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March 6, 2009

**ADVICE LETTER 1848-G**  
(U902-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: DAILY BALANCING STANDBY RATES FOR FEBRUARY 2009**

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 filing updates the Daily Balancing Standby Rates, located in SDG&E Schedule G-IMB, Transportation Imbalance Service, for the month of February 2009.

**DISCUSSION**

As authorized in Schedule G-IMB, customers will be subject to balancing rules during the winter operating period. From November through March, customers are required to deliver (from flowing supply and firm storage withdrawal) at a minimum of 50% of burn during a five-day period. Volumes not in compliance with the 50% five-day minimum delivery requirement are purchased at the daily balancing standby rate. The daily balancing standby rate is also utilized for deliveries that are less than the 70% and 90% minimum daily delivery requirements (when triggered), as set forth in Schedule G-IMB.

The daily balancing standby rate is calculated as 150% of the highest Southern California Border pricing during the five-day period as published in the "NGI's *Daily Gas Price Index*," including authorized franchise fees and uncollectibles plus the authorized brokerage fee. A workpaper detailing the calculation of these rates is included herein as Attachment B.

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

**EFFECTIVE DATE**

SDG&E believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to GO 96-B. SDG&E requests that the tariffs proposed herein be approved effective March 6, 2009, the date filed, and are to be applicable for the month of February 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 ([inj@cpuc.ca.gov](mailto:inj@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, 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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RON VAN DER LEEDEN  
Director – Rates, Revenues & Tariffs

(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) #: 1848-G

Subject of AL: Daily Balancing Standby Rates for February 2009

Keywords (choose from CPUC listing): Compliance, Daily Balancing

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: 3/6/09

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  
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  
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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 1848-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 17494-G	SCHEDULE G-IMB, TRANSPORTATION IMBALANCE SERVICE, Sheet 4	Revised 17437-G
Revised 17495-G	TABLE OF CONTENTS, Sheet 1	Revised 17492-G
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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 17496-G

Canceling Revised Cal. P.U.C. Sheet No. 17483-G

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(Continued)

4H6  
Advice Ltr. No. 1848-G  
Decision No. \_\_\_\_\_

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

Date Filed Mar 6, 2009  
Effective Mar 6, 2009  
Resolution No. \_\_\_\_\_

San Diego Gas & Electric Company  
**ADVICE LETTER 1848-G**  
**Attachment B**

**RATE CALCULATION WORKPAPER**  
**DAILY BALANCING STANDBY RATE FILING**  
**Effective February 1 - 28, 2009**

**Daily Balancing Standby Rate = (150% x (NGI's Price Index + FF&U Charge)) + Brokerage Fee**

**FF&U Charge = FF&U x NGI's Price Index**

**FF&U = 0.023102**

**Core Retail Brokerage Fee = 0.00188 \$/therm**

**Noncore Retail Brokerage Fee = 0.00188 \$/therm**

<b>February Day</b>	<b>NGI's Price Index (\$/therm)</b>	<b>Core Retail Daily Balancing Standby Rates (\$/therm)</b>	<b>Noncore Retail Daily Balancing Standby Rates (\$/therm)</b>
1	0.392	0.603	0.603
2	0.392	0.603	0.603
3	0.384	0.591	0.591
4	0.407	0.626	0.626
5	0.400	0.616	0.616
6	0.402	0.619	0.619
7	0.390	0.600	0.600
8	0.390	0.600	0.600
9	0.390	0.600	0.600
10	0.408	0.628	0.628
11	0.412	0.634	0.634
12	0.397	0.611	0.611
13	0.395	0.608	0.608
14	0.386	0.594	0.594
15	0.386	0.594	0.594
16	0.386	0.594	0.594
17	0.386	0.594	0.594
18	0.370	0.570	0.570
19	0.360	0.554	0.554
20	0.357	0.550	0.550
21	0.339	0.522	0.522
22	0.339	0.522	0.522
23	0.339	0.522	0.522
24	0.349	0.537	0.537
25	0.345	0.531	0.531
26	0.340	0.524	0.524
27	0.316	0.487	0.487
28	0.316	0.487	0.487