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March 14, 2014

ADVICE LETTER 2584-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: ESTABLISHMENT OF ALTERNATIVE FUEL VEHICLE MEMORANDUM
ACCOUNT (AFVMA) PURSUANT TO DECISION 13-11-002**

San Diego Gas & Electric Company (SDG&E) hereby submits for approval the following modifications to its electric tariffs as shown in enclosed Attachment A.

PURPOSE

In compliance with Ordering Paragraph (OP) 7 of Decision (D.) 13-11-002, this filing establishes the AFV Memorandum Account (AFVMA).

DISCUSSION

On November 19, 2013, the Commission issued D.13-11-002, which modified the Plug-In Electric Vehicle Submetering Protocol requirements set forth in D.11-07-029 by adopting the Energy Division Staff Roadmap for a two-phase pilot project and extended the deadline to submit a final proposal on the Submetering Protocol. D.13-11-002 authorizes utilities to recover all or the majority of costs for the submetering pilot program through the Electric Program Investment Charge (EPIC) Program, as established in D.11-12-035, D.12-05-037, and D.13-11-025.¹

¹ While the recent EPIC decision, D.13-11-025, allows SDG&E to use EPIC funds for the submetering pilot ("SDG&E is not required but is encouraged to support this project with EPIC funds"), it is unclear whether D.13-11-025 requires SDG&E to consider the submetering pilot part of its EPIC portfolio for reporting purposes if it funds the submetering pilot with EPIC funds. SDG&E has recently filed a Petition for Modification of D.13-11-025 requesting clarification; during its pendency, SDG&E will post submetering pilot costs to the EPIC Balancing Account (EPICBA). The EPIC decision's ambiguity does not concern this advice letter or the AFVMA.

Additionally, because of the uncertainty of total costs for the submetering pilots and to ensure timely implementation of the pilot program, D.13-11-002 authorized SDG&E to establish the AFVMA. The purpose of the AFVMA is to record expenses related to implementation of the submetering pilots (including, but not limited to labor, incentives, equipment, manual billing and service operations) that are above what could reasonably be recovered through EPIC. Costs recorded in the AFVMA shall not exceed \$2 million per utility in the case of co-funding from EPIC.²

According to D.13-11-002, "EPIC funding for submetering pilots . . . shall be subtracted from memorandum accounts."³ Costs recorded in the AFVMA in excess of what could be recovered through EPIC may be recovered later through an "appropriate ratemaking proceeding".⁴

In the event that the Commission rejects SDG&E's recording of submetering pilot costs in the EPICBA, SDG&E requests that it be allowed to transfer any submetering pilot funds booked in the EPICBA to the AFVMA. In that situation, costs recorded in the AFVMA shall not exceed \$5 million.⁵

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

EFFECTIVE DATE

SDG&E believes this filing is subject to Energy Division disposition and should be classified as Tier 1 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this filing become effective on March 14, 2014, 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 April 3, 2014, 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

² D.13-11-002 at OP7.

³ D.13-11-002 at 43.

⁴ D.13-11-002 at 43.

⁵ D.13-11-002 at OP7.

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.09-08-009, R.13-11-007 and A.12-11-001, 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: Megan Caulson

Phone #: (858) 654-1748

E-mail: mcaulson@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) #: 2584-E

Subject of AL: Establishment of the Alternative Fuel Vehicle Memorandum Account (AFVMA) Pursuant to Decision 13-11-002

Keywords (choose from CPUC listing): Memorandum Account

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

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

D.13-11-002

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: None

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

Does AL request confidential treatment? If so, provide explanation: None

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 3/14/2014

No. of tariff sheets: 3

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: Alternative Fuel Vehicle Memorandum Account, Table of Contents

Service affected and changes proposed¹: No re

Pending advice letters that revise the same tariff sheets: None

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 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

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

R.09-08-009

R.13-11-007

A.12-11-001

ATTACHMENT A
ADVICE LETTER 2584-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original 24572-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, ALTERNATIVE FUEL VEHICLE MEMORANDUM ACCOUNT (AFVMA), Sheet 1	
Revised 24573-E	TABLE OF CONTENTS, Sheet 1	Revised 24570-E
Revised 24574-E	TABLE OF CONTENTS, Sheet 3	Revised 23825-E



PRELIMINARY STATEMENT

Sheet 1

III. MEMORANDUM ACCOUNTS
ALTERNATIVE FUEL VEHICLE MEMORANDUM ACCOUNT (AFVMA)

1. Purpose:

The purpose of the Alternative Fuel Vehicle Memorandum Account (AFVMA), authorized in Decision (D.) 13-11-002, is to record any and all costs related to implementation of the submetering pilots (including, but not limited to labor, incentives, equipment, manual billing and service operations) that are above what could reasonably be recovered through the Electric Program Investment Charge (EPIC). Costs recorded in this memorandum account shall not exceed \$2 million in the case of co-funding from EPIC and shall not exceed \$5 million in the case that the EPIC program is not authorized.

2. Applicability:

The AFVMA applies to electric customers only unless otherwise specified by the Commission.

3. Rates

The AFVMA does not currently have a rate component.

4. Effective Date

The effective date of this account is March 14, 2014.

5. Accounting Procedures

SDG&E shall maintain the AFVMA by making entries to it at the end of each month as follows:

- a) A debit entry equal to costs incurred from activities related to planning for and implementing the submetering pilots.
- b) An entry to reflect any transfer to or from other regulatory accounts as authorized by the Commission.
- c) An entry equal to interest calculated on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

6. Disposition

The disposition of this account balance will be addressed in connection with SDG&E's Annual Regulatory Account Balance Update filing or other proceeding expressly authorized by the Commission.

(Continued)

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Advice Ltr. No. 2584-E

Decision No. D.13-11-002

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Mar 14, 2014

Effective

Resolution No.

N
N
N
N
N



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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.

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Issued by

Date Filed

Mar 14, 2014

Advice Ltr. No. 2584-E

Lee Schavrien

Effective

Decision No. D.13-11-002

Senior Vice President
Regulatory Affairs

Resolution No.