DEBITS	13,234,745,232

SAN DIEGO GAS & ELECTRIC COMPANY BALANCE SHEET LIABILITIES AND OTHER CREDITS DECEMBER 31, 2011

	5. PROPRIETARY CAPITAL					
		2011				
201 204 207 210	COMMON STOCK ISSUED PREFERRED STOCK ISSUED PREMIUM ON CAPITAL STOCK GAIN ON RETIRED CAPITAL STOCK	(\$291,458,395) (78,475,400) (592,222,753)				
210 211 214 216 219	MISCELLANEOUS PAID-IN CAPITAL CAPITAL STOCK	(479,672,485) 25,688,571 (2,412,437,103)				
219	ACCOMOLATED OTHER COMPREHENSIVE INCOME	10,484,701				
	TOTAL PROPRIETARY CAPITAL	(3,818,092,864)				
	6. LONG-TERM DEBT					
221	BONDS	(3,286,905,000)				
223 224	ADVANCES FROM ASSOCIATED COMPANIES OTHER LONG-TERM DEBT UNAMORTIZED PREMIUM ON LONG-TERM DEBT UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(253,720,000)				
225 226		- 11,024,429				
	TOTAL LONG-TERM DEBT	(3,529,600,571)				
	7. OTHER NONCURRENT LIABILITIES					
228.3	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT ACCUMULATED PROVISION FOR INJURIES AND DAMAGES ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(702,255,240) (51,806,170) (350,773,481)				
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS ASSET RETIREMENT OBLIGATIONS	(696,986,890)				
	TOTAL OTHER NONCURRENT LIABILITIES	(1,801,821,781)				

SAN DIEGO GAS & ELECTRIC COMPANY BALANCE SHEET LIABILITIES AND OTHER CREDITS DECEMBER 31, 2011

	8. CURRENT AND ACCRUED LIABILITES	2011
231 232 233 234 235 236 237 238 241 242 243 244 245	NOTES PAYABLE ACCOUNTS PAYABLE NOTES PAYABLE TO ASSOCIATED COMPANIES ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES CUSTOMER DEPOSITS TAXES ACCRUED INTEREST ACCRUED DIVIDENDS DECLARED TAX COLLECTIONS PAYABLE MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES OBLIGATIONS UNDER CAPITAL LEASES - CURRENT DERIVATIVE INSTRUMENT LIABILITIES DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	(404,688,334) - (14,213,562) (61,588,110) (1,533,340) (38,983,651) (1,204,917) (4,689,426) (748,127,176) (35,165,036) (217,397,394)
	TOTAL CURRENT AND ACCRUED LIABILITIES	(1,527,590,946)
	9. DEFERRED CREDITS	
252 253 254 255 257 281 282 283	CUSTOMER ADVANCES FOR CONSTRUCTION OTHER DEFERRED CREDITS OTHER REGULATORY LIABILITIES ACCUMULATED DEFERRED INVESTMENT TAX CREDITS UNAMORTIZED GAIN ON REACQUIRED DEBT ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED ACCUMULATED DEFERRED INCOME TAXES - PROPERTY ACCUMULATED DEFERRED INCOME TAXES - OTHER	(15,219,412) (144,677,073) (943,419,991) (25,802,894) - (5,201,256) (1,082,826,482) (340,491,962)
	TOTAL DEFERRED CREDITS	(2,557,639,070)
	TOTAL LIABILITIES AND OTHER CREDITS	(\$13,234,745,232)

SAN DIEGO GAS & ELECTRIC COMPANY STATEMENT OF INCOME AND RETAINED EARNINGS TWELVE MONTHS ENDED DECEMBER 31, 2011

1. UTILITY OPERATING INCOME

400 401 402 403-7 408.1 409.1 410.1 411.1 411.4 411.6	OPERATING REVENUES OPERATING EXPENSES MAINTENANCE EXPENSES DEPRECIATION AND AMORTIZATION EXPENSES TAXES OTHER THAN INCOME TAXES INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES - CREDIT INVESTMENT TAX CREDIT ADJUSTMENTS GAIN FROM DISPOSITION OF UTILITY PLANT TOTAL OPERATING REVENUE DEDUCTIONS NET OPERATING INCOME	\$2,548,420,220 169,100,350 400,326,063 78,842,822 11,668,040 436,912,279 (161,242,554) 777,249 (104,354)	\$3,920,072,346 3,484,700,115 435,372,231
	2. OTHER INCOME AND DEDUCTIONS		, ,
415 417.1 418 418.1 419 419.1 421.1 421.1	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK EXPENSES OF NONUTILITY OPERATIONS NONOPERATING RENTAL INCOME EQUITY IN EARNINGS OF SUBSIDIARIES INTEREST AND DIVIDEND INCOME ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION MISCELLANEOUS NONOPERATING INCOME GAIN ON DISPOSITION OF PROPERTY TOTAL OTHER INCOME LOSS ON DISPOSITION OF PROPERTY MISCELLANEOUS OTHER INCOME DEDUCTIONS TOTAL OTHER INCOME DEDUCTIONS TOTAL OTHER INCOME DEDUCTIONS TAXES OTHER THAN INCOME TAXES	(35,466) 425,858 - 3,105,382 79,674,257 1,434,240 289,569 84,893,840 - 2,726,802 2,726,802 503,107 (64,618,213)	
409.2 410.2 411.2	INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(64,618,213) 13,349,882 0	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	(50,765,224)	
	TOTAL OTHER INCOME AND DEDUCTIONS	-	132,932,262
	INCOME BEFORE INTEREST CHARGES NET INTEREST CHARGES*	_	568,304,493 132,203,104
	NET INCOME	=	\$436,101,389

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

SAN DIEGO GAS & ELECTRIC COMPANY STATEMENT OF INCOME AND RETAINED EARNINGS TWELVE MONTHS ENDED DECEMBER 31, 2011

3. RETAINED EARNINGS	
RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$1,981,155,383
NET INCOME (FROM PRECEDING PAGE)	436,101,389
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(4,819,669)
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	\$2,412,437,103

Attachment B



Revised

Cal. P.U.C. Sheet No.

22908-E

Τ

San Diego, California

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

Cal. P.U.C. Sheet No.

22905-E Sheet 1

TABLE OF CONTENTS

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

TITLE PAGE	16015-E	Ξ
TABLE OF CONTENTS	22908, 22850, 22823, 22897, 22909, 22906, 22828-E	Ξ
	22738, 22892, 22893, 22732, 22866, 19529-E	Ξ
PRELIMINARY STATEMENT:		
I. General Information	8274, 18225, 22140-E	Ξ
II. Balancing Accounts		
Description/Listing of Accounts	19402, 20706-E	Ξ
California Alternate Rates for Energy (CARE) Balancing		
Account	21639, 21640-E	
Rewards and Penalties Balancing Account (RPBA)	21643, 22802-E	
Transition Cost Balancing Account (TCBA)	22803, 19411, 22804, 22805, 19414-E	Ξ
Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA)	40445 40440 5	_
Research, Development and Demonstration (RD&D)	19415, 19416-E	=
Balancing Account	19417, 19418-E	=
Renewables Balancing Account (RBA)	19417, 19410-E	
Tree Trimming Balancing Account (TTBA)	19421, 19422-E	
Baseline Balancing Account (BBA)	21377, 19424-E	
El Paso Turned-Back Capacity Balancing Account	,	_
(EPTCBA)	19425-E	Ξ
Energy Resource Recovery Account (ERRA)	22806, 22807, 22808, 22809, 22400-E	Ξ
Low-Income Energy Efficiency Balancing Account		
(LIEEBA)	19431, 19432-E	
Non-Fuel Generation Balancing Account (NGBA)	21484, 22081, 22810, 21487-E	Ξ
Electric Procurement Energy Efficiency Balancing		_
Account (EPEEBA)	19438-E	
Common Area Balancing Account (CABA)	19439-E	=
Nuclear Decommissioning Adjustment Mechanism (NDAM)	22811-E	=
Pension Balancing Account (PBA)	19441, 19442-E	
Post-Retirement Benefits Other Than Pensions	10771, 10712	-
Balancing Account (PBOPBA)	19443, 19444-E	=
Community Choice Aggregation Implementation		
Balancing Account (CCAIBA)	19445-E	Ξ

(Continued)

1C9 Advice Ltr. No. 2366-E Decision No. 12-04-045

Issued by Lee Schavrien Senior Vice President Date Filed May 30, 2012 Effective May 30, 2012

Resolution No.



Advice Ltr. No.

Decision No.

2342-E

Revised
Diego Gas & Electric Company

Cal. P.U.C. Sheet No.

22819-E

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

22643-E

Sheet 2 TABLE OF CONTENTS Balancing Accounts (Continued) Т Electric Distribution Fixed Cost Account (EDFCA)..... 22812, 22813, 2116-E Rate Design Settlement Component Account (RDSCA)..... 19448-E California Solar Initiative Balancing Account (CSIBA)...... 21843, 21844, 21845-E SONGS O&M Balancing Account (SONGSBA)..... 21130-E Solar Energy Project Balancing Account (SEPBA)..... 22078-E Electric Program Investment Charge Balancing Account (EPICBA)..... 22640, 22641-E III. Memorandum Accounts Description/Listing of Accounts 19451, 22510-E 19453, 19454, 22814-E Catastrophic Event Memorandum Account (CEMA)...... Generation Divestiture Transaction Costs Memorandum Account (GDTCMA)..... 19458-E Streamlining Residual Account (SRA)..... 20137, 20138-E Nuclear Claims Memorandum Account (NCMA)..... 19465-E Electric Meter Pilot Memorandum Account (EMPMA)...... 19467-E Interruptible Load and Rotating Outage Programs Memorandum Account (ILROPMA)..... 19469, 19470, 19471-E Real-Time Energy Metering Memorandum Account (RTEMMA)... 19472-E Net Energy Metering Memorandum Account (NEMMA)...... 19473-E Residential Demand Responsiveness Program Memorandum Account (RDRPMA)..... 19475, 19476-E Self-Generation Program Memorandum Account (SGPMA)..... 19530, 19531-E Bond Payment Memorandum Account (BPMA)..... 19481-E Direct Access Cost Responsibility Surcharge Memorandum Account (DACRSMA)..... 19576, 19577, 19578-E Electric Energy Transaction Administration Memorandum Account (EETAMA)..... 19484-E Advanced Metering and Demand Response Memorandum T Account (AMDRMA)..... 22815, 20873, 20874, 22816, 22817-E Distributed Generation Implementation Cost Memorandum Account (DGICMA)..... 19490-E Annual Earnings Assessment Proceeding Memorandum Account (AEAPMA)..... 19491-E Procurement Transaction Auditing Memorandum Account (PTAMA)..... 19492-E Reliability Costs Memorandum Account (RCMA)..... 19493-E (Continued) 2C6 Date Filed Mar 30, 2012 Issued by

Lee Schavrien

Senior Vice President

Effective

Resolution No.

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Apr 29, 2012



Decision No.

Revised Cal. P.U.C. Sheet No.

22850-E

TABLE	OF CONTENT	S	Sheet 3
III. Memorandum Accounts (Continued)			
Market Redesign Technology Upgrade Memorandu			
Account (MRTUMA)			22549-E
Gain/Loss On Sale Memorandum Account (GLOS)			20157-E
Non-Residential Submetering Memorandum Accou (NRSMA)			20474-E
Long Term Procurement Plan Technical Assistance Memorandum Account (LTAMA)			20640-E
Fire Hazard Prevention Memorandum Account (FH	IPMA)		21344, 21345-E
Wildfire Expense Memorandum Account (WEMA)			21959-E
Critical Peak Pricing Small Customer Memorandum (SPPSMA)			21400-E
Smart Grid Memorandum Account (SGMA)			21478-E
Disconnect Memorandum Account (DMA)			22210-E
General Rate Case Memorandum Account (GRCM	•		22510-E
El Dorado Transition Cost Memorandum Account (•		22408-E
Smart Meter Opt-Out Memorandum Account (SMO	MA)		22820, 22821-E
2012- 2014 Energy Savings Assistance Programs Memorandum Account (ESAPMA)			22554-E
Sutter Energy Center Memorandum Account (SECN	/IA)		22847, 22848-E
Cuyamaca Peak Energy Plant Memorandum Accou (CPCPMA)			22620-E
IV. Electric Distribution and Gas Performance	20736	5, 21378, 20738, 20739, 207	740, 20741, 20742-E
		20743, 207	744, 20745, 20746-E
V. SONGS 2&3 Procedures			17006, 17007-E
VI. Miscellaneous			
Listing of Accounts			20158-E
Income Tax Component of Contributions and Adva Provision (ITCCAP)		225	694, 19501, 19502-E
Hazardous Substance Cleanup Cost Account (HSCCA	۸)	19503, 19504, 21291, 195	506, 19507, 19508-E
		19509, 19510, 195	511, 19512, 19513-E
Competition Transition Charge Responsibility (CTCR)			19514-E
Public Purpose Programs Adjustment Mechanism (PPPAM)			20610, 19516-E
Gain/Loss On Sale Mechanism (GLOSM)		20159, 20160, 20 ⁻	161,20162, 20163-E
VII. Cost of Capital Mechanism (CCM)			20697-E
INDEX OF RATE AREA MAPS			
Map 1 - Territory Served			15228-E
Map 1-A - Territory Served			4916-E
Map 1-B - Territory Served			7295-E
Map 1-C - Territory Served			9135-E
			9136-E
	(Continued)		
C6	Issued by	Date Filed	May 4, 20
dvice Ltr. No. 2354-E	ee Schavrien	Effective	May 25, 20

Regulatory Affairs

Resolution No.



Revised

Cal. P.U.C. Sheet No.

22897-E

Canceling Revised

Cal. P.U.C. Sheet No.

22891-E

TABLE OF CONTENTS

Sheet 4

SCHEDULE OF RATES

SCHEDULE		_	
NUMBER	<u>SERVICE</u>	CAL. P.U.C. SHEET NO.	
	Residential Rates		
DR	Domestic Service	22740, 22651, 19944, 21402-E	
DR-TOU	Domestic Time-of-Use Service	22741, 22742, 21535, 21536, 21537-E	
DR-SES	Domestic Households with a Solar Energy System	22743, 22146, 21539, 20482-E	
E-CARE	California Alternate Rates for Energy	22655, 22867, 22868, 19373, 19374-E	
DM	Multi-Family Service	22744, 22062, 21409, 21410, 19706-E	
DS	Submetered Multi-Family Service	22745, 22150, 13674, 21412, 21413-E 18237, 19707-E	
DT	Submetered Multi-Family Service Mobilehome Park	22746, 22659, 14020, 21415, 18312-E 21416, 18239, 14897-E	
DT-RV	Submetered Service – Recreational Vehicle Parks and Residential Marinas	22747, 22661, 13686, 21418, 21419-E 19708, 14900-E	
EV-TOU	Domestic Time-of-Use for Electric Vehicle Charging	22748, 19929, 21424-E	
EV-TOU-2	Domestic Time-of-Use for Households With Electric Vehicles	22749, 19930, 18242, 21426-E	
DE	Domestic Service to Utility Employee	10777.1-E	
FERA	Family Electric Rate Assistance	22335, 19713-E	
EPEV-X	Experimental Electric Plug-In Vehicle Rate – Low Ratio	22750, 22116, 22117-E	
EPEV-Y	Experimental Electric Plug-In Vehicle Rate – Med Ratio	22751, 22119, 22120-E	
EPEV-Z E-SMOP	Experimental Electric Plug-In Vehicle Rate – High Ratio Electric Smart Meter Opt-Out Program	22752, 22122, 22123-E 22894, 22895-E	N
	Commercial/Industrial Rates		
Α	General Service	22753, 20496, 21429, 19985-E	
A-TC	Traffic Control Service	22754, 20498, 21430-E	
AD	General Service - Demand Metered	22755, 20500, 21431-E	
A-TOU	General Service - Small - Time Metered	22756, 20502, 20503, 21433-E	
AL-TOU	General Service - Time Metered	20825, 22757, 22672, 20507, 20508-E 21434, 20509-E	
AY-TOU	General Service – Time Metered – Optional	22673, 22758, 20518, 21436-E	
A6-TOU	General Service - Time Metered	22759, 22676, 19936, 20521, 21437-E	
DG-R	Distributed Generation Renewable – Time Metered	21438, 22760, 22761, 20525, 20977, 20978-E, 20979-E	

(Continued)

4C5 Advice Ltr. No. 2348-E-A Decision No. D.12-04-019

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Cal. P.U.C. Sheet No.

22909-E

Canceling Revised

Cal. P.U.C. Sheet No.

22788-E Sheet 5

TABLE OF CONTENTS

CHEDULE N	O. <u>SERVICE</u> Lighting Rates	AL. P.U.C. SHEET NO.
LS-1	Lighting - Street and Highway -	22762, 22763, 22761, 12626, 12627, 12628- 21439-
LS-2	Utility-Owned Installations Lighting - Street and Highway –	22765, 22766, 22767, 22768, 22769, 22362-
LS-3	Customer-Owned Installations Lighting - Street and Highway -	22363, 22364-
L3-3	Customer-Owned Installations	22770, 14943, 21441-
OL-1 OL-2	Outdoor Area Lighting Service	22771, 20280, 21442-
OL-Z	Outdoor Area Lighting Service Metered – Customer- Owned Installation	22772, 21444, 21445-
DL-TOU	Outdoor Lighting – Time Metered	22773, 21447, 21448, 21449-
DWL	Residential Walkway Lighting Miscellaneous	22691, 21450-
PA	Power – Agricultural	22774, 20539, 21451-
PA-T-1	Power – Agricultural – Optional Time-of-Use	22693, 22775, 20542, 20543, 21385, 21452-
S S-I	Standby ServiceStandby Service – Interruptible	22776, 18256, 21453- 17678, 6085, 6317-
SE	Service Establishment Charge	18651, 11594-
DA	Transportation of Electric Power for	17679, 14953, 14954, 21894, 15111, 16976-
NDA	Direct Access Customers	21454, 21895-
	UDC Meter Services for Non-Direct Access Customers	17892, 11850, 11851, 21455, 16427
E-Depart BIP	Departing Load Nonbypassable ND & PPP Charges. Base Interruptible Program	18385-E, 18386- 21944, 21945, 20315, 20545-
DBMC	Optional Binding Mandatory Curtailment Plan	14625, 15198, 14627, 21948, 21949 21950
		21951-
SLRP RBRP	Scheduled Load Reduction Program Rolling Blackout Reduction Program	14584, 14675, 15203, 14587, 18367- 18259, 18260, 20546, 18262-
DBP	Demand Bidding Program	19833, 19834, 19835, 19836, 19162-
NEM	Net Energy Metering	21362, 21363, 21364, 22493, 21366, 22494-
NEM-BIO	Net Energy Metering Service for Biogas Customer-	22495, 22496, 22497, 22498-
INCIVI-DIO	Generators	20448, 20449, 20450, 20451, 20452, 20453
NEM-FC E-PUC	Net Energy Metering for Fuel Cell Customer-Generators Surcharge to Fund Public Utilities Commission	21610,20455,20456,20457, 20458-
L-1 0C	Reimbursement Fee	15214-
DWR-BC	Department of Water Resources Bond Charge	24942 22456 24944 24945
DA-CRS CGDL-CRS	Direct Access Cost Responsibility Surcharge Customer Generation Departing Load Cost Responsibility	21812, 22456, 21814, 21815-
004	Surcharge	19581, 19582, 18583, 18584, 18391-
CCA	Transportation of Electric Power, For Community Choice Aggregation Customers	17894, 17895, 17896, 17897
CCA-CRS	Community Choice Aggregation Cost Responsibility	
CCA-INFO	SurchargeInformation Release to Community Choice	21816, 21817-
CDD	Providers	22783, 17858, 22784, 17860-
CBP	Capacity Bidding Program	21952, 21178, 21953, 19649, 21954, 22907 21179, 21180,21181, 21956, 19656,19657
UM	Unmetered Electric Service	22777,19337,19338

 (Continued)

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Cal. P.U.C. Sheet No.

22782-E Sheet 6

TABLE OF CONTENTS

SCHEDULE OF RATES

SCHEDULE <u>NUMBER</u>	<u>SERVICE</u>	CAL. P.U.C. SHEET NO
	<u>Miscellaneous</u>	
WATER	Water Agency Tariff for Eligible Renewables	20287,19337,19338-E 20429,20430-E
PTR CRE VNM-A	Peak Time Rebate Customer Renewable Energy Virtual Net Metering for Multi-Family Affordable	22301, 20551, 22302, 20553-E 20882, 20883-E
PLP	HousingParticipating Load Pilot	22385, 22402, 22403, 22404, 22405-E 21257, 21258, 21259, 21260, 21261-E 21262, 21263, 21264-E
ECO SPSS	Energy Credit OptionStation Power Self Supply	21280, 21281, 21282, 21283-E 21625, 21626, 21627, 21628-E
DRWMP	Demand Response Wholesale Market Pilot	22031, 22032, 22033, 22034, 22035-E 22036, 22037, 22038, 22039, 22040-E
CHP	Combined Heat and Power	22625, 22626-E
EECC	Electric Energy Commodity Cost	22697, 22778,22699 22700, 22701-E 22702, 22703, 22704, 22705, 20563-E 20564,20565-E
EECC-TBS	Electric Energy Commodity Cost – Transitional Bundled Service	22903, 22904, 16432, 19750-E
EECC-CPP-E	Electric Energy Commodity Cost – Critical Peak Pricing Emergency	22706, 22707, 21007, 20575, 20576-E
EECC-CPP-D	Electric Energy Commodity Cost – Critical Peak Pricing Default	22708, 22709, 20579, 20580, 20581-E 20582, 20583-E
LIST OF CONTR	ACTS AND DEVIATIONS	14296, 5488, 5489, 6205, 6206, 5492-E 16311, 22320, 5495, 6208, 6209, 8845-E 6109, 5902, 5750, 8808, 8809, 6011-E 8001, 8891, 22019, 22533-E

(Continued)

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Revised Cal. P.U.C. Sheet No.

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

22796-E Sheet 7

TABLE OF CONTENTS

RULES

27.2 28 29	Community Choice Aggregation Open Season Provision of Utility Right-of-Way Information. Third-Party Marketers for BIP	19091, 19092, 20466, 2046 14167, 14168, 14169, 14170, 1417 19190, 19191, 19192, 19848, 19194, 19195, 19196, 1919	7-E 1-E
25.2 27	Direct Access Service for Qualified Nonprofit Charitable Organizations Community Choice Aggregation	1981; 19763-19770, 20299, 21898, 19773-76, 21899, 21900, 218 19780, 19781, 22824, 22825, 19784-91, 20300, 22826,19794-95	901 8-E 1
25.1	Switching Exemptions	21679, 21680, 21681, 21682-21693,10915, 20294, 20294 10918-10920, 20296, 10922-10924, 20297, 20298, 10927-11930 21694, 22644, 22727, 22646, 21698, 21699, 21700, 22720 21702, 21703, 21704	5-E)-E 8-E 4-E
23 25	Competition Transition Charge Responsibility Direct Access Rules	19052, 15189, 15190, 15191, 15192, 15123, 10623, 10624 10625, 12720, 12721, 12722, 12723, 12724 10526, 21668, 21669, 21670-21675, 21676, 21677, 21676	4-E
21.1 22	Final Standard Offer 4 Qualifying Facilities Special Service Charges	7966 to 7986, 798 8713, 871	- 1
21	Electric Facilities	17283, 17284, 17285, 17286, 17287, 17288, 19108, 19109, 17291, 19600, 19111, 19112, 19113, 19114, 19115, 19110, 17299, 17300, 17301, 19601, 17303, 17304, 17305, 17300, 17307, 18699, 17309, 17310, 17311, 17312, 17313, 17314, 17315, 17316, 17317, 17318, 17319, 17320, 17321, 17322 & 23	2-E 9-E 6-E 6-E 4-E 3-E
18 19 20	Meter Tests and Adjustment of Bills	16585, 22130, 2213 18457, 18458,, 20925, 2251	1-E
16	Service Extensions	17074, 17075, 17076, 22238, 22239, 2042 11233, 22794, 10501, 11235, 11236, 1323 11238, 11239, 11240, 19051, 11242, 11243-E, 11244, 1124	8-E
13 14 15	Temporary Service	1904: 479- 19050, 11221, 11222, 22237, 13202, 13203, 20417, 1277	4-E 7-E
12	Rates and Optional Rates	1576:	
9 10 11	Disputed Bills	15695, 9112, 16598, 13231, 16599, 16094, 18981, 19975, 1904 1904 22212, 19691, 19692, 19693, 19694, 19695, 19696,19697,2279	8-E
6 7 8	Establishment & Re-establishment of Credit Deposits Notices	15481, 2212i 22315, 665; 1740	8-E 2-E
3 4 5	Applications for Service Contracts Special Information Available for Customers	15599, 15600, 15601, 15602, 15603,2041 15484, 15489 15488, 15489, 15490 14157, 11452, 5925, 8797, 6490	5-E 0-E
1 2	JLE NO. SERVICE Definitions Description of Service	CAL. P.U.C. SHEET NO. 19043, 19044, 21386, 20288, 18867, 17687, 14852, 1518 14854, 18972, 21239, 18268, 20289, 1827 15591, 15592, 15593, 15594, 15595, 15596, 15597, 15593	0-E 8-E

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Cal. P.U.C. Sheet No.

20424-E Sheet 8

TABLE OF CONTENTS

SAMPLE FORMS

Form No.	<u>Date</u>	Applications, Agreements & Contracts	Cal. P.U.C. <u>Sheet No.</u>
101-663A	10-68	Agreement - Bills/Deposits	2497-E
101-4152G	6-69	Sign Up Notice for Service.	1768-E
106-1202	6-96	Contract for Special Facilities	9118-E
106-1202 106-1502C			
	5-71	Contract for Agricultural Power Service	1919-E
106-1959A	5-71	Absolving Service Agreement,	4004 5
400 07501	4.04	Service from Temporary Facilities	1921-E
106-2759L	4-91	Agreement for Replacement of Overhead with	7000 =
		Underground Facilities	7063-E
106-3559		Assessment District Agreement	6162-E
106-3559/1		Assessment District Agreement	6202-E
106-3859	01-01	Request for Service at Secondary/Primary	
		Substation Level Rates	14102-E
106-3959	6-96	Contract for Special Facilities Refund	9120-E
106-4059	6-96	Contract for Buyout Special Facilities	9121-E
106-5140A	10-72	Agreement for Service	2573-E
106-15140	5-71	Agreement for Temporary Service	1920-E
106-36140	11-73	Agreement for Street Lighting - Schedule LS-1	2575-E
106-37140	11-73	Agreement for Street Lighting - Schedule LS2-A	2576-E
106-38140	11-73	Agreement for Street Lighting - Schedule LS2-B	2577-E
106-13140	6-95	General Street Lighting Contract	8785-E
106-14140A	1-79	Street Lighting Contract, Supplement	3593-E
106-2059A	6-69	Contract for Outdoor Area Lighting Service	1773-E
106-23140	9-72	Contract for Residential Walkway Lighting Service	2581-E
106-35140E	11-85	Underground Electric General Conditions	5547-E
106-43140	11-85	Overhead Line Extension General Conditions	5548-E
106-44140	1-08	Agreement for Extension and Construction	00+0 L
100 44140	1-00	of	20421-E
65502	5-04	Statement Of Applicant's Contract Anticipated Cost	2072 I-L
05502	3-04		17139-E
107-00559	3-98	For Applicant Installation Project	17139-
107-00559	3-90	Proposal to Purchase and Agreement for Transfer	11076-E
146 0001	10 11	of Ownership of Distribution Systems	
116-2001	12-11	Combined Heat & Power System Contract less than 20 MW	22627-E
116-0501	12-11	Combined Heat & Power System Contract less than 5 MW	22628-E
117-2159B		Standard Offer for Power Purchase and Interconnection -	5440 E
447.0400	10.10	Qualifying Facilities Under 100 Kw	5113-E
117-2160	12-12	Generating Facility Interconnection Agreement (NEM/Non-	
		NEM Generating Facility Export)	22734-E
117-2259	8-95	Electronic Data Interchange (EDI) and Funds Transfer	
		Agreement	8802-E
118-159	7-91	Group Load Curtailment Demonstration Program -	
		Curtailment Agreement	7153-E
118-00228	7-98	Agreement for Illuminated Transit Shelters	11455-E

(Continued)

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

TABLE OF CONTENTS

Sheet 9

22357-E

SAMPLE FORMS

Peak Capacity Agreement	Form No.	<u>Date</u>	Applications, Agreements & Contracts	Sheet No.
18-228	118-459	07-91	Group Load Curtailment Demonstration Program -	
118-1228 01-11 Agreement for illuminated Transil Shelters 22225-26-26-26-26-26-26-26-26-26-26-26-26-26-				7154-E
124-363 Declaration of Eligibility for Lifeline Rates. 2857-244-483/1 07-07 Continuity of Service Agreement. 20128-24-483/1 07-07 Continuity of Service Agreement Change Request. 20127-2017-2017-2017-2017-2017-2017-2017	118-228	01-11		22224-E
124-463 07-07 Continuity of Service Agreement. 20126- 124-4000 09-07 Continuity of Service Agreement Change Request. 20127- 124-1010 03-12 Community Choice Aggregator (CCA) Service Agreement. 22785- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding 22786- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding 22786- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding 22786- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding 22786- 124-1020 03-12 Application for Gas/Electric Service 2496- 124-1020 04-02 Medical Baseline Allowance Self-Certification. 2230- 132-1011 07-02 Medical Baseline Allowance Self-Certification. 2230- 132-1011991 02-99 Historical Energy Usage Information Release (English). 11886- 132-1011991 02-99 Historical Energy Usage Information Release (English). 11886- 132-1011991 02-90 Ch-74 Contract for Sevice	118-1228	01-11	Agreement for Illuminated Transit Shelters	22225-E
124-483/1 07-07 Continuity of Service Agreement Change Request. 20127-224-1000 09-07 Community Choice Aggregator (CCA) Service Agreement. 2030-124-1010 03-12 Community Choice Aggregator (Non-Disclosure Agreement. 22785-124-1020 22785-124-1020 Declaration by Mayor or Chief County Administrator Regarding Investigation, Pursuit or Implementation of Community Choice Aggregation. 22786-124-124-124-125-125-125-125-125-125-125-125-125-125	124-363			2857-E
124-1000 09-07 Community Choice Aggregator (CCA) Service Agreement. 22301- 124-1010 03-12 Community Choice Aggregator Non-Disclosure Agreement. 22785- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding Investigation, Pursuit or Implementation of Community Choice Aggregation. 22786- 124-5152F 08-73 Application for Gas/Electric Service. 2496- 132-150/1 07-02 Medical Baseline Allowance Splication. 22307- 132-01199 02-99 Historical Energy Usage Information Release (English). 11886- 132-01199/1 02-99 Historical Energy Usage Information Release (Spanish). 11887- 132-1259C 06-74 Contract for Special Electric Facilities. 2580- 132-2259G Resident's Air Conditioner Cycling Agreement. 4677- 132-26263 06-07 On-Bill Financing Loan Agreement. 21100- 132-20101 12-10 Affidavit for Small Business Customer. 22132- 135-559 07-87 Power Line Analysis and/or Engineering Study Agreement. 5978- 139-6001 12-07 Fine Analysis and/or Engineering Study	124-463	07-07	Continuity of Service Agreement	20126-E
124-1010 03-12 Community Choice Aggregator Non-Disclosure Agreement. 22785- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding Investigation, Pursuit or Implementation of Community Choice Aggregation	124-463/1	07-07	Continuity of Service Agreement Change Request	20127-E
124-1010 03-12 Community Choice Aggregator Non-Disclosure Agreement. 22785- 124-1020 03-12 Declaration by Mayor or Chief County Administrator Regarding Investigation, Pursuit or Implementation of Community Choice Aggregation. 22786- 124-5152F 08-73 Application for Gas/Electric Service. 2496- 123-150 07-02 Medical Baseline Allowance Application. 22307- 123-1501 07-02 Medical Baseline Allowance Application. 22308- 132-101199 02-99 Historical Energy Usage Information Release (English). 11886- 123-1259C 06-74 Contract for Special Electric Facilities. 2580- Contract for Special Electric Facilities. 2580- Contract for Special Electric Facilities. 2580- Contract for Electric Service. Agua Callente - Canebrake. 123- 123-26263 06-07 On-Bill Financing Loan Agreement. 2110- 132-20101 12-10 Affidavit for Small Business Customer. 22132- 135-00061 12-00 Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up. 14001- 135-659 10-92 Annual Certification Form. Master Metered Accounts. 7542- 139-0001 02-07 Energy Payment Deferral Plan for Citrus & Agricultural Growers. 19981- 142-2059 07-87 Contract for Service. Schedule S-I (Standby Service. 16102-	124-1000	09-07	Community Choice Aggregator (CCA) Service Agreement	20301-E
124-1020	124-1010	03-12		22785-E
Aggregation. 22786- 132-150 07-02 Medical Baseline Allowance Application. 22907- 132-150/1 07-02 Medical Baseline Allowance Application. 22908- 132-150/1 07-02 Medical Baseline Allowance Self-Certification. 22908- 132-01199 02-99 Historical Energy Usage Information Release (English). 11886- 132-01199/1 02-99 Historical Energy Usage Information Release (Spanish). 11887- 132-1259C 06-74 Contract for Special Electric Facilities. 2580- Contract for Electric Service - Agua Caliente - Canebrake. 1233- 132-2059C Resident's Air Conditioner Cycling Agreement. 21100- 132-6263 06-07 On-Bill Financing Loan Agreement (Cycling Agreement. 21100- 132-6263/1 06-07 On-Bill Financing Loan Agreement of Self Installers. 21101- 132-20101 12-10 Affidavit for Small Business Customer. 2135- 135-00061 12-00 Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up. 14001- 135-659 07-87 Power Line Analysis and/or Engineering Study Agreement. 5978- 135-659 10-92 Annual Certification Form - Master Metered Accounts. 7542- 139-0001 02-07 Energy Payment Deferral Plan for Citrus & Agricultural Growers. 19981- 142-2001 02-03 Schedule Load Reduction Program Contract. 16102- 142-140 08-93 Request for Service on Schedule LR. 7912- 142-359 O7-87 Contract for Service - Schedule S-I (Standby Service). 5975- 142-359 O7-87 Contract for Service, Schedule S-I (Standby Service). 5975- 142-32/2 05-08 Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program. 22336- 142-732/1 05-08 Residential Rate Assistance Application (WR/System-Gen). 22331- 142-732/2 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/3 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/3 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/10 05-08 Residential Rate Assistance Application (Mondarin Chinese). 22342- 142-732/10 05-08 Residential	124-1020	03-12	Declaration by Mayor or Chief County Administrator Regarding	
124-5152F 08-73				
132-150 07-02 Medical Baseline Allowance Application. 22307- 132-150/1 07-02 Medical Baseline Allowance Self-Certification. 22308- 132-01199 02-99 Historical Energy Usage Information Release (English). 11886- 132-1259C 08-74 Contract for Special Electric Facilities. 2580- 2				22786-E
132-150/1 07-02 Medical Baseline Allowance Self-Certification. 22308-132-01199 02-99 Historical Energy Usage Information Release (English). 11886-132-01199/1 02-99 Historical Energy Usage Information Release (Spanish). 11887-132-1259C 06-74 Contract for Special Electric Facilities. 2580-2580 2580-2580 06-07 Contract for Electric Service - Agua Caliente - Canebrake. 1233-2592 1233-2592 4677-132-6263 06-07 On-Bill Financing Loan Agreement. 21100-21100-21100-21100-21100-21100-21100-21100-21100-20-21100-20-21100-20-21100-20-20-21100-20-20-21100-20-20-20-20-20-20-20-20-20-20-20-20-2	124-5152F			2496-E
132-01199 02-99 Historical Energy Usage Information Release (English). 11886-132-01199/1 132-01199/1 02-99 Historical Energy Usage Information Release (Spanish). 11887-132-1259C 132-1259C 06-74 Contract for Special Electric Facilities. 2580-2580-2580-2580-2580-2580-2580-2580-	132-150	07-02		22307-E
132-01199/1 02-99 Historical Energy Usage Information Release (Spanish) 11887-132-1259C 132-1259C 06-74 Contract for Special Electric Facilities 2580-123-1259C 132-2059C Resident's Air Conditioner Cycling Agreement 4677-132-133-132-133-132-133-132-133-132-133-133	132-150/1	07-02	Medical Baseline Allowance Self-Certification	22308-E
132-1259C 06-74 Contract for Special Electric Facilities. 2580- 132-2059C Contract for Electric Service - Agua Calliente - Canebrake. 1233- 132-2059C Resident's Air Conditioner Cycling Agreement. 4677- 132-62633 06-07 On-Bill Financing Loan Agreement. 21100- 132-20101 12-10 Affidavit for Small Business Customer. 22132- 135-00061 12-00 Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up. 14001- 135-559 07-87 Power Line Analysis and/or Engineering Study Agreement. 5978- 135-659 10-92 Annual Certification Form - Master Metered Accounts. 7542- 139-0001 02-07 Energy Payment Deferral Plan for Citrus & Agricultural Growers. 19981- 142-00012 02-03 Scheduled Load Reduction Program Contract. 16102- 142-259 07-87 Contract for Service on Schedule S.I. 5975- 142-359A 07-87 Contract for Service, Schedule S.I. 5975- 142-359A 07-87 Contract for Service, Schedule S.I. 5974- 142-732	132-01199	02-99	Historical Energy Usage Information Release (English)	11886-E
Contract for Electric Service - Agua Caliente - Canebrake 1233-	132-01199/1	02-99	Historical Energy Usage Information Release (Spanish)	11887-E
Contract for Electric Service - Agua Caliente - Canebrake 1233-	132-1259C	06-74	Contract for Special Electric Facilities	2580-E
132-2059C Resident's Air Conditioner Cycling Agreement. 4677- 132-6263 06-07 On-Bill Financing Loan Agreement. 21100- 132-6263/1 06-07 On-Bill Financing Loan Agreement for Self Installers. 21101- 132-20101 12-10 Affidavit for Small Business Customer. 22132- 135-00061 12-00 Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up. 14001- 135-559 07-87 Power Line Analysis and/or Engineering Study Agreement. 5978- 135-659 10-92 Annual Certification Form - Master Metered Accounts. 7542- 139-0001 02-07 Energy Payment Deferral Plan for Citrus & Agricultural Growers. 19981- 142-140 08-93 Request for Service on Schedule LR. 7912- 142-140 08-93 Request for Service, Schedule S-I (Standby Service). 5975- 142-359 07-87 Contract for Service, Schedule S (Standby Service). 5974- 142-359 07-87 Contract for Service, Schedule S (Standby Service). 5974- 142-732 05-08 Residential Rate Assistance Application (IVE/System-Gen).				1233-E
132-6263/1 06-07 On-Bill Financing Loan Agreement for Self Installers. 21101-132-20101 135-00061 12-00 Affidavit for Small Business Customer. 22132-132-133-00061 135-00061 12-00 Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up. 14001-136-559 135-659 10-92 Annual Certification Form - Master Metered Accounts. 7542-139-0001 139-0001 02-07 Energy Payment Deferral Plan for Citrus & Agricultural Growers. 19981-140-140-140 142-140 08-93 Request for Service on Schedule LR. 7912-142-140-140-140-140-140-140-140-140-140-140	132-2059C			4677-E
132-20101 12-10	132-6263	06-07	On-Bill Financing Loan Agreement	21100-E
132-20101 12-10	132-6263/1	06-07	On-Bill Financing Loan Agreement for Self Installers	21101-E
135-00061	132-20101	12-10		22132-E
Fixed Price Electric Energy with True-up. 14001- 135-559 07-87 Power Line Analysis and/or Engineering Study Agreement. 5978- 135-659 10-92 Annual Certification From - Master Metered Accounts. 7542- 139-0001 02-07 Energy Payment Deferral Plan for Citrus & Agricultural Growers. 19981- 142-00012 02-03 Scheduled Load Reduction Program Contract. 16102- 142-140 08-93 Request for Service on Schedule LR. 7912- 142-259 07-87 Contract for Service, Schedule S-I (Standby Service - Interruptible). 5975- 142-359A 07-87 Contract for Service, Schedule S (Standby Service). 5974- 142-459 Agreement for Standby Service. 6507- 142-732 05-08 Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program. 22336- 142-732/1 05-08 Residential Rate Assistance Application (IVR/System-Gen). 22337- 142-732/2 05-08 CARE Program Recertification Application & Statement of Eligibility for California Alternate Rates for Energy (CARE) Program. 22338- 142-732/3 05-08 CARE Program Renewal – Application & Statement of Eligibility 22339- 142-732/4 05-08 CARE Program Renewal – Application & Statement of Eligibility 22339- 142-732/6 05-08 CARE Post Enrollment Verification. 22341- 142-732/6 05-08 Residential Rate Assistance Application (Vietnamese). 22342- 142-732/1 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/1 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/1 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/1 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/1 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22342- 142-732/1 05-08 Residential Rate Assistance Application (Hrong). 22345- 142-732/1 05-08 Residential Rate Assistance Application (Hrong). 22345- 142-732/1 05-08 Residential Ra	135-00061	12-00	Voluntary Rate Stabilization Program Contract for	
135-559 07-87 Power Line Analysis and/or Engineering Study Agreement				14001-E
135-659 10-92 Annual Certification Form - Master Metered Accounts	135-559	07-87		5978-E
142-00012 02-03 Scheduled Load Reduction Program Contract 16102-142-140 142-140 08-93 Request for Service on Schedule LR. 7912-142-259 142-259 07-87 Contract for Service, Schedule S-I (Standby Service) 5975-142-359A 142-359A 07-87 Contract for Service, Schedule S (Standby Service) 5974-142-459 142-732 05-08 Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program 22336-142-732/1 142-732/1 05-08 Residential Rate Assistance Application (IVR/System-Gen) 22337-142-732/2 142-732/2 05-08 Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program 22338-142-732/3 142-732/3 05-08 CARE Program Recertification Application & Statement of Eligibility for Sub-metered Customers 22340-142-732/4 142-732/4 05-08 CARE Program Renewal – Application & Statement of Eligibility for Sub-metered Customers 22340-142-732/5 142-732/5 05-08 Residential Rate Assistance Application (Vietnamese) 22341-142-732/6 142-732/6 05-08 Residential Rate Assistance Application (Mandarin Chinese) 22342-142-732/10 </td <td>135-659</td> <td>10-92</td> <td></td> <td>7542-E</td>	135-659	10-92		7542-E
142-00012 02-03 Scheduled Load Reduction Program Contract 16102-142-140 142-140 08-93 Request for Service on Schedule LR 7912-142-142-142-142-142-142-142-142-142-1	139-0001	02-07	Energy Payment Deferral Plan for Citrus & Agricultural Growers	19981-E
142-140 08-93 Request for Service on Schedule LR	142-00012	02-03		16102-E
142-259 07-87 Contract for Service, Schedule S-I (Standby Service - Interruptible)		08-93		7912-E
(Standby Service - Interruptible) 5975- 142-359A 07-87 Contract for Service, Schedule S (Standby Service) 5974- 142-459 Agreement for Standby Service 6507- 142-732 05-08 Application and Statement of Eligibility for the 22336- 142-732/1 05-08 Residential Rate Assistance Application (IVR/System-Gen) 22337- 142-732/2 05-08 Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program 22338- 142-732/3 05-08 CARE Program Recertification Application & Statement of Eligibility 22339- 142-732/4 05-08 CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers 22340- 142-732/5 05-08 CARE Post Enrollment Verification 22341- 142-732/6 05-08 Residential Rate Assistance Application (Vietnamese) 22342- 142-732/8 05-08 Residential Rate Assistance Application (Mandarin Chinese) 22343- 142-732/10 05-08 Residential Rate Assistance Application (Arabic) 22344- 142-732/11 05-08 Residential Rate Assistance Applica				
142-359A 07-87 Contract for Service, Schedule S (Standby Service) 5974-				5975-E
142-459 Agreement for Standby Service	142-359A	07-87	Contract for Service. Schedule S (Standby Service)	5974-E
142-732 05-08 Application and Statement of Eligibility for the			Agreement for Standby Service	6507-E
California Alternate Rates for Energy (CARE) Program		05-08		
142-732/105-08Residential Rate Assistance Application (IVR/System-Gen).22337-142-732/205-08Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program.22338-142-732/305-08CARE Program Recertification Application & Statement of Eligibility22339-142-732/405-08CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers.22340-142-732/505-08CARE Post Enrollment Verification.22341-142-732/605-08Residential Rate Assistance Application (Vietnamese).22342-142-732/805-08Residential Rate Assistance Application (Direct Mail).21868-142-732/1005-08Residential Rate Assistance Application (Mandarin Chinese).22343-142-732/1105-08Residential Rate Assistance Application (Arabic).22344-142-732/1205-08Residential Rate Assistance Application (Farsi).22345-142-732/1305-08Residential Rate Assistance Application (Farsi).22346-142-732/1405-08Residential Rate Assistance Application (Hmong).22347-142-732/1505-08Residential Rate Assistance Application (Khmer).22348-142-0083205-08Application for CARE Program for Qualified Nonprofit Group				22336-E
142-732/2 05-08 Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program. 22338-142-732/3 142-732/3 05-08 CARE Program Recertification Application & Statement of Eligibility 22339-142-732/4 142-732/4 05-08 CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers. 22340-142-732/5 142-732/5 05-08 CARE Post Enrollment Verification. 22341-142-732/6 142-732/6 05-08 Residential Rate Assistance Application (Vietnamese). 22342-142-732/8 142-732/8 05-08 Residential Rate Assistance Application (Direct Mail). 21868-142-732/10 142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22343-142-732/11 142-732/12 05-08 Residential Rate Assistance Application (Arabic). 22344-142-732/12 142-732/13 05-08 Residential Rate Assistance Application (Farsi). 22345-142-732/14 142-732/14 05-08 Residential Rate Assistance Application (Hmong). 22347-142-732/15 142-0832 05-08 Application for CARE Program for Qualified Nonprofit Group	142-732/1	05-08		
142-732/3 05-08 CARE Program Recertification Application & Statement of Eligibility 22338- 142-732/4 05-08 CARE Program Recertification Application & Statement of Eligibility for Sub-metered Customers 22340- 142-732/5 05-08 CARE Post Enrollment Verification 22341- 142-732/6 05-08 Residential Rate Assistance Application (Vietnamese) 22342- 142-732/8 05-08 Residential Rate Assistance Application (Direct Mail) 21868- 142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese) 22343- 142-732/11 05-08 Residential Rate Assistance Application (Arabic) 22344- 142-732/12 05-08 Residential Rate Assistance Application (Armenian) 22345- 142-732/13 05-08 Residential Rate Assistance Application (Farsi) 22346- 142-732/14 05-08 Residential Rate Assistance Application (Hmong) 22347- 142-732/15 05-08 Residential Rate Assistance Application (Khmer) 22348- 142-08832 05-08 Application for CARE Program for Qualified Nonprofit Group			Sub-metered Household Application and Statement of Fligibility	
142-732/3 05-08 CARE Program Recertification Application & Statement of Eligibility 22339- 142-732/4 05-08 CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers. 22340- 142-732/5 05-08 CARE Post Enrollment Verification. 22341- 142-732/6 05-08 Residential Rate Assistance Application (Vietnamese). 22342- 142-732/8 05-08 Residential Rate Assistance Application (Direct Mail). 21868- 142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22343- 142-732/11 05-08 Residential Rate Assistance Application (Arabic). 22344- 142-732/12 05-08 Residential Rate Assistance Application (Armenian). 22345- 142-732/13 05-08 Residential Rate Assistance Application (Farsi). 22346- 142-732/14 05-08 Residential Rate Assistance Application (Hmong). 22347- 142-0832 05-08 Application for CARE Program for Qualified Nonprofit Group 22348-		30 00	for California Alternate Rates for Energy (CARE) Program	22338-E
142-732/4 05-08 CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers	142-732/3	05-08		22339-E
Eligibility for Sub-metered Customers 22340- 142-732/5 05-08 CARE Post Enrollment Verification 22341- 142-732/6 05-08 Residential Rate Assistance Application (Vietnamese) 22342- 142-732/8 05-08 Residential Rate Assistance Application (Direct Mail) 21868- 142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese) 22343- 142-732/11 05-08 Residential Rate Assistance Application (Arabic) 22344- 142-732/12 05-08 Residential Rate Assistance Application (Armenian) 22345- 142-732/13 05-08 Residential Rate Assistance Application (Farsi) 22346- 142-732/14 05-08 Residential Rate Assistance Application (Hmong) 22347- 142-732/15 05-08 Residential Rate Assistance Application (Khmer) 22348- 142-00832 05-08 Application for CARE Program for Qualified Nonprofit Group				22000 ·L
142-732/5 05-08 CARE Post Enrollment Verification	2 102/1	55 55		22340-F
142-732/6 05-08 Residential Rate Assistance Application (Vietnamese). 22342- 142-732/8 05-08 Residential Rate Assistance Application (Direct Mail). 21868- 142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese). 22343- 142-732/11 05-08 Residential Rate Assistance Application (Arabic). 22344- 142-732/12 05-08 Residential Rate Assistance Application (Armenian). 22345- 142-732/13 05-08 Residential Rate Assistance Application (Farsi). 22346- 142-732/14 05-08 Residential Rate Assistance Application (Hmong). 22347- 142-732/15 05-08 Residential Rate Assistance Application (Khmer). 22348- 142-00832 05-08 Application for CARE Program for Qualified Nonprofit Group	142-732/5	05-08		22341-E
142-732/8 05-08 Residential Rate Assistance Application (Direct Mail)			Residential Rate Assistance Application (Vietnamese)	
142-732/10 05-08 Residential Rate Assistance Application (Mandarin Chinese) 22343- 142-732/11 05-08 Residential Rate Assistance Application (Arabic) 22344- 142-732/12 05-08 Residential Rate Assistance Application (Armenian) 22345- 142-732/13 05-08 Residential Rate Assistance Application (Farsi) 22346- 142-732/14 05-08 Residential Rate Assistance Application (Hmong) 22347- 142-732/15 05-08 Residential Rate Assistance Application (Khmer) 22348- 142-00832 05-08 Application for CARE Program for Qualified Nonprofit Group			Residential Rate Assistance Application (Direct Mail)	
142-732/11 05-08 Residential Rate Assistance Application (Arabic). 22344- 142-732/12 05-08 Residential Rate Assistance Application (Armenian). 22345- 142-732/13 05-08 Residential Rate Assistance Application (Farsi). 22346- 142-732/14 05-08 Residential Rate Assistance Application (Hmong). 22347- 142-732/15 05-08 Residential Rate Assistance Application (Khmer). 22348- 142-00832 05-08 Application for CARE Program for Qualified Nonprofit Group				
142-732/1205-08Residential Rate Assistance Application (Armenian).22345-142-732/1305-08Residential Rate Assistance Application (Farsi).22346-142-732/1405-08Residential Rate Assistance Application (Hmong).22347-142-732/1505-08Residential Rate Assistance Application (Khmer).22348-142-0083205-08Application for CARE Program for Qualified Nonprofit Group				
142-732/13 05-08 Residential Rate Assistance Application (Farsi)				
142-732/1405-08Residential Rate Assistance Application (Hmong)22347-142-732/1505-08Residential Rate Assistance Application (Khmer)22348-142-0083205-08Application for CARE Program for Qualified Nonprofit Group				
142-732/15 05-08 Residential Rate Assistance Application (Khmer)				
142-00832 05-08 Application for CARE Program for Qualified Nonprofit Group				
				22348-E
1 MIDD ESCRITIOS 27353-	142-00832	05-08		00050 5
Living Facilities			Living Facilities	22353-E
(Continued)				

9C5 Issued by Date Filed Mar 5, 2012
Advice Ltr. No. 2333-E Lee Schavrien Effective May 5, 2012
Senior Vice President Resolution No.



Revised Cal. P.U.C. Sheet No.

U.C. Sheet No. 22739-E

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

TABLE OF CONTENTS

Sheet 10

22358-E

SAMPL	.E F(JRMS.

		SAMPLE FORMS	
			Cal. P.U.C.
Form No.	<u>Date</u>	Applications, Agreements & Contracts	Sheet No.
142-732/16	08-08	Residential Rate Assistance Application (Korean)	22349-E
142-732/17	80-80	Residential Rate Assistance Application (Russian)	22350-E
142-732/18	80-80	Residential Rate Assistance Application (Tagalog)	22351-E
142-732/19	08-08	Residential Rate Assistance Application (Thai)	22352-E
142-859	03-94	Request for Service on Schedule NJ - New Job Incentive Rate Service	. 8100-E
142-959	06-96	Standard Form Contract for Service New Job Incentive Rate Service	9129-E
142-1059	06-96	Standard Form Contract for Service New Job Connection Credit	9130-E
142-1159	03-94	Standard Form Contract - Use of Rule 20A Conversion	
		Funds to Fund New Job Connection Credit	8103-E
142-1359	05-95	Request for Contract Minimum Demand	8716-E
142-1459	05-95	Agreement for Contact Closure Service	8717-E
142-1559	05-95	Request for Conjunctive Billing	8718-E
142-1659	05-95	Standard Form Contract - Credits for Reductions in	0710 2
142-1000	00-00	Overhead to Underground Conversion Funding Levels	8719-E
142-01959	01-01	Consent Agreement	14172-E
	01-01		1417Z-C
142-02559	01-90	Contract to Permit the Billing of a Customer on Schedule	_
		AV-1 Prior to Installation of all Metering and Equipment Required to Provid	
		a Contract Closure in Compliance With Special Condition 12 of Schedul	
		AV-1	11023-E
142-02760	12-12	Interconnection Agreement for Net Energy Metering Solar	
		or Wind Electric Generating Facilities for Other than	
		Residential or Small Commercial of 10 Kilowatts or Less	22735-E
142-02760.5	12-12	Interconnection Agreement for Virtual Net Metering (VNM) Photovoltaic	
		Electric Generating Facilities	22736-E
142-02761	10-03	Biogas Digester Generating Facility Net	
		Energy Metering and Interconnection Agreement	16697-E
142-02762	11-05	Fuel Cell Generating Facility Net Energy Metering and Interconnection	
		Agreement	18679-E
142-02763	12-10	NEM/VNM-A Inspection Report	22105-E
142-02765	09-09	NEM Application & Interconnection Agreement for Customers with Solar	04070 5
		and/or Wind Electric Generating Facilities of 30 kW or Less	21372-E
142-02768	02-09	Photovoltaic Generation Allocation Request Form	21148-E
142-3201		Residential Hotel Application for Residential Rates	5380-E
142-3242		Agreement for Exemption from Income Tax Component	
		on Contributions and Refundable Advances	6041-E
142-4032	05-08	Application for California Alternate Rates for Energy	
		(CARE) Program for Qualified Agricultural	
		Employee Housing Facilities	22354-E
142-4035	06-05	Application for California Alternate Rates for Energy (CARE)	
		Program for Migrant Farm Worker Housing Centers	18415-E
142-05202	01-01	Generating Facility Interconnection Application Agreement	14152-E
142-05203	09-09	Generating Facility Interconnection Application	21373-E
142-05205	07-02	Optional Binding Mandatory Curtailment Plan Contract	17729-E
142-05207	04-06	Base Interruptible Program Contract	19198-E
142-05209	04-01	No Insurance Declaration	15476-E
142-05210	06-04	Rolling Blackout Reduction Program Contract	18273-E
142-05211	06-04	Bill Protection Application.	18273-E
142-05212	07-03	Demand Bidding Program Non-Disclosure Agreement	17152-E
142-05215	04-06	Third Party Marketer Agreement for BIP	19199-E
112-00210	5-1-00		19199-

(Continued) 10C5 Issued by

Advice Ltr. No.

Decision No.

2315-E-A Lee Schavrien

Date Filed Effective Jan 20, 2012 Jan 1, 2012

Senior Vice President Regulatory Affairs

Resolution No.

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San Diego Gas & Electric Company San Diego, California Revised Cal. P.U.C. Sheet No.

22733-E

21855-E Sheet 11

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

TABLE OF CONTENTS

SAMPLE FORMS

		STATE LE FORMIO	Cal. P.U.C.
Form No.	Date	Applications, Agreements and Contracts	Sheet No.
142-05216	<u>Date</u> 04-06	Notice to Add, Change or Terminate Third Party Marketer for BIP	19200-E
142-05300	10-06	Capacity Bidding Program Customer Contract	19200-L 19664-E
142-05300	10-06	Aggregator Agreement for Capacity Bidding Program (CBP)	19665-E
142-05301	10-06	Notice to Add, Change, or Terminate Aggregator for Capacity Bidding	19003-L
142-03302	10-00	Program	19666-E
142-05303	10-06	Notice by Aggregator to Add or Delete Customer	19667-E
142-05213	07-03		16568-E
142-05213	07-03 06-02	Technical Assistance Incentive Application Customer Generation Agreement	15384-E
142-0541	06-02	Generating Facility Interconnection Agreement	15385-E
142-0542	00-02	(3 rd Party Inadvertent Export)	10000-⊑
142-0543	06-02	Generating Facility Interconnection Agreement	15386-E
ı		(3 rd Party Non-Exporting)	
142-0544	06-02	Generating Facility Interconnection Agreement	15387-E
440.0545	00.00	(Inadvertent Export)	40000 5
142-0545	06-06	Generating Facility Interconnection Agreement (Continuous Export)	19323-E
142-0546	05-10	Generation Bill Credit Transfer Allocation Request Form	21852-E
143-359		Resident's Agreement for Water Heater Switch Credit	3542-E
143-00212		Service Agreement between the Customer and	44054 =
440.050		SDG&E for Optional UDC Meter Services	11854-E
143-359		Resident's Agreement for Water Heater Switch Credit	3542-E
143-459		Resident's Agreement for Air Conditioner or	
		Water Heater Switch	3543-E
143-559		Owner's Agreement for Air Conditioner or	
		Water Heater Switch Payment	3544-E
143-659		Owner's Agreement for Air Conditioner or Water Heater Switch	3545-E
143-759	12-97	Owner's Agreement for Air Conditioner Switch Payment	3699-E
143-859	1-99	Occupant's Agreement for Air Conditioner Switch Payment	3700-E
143-01212		Letter of Understanding between the Customer's	
		Authorized Meter Supplier and SDG&E for	
		Optional UDC Meter Services	11855-E
143-1459B	12-97	Thermal Energy Storage Agreement	5505-E
143-01759	12-97	Meter Data and Communications Request	11004-E
143-01859	2-99	Energy Service Provider Service Agreement	10572-E
143-01959	8-98	Request for the Hourly PX Rate Option Service Agreement	11005-E
143-01959/1	2-99	Request for the Hourly PX Rate Option (Spanish)	11888-E
143-02059	12-99	Direct Access Service Request (DASR)	13196-E
143-02159	12-97	Termination of Direct Access (English)	11889-E
143-02159/1	12-97	Termination of Direct Access (Spanish)	11890-E
143-2259	12-97	Departing Load Competition Transition	
		Charge Agreement	10629-E
143-02359	12-97	Customer Request for SDG&E to Perform	
		Telecommunication Service	11007-E
143-02459	12-97	ESP Request for SDG&E to Perform ESP	
		Meter Services	11008-E
143-02659	3-98	ESP Request to Receive Meter Installation	
		and Maintenance Charges	11175-E
143-02759	04-10	Direct Access Customer Relocation/Replacement Declaration	21705-E
143-02760	01-12	Six Month Notice to Return to Direct Access Service	22729-E
143-02761	01-12	Six Month Notice to Return to Bundled Portfolio Service	22730-E
143-02762	04-10	Direct Access Customer Assignment Affidavit	21708-E
143-02763	04-10	Notice of Intent to Transfer to DA During OEW	21709-E
144-0810	03-08	Critical Peak Pricing (CPP) Opt-Out Form	20594-E
144-0811	03-09	Capacity Reservation Election & Event Notification Form	21133-E
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		(Continued)	
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 Jan 10, 2012

 Advice Ltr. No.
 2322-E-A
 Lee Schavrien
 Effective
 Jan 10, 2012

 Senior Vice President
 Resolution No.
 Resolution No.



San Diego Gas & Electric Company San Diego, California

Decision No.

Revised Cal. P.U.C. Sheet No.

22581-E

22333-E

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

		TABLE OF CONTENTS	Sheet 12	<u></u>
		SAMPLE FORMS	0 5 0	
Form No	Data	Applications Agreements and Contracts	Cal. P.U.C.	
Form No.	<u>Date</u>	Applications, Agreements and Contracts	Sheet No.	
165-1000	06-09	Participating Load Pilot Customer Contract	21271-E	
165-1000/1	06-10	Demand Response Wholesale Market Pilot Customer Contract	22047-E	
165-1001	06-09	Aggregator Agreement for Participating Load Pilot	21272-E	
165-1001/1	06-10	Aggregator Agreement for Demand Response Wholesale Market Pilot	22048-E	
165-1002	06-09	Notice to Add, Change or Terminate Aggregator for PLP	21273-E	
165-1002/1	06-10	Notice to Add, Change or Terminate Aggregator for DRWMP	22049-E	
165-1003	06-09	Notice by Aggregator to Add or Delete Customers for PLP	21274-E	
165-1003/1	06-10	Notice by Aggregator to Add or Delete Customers for DRWMP	22050-E	
175-1000	07-09	Customer Energy Network – Terms and Conditions	21298-E	
		Deposits, Receipts and Guarantees		
144-0812	03-09	Critical Peak Pricing - Event Notification Information Form	21134-E	
144-0812	03-09	Critical Peak Pricing - Future Communications Contact Information Form	21135-E	
155-100	03-09	Application and Contract for Unmetered Service	19128-E	
		Public Agency and Wastewater Agency Agreement	22578-E	17
160-1000	12-09	Customer Renewable Energy Agreement	22579-E	17
160-2000	12-09	Payment Receipt for Meter Deposit	11197-E	
101-00197	09-08	Guarantor's Statement	20604-E	
101-363	04-98	Receipt of Payment	2501-E	
101-1652B	04-08	Return of Customer Deposit	2500-E	
103-1750-E	03-68		2000 L	
400 04044	00.04	Bills and Statements		
108-01214	02-01	Residential Meter Re-Read Verification	14280-E	
110-00432	09-07	Form of Bill - General, Domestic, Power, and Lighting Service -		
440.00400/0	00.07	Opening, Closing, and Regular Monthly Statements	20302-E	
110-00432/2	06-07	Form of Bill - Pink Past Due Format	20120-E	
		Collection Notices		
101-00751	04-11	Final Notice Before Disconnect (MDTs)	22323-E	
101-00752	04-11	Final Notice Before Disconnect (delivered)	22324-E	
101-00753	02-04	Back of Urgent Notice Applicable to Forms		
		101-00753/1 through 101-00753/11	16944-E	
101-00753/1	04-11	Urgent Notice Payment Request Security Deposit to Establish Credit	22325-E	
101-00753/2	03-05	Urgent Notice Payment Request Security Deposit to Re-Establish Credit.	18084-E	
101-00753/3	04-11	Urgent Notice Payment Request for Past Due Security Deposit	22326-E	1
101-00753/4	04-11	Urgent Notice Payment Request for Past Due Bill	22327-E	
101-00753/5	02-04	Urgent Notice Payment Request for Returned Payment	16948-E	1
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill	16949-E	
101-00753/7	02-04	Urgent - Sign Up Notice for Service	16950-E	1
101-00753/8	02-04	Reminder Notice – Payment Request for Past Due Bill	16951-E	1
101-00753/9	02-04	Closing Bill Transfer Notification	16952-E	
101-00753/9	02-04	Payment Agreement Confirmation.	22328-E	1
101-00753/10	02-04	ESP Reminder Notice – Payment Request for Past Due Bill	16954-E	
101-00753/11	02-04	Final Notice Before Disconnection (mailed), Notice of Past Due Closing	22329-E	1
101-00734	04-11	Bill, and Notice of Past Due Closing Bill Final Notice	22330-E	
101-01071	04-11	Notice of Disconnect (delivered)	22331-E	ļ
		(Continued)		
12C8		Issued by Date Filed	Dec 6, 201	1
Advice Ltr. No.	2310-E	Lee Schavrien Effective	Jan 3, 201	
		Sonior Vice President	-,	—

Senior Vice President

SB_GT&S_0575798

Resolution No. E-4442



Revised

Cal. P.U.C. Sheet No.

22055-E

Canceling Revised

Cal. P.U.C. Sheet No.

21529-E Sheet 13

TABLE OF CONTENTS

SAMPLE FORMS

Form No.	<u>Date</u>	Collection Notices (Continued)	Cal. P.U.C. Sheet No.	
101-02171	05-10	Notice to Landlord - Termination of Tenant's]
		Gas/Electric Service (two or more units	21885-E	
101-02172	03-09	Notice of Disconnect (MDTs)	21139-E	
101-2452G	02-04	Notice to Tenants - Request for Termination of Gas and Electric		
		Service Customer Payment Notification	16959-E	L
		Operation Notices		
101-2371	11-95	No Access Notice	8826-E	
101-3052B	3-69	Temporary "After Hour" Turn On Notice	2512-E	
101-15152B		Door Knob Meter Reading Card	2515-E	
107-04212	4-99	Notice of Temporary Electric Service Interruption	20.02	
		(English & Spanish)	12055-E	
115-00363/2	9-00	Sorry We Missed You	13905-E	
115-002363	9-00	Electric Meter Test	13906-E	
115-7152A		Access Problem Notice	3694-E	
124-70A		No Service Tag	2514-E	
124-70/		140 Colvido Tag	20 17-L	1

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 Is

 Advice Ltr. No.
 2177-E-A
 Lee S

 Senior \
 Senior \

 Decision No.
 10-06-002
 Regulation

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

 Date Filed
 Sep 23, 2010

 Effective
 Oct 23, 2010

Resolution No.

Attachment C

ATTACHMENT C

ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

If the CPUC approves SDG&E's request in this Application for recovery of the costs accrued during 2011 in the Market Redesign and Technology Upgrade Memorandum Account ("MRTUMA") and Independent Evaluator Memorandum Account ("IEMA"), a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours per month could see a monthly summer bill increase of 0.05%, or \$0.04. A typical monthly electric bill could increase from \$81.32 to \$81.36. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

SAN DIEGO GAS & ELECTRIC COMPANY® —ELECTRIC DEPARTMENT ILLUSTRATIVE ELECTRIC RATE IMPACT

	IEECSTRUITTE EL	ECTION MILE IN THE		
	03/01/12 Class Average Rates (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Changes (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change %
Residential	17.591	17.607	0.016	0.09%
Small Commercial	17.020	17.038	0.018	0.11%
Medium and Large C&I*	13.626	13.643	0.017	0.12%
Agricultural	16.537	16.554	0.017	0.10%
Lighting	14.634	14.646	0.012	0.08%
System Total	15.429	15.446	0.017	0.11%

^{*} C&I stands for Commercial and Industrial

Attachment D

SAN DIEGO GAS & ELECTRIC COMPANY

COST OF PROPERTY AND DEPRECIATION RESERVE APPLICABLE THERETO AS OF DECEMBER 31, 2011

<u>No.</u>	<u>Account</u>	Original <u>Cost</u>	Reserve for Depreciation and <u>Amortization</u>
ELEC ⁻	TRIC DEPARTMENT		
302 303	Franchises and Consents Misc. Intangible Plant	\$ 222,841 10,063,087	\$ 202,900 3,216,144
	TOTAL INTANGIBLE PLANT	10,285,928	3,419,044
310.1	Land	14,526,518	46,518
310.2 311	Land Rights Structures and Improvements	0 80,889,335	0 26,031,715
312	Boiler Plant Equipment	162,934,540	43,962,897
314	Turbogenerator Units	112,737,442	28,996,670
315	Accessory Electric Equipment	80,702,642	23,040,463
316	Miscellaneous Power Plant Equipment	23,790,110	4,907,181
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	475,580,588	126,985,445
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	275,548,378	270,229,567
322	Boiler Plant Equipment	553,558,481	409,330,027
323	Turbogenerator Units	142,362,919	136,764,746
324	Accessory Electric Equipment	173,081,736	167,279,092
325	Miscellaneous Power Plant Equipment	311,721,011	232,885,231
107	ICIP CWIP	0	0
	TOTAL NUCLEAR PRODUCTION	1,456,556,203	1,216,772,341
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	18,531,032	2,805,878
342	Fuel Holders, Producers & Accessories	19,764,808	3,648,913
343	Prime Movers	72,001,094	15,773,097
344	Generators	318,922,349	71,029,156
345	Accessory Electric Equipment	30,834,379	5,858,522
346	Miscellaneous Power Plant Equipment	22,723,544	8,534,385
	TOTAL OTHER PRODUCTION	482,923,110	107,652,379
	TOTAL ELECTRIC PRODUCTION	2,415,059,900	1,451,410,164

<u>No.</u>	<u>Account</u>		Original <u>Cost</u>	Reserve for Depreciation and <u>Amortization</u>
250.4	l and	Φ.	40 704 040	Φ 0
350.1	Land Dights	\$	40,781,313	\$ 0
350.2	Land Rights		63,342,464	11,860,192
352	Structures and Improvements		114,209,757	34,347,361
353	Station Equipment		717,546,009	151,782,177
354 355	Towers and Fixtures		110,186,988	84,637,349
355	Poles and Fixtures		232,493,071	45,936,707
356	Overhead Conductors and Devices		287,571,913	166,382,164
357	Underground Conduit		136,727,462	22,233,764
358	Underground Conductors and Devices		125,792,671	24,474,578
359	Roads and Trails		34,042,577	6,502,048
	TOTAL TRANSMISSION		1,862,694,225	548,156,340
360.1	Land		16,176,228	0
360.1	Land Rights		73,872,149	31,984,962
361	Structures and Improvements		3,492,046	1,457,238
362	·		392,072,128	78,100,654
362 364	Station Equipment Poles, Towers and Fixtures			215,921,468
365	•		496,208,352	
	Overhead Conductors and Devices		390,477,539	149,705,076
366 367	Underground Conduit		925,223,489	357,158,542
367	Underground Conductors and Devices		1,227,074,157	715,839,455
368.1	Line Transformers		476,182,642	80,064,706
368.2	Protective Devices and Capacitors		15,609,706	(8,073,777)
369.1	Services Overhead		117,828,925	122,271,469
369.2	Services Underground		300,988,925	206,300,184
370.1	Meters		196,182,798	(19,211,649)
370.2	Meter Installations		41,941,738	(28,508,768)
371	Installations on Customers' Premises		6,410,699	10,964,753
373.1	St. Lighting & Signal SysTransformers		0	47.400.074
373.2	Street Lighting & Signal Systems		24,426,008	17,480,374
	TOTAL DISTRIBUTION PLANT		4,704,167,527	1,931,454,688
389.1	Land		7 500 607	0
389.1 389.2	Land Pights		7,523,627	0
	Land Rights		20 000 007	
390 392.1	Structures and Improvements		30,909,097	17,374,499
392.1	Transportation Equipment - Autos		0 50 146	49,884 609
392.2 393	Transportation Equipment - Trailers		58,146	17,279
394.1	Stores Equipment Portable Tools		19,150 18,923,448	5,881,422
394.1			336,798	187,138
	Shop Equipment			*
395 396	Laboratory Equipment		320,845 92,162	44,926 149,134
	Power Operated Equipment			· ·
397 398	Communication Equipment		145,058,548	63,914,193
390	Miscellaneous Equipment		456,067	119,809
	TOTAL GENERAL PLANT		203,697,887	87,738,895
101	TOTAL ELECTRIC PLANT		9,195,905,467	4,022,179,131

<u>No.</u>	<u>Account</u>	Original <u>Cost</u>	Reserve for Depreciation and <u>Amortization</u>
GAS P	LANT		
302 303	Franchises and Consents Miscellaneous Intangible Plant	\$ 86,104 0	\$ 86,104 0
	TOTAL INTANGIBLE PLANT	86,104	86,104
360.1 361 362.1 362.2 363 363.1 363.2 363.3 363.4 363.5 363.6	Land Structures and Improvements Gas Holders Liquefied Natural Gas Holders Purification Equipment Liquefaction Equipment Vaporizing Equipment Compressor Equipment Measuring and Regulating Equipment Other Equipment LNG Distribution Storage Equipment TOTAL STORAGE PLANT	0 43,992 0 0 0 0 0 0 0 0 0 2,052,614 2,096,606	0 43,992 0 0 0 0 0 0 0 0 0 609,435
365.1 365.2 366 367 368 369 371	Land Land Rights Structures and Improvements Mains Compressor Station Equipment Measuring and Regulating Equipment Other Equipment TOTAL TRANSMISSION PLANT	4,649,144 2,217,185 11,548,563 127,037,835 77,622,210 17,746,259 0	0 1,185,799 9,212,762 58,774,009 54,184,859 14,024,850 0
374.1 374.2 375 376 378 380 381 382 385 386 387	Land Land Rights Structures and Improvements Mains Measuring & Regulating Station Equipment Distribution Services Meters and Regulators Meter and Regulator Installations Ind. Measuring & Regulating Station Equipm Other Property On Customers' Premises Other Equipment	102,187 8,108,775 43,447 542,247,078 13,415,668 240,194,839 135,350,074 86,034,140 1,516,811 0 5,234,851	0 5,871,225 61,253 312,442,494 6,543,045 276,806,639 34,586,537 24,206,913 978,655 0 4,527,697
	TOTAL DISTRIBUTION PLANT	1,032,247,869	666,024,459_

_No	<u>Account</u>	_	Original Cost	Reserve for Depreciation and <u>Amortization</u>
392.1 392.2 394.1 394.2 395 396 397 398	Transportation Equipment - Autos Transportation Equipment - Trailers Portable Tools Shop Equipment Laboratory Equipment Power Operated Equipment Communication Equipment Miscellaneous Equipment	\$	0 74,501 7,147,205 84,181 283,094 162,284 1,693,847 243,605	\$ 25,503 74,501 2,918,169 31,350 214,578 77,359 1,172,098 100,503
	TOTAL GENERAL PLANT		9,688,717	4,614,061
101	TOTAL GAS PLANT		1,284,940,492	808,760,330
СОММО	ON PLANT			
303 350.1 360.1 389.1 389.2 390 391.1 391.2 392.1 392.2 393 394.1 394.2 394.3 395 396 397 398	Miscellaneous Intangible Plant Land Land Land Land Rights Structures and Improvements Office Furniture and Equipment - Other Office Furniture and Equipment - Computer E Transportation Equipment - Autos Transportation Equipment - Trailers Stores Equipment Portable Tools Shop Equipment Garage Equipment Laboratory Equipment Power Operated Equipment Communication Equipment Miscellaneous Equipment TOTAL COMMON PLANT TOTAL ELECTRIC PLANT TOTAL GAS PLANT TOTAL COMMON PLANT		171,087,039 0 0 5,612,511 1,080,961 222,262,727 22,520,261 54,844,563 33,942 33,369 144,926 1,216,895 284,834 1,231,487 2,392,911 91,490,227 2,230,094 576,466,749 9,195,905,467 1,284,940,492 576,466,749	85,454,781 0 0 0 27,275 94,792,863 12,453,754 25,186,387 (338,930) (12,547) 61,321 116,238 165,789 128,526 949,607 (192,979) 45,840,831 768,918 265,401,834 4,022,179,131 808,760,330 265,401,834
101 & 118.1	TOTAL		11,057,312,708	5,096,341,296
101	PLANT IN SERV-SONGS FULLY RECOVER	\$	(1,164,131,236)	\$ (1,164,131,236)
101	PLANT IN SERV-ELECTRIC NON-RECON Common	\$	0	\$ (1,982,000)
101	PLANT IN SERV-LEGACY METER RECLASS Electic	S 	(22,682,664)	\$ 67,966,251
118	PLANT IN SERV-COMMON NON-RECON Common - Transferred Asset Adjustment	\$	(3,960,652)	\$ (3,960,652)

<u>No.</u>	<u>Account</u>	Original <u>Cost</u>	Reserve for Depreciation and <u>Amortization</u>
101	Accrual for Retirements		
101	Electric Gas	\$ (5,956,750) (81,280)	\$ (5,956,750) (81,280)
	TOTAL PLANT IN SERV-NON RECON ACC	(6,038,030)	(6,038,030)
102	Electric Gas	23,628 0	0
	TOTAL PLANT PURCHASED OR SOLD	23,628	0
105	Plant Held for Future Use Electric Gas	72,657,994 0	0
	TOTAL PLANT HELD FOR FUTURE USE	72,657,994	0
107	Construction Work in Progress Electric Gas Common	1,915,034,172 28,131,060 109,205,321	
	TOTAL CONSTRUCTION WORK IN PROGRESS	2,052,370,553	0
108	Accum. Depr SONGS Mitigation/Spent Fuel E Electric	Disallowance 0	221,468
108	Accum. Depr SONGS SGRP Removal Electric	0	0
108.5	Accumulated Nuclear Decommissioning Electric	0	721,378,466
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0	721,378,466
101.1 118.1	ELECTRIC CAPITAL LEASES COMMON CAPITAL LEASE	778,390,265 25,982,293 804,372,558	54,226,689 12,725,592 66,952,281
120	NUCLEAR FUEL FABRICATION	62,963,775	39,822,587
143 143	FAS 143 ASSETS - Legal Obligation FIN 47 ASSETS - Non-Legal Obligation FAS 143 ASSETS - Legal Obligation	116,491,281 72,534,657 0	(610,135,470) 28,884,654 (1,278,616,385)
	TOTAL FAS 143	189,025,938	(1,859,867,202)
	UTILITY PLANT TOTAL	\$ 13,041,914,573	\$ 2,956,703,229

Attachment E

SAN DIEGO GAS & ELECTRIC COMPANY SUMMARY OF EARNINGS TWELVE MONTHS ENDED DECEMBER 31, 2011 (DOLLARS IN MILLIONS)

Line No.	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,920
2	Operating Expenses	3,485
3	Net Operating Income	\$435
4	Weighted Average Rate Base	\$5,071
5	Rate of Return*	8.40%
	*Authorized Cost of Capital	

Attachment F

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

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

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

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

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

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

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

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

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

City of Laguna Beach Attn. City Clerk 505 Forest Ave Laguna Beach, CA 92651 State of California Attn. Director Dept of General Services PO Box 989052 West Sacramento, CA 95798-9052

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

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

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

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

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

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

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

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

City of Laguna Beach Attn. City Attorney 505 Forest Ave Laguna Beach, CA 92651 United States Government General Services Administration 300 N. Los Angeles Los Angeles, CA 90012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of San Marcos Attn. City Attorney 1 Civic Center Dr. San Marcos, CA 92069 City of Lakeside Attn. City Clerk 9924 Vine Street Lakeside CA 92040

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

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

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

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

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

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

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

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

City of Santee Attn. City Clerk 10601 Magnolia Avenue Santee, CA 92071 City of La Mesa Attn. City Attorney 8130 Allison Avenue La Mesa, CA 91941

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

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

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

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

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

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

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

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

City of Santee Attn. City Attorney 10601 Magnolia Avenue Santee, CA 92071 City of Solana Beach Attn. City Attorney 635 S. Highway 101 Solana Beach, CA 92075

City of Vista Attn. City Attorney 200 Civic Center Drive, Bldg. K Vista, CA 92084 Spring Valley Chamber of Commerce Attn. City Clerk 3322 Sweetwater Springs Blvd, Ste. 202 Spring Valley, CA 91977-3142

City of Vista Attn. City Clerk 200 Civic Center Drive Vista, CA 92084 Valley Center Chamber of Commerce Attn. City Clerk P.O. Box 8 Valley Center, CA 92082

City of Aliso Viejo 12 Journey Aliso Viejo, CA 92656