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July 31, 2008

ADVICE LETTER 2011-E/ 1788-G
(U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: Revisions to Gas and Electric Schedules GS, DS, and DT

San Diego Gas & Electric Company (SDG&E) hereby submits for approval the following revisions to its electric and gas tariffs as shown in Attachments A and B, respectively.

PURPOSE

The purpose of this filing is to request California Public Utilities Commission (Commission) authorization to revise SDG&E gas and electric Schedules GS - Submetered Multi-Family and Mobilehome Park Natural Gas Service, DS - Submetered Multi-Family Service, and DT - Submetered Multi-Family Service – Mobilehome Park, to limit the credit applicable to discounted master-metered facilities that submeter their tenants.

DISCUSSION

SDG&E's master-metered customers who submeter their tenants receive a daily submetering credit against their monthly bills for schedules GS, DS, and DT. The purpose of the submetering credit is to reimburse the master-metered customers for costs associated with owning, operating and maintaining their own distribution systems, which in turn, is a cost savings to SDG&E. Tenants of the master-metered facility are billed for their usage recorded by their submeter according to their applicable residential gas and/or electric rate schedules and do not receive benefit of this credit.

An evaluation of SDG&E's master-metered customer base revealed that because its current tariffs do not limit the amount of credit adjustments that are applied to master-metered customers' monthly bills, the credit in some cases offsets not only all of the gas or electric non-procurement charges, but also a portion of the gas or electric procurement charges. Consequently, by receiving a credit to the commodity portion of the bill, the master-metered customer is receiving a discount in excess of what was intended.

The master-meter discount is not intended to offset the commodity charges on a customer's bill. Decision 05-04-041, dated April 21, 2005, addressed matters relating to the discount authorized by Public Utilities Code Section 739.5 (a)¹ for master-metered customers who provide electricity and/or natural gas to their tenants through a submetered distribution system. The decision states that the discount was intended to reimburse the master-metered customer for the reasonable average cost of providing submetered service and it also imposes a cap on the discount. The discount is not to exceed the average cost that the utility would have incurred in providing comparable services to the tenant directly.

SDG&E therefore respectfully requests authorization to modify Schedules GS, DS, and DT to include clarifying language that would limit the daily submetering credit in instances where the credit exceeds the non-procurement portion of a master-metered customer's gas and electric bill. With the exception of SDG&E, the practice of limiting the submetering credit from exceeding the non-procurement portion of the customer's master-metered bill is consistent with the other California Investor Owned Utilities. Therefore, upon Commission approval, the daily submetering credit will be applied, prospectively, to SDG&E's master-metered customers who submeter their customers.

Because submetered tenants receive service under their respective gas and/or electric rate schedules, the changes proposed herein **will not impact a tenant's bill**.

Proposed Tariff Changes

SDG&E therefore modifies its gas and electric rate schedules as follows:

Schedule GS – Submetering Credit:

A daily submetering credit for multi-family service of 25.493 cents per day and a submetering credit for multi-family Mobilehome Parks of 34.064 cents per day will be applied to each residential dwelling unit utilizing gas service. In the event that the total submetering credit exceeds the amount of the Core Gas Transportation (GTC) portion of the master-metered customer's total gas bill, the applicable Core Gas Procurement charge (GPC), multiplied by the daily number of therms, will be the minimum Bill that shall apply.

Schedules DS and DT – Minimum Bill:

In the event that the total submetering credit exceeds the amount of the Utility Distribution Company (UDC) portion of the master-metered customer's total electric bill, the applicable Electric Energy Commodity Cost (EECC) charge, multiplied by total usage, will be the minimum bill that shall apply.

¹ Section 739.5(a) states as follows:

The commission shall require that, whenever gas or electric service, or both, is provided by a master-meter customer to users who are tenants of a mobilehome park..., the master-meter customer shall charge each user of the service at the same rate which would be applicable if the user were receiving gas or electricity, or both, directly from the gas or electrical corporation. The commission shall require the corporation furnishing service to the master-meter customer to establish uniform rates for master-meter service at a level which will provide a sufficient differential to cover the reasonable average costs to master-meter customers of providing submeter service, except that these costs shall not exceed the average cost that the corporation would have incurred in providing comparable services directly to the users of the service .

EFFECTIVE DATE

SDG&E believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this filing be approved on August 30, 2008, which is 30 days after the date filed. Once approved, SDG&E requests implementation to be effective January 1, 2009.

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) and Maria Salinas (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

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, 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.

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: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: acarrillo@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) #: 2011-E / 1788-G

Subject of AL: Revisions to Gas and Electric Schedules GS, DS, and DT

Keywords (choose from CPUC listing): Mobile Home Parks

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 AL¹: N/A

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

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 8/30/08

No. of tariff sheets: 8

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: Schedules GS, DS, DT and TOC

Service affected and changes proposed¹: 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

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

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

Energy Division

P. Clanon
S. Gallagher
H. Gatchalian
D. Lafrenz
M. Salinas

CA. Energy Commission

F. DeLeon
R. Tavares

Alcantar & Kahl LLP

K. Harteloo

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

CCSE

S. Freedman
J. Porter

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham
E. Hull

City of Poway

R. Willcox

City of San Diego

J. Cervantes
G. Lonergan
M. Valerio

Commerce Energy Group

V. Gan

Constellation New Energy

W. Chen

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

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

OnGrid Solar

Andy Black

Pacific Gas & Electric Co.

J. Clark
M. Huffman
S. Lawrie
E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

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

ATTACHMENT A
ADVICE LETTER 2011-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 20714-E	SCHEDULE DS, SUBMETERED MULTI-FAMILY SERVICE, Sheet 2	Revised 20485-E
Revised 20715-E	SCHEDULE DT, SUBMETERED MULTI-FAMILY SERVICE - MOBILEHOME PARK, Sheet 2	Revised 20487-E
Revised 20716-E	TABLE OF CONTENTS, Sheet 1	Revised 20713-E
Revised 20717-E	TABLE OF CONTENTS, Sheet 4	Revised 20711-E



SCHEDULE DS

Sheet 2

SUBMETERED MULTI-FAMILY SERVICE

RATES (Continued)

Minimum Bill

In the event that the total submetering credit exceeds the amount of the Utility Distribution Company (UDC) portion of the master-metered customer's total electric bill, the applicable Electric Energy Commodity Cost (EECC) charge, multiplied by total usage, will be the minimum bill that shall apply.

D, N
N
N

Rate Components

The Utility Distribution Company Total Rates (UDC Total) shown above are comprised of the following components (if applicable): (1) Transmission (Trans) Charges, (2) Distribution (Distr) Charges, (3) Public Purpose Program (PPP) Charges, (4) Nuclear Decommissioning (ND) Charge, (5) Ongoing Competition Transition Charges (CTC), (6) Reliability Services (RS), and (7) Total Rate Adjustment Component (TRAC).

Utility Distribution Company (UDC) Total Rate shown above excludes any applicable commodity charges associated with Schedule EECC and Schedule DWR-BC (Department of Water Resources Bond Charge).

Certain Direct Access customers are exempt from the TRAC, as defined in Rule 1-Definitions.

CARE Discount

A 20% CARE discount will be applied to all electric charges billed on this schedule to qualified CARE customers as set forth in Schedule E-CARE. In addition, eligible customers on this schedule will be exempt from paying the CARE surcharge of \$0.00165 per kWh. Customers receiving service under this schedule shall comply with the provisions of Public Utilities Code 739.5 in providing service to their submetered tenants.

Franchise Fee Differential

A Franchise Fee Differential of 5.78% will be applied to the monthly billings calculated under this schedule for all customers within the corporate limits of the City of San Diego. Such Franchise Fee Differential shall be so indicated and added as a separate item to bills rendered to such customers.

(Continued)

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Advice Ltr. No. 2011-E

Decision No. 05-04-01

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Jul 31, 2008

Effective _____

Resolution No. E-4198



SCHEDULE DT

Sheet 2

SUBMETERED MULTI-FAMILY SERVICE - MOBILEHOME PARK

RATES (Continued)

Minimum Bill

In the event that the total submetering credit exceeds the amount of the Utility Distribution Company (UDC) portion of the master-metered customer's total electric bill, the applicable Electric Energy Commodity Cost (EECC) charge, multiplied by total usage, will be the minimum bill that shall apply.

D, N
N
N

Rate Components

The Utility Distribution Company Total Rates (UDC Total) shown above are comprised of the following components (if applicable): (1) Transmission (Trans) Charges, (2) Distribution (Distr) Charges, (3) Public Purpose Program (PPP) Charges, (4) Nuclear Decommissioning (ND) Charge, (5) Ongoing Competition Transition Charges (CTC), (6) Reliability Services (RS), and (7) Total Rate Adjustment Component (TRAC).

Utility Distribution Company (UDC) Total Rate shown above excludes any applicable commodity charges associated with Schedule EECC and Schedule DWR-BC (Department of Water Resources Bond Charge).

Certain Direct Access customers are exempt from the TRAC, as defined in Rule 1-Definitions.

CARE Discount

A 20% CARE discount will be applied to all electric charges billed on this schedule to qualified CARE customers as set forth in Schedule E-CARE. In addition, eligible customers on this schedule will be exempt from paying the CARE surcharge of \$0.00165 per kWh. Customers receiving service under this schedule shall comply with the provisions of Public Utilities Code 739.5 in providing service to their submetered tenants.

Franchise Fee Differential

A Franchise Fee Differential of 5.78% will be applied to the monthly billings calculated under this schedule for all customers within the corporate limits of the City of San Diego. Such Franchise Fee Differential shall be so indicated and added as a separate item to bills rendered to such customers.

(Continued)

2R8

Advice Ltr. No. 2011-E

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Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Jul 31, 2008

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Resolution No. E-4198



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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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ATTACHMENT B
ADVICE LETTER 1788-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 17118-G	SCHEDULE GS, SUBMETERED MULTI-FAMILY AND MOBILEHOME PARK NATURAL GAS SERVICE, (Includes Rates for GS/GT, GS/GT-C, and GTC/GTCA), Sheet 2	Revised 16871-G
Revised 17119-G	TABLE OF CONTENTS, Sheet 1	Revised 17115-G
Revised 17120-G	TABLE OF CONTENTS, Sheet 3	Revised 17117-G



SCHEDULE GS

Sheet 2

SUBMETERED MULTI-FAMILY AND MOBILEHOME PARK NATURAL GAS SERVICE
(Includes Rates for GS/GT, GS/GT-C, and GTC/GTCA)

RATES (Continued)

Submetering Credit:

A daily submetering credit for multi-family service of 25.493 cents per day and a submetering credit for multi-family Mobilehome Parks of 34.064 cents per day will be applied to each residential dwelling unit utilizing gas service. In the event that the total submetering credit exceeds the amount of the Core Gas Transportation (GTC) portion of the master-metered customer's total gas bill, the applicable Core Gas Procurement charge (GPC), multiplied by the daily number of therms, will be the minimum Bill that shall apply.

Franchise Fee Differential

A Franchise Fee Differential of 1.03% will be applied to the monthly billings calculated under this schedule for all customers within the corporate limits of the City of San Diego. Such Franchise Fee Differential shall be so indicated and added as a separate item to bills rendered to such customers.

Additional Charges:

Rates may be adjusted to reflect any applicable taxes, franchise fees or other fees, regulatory surcharges, and interstate or intrastate pipeline charges that may occur.

SPECIAL CONDITIONS

1. Definitions: The definitions of principal terms used in this Schedule are found either herein or in Rule 1, Definitions.
2. Number of Therms: The number of therms to be billed shall be determined in accordance with Rule 2. The therms in the Baseline Usage, shown in Special Condition 4, shall be multiplied by the number of qualified residential units. It is the responsibility of the customer to advise the Utility within 15 days following any change in the number of dwelling units or mobilehome spaces provided gas service. The number of qualifying units is subject to verification by the Utility.

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Advice Ltr. No. 1788-G

Decision No. 05-04-041

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Jul 31, 2008

Effective _____

Resolution No. _____

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Advice Ltr. No. 1788-G

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