

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

Order Instituting Rulemaking on the Commission's
Own Motion to Conduct a Comprehensive
Examination of Investor Owned Electric Utilities'
Residential Rate Structures, the Transition to Time
Varying and Dynamic Rates, and Other Statutory
Obligations.

Rulemaking 12-06-013
(Filed June 21, 2012)

**PREHEARING CONFERENCE STATEMENT OF
SAN DIEGO GAS & ELECTRIC COMPANY (U902E)**

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Dated: May 2, 2014

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I. INTRODUCTION

San Diego Gas & Electric Company ("SDG&E") hereby submits its Prehearing Conference Statement pursuant to the Third Amended Scoping Memo and Ruling Of Assigned Commissioner ("Ruling") issued on April 15, 2014 in this proceeding. As is set forth in greater detail below, SDG&E makes the following suggestions herein:

- The issue of default Time-of-Use ("TOU") rates should be addressed on a utility-specific basis; and,
- Until Intervenor testimony has been filed herein, specific areas of factual dispute cannot be clearly identified.

II. THE ISSUE OF DEFAULT TOU RATES SHOULD BE ADDRESSED ON A UTILITY-SPECIFIC BASIS

The Ruling points out that SDG&E has proposed default TOU Rates, beginning in 2018 and asks if Southern California Edison Company ("SCE") and Pacific Gas and Electric Company ("PG&E") should "be required to propose 2018 default TOU rates for evaluation."¹ While SDG&E defers to the Commission on the ultimate determination of this issue, SDG&E agrees with the insights set forth in the Ruling to the effect that, "Because each utility's service territory

¹ See, Ruling, at pp. 7-8.

includes different weather patterns and load shapes, TOU periods will be different across the state.” Consistent with this observation, SDG&E submits that the issue of default TOU rates should be addressed on a utility-specific basis. Should default TOU rates be adopted for SDG&E prior to other utilities, the Commission could gain significant experience that could result in statewide benefits. Requiring SCE and PG&E at this time to propose default TOU rates in 2018 is not necessary for the Commission to approve SDG&E’s request to implement default TOU rates in 2018 for its customers.

III. UNTIL INTERVENOR TESTIMONY HAS BEEN FILED HEREIN, SPECIFIC AREAS OF FACTUAL DISPUTE CANNOT BE CLEARLY IDENTIFIED

The Ruling stated that during the upcoming Prehearing Conference, scheduled for May 13, 2014, “parties will have the opportunity to further identify areas of factual dispute and categories of data and types of studies that could be used to resolve these disputes.” SDG&E submits that it is premature to identify specific areas of factual dispute until non-utility parties have submitted their expert testimony herein. Only after a review and evaluation of this testimony will SDG&E be able to identify specific factual issues of dispute.

IV. CONCLUSION

SDG&E appreciates the opportunity to submit this Prehearing Conference Statement.

Dated: May 2, 2014

San Diego Gas & Electric Company

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