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April 3, 2009

ADVICE LETTER 1854-G
(U902-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: DAILY BALANCING STANDBY RATES FOR MARCH 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 March 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 April 3, 2009, the date filed, and are to be applicable for the month of March 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) 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.

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: Megan Caulson

Phone #: (858) 654-1748

E-mail: mcaulson@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) #: 1854-G

Subject of AL: Daily Balancing Standby Rates for March 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 AL¹: N/A

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

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 4/3/09

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 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.

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Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

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C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

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Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

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City of Poway

R. Willcox

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J. Cervantes
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W. Chen

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill
J. Pau

Dept. of General Services

H. Nanjo
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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

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Itsa-North America

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J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard
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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 1854-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 17536-G	SCHEDULE G-IMB, TRANSPORTATION IMBALANCE SERVICE, Sheet 4	Revised 17494-G
Revised 17537-G	TABLE OF CONTENTS, Sheet 1	Revised 17533-G
Revised 17538-G	TABLE OF CONTENTS, Sheet 4	Revised 17535-G



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Sheet 1

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Advice Ltr. No. 1854-G

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Apr 3, 2009

Effective Apr 3, 2009

Resolution No. _____



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 17538-G

Canceling Revised Cal. P.U.C. Sheet No. 17535-G

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Sheet 4

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(Continued)

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Advice Ltr. No. 1854-G

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Apr 3, 2009

Effective Apr 3, 2009

Resolution No. _____

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San Diego Gas & Electric Company
ADVICE LETTER 1854-G
Attachment B

RATE CALCULATION WORKPAPER
DAILY BALANCING STANDBY RATE FILING
Effective March 1 - 31, 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

March Day	NGI's Price Index (\$/therm)	Core Retail Daily Balancing Standby Rates (\$/therm)	Noncore Retail Daily Balancing Standby Rates (\$/therm)
1	0.303	0.467	0.467
2	0.303	0.467	0.467
3	0.345	0.531	0.531
4	0.345	0.531	0.531
5	0.345	0.531	0.531
6	0.341	0.525	0.525
7	0.323	0.498	0.498
8	0.323	0.498	0.498
9	0.323	0.498	0.498
10	0.324	0.499	0.499
11	0.340	0.524	0.524
12	0.338	0.521	0.521
13	0.330	0.508	0.508
14	0.327	0.504	0.504
15	0.327	0.504	0.504
16	0.327	0.504	0.504
17	0.314	0.484	0.484
18	0.304	0.468	0.468
19	0.300	0.462	0.462
20	0.300	0.462	0.462
21	0.313	0.482	0.482
22	0.313	0.482	0.482
23	0.313	0.482	0.482
24	0.331	0.510	0.510
25	0.324	0.499	0.499
26	0.330	0.508	0.508
27	0.321	0.495	0.495
28	0.316	0.487	0.487
29	0.316	0.487	0.487
30	0.316	0.487	0.487
31	0.308	0.475	0.475