



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

Tel: 858-654-3563
Fax: 858-654-1788
CFaber@semprautilities.com

November 1, 2012

ADVICE LETTER 2413-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: REQUEST FOR APPROVAL TO SHIFT FUNDS IN THE 2010-2012 ENERGY EFFICIENCY PROGRAM

San Diego Gas & Electric Company (SDG&E) hereby transmits for filing with the California Public Utilities Commission (Commission) approval for 2010-2012 energy efficiency (EE) program fund shifts that are required in compliance with Decision (D.) 09-09-047.

PURPOSE

In compliance with D.09-09-047, SDG&E requests authority to execute EE program fund shifts, as described herein.

BACKGROUND

D. 09-09-047 provides fund shifting rules for the 2010-2012 EE programs. With the recent activity in the following EE programs described below, it has become necessary to shift funds among program categories that exceed the utility fund shifting flexibility threshold specified in D.09-09-047 governing the 2010-2012 EE programs once the threshold is exceeded, the utility must file an Advice Letter in order to implement the fund shift.

“ . . . (the IOUs) shall file an Advice Letter for shifts of funds of more than 15% per annum within and between any of the twelve statewide energy efficiency programs, third-party programs, or governmental programs for the entire portfolio cycle.”¹

Due to the higher than expected participation from SDG&E's small to medium commercial customers, budget increases for some of SDG&E's commercial programs as required. SDG&E proposed to shift funds from its small agricultural and industrial sectors.

Pursuant to D. 09-09-047, this Advice Letter includes requests for fund shifts that cannot currently be made within existing IOU authority. SDG&E seeks authority to fully implement the

¹ D. 09-09-047, OP 43 b.

specified fund shifts to ensure a successful portfolio and the maximum achievement of energy savings for the 2010-2012 EE programs.

ENERGY EFFICIENCY PROGRAM FUND SHIFTING AMOUNTS

The following fund shifts are proposed:

Shift a total of \$5,479,232 to the Statewide Commercial (SW Commercial) Program to be divided between two subprograms as follows: Statewide Commercial Calculated (SW-ComA-Calculated) - \$4,479,232 and Statewide Commercial Deemed (SW-ComB-Deemed) - \$1,000,000. The following programs and the proposed shifts are listed below:

- 1) Statewide Agricultural Calculated to SW-ComA-Calculated - \$3,441,979
- 2) Statewide Industrial Calculated to SW-ComA-Calculated - \$1,037,253
- 3) Statewide Industrial Deemed Program to SW-ComB-Deemed - \$1,000,000

ENERGY EFFICIENCY PROGRAM FUND SHIFTING DETAILS

\$5,479,232 to Statewide Commercial Program:

SDG&E seeks additional funding of \$5,479,232 for the Statewide Commercial Program because the demand for the program has greatly accelerated beyond expectations in the past year for two subprograms SW-ComA-Calculated and SW-ComB-Deemed. In order to allow these subprograms to process committed and proposed projects that are in the pipeline and benefit from the forecasted energy savings, additional funding will be necessary. The additional funds would not only keep the subprograms open through the end of the year but would allow both subprograms to exceed their energy savings goals. The additional forecasted energy savings impacts resulting from these fund shifts are listed below:

Fund Shift Forecasted Additional Energy Savings			
<u>Program</u>	<u>kWh</u>	<u>kW</u>	<u>Therms</u>
SW-ComA-Calculated	36,782,657	2,536	552,929
SW-ComB-Deemed	11,048,917	997	-9,062
Total	47,831,574	3,533	543,867

Because of the economy, participation from small agricultural and industrial customers in the Statewide Agricultural (SW Agricultural) and Statewide Industrial (SW Industrial) programs are below expectation. Therefore, the Statewide Agricultural Calculated (SW-AgA-Calculated), Statewide Industrial Calculated (SW-IndA-Calculated) and Statewide Industrial Deemed (SW-IndB-Deemed) subprograms have funds available that would, otherwise, go unspent.

EFFECTIVE DATE

SDG&E believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. Therefore SDG&E respectfully requests that this advice letter become effective December 1, 2012, which is 30 calendar days after the date filed.

PROTEST

Anyone may protest this advice letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impacts, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date this advice letter was filed with the CPUC, or November 21, 2012. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. It is also requested that a copy of the protest also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

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

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service list A.08-07-022, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

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

CLAY FABER
Director – Regulatory Affairs

(cc list enclosed)

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY

ENERGY UTILITY

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

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

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Christina Sondrini

Phone #: (858) 636-5736

E-mail: csondrini@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2413-E

Subject of AL: Request for Approval to Shift Funds in the 2010-2012 Energy Efficiency Program

Keywords (choose from CPUC listing): Energy Efficiency

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.09-09-047

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

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

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

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 12/1/12

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

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

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

EDTariffUnit@cpuc.ca.gov

San Diego Gas & Electric

Attention: Megan Caulson

8330 Century Park Ct, Room 32C

San Diego, CA 92123

mcaulson@semprautilities.com

¹ Discuss in AL if more space is needed.

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

cc: (w/enclosures)

Public Utilities Commission

DRA

S. Cauchois
R. Pocta
W. Scott

Energy Division

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

CA. Energy Commission

F. DeLeon
R. Tavares

Alcantar & Kahl LLP

K. Cameron

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham

City of Poway

R. Willcox

City of San Diego

J. Cervantes
G. Lonergan
M. Valerio

Commerce Energy Group

V. Gan

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill
J. Pau

Dept. of General Services

H. Nanjo
M. Clark

Douglass & Liddell

D. Douglass
D. Liddell
G. Klatt

Duke Energy North America

M. Gillette

Dynergy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell
M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg
J. Heather Patrick
J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard
R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

Pacific Gas & Electric Co.

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

Pacific Utility Audit, Inc.

E. Kelly

San Diego Regional Energy Office

S. Freedman
J. Porter

School Project for Utility Rate Reduction

M. Rochman

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Sutherland Asbill & Brennan LLP

K. McCrea

Southern California Edison Co.

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

TransCanada

R. Hunter
D. White

TURN

M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi
N. Furuta

L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties In:

A.08-07-023