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December 3, 2012

ADVICE LETTER 2427-E (U 902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: ESTABLISHMENT OF ELECTRIC SONGS OUTAGE MEMORANDUM ACCOUNT

("SONGS OMA") IN COMPLIANCE WITH ORDERING PARAGRAPH ("OP") #4a OF

**ORDER INSTITUTING INVESTIGATION ("I") 12-10-013** 

San Diego Gas & Electric Company ("SDG&E") hereby submits for approval by the California Public Utilities Commission ("Commission") revisions to its electric and gas tariff schedules, applicable throughout its service territory, as shown on Attachment A.

### **PURPOSE**

In compliance with Ordering Paragraph 4.a. of California Commission I.12-10-013 (herein after referred to as the "SONGS OII"), this filing revises SDG&E's electric Preliminary Statement, Section III, Memorandum Accounts, to establish the San Onofre Nuclear Generating Station Outage Memorandum Account ("SONGS OMA"). The purpose of SONGS OMA is to track all SONGS costs and expenditures incurred on and after January 1, 2012 and the revenues collected in recovery of those costs. Further, Steam Generator Replacement Program ("SGRP") costs and revenues collected in recovery of those costs shall be tracked from SGRP inception.

### **BACKGROUND**

The SONGS OII, issued November 1, 2012 opened an investigation to consolidate and consider issues raised by the extended outages of Unit 2 and 3 at SONGS. This includes whether to order the immediate removal of all costs related to SONGS from the rates of Southern California Edison ("SCE") and SDG&E with placement of those costs in a deferred debit account pending the return of one or both facilities to useful service or other possible action. It also includes considering appropriate rate treatment for all SONGS related costs in other proceedings including the subaccounts noted in OP #4a. As such, all costs incurred on and after January 1, 2012 that are associated with SONGS shall be tracked in a memorandum account.

### **ORDERING PARAGRAPH 4a**

OP #4a of I.12-10-013 states:

- 4. Southern California Edison (SCE) and San Diego Gas & Electric Company (SDG&E) shall take the following actions:
  - a. SCE and SDG&E shall, after a meet and confer session with Commission staff and within 30 days of the date this order is issued, each file and serve a Tier 1 advice letter to establish a San Onofre Nuclear Generating Station (SONGS) Outage Memorandum Account (OMA). Each utility shall track in SONGS OMA all SONGS costs and expenditures incurred on and after January 1, 2012, and the revenues collected in recovery of those costs; except Steam

Generator Replacement Program (SGRP) costs and revenues collected in recovery of those costs, which shall track all SGRP costs from SGRP inception. Each utility shall also track in SONGS OMA all costs, expenditures, and related revenues on and after January 1, 2012 for other costs incurred as a result of the outages (e.g., replacement power, repairs, litigation). SONGS OMA shall contain at least the following subaccounts (subject to adjustment at the direction of the Energy Division Director): existing fixed costs, revenue requirements for SONGS, existing variable costs, existing seismic safety program costs, SGRP costs, other existing costs, outage investigation costs, replacement generation costs, safety-related program costs pursuant to Nuclear Regulatory Commission findings or orders, other product and service costs, cost of transmission upgrades or other system improvements related to the outages, repair costs, other routine operational costs, regulatory costs, litigation costs, other costs.

On November 14, 2012, SDG&E and SCE held a meet and confer with Commission staff (Energy Division and DRA) to discuss the reporting of SONGS outage costs, as required by the OII. A follow up to the November 14 meet and confer was held on November 20, 2012. A template for the SONGS OMA and the specific reporting criteria was discussed and it was agreed to share the draft template with the Energy Division and DRA prior to filing this Advice Letter. The resulting agreed-upon SONGS OMA template and preliminary statement is provided as Attachment B to this advice letter.

### **EFFECTIVE DATE**

Pursuant to OP #4a of I.12-10-013, SDG&E believes that this filing is subject to Energy Division disposition and should be classified as Tier 1 pursuant to GO 96-B. SDG&E respectfully requests that this filing become effective on December 3, 2012, 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 December 24, 2012. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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. A copy of the protest should also be sent via both e-mail <u>and</u> 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 on service list A.11-04-006, A.11-05-011, A.10-11-015, A.10-12-006, R.12-03-014, A.11-04-001, R.11-10-023, A.12-04-001, A.11-08-002, A.12-08-001, A.11-06-003,

A.11-09-002, A.12-04-003, and A.12-10-002 by either providing them a copy electronically or by mailing them a copy, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1879 or by e-mail to 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 UT	'ILITY (Attach additional pages as needed)
Company name/CPUC Utility No. SAN DIEGO G	AS & ELECTRIC (U 902)
Utility type: Contact Pe	erson: <u>Joff Morales</u>
⊠ ELC ☐ GAS Phone #: (8	858) <u>650-4098</u>
PLC HEAT WATER E-mail: jm	norales@semprautilities.com
EXPLANATION OF UTILITY TYPE	(Date Filed/ Received Stamp by CPUC)
ELC = Electric $GAS = Gas$ $PLC = Pipeline$ $HEAT = Heat$ $WATER = Wa$	uter
Advice Letter (AL) #: 2427-E	
Subject of AL: <u>Establishment of Electric SONGS</u>	Outage Memorandum Account ("SONGS OMA") in
Compliance with OP #4a of Order Instituting Inve	estigation ("I") 12-10-013
Keywords (choose from CPUC listing): Memorar	ndum Account, Compliance
AL filing type:  Monthly Quarterly Annua	al 🛮 One-Time 🗌 Other
If AL filed in compliance with a Commission order	, indicate relevant Decision/Resolution #:
I.12-10-013	
Does AL replace a withdrawn or rejected AL? If so	o, identify the prior AL: <u>None</u>
Summarize differences between the AL and the pr	rior withdrawn or rejected AL¹: N/A
Does AL request confidential treatment? If so, prov	vide explanation: _ <del>No</del>
Resolution Required?   Yes   No	Tier Designation: $\square$ 1 $\square$ 2 $\square$ 3
Requested effective date: <u>12/3/2012</u>	No. of tariff sheets: 4
Estimated system annual revenue effect: (%):	N/A
Estimated system average rate effect (%):N	/A
When rates are affected by AL, include attachment (residential, small commercial, large C/I, agricultum	t in AL showing average rate effects on customer classes ural, lighting).
Tariff schedules affected: <u>Table of Contents, SO</u>	ONGS OMA
Service affected and changes proposed <sup>1</sup> : No n	e
Pending advice letters that revise the same tariff s	sheets: None
this filing, unless otherwise authorized by the Co	·
CPUC, Energy Division	San Diego Gas & Electric
Attention: Tariff Unit 505 Van Ness Ave.,	Attention: Megan Caulson 8330 Century Park Ct, Room 32C
San Francisco, CA 94102	San Diego, CA 92123
EDTariffUnit@cpuc.ca.gov	mcaulson@semprautilities.com

 $<sup>^{\</sup>rm 1}$  Discuss in AL if more space is needed.

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

Dept. of General Services

School Project for Utility Rate

cc: (w/enclosures)

J. Pau

**Public Utilities Commission** 

Public Utilities Commission	Dept. of General Services	School Project for Utility Rate
<u>DRA</u>	H. Nanjo	<u>Reduction</u>
Y. Schmidt	M. Clark	M. Rochman
W. Scott	Douglass & Liddell	Shute, Mihaly & Weinberger LLP
Energy Division	D. Douglass	O. Armi
P. Clanon	D. Liddell	Solar Turbines
S. Gallagher	G. Klatt	F. Chiang
H. Gatchalian	Duke Energy North America	Sutherland Asbill & Brennan LLP
D. Lafrenz	M. Gillette	K. McCrea
M. Salinas	Dynegy, Inc.	Southern California Edison Co.
CA. Energy Commission	J. Paul	M. Alexander
F. DeLeon	Ellison Schneider & Harris LLP	K. Cini
R. Tavares	E. Janssen	K. Gansecki
Alcantar & Kahl LLP	Energy Policy Initiatives Center (USD)	H. Romero
K. Harteloo	S. Anders	<u>TransCanada</u>
		R. Hunter
American Energy Institute	Energy Price Solutions	
C. King	A. Scott	D. White
APS Energy Services	Energy Strategies, Inc.	TURN
J. Schenk	K. Campbell	M. Florio
BP Energy Company	M. Scanlan	M. Hawiger
J. Zaiontz	Goodin, MacBride, Squeri, Ritchie & Day	UCAN
Barkovich & Yap, Inc.	B. Cragg	M. Shames
B. Barkovich	J. Heather Patrick	U.S. Dept. of the Navy
Bartle Wells Associates	J. Squeri	K. Davoodi
R. Schmidt	Goodrich Aerostructures Group	N. Furuta
Braun & Blaising, P.C.	M. Harrington	L. DeLacruz
S. Blaising	Hanna and Morton LLP	Utility Specialists, Southwest, Inc.
California Energy Markets	N. Pedersen	D. Koser
S. O'Donnell	Itsa-North America	Western Manufactured Housing
C. Sweet	L. Belew	Communities Association
California Farm Bureau Federation	J.B.S. Energy	S. Dey
K. Mills	J. Nahigian	White & Case LLP
California Wind Energy	Luce, Forward, Hamilton & Scripps LLP	L. Cottle
N. Rader	J. Leslie	Interested Parties
CCSE	Manatt, Phelps & Phillips LLP	A.11-04-006
S. Freedman	D. Huard	A.11-05-011
J. Porter	R. Keen	A.10-11-015
	Matthew V. Brady & Associates	A.10-11-015 A.10-12-005
Children's Hospital & Health Center		
T. Jacoby	M. Brady	A.10-12-006
City of Chula Vista	Modesto Irrigation District	R.12-03-014
M. Meacham	C. Mayer	A.11-04-001
E. Hull	Morrison & Foerster LLP	R.11-10-023
City of Poway	P. Hanschen	A.12-04-001
R. Willcox	MRW & Associates	A.11-08-002
City of San Diego	D. Richardson	A.12-08-001
J. Cervantes	OnGrid Solar	A.11-06-003
G. Lonergan	Andy Black	A.11-09-002
M. Valerio	Pacific Gas & Electric Co.	A.12-04-003
Commerce Energy Group	J. Clark	A.12-10-002
V. Gan	M. Huffman	
Constellation New Energy	S. Lawrie	
W. Chen	E. Lucha	
CP Kelco	Pacific Utility Audit, Inc.	
A. Friedl	E. Kelly	
Davis Wright Tremaine, LLP	R. W. Beck, Inc.	
E. O'Neill		
E. O NEIII	C. Elder	

### ATTACHMENT A ADVICE LETTER 2427-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original 23291-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, SONGS OUTAGE MEMORANDUM ACCOUNT (SONGS OMA), Sheet 1	
Original 23292-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, SONGS OUTAGE MEMORANDUM ACCOUNTS (SONGS OMA), Sheet 2	
Revised 23293-E	TABLE OF CONTENTS, Sheet 1	Revised 23266-E
Revised 23294-E	TABLE OF CONTENTS, Sheet 3	Revised 23034-E



San Diego Gas & Electric Company San Diego, California

Original	Cal. P.U.C. Sheet No.	23291-E

Canceling \_\_\_\_ Cal. P.U.C. Sheet No.

### PRELIMINARY STATEMENT

Sheet 1

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# III. MEMORANDUM ACCOUNTS SONGS OUTAGE MEMORANDUM ACCOUNT (SONGS OMA)

#### 1. Purpose

In regards to the extended outages of Units 2 and 3 at the San Onofre Nuclear Generating Station (SONGS), the SONGS OMA is created as a tracking only account and does not post to the utility's general ledger. The purpose of the SONGS OMA is to track all costs and expenditures associated with SONGS units 2 and 3 (and all related costs as specified per the subaccounts below) incurred on and after January 1, 2012 (except all Steam Generator Replacement Program (SGRP) costs and revenues collected in recovery of those costs will be tracked from SGRP inception) and the revenues collected in recovery of those costs pursuant to Decision 12-10-013 issued on November 1, 2012.

### 2. Applicability

The SONGS OMA shall apply to all bundled customers unless otherwise specified by the Commission.

#### 3. Rates

See disposition section.

### 4. Memo Account, subaccounts

On a reporting basis as authorized by the Commission, the SONGS OMA will track all SONGS costs and expenditures incurred as a result of the Unit 2 and 3 outages, and all SGRP costs since inception. For this purpose, the SONGS OMA shall contain subaccounts that separately identify and track at least the following specifically identified reporting line items as identified by the Commission in D. 12-10-013:

- a. existing SONGS fixed costs (e.g., capital costs in rate base),
- b. revenue requirements for SONGS ratebase costs (e.g., depreciation, return, taxes),
- c. existing SONGS variable costs (e.g., fuel, operation, maintenance),
- d. existing SONGS seismic safety program costs,
- e. other existing SONGS costs,
- f. outage investigation costs,
- g. replacement generation costs,
- safety-related program costs implemented pursuant to NRC findings or orders,
- i. the cost of other energy products or services to provide reliable electric service during the period of the outage (including Demand Response programs),
- the cost of other transmission upgrades or other system improvements to provide reliable electric service during the period of the outage (including substation or line related work),
- k. other repair costs (separately identified as fixed and variable).
- other routine operational costs,
- m. regulatory costs,

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1P11		Issued by	Date Filed	Dec 3, 2012
Advice Ltr. No.	2427-E	Lee Schavrien	Effective	
		Senior Vice President		
Decision No.		_ Regulatory Affairs	Resolution No.	
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San Diego Gas & Electric Company
San Diego, California

Original	Cal. P.U.C. Sheet No.	23292-E
	Cal. P.U.C. Sheet No.	

### PRELIMINARY STATEMENT

Sheet 2

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# III. MEMORANDUM ACCOUNTS SONGS OUTAGE MEMORANDUM ACCOUNTS (SONGS OMA)

- 4. <u>Memo Account, subaccounts</u> (continued)
  - a. litigation costs,
  - b. all ERRA entries including replacement energy and capacity resulting from the SONGS outage,
  - c. all costs related to Huntington Beach and Demand Response specifically implemented to address the loss of SONGS unit 2 and 3 capacity,
  - all excess energy sales foregone (actual or estimated) by SDG&E due to the loss of SONGS units 2 and 3,
  - e. any other costs related to SONGS, and

Canceling

- f. all expenditures in excess of those removed pursuant to section 455.5
- 5. Accounting Procedure

SDG&E shall maintain the SONGS OMA by making tracking entries to the account and applicable subaccounts at the end of each Commission authorized reporting period as follows:

- a. An entry equal to costs, expenditures, and revenue requirements detailed in Section 4 above incurred for the period,
- b. An entry equal to any costs transferred from the account as authorized by the Commission.
- c. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after 4.a and 4.b above, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.
- 5. Disposition

Disposition of any balance in the SONGS OMA shall be determined through a formal application filed with the Commission or another regulatory proceeding as deemed appropriate by the Commission.

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2P6		Issued by	Date Filed	Dec 3, 2012
Advice Ltr. No.	2427-E	Lee Schavrien	Effective	
		Senior Vice President		
Decision No.		Regulatory Affairs	Resolution No.	



San Diego Gas & Electric Company San Diego, California Revised

Cal. P.U.C. Sheet No.

23293-E

Canceling Revised

Cal. P.U.C. Sheet No.

23266-E Sheet 1

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Decision No.		Senior Vice President Regulatory Affairs	Resolution No.	
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San Diego Gas & Electric Company San Diego, California

Decision No.

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

P.U.C. Sheet No. <u>23294-E</u>

23034-E

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

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Regulatory Affairs

Resolution No.

San Diego Gas & Electric Advice Letter 2427-E December 3, 2012

## ATTACHMENT B

(\$000)							2012					
	January F	ebruary	March	April	May	June	July	August	September	October	November	December
1. Sunk Capital Cost Subaccount												
Capital Expenditures	-	-	-	-	-	-	-	-	-	-	-	-
CWIP	-	-	-	-	-	-	-	-	-	-	-	-
Rate Base	-	-	-	-	-	-	-	-	-	-	-	-
Depreciation												
Taxes on Income	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes									-		-	
Return	_	_	_	_	_	_	_	_	-	_	_	_
Subtotal Revenue Requirement	-	-	-	-	-	-	-	-	-	-	-	-
II. Steam Gen Replacement/Removai Capital Cost Subaccount												
Capital Expenditures -Replace (Includes SDG&E Overheads)	-	-	-	-	-	-	-	-	-	-	-	-
Capital Expenditures -Remove (Includes SDG&E Overheads)	-	-	-	-	-	-	-	-	-	-	-	-
Data Dana Daniana												
Rate Base - Replace Rate Base - Remove	-											
note buse nemove												
CWIP Balance - Replace	-	-				-	-					
CWIP Balance - Remove	-	-	-	-	-	-	-	-	-	-	-	-
Depreciation	-	-	-	-	-	-	-	-	-	-	-	-
Taxes on Income	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes Return	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal Revenue Requirement												
Subtotal lie vertice lie qui e ment												
III. O&M Expense Subaccount												
Fuel (ERRA)	-	-	-	-	-	-	-	-	-	-	-	-
Fuel Carrying Costs (ERRA)	-	-	-	-	-	-	-	-	-	-	-	-
Replacement Power (ERRA)	-	-	-	-	-	-	-	-	-	-	-	-
Foregone Sales Revenue (ERRA)	-	-	-	-	-	-	-	-	-	-	-	-
Routine O&M Refueling (1 in 2012)	-	-	-	-	-	-	-	-	-	-	-	-
Unit 3 Defueling	-											
Seismic Safety	_	_	_	_	-	_	_		-	_		_
Investigation	-	-	-	-	-	-	-	-	-	-	-	-
Repairs - After Outage	-	-	-	-	-	-		-	-	-		-
Regulatory - After Outage	-	-	-	-	-	-	-	-	-	-	-	-
Litigation	-	-	-	-	-	-	-	-	-	-	-	-
Payroll Taxes	-	-	-	-	-	-	-	-	-	-	-	-
Other (Pensions, PBOP, Insurance) Subtotal			-				-				-	
Subtotur												
IV. Huntington Beach Subaccount	-	-	-	-	-	-	-	-	-	-	-	-
V. Demand Response Subaccount												
Peak Time Rebate - Small Commercial (PTRA) **												_
Demand Bidding Program (DBP 2012) ***	_	_										
Marketing, Education & Outreach (ME&O)	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal DR	-	-	-	-	-	-	-	-	-	-	-	-
VI. Transmission Upgrades Subaccount												
Capital Expenditures	-	-	-	-	-	-	-	-	-	-	-	-
Rate Base	-	-	-	-	-	-	-	-	-	-	-	-
Depreciation												_
Taxes on Income	_				_		_		-			-
Ad Valorem Taxes		-	-	-	-	-	-	-	-	-		-
Return		-	-	-	-	-	-	-	-	-	-	-
Subtotal Revenue Requirement	-	-	-	-	-	-	-	-	-	-		-
O&M (if any)												
Odivi (ii any)	-	-	-	-	-	-	-	-	-	-	-	-
Mit Andread - d December - December - and Colores												
VII. Authorized Revenue Requirement Subaccount  Monthly Revenue Requirements	-	-	-	-	-	-	-	-	-	-	-	-
VII. Authorized Revenue Requirement Subaccount Monthly Revenue Requirements												
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Monthly Revenue Requirements  VIII. Adders to SCE-Originated SONGS Costs * SCE-Billed SONGS Costs Under Review (Adder to Lines 2, 24-32) SDG&E Portion of Nuclear and Related Insurance SDG&E Overheads on SONGS Costs - Capital (Adder to Line 2)	- - -	-	-	- - -	-	-	- - -	- - -	-	- - -	- - -	-
Monthly Revenue Requirements  VIII. Adders to SCE-Originated SONGS Costs *  SCE-Billed SONGS Costs Under Review (Adder to Lines 2, 24-32)  SDG&E Portion of Nuclear and Related Insurance  SDG&E Overheads on SONGS Costs - Capital (Adder to Line 2)  SDG&E Overheads on SONGS Costs - O&M (Adder to Lines 24-32)	- - -	-	-	- - -	- - -	- - -	- - -	-	- - -	-	-	-
Monthly Revenue Requirements  VIII. Adders to SCE-Originated SONGS Costs * SCE-Billed SONGS Costs Under Review (Adder to Lines 2, 24-32) SDG&E Portion of Nuclear and Related Insurance SDG&E Overheads on SONGS Costs - Capital (Adder to Line 2)	- - - -	-	- - - -	-	- - - -	-	- - - -	-	-	-	-	- - - -
Monthly Revenue Requirements  VIII. Adders to SCE-Originated SONGS Costs *  SCE-Billed SONGS Costs Under Review (Adder to Lines 2, 24-32)  SDG&E Portion of Nuclear and Related Insurance  SDG&E Overheads on SONGS Costs - Capital (Adder to Line 2)  SDG&E Overheads on SONGS Costs - O&M (Adder to Lines 24-32)	- - - -	-	- - - -	-	-	-	- - - -	- - - -	-	- - - -	-	- - - -

NOTES

\* Adjustments to costs incurred at SONGS prior to January 1, 2012, are excluded from this report.