

STATE OF CALIFORNIA

Edmund G. Brown Jr., *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



August 3, 2011

Advice Letter 1881-E

Clay Faber, Director
Regulatory Affairs
San Diego Gas and Electric
8330 Century Park Court, CP32C
San Diego, CA 92123-1548

**Subject: Modifications to the Community Choice Aggregation Cost
Responsibility Surcharge Tariffs in Compliance with
D.07-01-025**

Dear Mr. Faber:

Advice Letter 1881-E is effective April 11, 2007.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



J. Steve Rahon
Director
Tariffs & Regulatory Accounts
8330 Century Park Court
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March 12, 2007

ADVICE LETTER 1881-E
(U 902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: MODIFICATIONS TO THE COMMUNITY CHOICE AGGREGATION COST
RESPONSIBILITY SURCHARGE TARIFFS IN COMPLIANCE WITH DECISION
07-01-025**

San Diego Gas & Electric Company (SDG&E) hereby transmits for filing the following changes to its electric tariffs, as shown in the Attachment.

PURPOSE

San Diego Gas & Electric Company (SDG&E) hereby submits for approval by the California Public Utilities Commission (Commission) revisions to its Community Choice Aggregation Cost Responsibility Surcharge tariffs in compliance with Decision (D.) 07-01-025 in R.03-10-003. These revisions will align the method for calculating the CCA-CRS to be consistent with the CRS applicable to direct access and municipal departing load customers adopted in D.06-07-030.

BACKGROUND

Assembly Bill (AB) 117 was enacted by the Legislature in order to establish a Community Choice Aggregation (CCA) program whereby local governmental entities would be able to procure energy on behalf of the citizens in their communities and required that the Commission establish methods to protect existing utility customers from liabilities that they might otherwise incur when a portion of utility customers transfer their energy services to a CCA.

In D.04-12-046, the Commission stated its intent to protect bundled utility customers from the possible cost impacts of a CCA program while seeking to establish reasonable costs for the utility services CCAs and their customers would require by adopting a methodology for estimating a cost responsibility surcharge (CRS). The CRS allows the utilities to recover the CCA's allocation of all above market costs associated with DWR power contracts, utility owned generation, utility power procurement contracts, and all other utility resource commitments in a way that remaining bundled utility customers are indifferent to the CCA program.

D.06-07-030 issued in Rulemaking (R.) 02-01-011, adopted modifications to the method for calculating the CRS applicable to direct access customers and municipal departing load customers. In D.05-12-041, the CCA proceeding, the Commission stated its intent to consider

whether to conform the methodological modifications to the CRS for direct access customers and municipal departing load customers as it applies to CCAs.

Pursuant to D.07-01-025, Ordering Paragraph (OP) 1, the utilities were instructed to file tariffs applicable to CCA that would incorporate the methodology approved in D.06-07-030 for direct access customers for recovering above market costs. OP 2 ordered that the tariff revisions include the following changes:

- For vintaged CRS calculations, replace the “in and out” total portfolio calculation methods described in D.04-12-046 with a calculation that relies on market benchmarks compared to projected utility power costs, eliminating the true-up process;
- Use the adopted procedure in D.06-07-030 for deriving the market price benchmark;
- Update the CCA-CRS in the same Commission proceedings that would be used for the direct access and departing load customers calculations;
- Confirm that the CRS should not be negative, should not result in any net payment to customers who leave utility service, and should not be applied against other non-bypassable charges;
- CCA CRS modifications would not affect other non-bypassable charges.

SDG&E's is revising Schedule CCA-CRS consistent with the decision as follows:

- Under Rates, replaces the Energy Rate with the CCA-PCIA and sets the rate at zero. The CCA-PCIA is set to zero because SDG&E's total portfolio costs forecasted for 2007 are below the market benchmark distributed by the Energy Division.
- Modifies Special Condition (SC) 2, Composition of Rate, to reflect the methodology to be used in calculating the CCA CRS. Sets forth that the CCA-PCIA is determined in the annual ERRRA proceeding and is equal to the total indifference rate less the ongoing CTC. The total indifference rate is determined by comparing the utility's total portfolio to the market benchmark, pursuant to the methodology adopted in D.06-07-030. If the total indifference rate is less than or equal to zero then the CCA-PCIA is set to zero; therefore, the CRS will never be negative.
- Adds SC 3, Vintaging, in order to calculate a CCA's CRS based upon the applicable utility resource commitments and the timing of the CCA's departing load. The use of a vintaged portfolio and a market benchmark based on publicly available information replaces the “in and out” total portfolio method calculation.
- Deletes the former SC 3 (Treatment of Revenues) since the reconciliation process was eliminated pursuant to OP 2.
- Deletes the former SC 4 (Treatment of DA Customers) since it no longer applies.

In addition, SDG&E is revising Preliminary Statement III, Community Choice Aggregation Surcharge Memorandum Account (CCASMA), to reflect that this account is being modified

consistent with D.07-01-025 and to change the term under Accounting Procedure to CCA Power Charge Indifference Adjustment.

This filing will not create any deviations from SDG&E's tariffs, cause withdrawal of service from any present customers, or impose any more restrictive conditions.

EFFECTIVE DATE

SDG&E believes this filing is subject to Energy Division disposition and therefore respectfully requests that this filing become effective on April 11, 2007, which is 30 calendar days after 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 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 should also be sent via e-mail to the attention of both Honesto Gatchalian (jjn@cpuc.ca.gov) and Maria Salinas (mas@cpuc.ca.gov) of the Energy Division. It is also requested that a copy of the protest be sent via electronic mail and facsimile to SDG&E on the same date it is mailed or delivered to the Commission (at the addresses shown below).

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, including interested parties in R.03-10-003, 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 to SDG&ETariffs@semprautilities.com.

J. STEVE RAHON
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**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Margee Moore

Phone #: (858) 654-1748

E-mail: mmoore@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) #: 1881-E

Subject of AL: Modifications to the Community Choice Aggregation Cost Responsibility Surcharge

Tariffs in Compliance with Decision 07-01-025

Keywords (choose from CPUC listing): Compliance, CCA-CRS, Vintaging

AL filing type: Monthly Quarterly Annual One-Time Other _____

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

D.07-01-025

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: _____

Resolution Required? Yes No

Requested effective date: 4/11/07 No. of tariff sheets: 6

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: PS III - CCASMA, Schedule CCA-CRS, & TOCs

Service affected and changes proposed¹: _____

Pending advice letters that revise the same tariff sheets: None

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-A, Sec. III. G.
ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

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UCAN

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D. Koser

Western Manufactured Housing

Communities Association

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White & Case LLP

L. Cottle

Interested Parties:

R.03-10-003

ATTACHMENT
ADVICE LETTER 1881-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 19988-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, COMMUNITY CHOICE AGGREGATION SURCHARGE MEMORANDUM ACCOUNT (CCASMA), Sheet 1	Original 19495-E
Revised 19989-E	SCHEDULE CCA-CRS, COMMUNITY CHOICE AGGREGATION COST RESPONSIBILITY SURCHARGE, Sheet 1	Revised 19817-E*
Revised 19990-E	SCHEDULE CCA-CRS, COMMUNITY CHOICE AGGREGATION COST RESPONSIBILITY SURCHARGE, Sheet 2	Revised 19744-E
Revised 19991-E	TABLE OF CONTENTS, Sheet 1	Revised 19986-E
Revised 19992-E	TABLE OF CONTENTS, Sheet 3	Revised 19974-E
Revised 19993-E	TABLE OF CONTENTS, SCHEDULE OF RATES, Sheet 5	Revised 19941-E



PRELIMINARY STATEMENT

Sheet 1

III. MEMORANDUM ACCOUNTS

COMMUNITY CHOICE AGGREGATION SURCHARGE MEMORANDUM ACCOUNT (CCASMA)

1. Purpose

The CCASMA is for tracking purposes only, not recorded on the Utility's financial statements. The purpose of the CCASMA is to track the costs associated with the Community Choice Aggregation customers obligations for Department of Water Resources (DWR) power purchase commitments, the Utility's generation and procurement costs, and revenues collected from the Community Choice Aggregation Cost Responsibility Surcharge (Schedule CCA-CRS) rate applicable to CCA customers, pursuant to Commission Decision (D.) 04-12-046, and modified pursuant to D.07-01-025 to be consistent with the methodology established for calculating the CRS applicable to direct access and municipal departing load customers adopted in D.06-07-030.

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2. Applicability

The CCASMA will be applied to applicable CCA customers.

3. Accounting Procedure

The Utility shall maintain the CCASMA by making entries at the end of each month as follows:

- a. A debit entry representing the CRS obligation of CCA customers for DWR power purchase contracts.
- b. A debit entry representing the CRS obligation of CCA customers for the Utility's costs for generation and purchased power.
- c. An entry representing the CCA Power Charge Indifference Adjustment (CCA-PCIA) reflected in the CCA-CRS rate charged to CCA customers.
- d. Interest shall be calculated on the average of the balance at the beginning of the month and the balance after entries 3.a through 3.c above, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

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4. Account Disposition

Disposition of the balance in the CCASMA shall be determined in the Utility's annual Energy Resource Recovery Account (ERRA) proceeding.

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SCHEDULE CCA-CRS

Sheet 1

COMMUNITY CHOICE AGGREGATION COST RESPONSIBILITY SURCHARGE

APPLICABILITY

The Community Choice Aggregation Cost Responsibility Surcharge (CCA-CRS) is applicable to all CCA customers, as defined in Rule 1, who receive procured energy services from a Community Choice Aggregator (CCA). Pursuant to Senate Bill (SB) 423, qualified nonprofit charitable organizations are eligible to enter into an agreement for DA service with an electric Energy Service Provider (ESP) to receive electric commodity service free of charge from the ESP will be subject to the provisions and applicable charges under this schedule.

TERRITORY

Within the entire territory served by the Utility.

RATES

The CCA-CRS is set at the following level:

2007 CCA-PCIA: \$/kWh.....0.00

The rate shown above is in addition to Utility Distribution Company Total Rates (UDC Total) shown under the CCA customer's otherwise applicable rate schedule, including the applicable CTC rate, and is in addition to the Department of Water Resources Bond Charge shown on Schedule DWR-BC.

Municipal Surcharge: Amounts calculated under this Schedule are subject to a municipal surcharge as provided in Sections 6350 through 6354.1 of the Public Utilities Code.

SPECIAL CONDITIONS

1. Definitions: The definitions of principal terms used in this Schedule are found either herein or in Rule 1, Definitions.
2. Composition of Rate: The CCA-CRS is comprised of the following:
 - a. CCA Power Charge Indifference Adjustment (CCA-PCIA) consists of the total indifference rate less the ongoing CTC. The CCA-PCIA is calculated annually in the Utility's Energy Resource Recovery Account (ERRA) proceeding. A separate CCA-PCIA is calculated in the Utility's ERRA proceeding to be used in the event vintaging, as described below in Section 3, is required.
 - b. The total indifference rate is determined by comparing the combined Utility and DWR resource commitments to the market benchmark. The market benchmark is determined pursuant to the methodology adopted in D.06-07-030 and is distributed by the Energy Division in November of a given year. If the total indifference rate is less than or equal to zero, then the CCA-PCIA is set to zero.
 - c. Ongoing CTC is the system average CTC rate that is adopted in the Utility's ERRA proceeding.

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SCHEDULE CCA-CRS

Sheet 2

COMMUNITY CHOICE AGGREGATION COST RESPONSIBILITY SURCHARGE

SPECIAL CONDITIONS (Continued)

3. Vintaging: The CCA-CRS will be calculated based upon the departure date of CCA load from the Utility or based upon the Utility's receipt of a Binding Notice of Intent (BNI), pursuant to Rule 27.2

a. If the Utility receives a BNI from a CCA or the CCA load transfers from the Utility to the CCA on or before June 30th, the CCA-CRS shall be vintaged based on the total Utility resource commitments effective in the preceding calendar year. If the Utility receives a BNI from a CCA or the CCA load transfers from the Utility to the CCA on or after July 1st, the CCA-CRS shall be vintaged based on the total Utility resource commitments effective in the calendar year the BNI was received by the Utility or that the load was transferred to the CCA.

b. Total Utility resource commitments in a given year include the Utility's total procurement portfolio set forth in the applicable ERRRA filing, DWR power contracts, and all resources committed to by the Utility through effective contracts or construction that commences in the applicable year.

4. Exemptions and Discounts:

a. California Alternate Rates for Energy (CARE) and Medical Baseline Customers: Consistent with Resolution E-3813, effective June 19, 2003, CARE and Medical Baseline customers are also exempt from the DWR-CCA power charge and Utility power procurement cost component. CARE and Medical Baseline customers are not exempt from the charges under the customer's otherwise applicable rate schedule.

b. Continuous Direct Access Customers: Continuous DA customers are those customers who took DA service both before and after February 1, 2001. In addition, pursuant to Resolution E-3843, effective December 4, 2003, a customer who was DA prior to February 1, 2001 that returned to bundled service after September 20, 2001 shall be considered continuous DA. Continuous DA customers who take service from a CCA are exempt from the CCA-CRS and DWR Bond Charge. Continuous DA customers who take service from a CCA are not exempt from other charges under the customer's otherwise applicable rate schedule.



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5H7

Issued by

Date Filed

Mar 12, 2007

Advice Ltr. No. 1881-E

Lee Schavrien

Effective

Decision No. 07-01-025

Senior Vice President
Regulatory Affairs

Resolution No.

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