

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Enhance  
the Role of Demand Response in Meeting  
the State's Resource Planning Needs and  
Operational Requirements.

Rulemaking 13-09-011  
(Filed November 14, 2013)

**RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U902M) TO PROPOSED  
DECISION APPROVING TWO-YEAR BRIDGE FUNDING FOR DEMAND RESPONSE  
PROGRAMS**

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Dated: December 30, 2013

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San Diego Gas & Electric Company ("SDG&E") respectfully submits comments in response to the Proposed Decision Approving Two-Year Bridge Funding for Demand Response Programs ("PD"), dated December 9, 2013, in the above-entitled proceeding. SDG&E appreciates the Commission's efforts to address bridge funding for the 2015-2016 demand response ("DR") programs to ensure program continuity while the Commission undertakes its review and analysis in an effort to enhance the role DR plays in meeting the State's resource planning needs and operational requirements. In order to achieve these objectives in a smooth and seamless manner, SDG&E recommends that the Proposed Decision be modified in the following three respects:

1. The PD should be revised to specifically provide a new required filing date for the next DR cycle application (presumably for the 2017 – 2019 cycle, since 2015 and 2016 would be bridge years). At page 2, footnote 3 indicates that the original 2015 – 2017 applications were to be due on January 31, 2014, and that on September 18, 2013, the Executive Director granted a request to delay the filing until July 31, 2014. At this point, the only filing date that is still on the table is July 31, 2014, until the PD would adopt a

new date. SDG&E suggests that the new filing date for the 2017-2019 cycle should be no sooner than February 1, 2016 which would be consistent with the January 31 date originally envisioned by the Commission.

2. The PD in Ordering Paragraph 2 would require that the deadline for filing the DR program revision recommendations will be 30 days following the issuance of the guidance ruling. Thirty days may be insufficient time to receive, understand and fully integrate the guidance ruling recommendations into a filing. The PD should be revised to provide a slightly expanded period of up to 60 days.
3. The PD would cap the 2015 – 2016 bridge funding at the same level as the utilities' current 2013 – 2014 DR budget (at page 9). The PD should be modified to cap the 2015 – 2016 bridge funding at two thirds (2/3) of the previously adopted 2012 – 2014 DR program cycle budget. While it is accurate to state that the 2012 – 2014 DR program cycle budgets are prepared on an annual basis, the fact is that D. 12-04-045 adopted a total 3-year cycle budget. In addition, the Commission has previously permitted the utilities budget funding fungibility, to allow flexibility in spending, up to adopted budget levels, between program years. By modifying the PD to allow for a cap of 2/3 of the adopted 2012 – 2014 DR budget, that same flexibility is maintained.

DATED at San Diego, California, on this 30th day of December, 2013.

Respectfully submitted,

By:     /s/ Thomas R. Brill    

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