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ED Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments of San Diego Gas & Electric Company on Draft Resolution E-4655

Dear Energy Division Tariff Unit:

San Diego Gas & Electric (“SDG&E”) submits the following comments regarding Draft Resolution E-4655 (the “RAM DR”), which approves without modifications SDG&E’s Advice Letter 2580-E and addresses additional issues that impact the Renewable Auction Mechanism (“RAM”) for all three Investor Owned Utilities (“IOUs”).

SDG&E’s reply comments seek clarification regarding section ‘B. Substantive Proposed Changes to the Individual IOU RAM Pro Forma PPAs’ of the RAM DR proposal.¹ This section is divided further into six subsections: (1) *Safety Provisions*, (2) *Network Upgrade Cost Cap and Seller’s “Buy-Down Right”*, (3) *Curtailment*, (4) *Resource Adequacy and Full Capacity Deliverability Status*, (5) *Shared Facilities*, and (6) *In-Service and Test Energy Date Provisions*.² For some of the aforementioned subsections, all three IOUs are authorized to include the respective provisions in their RAM PPAs³, however with respect to other subsections, the RAM DR proposal is silent on whether the three IOUs are authorized to include the provision. For example, in subsection (4) *Resource Adequacy and Full Capacity Deliverability Status*, the Commission agreed and approved of PG&E’s request to modify the date by which projects must achieve FCDS from December 31, 2021 to December 31, 2024.⁴ However, the RAM DR is silent as to whether the other two IOUs are authorized to include this modification as well (the authorized change is also absent from the ordering paragraphs). Accordingly, SDG&E requests that the Commission clarify that all three IOUs are authorized to modify the date by which projects must achieve FCDS from December 31, 2021 to December 31, 2024 and that the ordering paragraphs be updated as appropriate.

¹ Draft Resolution E-4655 p.10.

² Draft Resolution E-4655 p. 12-21.

³ See Ordering Paragraphs 6-9, p. 37-38.

⁴ Draft Resolution E-4655 p. 20.

Respectfully Submitted,

CLAY FABER
Director - Regulatory Affairs

cc: President Michael R. Peevey
Commissioner Michel P. Florio
Commissioner Catherine J.K. Sandoval
Commissioner Carla J. Peterman
Commissioner Michael Picker
Paul Douglas, Energy Division
Karen Clopton, Chief Administrative Law Judge
Frank Lindh, General Counsel
Service List R.11-05-005