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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 <u>EDTariffUnit@cpuc.ca.gov</u>. 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 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)				
		- Y		
Company name/CPUC Utility No. SAN	T			
Utility type: $\square$ GAS				
	•			
EXPLANATION OF UTILITY T	YPE	(Date Filed/ Received Stamp by CPUC)		
ELC = ElectricGAS = GasPLC = PipelineHEAT = Heat	VATER = Water			
Advice Letter (AL) #: <u>2484-E</u>				
Subject of AL: <u>Revisions to Electric R</u>	ule 25 - Direct Acce	ss Rules and the Submittal of ESP Financial		
Security Requirements for Increments	al Procurement Cos	ts in Compliance with D13-01-021		
Keywords (choose from CPUC listing):	Compliance, Dire	ect Access		
AL filing type:	ly 🗌 Annual 🔀 On	e-Time 🗌 Othe r		
If AL filed in compliance with a Comm	ission order, indicat	e relevant Decision/Resolution #:		
_D.13-01-021				
Does AL replace a withdrawn or reject	ed AL? If so, identi	fy the prior AL <u>N/A</u>		
Summarize differences between the Al	L and the prior with	drawn or rejected AL <sup>1</sup> : <u>N/A</u>		
Does AL request confidential treatmen	nt? If so, provide exp	lanation: N/A		
Resolution Required? $\Box$ Yes $\boxtimes$ No		Tier Designation: $\Box 1 \boxtimes 2 \Box 3$		
Requested effective date: <u>6/23/13</u>		No. of tariff sheets: <u>7</u>		
Estimated system annual revenue effe	ct: (%): <u>N/A</u>			
Estimated system average rate effect (	%): <u>N/A</u>			
When rates are affected by AL, include	e attachment in AL	showing average rate effects on customer classes		
(residential, small commercial, large C	VI, agricultural, ligh	iting).		
Tariff schedules affected: Rule 2	25 & TOC			
Service affected and changes proposed <sup>1</sup> : <u>N/A</u>				
Pending advice letters that revise the s	same tariff sheets:	2324-E		
Protests and all other correspondence this filing, unless otherwise authorize		are due no later than 20 days after the date of on, and shall be sent to:		
CPUC, Energy Division		an Diego Gas & Electric		
Attention: Tariff Unit		ttention: Megan Caulson		
505 Van Ness Ave.,		3330 Century Park Ct, Room 32C		
San Francisco, CA 94102		San Diego, CA 92123		
EDTariffUnit@cpuc.ca.gov	1	ncaulson@semprautilities.com		

 $<sup>^{\</sup>rm 1}$  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 Dynegy, 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. Kellv 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. Kellv U.S. Dept. of the Navy K. Davoodi N. Furuta L. DeLacruz Utility Specialists, Southwest, Inc. D. Koser Western Manufactured Housing **Communities Association** S. Dev White & Case LLP L. Cottle Interested Parties In: R.07-05-025

#### ATTACHMENT A ADVICE LETTER 2484-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original 23567-E	RULE 25, DIRECT ACCESS RULES, Sheet 44	
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



Original Cal. P.U.C. Sheet No.

23567-E

San Diego Gas & Electric Company San Diego, California

Cal. P.U.C. Sheet No.

#### Sheet 44

### RULE 25 DIRECT ACCESS RULES

Canceling

#### 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.

		(Continued)		
44P10		Issued by	Date Filed	May 24, 2013
Advice Ltr. No.	2484-E	Lee Schavrien Senior Vice President	Effective	
Decision No.	13-01-021	Centor vice i resident	Resolution No.	

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Original Cal. P.U.C. Sheet No.

San Diego Gas & Electric Company San Diego, California

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#### Sheet 45

### RULE 25 DIRECT ACCESS RULES

Canceling

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#### Q. <u>ESP Financial Security Requirements</u> (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. <u>Semi-annual Financial Security Amount Calculation:</u>

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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45P9		Issued by	Date Filed	May 24, 2013
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		Senior Vice President		
Decision No.	13-01-021		Resolution No.	



Cal. P.U.C. Sheet No. Original

23569-E

San Diego, California Canceling

Cal. P.U.C. Sheet No.

# **RULE 25**

#### Sheet 46

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# DIRECT ACCESS RULES

#### ESP Financial Security Requirements (Continued) Ο.

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.

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

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

- SDG&E will calculate re-entry fees pursuant to the methodology set forth in а. 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,

		(Continued)		
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Decision No.	13-01-021		Resolution No.	

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Cal. P.U.C. Sheet No. Original

San Diego Gas & Electric Company San Diego, California

Cal. P.U.C. Sheet No.

# **RULE 25**

Sheet 47

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# DIRECT ACCESS RULES

#### ESP Financial Security Requirements (Continued) О.

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

Canceling

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 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.
- Re-entry fees are due and payable to SDG&E within fifteen (15) days after issuance С. 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:
  - Residential and unaffiliated small commercial service accounts will be i. 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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47P9		Issued by	Date Filed	May 24, 2013
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Original Cal. P.U.C. Sheet No.

San Diego Gas & Electric Company San Diego, California

Cal. P.U.C. Sheet No.

### Sheet 48

## RULE 25 DIRECT ACCESS RULES

## Q. ESP Financial Security Requirements (Continued)

3. <u>Re-Entry Fees For The Involuntary Return Of Customers</u> (Continued)

Canceling

- 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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Advice Ltr. No. 2484-E

Decision No. 13-01-021

Issued by Lee Schavrien Senior Vice President Date Filed Effective May 24, 2013

Resolution No.



San Diego Gas & Electric Company San Diego, California

Cal. P.U.C. Sheet No. 23572-E Revised Canceling Revised Cal. P.U.C. Sheet No. 23482-E **TABLE OF CONTENTS** Sheet 1 The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein. Cal. P.U.C. Sheet No TITLE PAGE..... 16015-E TABLE OF CONTENTS..... 23472, 23430, 23465, 23401, 23483, 23484, 23473-E 23244, 22892, 23245, 23485, 23247, 19529-E PRELIMINARY STATEMENT I. General Information..... 8274, 18225, 22140-E II. Balancing Accounts Description/Listing of Accounts 19402. 20706-E 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 Post-1997 Electric Energy Efficiency Balancing Account (PEEEBA)..... 19415, 19416-E Research, Development and Demonstration (RD&D) Balancing Account..... 19417, 19418-E Renewables Balancing Account (RBA)..... 19419, 19420-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-F Energy Resource Recovery Account (ERRA)..... 23421, 23422, 23423, 23454, 23455-E Low-Income Energy Efficiency Balancing Account (LIEEBA)..... 19431, 19432-E Non-Fuel Generation Balancing Account (NGBA)..... 21484, 22081, 22810, 21487-E 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 Balancing Account (PBOPBA)..... 19443, 19444-E Community Choice Aggregation Implementation Balancing Account (CCAIBA)..... 19445-E

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

23573-E

23419-E

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Ac	lvice Ltr. No. 2484-E L	.ee Schavrien	Effective	
-	Se	nior Vice President		
De	ecision No. <u>13-01-021</u>		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

	U	naffiliated Small Cust	omer Calculation		
	Incremental	Incremental	ESP Financial Security	Affiliated Small Customer	Total ESP
	Procurement Cost	Administrative	Amount for Unaffiliated	and Large Customer	Financial Security
	Exposure (\$)	Costs (\$)	Small Customers (\$)	Administrative Costs (\$)	Amount
Electric Service Providers (ESPs)	(A)	(B)	(C=A+B or 0, whichever greater)	(D)	(E=C+D)
3 PHASES RENEWABLES LLC	and the second second second second				
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 h istorical 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.