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March 26, 2008

**ADVICE LETTER 1760-G**  
(U902-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: REVISIONS TO RULE 39 – ACCESS TO THE SDG&E PIPELINE SYSTEM**

San Diego Gas & Electric Company (SDG&E) hereby submits for approval the following revisions to its gas tariffs as shown in the enclosed attachment.

**PURPOSE**

This Advice Letter submits revisions to Rule 39, Access to the SDG&E Pipeline System. Southern California Gas Company (SoCalGas) is filing similar revisions concurrent with SDG&E's Advice Letter.

**BACKGROUND**

A comprehensive legislative and regulatory framework is currently in place in California to support major expansion of the supply of renewable electric resources and facilities within the State. Companion legislation, Senate Bills 1078 and 107, establish the renewable portfolio standard (RPS) program, which promotes renewable electric energy as a means of meeting the environmental goals of the State and, in particular, of reducing greenhouse gas (GHG) emissions.<sup>1</sup>

The State has also acknowledged the important role to be played by biofuels in meeting GHG emission reduction goals. In Executive Order S-06-06, Governor Schwarzenegger established targets to increase the production and use of bioenergy. The Order directs the State to produce a minimum of 20% of its biofuels within California by 2010, 40% by 2020, and 75% by 2050. The Bioenergy Action Plan issued by the Bioenergy Interagency Working Group<sup>2</sup> in July 2006, declared that "California has large untapped biomass resources, including residues from forestry, urban, and agricultural wastes. Using these resources to produce transportation fuels,

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<sup>1</sup> Senate Bill (SB) 107, Sec. 1, § 25620.1(b)(1) and (3) (Stats. 2006, Ch. 464); Senate Bill (SB) 1078, Sec. 1, § 387(a) (Stats. 2002, Ch. 516).

<sup>2</sup> The Bioenergy Interagency Working Group is comprised of the California Air Resources Board, the California Energy Commission, the California Environmental Protection Agency, the California Dept. of Food and Agriculture, the California Dept. of Forestry and Fire Protection, the California Dept. of General Services, the Integrated Waste Management Board, the California Public Utilities Commission and the Water Resources Control Board.

electrical energy and biogas will benefit California.”<sup>3</sup> The Bioenergy Action Plan recommends mechanisms designed to increase production and use of biomass energy, noting that “[t]he production and use of the state’s considerable biomass resources can achieve progress toward meeting the state’s petroleum reduction, climate change, and renewable energy goals, while providing strategic social, economic, and environmental benefits to California.”<sup>4</sup>

In September 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, which set forth the State’s intent in the effort to reduce GHG emissions. AB 32 also intended to stimulate investment, “in the development of innovative and pioneering technologies [that] will assist California in achieving the statewide limit on emissions of greenhouse gases.”<sup>5</sup> Most significantly, AB 32 set the ambitious goal of reducing statewide GHG emissions to 1990 levels by 2020 and required the California Air Resources Board (CARB), in consultation with stakeholders, including the Commission, to implement by January 2012, “emission reduction measures...to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gases in furtherance of achieving the statewide greenhouse gas emission limit.”<sup>6</sup> SDG&E believes in the mission of AB 32 and is fully committed to supporting the efforts of the State of California to reduce GHG emissions.

To that end, SDG&E and SoCalGas filed their Joint Climate Action Initiative (A.07-08-031) that builds on current successes and establishes a foundation for long-term progress towards reducing GHG emissions in California. The Climate Action Initiative describes several actions that can be taken in the near term so that in the long term renewable energy facilities could be made available at cost levels that are competitive with conventional resources and will require less legislative and regulatory push than is required today. One of the recommendations provided in A.07-08-031 is that the Commission should approve modifications to SDG&E Rule 39 to provide an interconnect allowance in order to increase access to biofuel resources generated from acceptable biofuel sources such as dairies, biomass, and wastewater treatment facilities.

There are more than 1.7 million dairy cows in the state of California. Approximately 40% of these cows are located within the SoCalGas or SDG&E service territory. Collectively, manure from dairies has the potential to produce up to 18 billion cubic feet of methane per year (approximately 50 MMcf/d) in the combined service territories. Although this represents less than 2% of the average system demand, it offers significant incremental resource potential because it is renewable. Although this segment is already attracting significant private development, SDG&E proposes to further support market development for dairy and other larger-scale pipeline biomethane producers by facilitating interconnection to its system.<sup>7</sup> For that purpose, SDG&E proposes that if a biomethane supplier commits to deliver, for at least five (5) years, biogas volumes exceeding an average of 500 Mcf/d, then certain interconnection costs, as described below, would be recovered through current rates paid by all customers. SDG&E will not seek any incremental cost recovery during the current rate case period.

Since the Commission’s consideration of A.07-08-031 has been delayed, SDG&E is seeking approval of this Advice Letter. This action is consistent with A.07-08-031 where SDG&E

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<sup>3</sup> Bioenergy Action Plan, page 1

<sup>4</sup> Ibid.

<sup>5</sup> Assembly Bill (AB) 32, Part 1, Ch. 2 § 38501 (e) (Stats. 2006, Ch. 488).

<sup>6</sup> AB 32, Part 4 § 38562 (a).

<sup>7</sup> Direct Testimony of Jeffrey Reed (A.07-08-031), page III-10.

indicated that it would be filing its proposed Rule 39 revisions through a separate Advice Letter.<sup>8</sup> SDG&E believes its proposed changes to Rule 39 would promote the development of substantial and cost-effective biomethane supplies and thus should be expeditiously considered by the Commission.

## **DISCUSSION**

The proposed additions to Rule 39 provide an interconnect allowance for a producer and/or supplier of biogas seeking an interconnection point with SDG&E. This change will aid the overall efforts of increasing renewable gas supplies by providing incentives for producers and/or suppliers of biogas to interconnect to the SDG&E system to deliver biogas to end use customers.

Specifically, if the interconnector is a producer and/or supplier of biogas, contracted and expected to deliver, for at least five (5) years, biogas volumes exceeding an average of 500 Mcf/d into the SDG&E system, SDG&E proposes to construct/install all the facilities, as described in Section 3(b) of Form 143-006, Interconnect Collectible System Upgrade Agreement (ICSUA), to receive from the interconnection point biogas volumes in an amount up to the interconnection capacity. All the costs of such facilities, excluding any equipment that is unique for receiving biogas supplies at the interconnection point, will be recovered through the rates paid by all customers. The interconnector shall pay SDG&E for all of its costs (including, but not limited to, SDG&E's income tax liability) associated with the construction and installation of any equipment that is unique for receiving biogas supplies at the interconnection point. If the interconnector is not contracted and expected to deliver, for at least five (5) years, into the SDG&E system biogas volumes exceeding an average of 500 Mcf/d, then the interconnector shall either construct/install all of the above-mentioned facilities meeting SDG&E's specifications or pay SDG&E for all of its costs (including, but not limited to, SDG&E's income tax liability) associated with the construction/installation of all of the above-mentioned facilities at the interconnection point.

Regardless of the amount of contracted and expected biogas volumes, the interconnector shall:

- 1) Pay SDG&E for all operations and maintenance expenses and future equipment upgrades associated with all of the above-mentioned facilities for receiving biogas supplies at the interconnection point.
- 2) Construct/install/maintain, at its own cost, all the facilities necessary, as described in Section 3(b) of Form 143-006, ICSUA, on the interconnector's system to deliver at the interconnection point, biogas volumes in an amount up to the interconnection capacity.
- 3) Construct/install/maintain, at its own cost, any pipeline facilities that may be necessary to transport biogas from the production facilities to the interconnection point.
- 4) Obtain firm and/or interruptible receipt point access rights to the SDG&E system under the provisions of SoCalGas' Schedule G-RPA.

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

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<sup>8</sup> Direct Testimony of Jeffrey Reed, (A.07-08-031), page III-20.

**EFFECTIVE DATE**

SDG&E believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. Therefore, SDG&E respectively requests that this advice letter be approved April 25, 2007, thirty days from 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 within 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 both Honesto Gatchalian ([jni@cpuc.ca.gov](mailto:jni@cpuc.ca.gov)) and Maria Salinas ([mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Todd Cahill  
Regulatory Tariff Manager  
8330 Century Park Court, Room 32C  
San Diego, CA 92123-1548  
Facsimile No. (858) 654-1788  
E-mail: [tcahill@semprautilities.com](mailto:tcahill@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 to service list R.06-04-009, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1788 or by e-mail at [SDG&ETariffs@semprautilities.com](mailto:SDG&ETariffs@semprautilities.com).

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KEN DEREMER  
Director – Tariffs & Regulatory Accounts

(cc list enclosed)

# 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: Will Fuller

Phone #: (858) 654-1885

E-mail: wfuller@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) #: 1760-G

Subject of AL: Revisions to Rule 39 - Access To the SDG&E Pipeline System

Keywords (choose from CPUC listing): Renewable, Biofuel, interconnect

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL N/A

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation:

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: 4/25/08

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: See Table of Contents

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

**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**

**mas@cpuc.ca.gov and jnj@cpuc.ca.gov**

**San Diego Gas & Electric**

**Attention: Todd Cahill**

**8330 Century Park Ct, Room 32C**

**San Diego, CA 92123**

**tcahill@semprautilities.com**

<sup>1</sup> 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

D. Appling  
S. Cauchois  
J. Greig  
R. Pocta  
W. Scott

Energy Division

P. Clanon  
S. Gallagher  
H. Gatchalian  
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F. DeLeon  
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Alcantar & Kahl LLP

K. Harteloo

American Energy Institute

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APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

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K. Mills

California Wind Energy

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V. Gan

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Davis Wright Tremaine, LLP

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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. Kelly

R. W. Beck, Inc.

C. Elder

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. Florio  
M. Hawiger

UCAN

M. Shames

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.06-04-009

ATTACHMENT  
ADVICE LETTER 1760-G

| Cal. P.U.C.<br>Sheet No. | Title of Sheet   | Canceling Cal.<br>P.U.C. Sheet No. |
|--------------------------|--|------------------------------------|
| Original 16933-G         | RULE 39, ACCESS TO THE SDG&E PIPELINE SYSTEM, Sheet<br>4 |                                    |
| Revised 16934-G          | TABLE OF CONTENTS, Sheet 1                               | Revised 16821-G                    |
| Revised 16935-G          | TABLE OF CONTENTS, Sheet 5                               | Revised 16824-G                    |



**RULE 39**

ACCESS TO THE SDG&E PIPELINE SYSTEM

C. Interconnection with Biogas Producer/Supplier

1. If the Interconnector is a producer and/or supplier of biogas (governed by the Utility's Rule No. 30) and is contracted and expected to deliver, for at least five (5) years, into the Utility system biogas volumes exceeding an average of 500 Mcf/d, then the Utility shall construct/install all the facilities, as described in Section 3(b) of Form 143-006, Interconnect Collectible System Upgrade Agreement (ICSUA), to receive from the interconnection point biogas volumes in an amount up to the interconnection capacity. All the costs of such facilities, excluding any equipment that is unique for receiving biogas supplies at the interconnection point, will be recovered through the rates paid by all customers. The Interconnector shall pay the Utility for all of its costs (including, but not limited to, the Utility's income tax liability) associated with the construction and installation of any equipment that is unique for receiving biogas supplies at the interconnection point.
2. If the Interconnector is not contracted and expected to deliver, for at least five (5) years, into the Utility system biogas volumes exceeding an average of 500 Mcf/d, then the Interconnector shall either construct/install all of the above-mentioned facilities meeting the Utility's specifications or pay the Utility for all of its costs (including, but not limited to, the Utility's income tax liability) associated with the construction/installation of all of the above-mentioned facilities at the interconnection point.
3. Regardless of the amount of contracted and expected biogas volumes, the Interconnector shall:
  - a) Pay the Utility for all operations and maintenance expenses and future equipment upgrades associated with all of the above-mentioned facilities at the interconnection point.
  - b) Construct/install/maintain, at its own cost, all the facilities necessary, as described in Section 3(b) of Form 6430, ICSUA, on the Interconnector's system to deliver at the interconnection point, biogas volumes in an amount up to the interconnection capacity.
  - c) Construct/install/maintain, at its own cost, any pipeline facilities that may be necessary to transport biogas from the production facilities to the interconnection point.
  - d) Obtain firm and/or interruptible receipt point access rights to the Utility system under the provisions of Southern California Gas Company's Schedule No. G-RPA.

N  
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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Advice Ltr. No. 1760-G

Decision No. \_\_\_\_\_

Issued by  
**Lee Schavrien**  
Senior Vice President  
Regulatory Affairs

Date Filed Mar 26, 2008

Effective \_\_\_\_\_

Resolution No. \_\_\_\_\_



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