



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

Tel: 858.654.3563
Fax: 858.654.1788
cfaber@semprautilities.com

May 24, 2013

ADVICE LETTER 2484-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: REVISIONS TO ELECTRIC RULE 25 – DIRECT ACCESS (DA) RULES AND THE SUBMITTAL OF ELECTRIC SERVICE PROVIDER (ESP) FINANCIAL SECURITY REQUIREMENTS FOR INCREMENTAL PROCUREMENT COSTS IN COMPLIANCE WITH D.13-01-021

San Diego Gas & Electric Company (SDG&E) hereby submits for approval the following revisions to its electric tariffs. The revised tariffs are attached hereto as Attachment A.

PURPOSE

In compliance with Ordering Paragraph (OP) 15 of California Public Utilities Commission's (Commission) Decision (D.) 13-01-021, SDG&E is submitting revisions to its electric Rule 25, *Direct Access Rules*, to incorporate financial security and reentry fee requirements applicable to ESP's provision of DA to include incremental procurement cost risks for involuntary returns involving DA residential and small commercial customers not affiliated with a large customer.

BACKGROUND

D.13-01-021, in order to implement § 394.25(e), adopted a methodology to determine financial security amounts and reentry fees necessary to ensure bundled service customer indifference in the event of an involuntary return of residential and small commercial customers (i.e., those having load of less than 20 kilowatts (kW), and not affiliated with a large customer). Medium and large DA commercial and industrial (C&I) customers (i.e., those with loads 20 kW and above) bear their own procurement cost risks in the event of an involuntary return.

Per Appendix 1 of D.13-01-021, a methodology to derive incremental procurement costs for the financial security requirement and reentry fees for an involuntary return of DA residential and small commercial customers was developed.

Per a letter dated March 21, 2013, Executive Director, Paul Clanon, granted the utilities' (SDG&E, PG&E and SCE) request for an extension of time to submit advice letters pursuant to OP 15 of D.13-01-021 to May 24, 2013.

TARIFF CHANGES

In compliance with D.13-01-021, SDG&E proposes the tariff revisions included in Attachment A for Section Q. ("ESP Financial Security Requirements") of Rule 25 *Direct Access Rules*.

ESP FINANCIAL SECURITY AMOUNTS

Specific financial security amounts required to be posted by ESPs pursuant to D.13-01-021 are set forth in Attachment B. The specific financial security amounts per ESP are redacted in the public version of this advice letter to protect the confidentiality of the ESP information. An unredacted version of Attachment B will be filed under the Commission's confidentiality provisions with the Energy Division.

In order to calculate the ESP's financial security requirement, SDG&E provided a list to each ESP of its residential and small commercial accounts, including up to two years of historical usage data for those accounts. Each ESP then identified which accounts were affiliated with large customers and provided the requisite certifications of the affiliations. SDG&E then used the unaffiliated small commercial and residential customer accounts to determine the ESP financial security amounts associated with the incremental procurement cost exposure pursuant to D.13-01-021.

Attachment B identifies the ESP's financial security requirement which consists of two parts pursuant to D.13-01-021: (1) reentry fee for unaffiliated small customers based on incremental procurement and administrative costs associated with unaffiliated small customers; and (2) reentry fee for affiliated small customers and large customers based on administrative costs for total ESP customer excluding unaffiliated small customers.

EFFECTIVE DATE

SDG&E believes this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this filing become effective on June 23, 2013, which is 30 days after the date filed.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than June 13, 2013, which is 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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 and

facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

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

NOTICE

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

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

CLAY FABER
Director – Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

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

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Christina Sondrini

Phone #: (858) 636-5736

E-mail: csondrini@semprautilities.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2484-E

Subject of AL: Revisions to Electric Rule 25 - Direct Access Rules and the Submittal of ESP Financial Security Requirements for Incremental Procurement Costs in Compliance with D13-01-021

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

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.13-01-021

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 AL: 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: 6/23/13

No. of tariff sheets: 7

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: Rule 25 & TOC

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: 2324-E

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

Southern California Edison Co.

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

TransCanada

R. Hunter
D. White

TURN

M. Hawiger

UCAN

D. Kelly

U.S. Dept. of the Navy

K. Davoodi

N. Furuta

L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties In:

R.07-05-025

ATTACHMENT A
ADVICE LETTER 2484-E

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Original 23568-E	RULE 25, DIRECT ACCESS RULES, Sheet 45	
Original 23569-E	RULE 25, DIRECT ACCESS RULES, Sheet 46	
Original 23570-E	RULE 25, DIRECT ACCESS RULES, Sheet 47	
Original 23571-E	RULE 25, DIRECT ACCESS RULES, Sheet 48	
Revised 23572-E	TABLE OF CONTENTS, Sheet 1	Revised 23482-E
Revised 23573-E	TABLE OF CONTENTS, Sheet 7	Revised 23419-E



RULE 25

DIRECT ACCESS RULES

Q. ESP Financial Security Requirements

As a described in Section D.3, all new and existing ESPs are required to post a bond , letter of credit, cash security deposit, equivalent evidence of insurance or parental guarantee from an investment grade rated institution or corporate parent or other financial instrument or security reasonably acceptable to SDG&E (collectively, "Financial Security") sufficient to cover the re-entry fees associated with the involuntary return of its DA customers to SDG&E's bundled service. The calculated Financial Security amount shall be the higher of the calculated Financial Security amount described in Section Q, or the minimum deposit of \$25,000 required for ESP registration pursuant to PU Code Section 394(b)(9). Pursuant to the methodology set forth in Appendix 1 of D.13-01-021 and corrected by D.13-02-017 and D.13-04-001, the calculated Financial Security amount will include the administrative costs related to switching a customer back to bundled service, and the incremental procurement costs for involuntarily returned residential and small commercial service accounts that are not affiliated with a large DA customer for a sixty (60) day safe harbor period and then for an additional six-month period. The incremental administrative costs shall be calculated for each involuntarily returned customer service account using the Customer Re-Entry Fee set forth in rate Schedule E-CCA, in effect at the time the Financial Security is calculated. As described in Sections Q.1.b and Q.2, below, the ESP is responsible for the identification and certification of the residential and small commercial service accounts that are affiliated with a large customer. Residential and small commercial service accounts that are not timely certified by the ESP as being affiliated with a large customer will be deemed to be an unaffiliated residential or small commercial service account for purposes of determining the Financial Security amount.

1. The initial Financial Security amount for existing and new ESPs will be established as follows:
 - a. For existing ESPs, pursuant to D.11-12-018, SDG&E will perform the initial Financial Security calculation based upon the administrative costs of switching an ESP's customer back to bundled service and submit the proposed Financial Security amount in separate Tier 2 advice letter filings for each applicable ESP for CPUC approval. Any confidential data relating to an ESP utilized in the calculation shall be redacted. An unredacted version of each advice letter will be filed under confidential seal to the Energy Division. Concurrent with submitting the advice letter to the Energy Division, SDG&E will serve by electronic means on each applicable ESP a copy of the advice letter, with the relevant supporting data and calculations of each respective ESP's Financial Security amount provided confidentially only to that specific ESP in complete and unredacted form. Financial Security amounts must be posted by June 30, 2012, subject to approval by the Commission's Energy Division.

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Issued by

Date Filed

May 24, 2013

Advice Ltr. No. 2484-E

Lee Schavrien

Effective

Senior Vice President

Decision No. 13-01-021

Resolution No. _____



RULE 25

DIRECT ACCESS RULES

Q. ESP Financial Security Requirements (Continued)

1. The initial Financial Security amount for existing and new ESPs will be established as follows: (Continued)

b. Per D.13-01-021, D.13-02-017, and D.13-04-00, for a new ESP that begins service, in Month M + 2 (where M denotes the month when SDG&E will calculate the Financial Security amount), the Financial Security calculation will be performed using Month M-1 data, and the Financial Security amount will be for the period from the start date through the next annual calculation. SDG&E will submit the proposed Financial Security amount for each ESP in a Tier 2 advice letter filing for each applicable ESP for Commission approval. Any confidential data relating to an ESP utilized in the calculation shall be redacted. An unredacted version of the advice letter will be filed under confidential seal to the Energy Division. Upon CPUC approval of the relevant ESP Financial Security amounts, the Energy Division will notify each ESP of the final Financial Security amounts due on an aggregate statewide basis. The ESP's Financial Security amount must be posted with the Commission before the ESP may begin serving customers. It is the responsibility of the ESP to provide SDG&E with an accurate forecast of the expected number of customers and associated loads, including a break-down by unaffiliated residential and small commercial service accounts, by the date specified by SDG&E.

2. Semi-annual Financial Security Amount Calculation:

On an annual basis, the ESP shall provide SDG&E with a certified list of the residential and small commercial service accounts that are affiliated with a large DA customer for use in the semi-annual Financial Security calculations. Upon request, SDG&E will provide the ESP with a list of residential and small commercial service accounts for use in the certification process. Residential and small commercial service accounts not certified by the ESP as being affiliated with a large DA customer will be deemed to be an unaffiliated residential or small commercial service account. If SDG&E does not receive the information from the ESP by no later than thirty (30) calendar days before the date SDG&E's semi-annual update filing is due to the Commission, SDG&E may proceed with the semi-annual updates based upon the assumption that none of the ESP's residential and small commercial service accounts are affiliated with a large DA customer.

SDG&E will update the amount of an ESP's Financial Security amount semi-annually, and submit the updated calculation to the Energy Division by May 10 and November 10 of each year and any adjustments to the Financial Security amount implemented on the following July 1 or January 1, respectively. Updated Financial Security amounts for each ESP will be submitted as Tier 2 advice letter for to the Energy Division. Any confidential data relating to an ESP utilized in the calculation shall be redacted. An unredacted version of the advice letter will be filed under confidential seal to the Energy Division.

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Issued by

Date Filed

May 24, 2013

Advice Ltr. No. 2484-E

Lee Schavrien

Effective

Decision No. 13-01-021

Senior Vice President

Resolution No.



RULE 25

DIRECT ACCESS RULES

Q. ESP Financial Security Requirements (Continued)

2. Semi-annual Bond Calculation: (Continued)

The ESP shall adjust the required posted Financial Security amount if and when it is more than ten percent (10 %) above or below the ESP's current posted bond amount. Upon CPUC approval of the relevant ESP Financial Security amounts, the Energy Division will notify each ESP of the final Financial Security amounts due on an aggregate statewide basis.

An ESP is required to post the Financial Security amounts in the advice letter(s) within thirty (30) days of notification by the Energy Division, subject to correction for any errors. If an ESP believes that its Financial Security amount has been calculated inaccurately or in conflict with the adopted processes, the ESP shall confer with SCE to resolve the inaccuracies, and may file comments with the Energy Division, and served upon SDG&E, indicating any appropriate corrections with relevant supporting explanation and detail within twenty (20) days of the advice letter filing.

The posted Financial Security amount may be in the form of a third-party guarantee from an investment grade guarantor, a surety bond, letter of credit, cash or cash equivalent financial instrument or security, or other financial instrument or security reasonably acceptable to SDG&E and should be payable to directly SDG&E in the event an ESP fails to timely pay the re-entry fees demanded by SDG&E pursuant to Section Q.3, below.

3. Re-Entry Fees For The Involuntary Return Of Customers

The ESP is responsible for all applicable re-entry fees for its customers that are involuntary returned.

a. SDG&E will calculate re-entry fees pursuant to the methodology set forth in Appendix 1 of D.13-01-021 within sixty (60) days of the earlier of (i) the start of the involuntary return of customers, or (ii) SDG&E's receipt of the ESP's written notice of involuntary return. The re-entry fee will be a binding estimate of:

- i) The administrative cost to switch the involuntarily returned large DA customers and their affiliated residential and small commercial service accounts to bundled service, which will be established for each customer service account using the Customer Re-Entry Fee set forth in rate Schedule E-CCA; plus,
- ii) The administrative cost to switch the involuntarily returned unaffiliated residential and small commercial DA service accounts to bundled service, which will be established for each customer service account using the Customer Re-Entry Fee set forth in rate Schedule E-CCA; plus,

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Issued by

Date Filed

May 24, 2013

Advice Ltr. No. 2484-E

Lee Schavrien

Effective

Decision No. 13-01-021

Senior Vice President

Resolution No.



RULE 25

DIRECT ACCESS RULES

Q. ESP Financial Security Requirements (Continued)

3. Re-Entry Fees For The Involuntary Return Of Customers (Continued)

iii) The incremental procurement costs for involuntarily returned residential and small commercial service accounts, that are not certified by the ESP as being affiliated with a large customer, for a sixty (60) day safe harbor period and then for an additional six-month period for those customers remaining on bundled service as set forth in Appendix 1 of D.13-01-021. For purposes of the ESP financial security amount, a commercial service account is considered "small" if it has a billing demand of less than twenty (20) kW for three (3) consecutive months during the past twelve (12) months.

At no time shall the sum of the administrative cost and the incremental procurement costs for involuntarily returned residential and small commercial service accounts, described in Section Q.3.a(2) and Q.3.a(3), above, be less than zero dollars (\$0). The re-entry fees will not be subject to true-up.

b. SDG&E's demand to the ESP for payment of the re-entry fees shall be made no later than sixty (60) days after the start of the involuntary return of DA customers to bundled service.

c. Re-entry fees are due and payable to SDG&E within fifteen (15) days after issuance of the demand for payment. An involuntary return by an ESP and the failure of the ESP to make payment within fifteen (15) days of SDG&E's demand shall be an event of default under the ESP's financial security instrument, entitling SDG&E to immediately draw on the Financial Security posted by the ESP under Sections Q.1 or Q.2. to cover the re-entry fees.

d. The ESP is responsible for covering all applicable re-entry fees for its customers that are involuntarily returned. Only if, or to the extent, the ESP is unable to cover all of the applicable re-entry fees any unreimbursed fees from the ESP must be covered by the involuntarily returned DA customers. Any re-entry fees not recovered from the ESP shall be paid by the involuntarily returned DA customers over a time period specified by SDG&E, but not to exceed the bundled service commitment period. If SDG&E subsequently recovers additional re-entry fees from the ESP, a refund up to the recovered amount will be provided to the involuntarily returned DA customers in proportion to the amount collected by SDG&E.

e. Service changes for the ESP's involuntarily returned customers will be as follows:

i. Residential and unaffiliated small commercial service accounts will be switched to Bundled Portfolio Service, but are otherwise subject to the same rights and obligations of other DA customer with respect to Transitional Bundled Service, advance notices required for switching, and the minimum stay provisions in SDG&E's authorized direct access tariffs.

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Issued by

Date Filed

May 24, 2013

Advice Ltr. No. 2484-E

Lee Schavrien

Effective

Senior Vice President

Decision No. 13-01-021

Resolution No. _____



San Diego Gas & Electric Company
San Diego, California

Original Cal. P.U.C. Sheet No. 23571-E

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

RULE 25

Sheet 48

DIRECT ACCESS RULES

Q. ESP Financial Security Requirements (Continued)

3. Re-Entry Fees For The Involuntary Return Of Customers (Continued)

e. Service changes for the ESP's involuntarily returned customers will be as follows:
(Continued)

ii. Large customers and their affiliated residential and small commercial service accounts will be switched to Transitional Bundled Service and be subject to the then current Switching Exemption Rules.

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Decision No. 13-01-021

Issued by
Lee Schavrien
Senior Vice President

Date Filed May 24, 2013

Effective _____

Resolution No. _____



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Advice Ltr. No. 2484-E

Decision No. 13-01-021

Issued by
Lee Schavrien
Senior Vice President

Date Filed May 24, 2013

Effective _____

Resolution No. _____



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 23573-E
Canceling Revised Cal. P.U.C. Sheet No. 23419-E

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Issued by Lee Schavrien Date Filed May 24, 2013
 Advice Ltr. No. 2484-E Senior Vice President Effective _____
 Decision No. 13-01-021 Resolution No. _____

Attachment B - REDACTED
SAN DIEGO GAS AND ELECTRIC ADVICE LETTER 2484-E
Electric Service Providers (ESPs) Financial Security Requirements
ESPs in San Diego Gas & Electric's Service Territory

	Unaffiliated Small Customer Calculation			Affiliated Small Customer and Large Customer Administrative Costs (\$) (D)	Total ESP Financial Security Amount (E=C+D)
	Incremental Procurement Cost Exposure (\$) (A)	Incremental Administrative Costs (\$) (B)	ESP Financial Security Amount for Unaffiliated Small Customers (\$) (C=A+B or 0, whichever greater)		
Electric Service Providers (ESPs)					
3 PHASES RENEWABLES LLC					
CALPINE POWERAMERICA-CA LLC					
COMMERCE ENERGY					
CONSTELLATION NEWENERGY INC					
DIRECT ENERGY BUSINESS LLC					
GLACIAL ENERGY OF CALIFORNIA					
LIBERTY POWER HOLDINGS LLC					
NOBLE AMERICAS ENERGY SOLUTIONS					
PILOT POWER GROUP INC					
SHELL ENERGY N AMER (US) LP					

Note:

- (1) SDG&E calculated the Incremental Procurement Cost Exposure (A) using the following, based on a methodology provided by the CPUC as follows:
 - (a) Forecasted Price of New Power of \$xx/MWh for residential and \$xx small commercial customers for the subject period, pursuant to Step 1 of Appendix 1 to D.13-01-021.
 - (b) ESP Unaffiliated Small Customer Load (MWh) using the 2-year average of June 2011-January 2012 and June 2012-January 2013 historical loads of unaffiliated small customer accounts.
 - (c) Resource Adequacy Adder of \$xx/MWh, pursuant to Step 2 of Appendix 1 to D.13-01-021.
 - (d) Renewable Portfolio Standard Adder of \$xx/MWh, pursuant to Step 3 of Appendix 1 to D.13-01-021
 - (e) IOU Loss Factor of 1.043, pursuant to Step 4 of Appendix 1 to D.13-01-021
 - (f) System Average Bundled Generation Rate of \$82.68/MWh, based on SDG&E's Advice Letter 2443-E, Attachment A, to implement January 1, 2013 Rates, pursuant to Step 5 of Appendix 1 to D.13-01-021.
- (2) Administrative Costs (B & D) equal the SDG&E Tariff Authorized Administrative Reentry Fee of \$1.12 per customer account from Schedule CCA, pursuant to D.11-12-018 (p. 70), multiplied by the number of applicable ESP Customer Accounts.
- (3) If Incremental Procurement Cost Exposure plus Incremental Administrative Costs is less than zero, ESP Financial Security Amount for Unaffiliated small customers is zero, pursuant to Appendix 1 of D.13-01-021.