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August 19, 2008

**ADVICE LETTER 2017-E**  
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: REVISIONS TO THE RENEWABLES PORTFOLIO STANDARD  
MEMORANDUM ACCOUNT (RPSMA)**

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

**PURPOSE**

The Purpose of this Advice Letter is to revise SDG&E's Renewable Portfolio Standard Memorandum Account (RPSMA) to clarify that the un-incurred portion, if any, of the \$400,000 annual Renewable Portfolio Standard (RPS) contractor cost limit may be carried over and expended in subsequent years, pursuant to a letter from California Public Utilities Commission (Commission) Executive Director Paul Clanon dated December 21, 2007.

**DISCUSSION**

Commission Decision (D.) 06-10-050, Ordering Paragraph (OP) 8, created a mechanism whereby the Commission's Executive Director may hire contractors for the purposes of advancing RPS program goals. As such, SDG&E filed Advice Letter 1842-E on November 9, 2006, establishing the RPSMA. Pursuant to the decision, technical contractor costs recorded in the RPSMA may not exceed a total annual amount of \$400,000, and shall be paid by each utility (PG&E, SCE and SDG&E) on a proportional basis in relationship to retail sales reported each year in the March 1 RPS Compliance Report. However, the Decision does not explicitly address the issue of whether costs not incurred in one year may be accrued and recorded to the RPSMA in a following year.

A letter from Executive Director Paul Clanon, dated December 21, 2007, found such an accrual "to be in keeping with the intent of D.06-10-050. Specifically to the extent the maximum annual amount is not expended in each year of the contract period, such amounts may carry over and be expended in subsequent years. All such costs shall be recorded by December 31, 2010 and the maximum notational value of this contract shall not exceed \$1.6 million." Thus, SDG&E has revised the RPSMA to reflect this clarification.

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 hereby requests that the tariffs proposed herein be approved effective August 19, 2008, 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.06-05-027, 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) #: 2017-E

Subject of AL: Revisions to the Renewables Portfolio Standard Memorandum Account (RPSMA)

Keywords (choose from CPUC listing): Renewables, Memorandum Account

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: 8/19/08

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  
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. DeLaacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties

R.06-05-027

ATTACHMENT  
ADVICE LETTER 2017-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 20808-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, RENEWABLES PORTFOLIO STANDARD MEMORANDUM ACCOUNT (RPSMA), Sheet 1	Original 19686-E
Revised 20809-E	TABLE OF CONTENTS, Sheet 1	Revised 20804-E
Revised 20810-E	TABLE OF CONTENTS, Sheet 3	Revised 20749-E



**PRELIMINARY STATEMENT**

Sheet 1

III. MEMORANDUM ACCOUNTS

RENEWABLES PORTFOLIO STANDARD MEMORANDUM ACCOUNT (RPSMA)

1. Purpose

Pursuant to Commission Decision (D.) 06-10-050, the purpose of the RPSMA is to record the RPS technical contractor costs allocated to SDG&E for the purpose of performing tasks related to advancing RPS Program goals. The total annual costs incurred by the Commission shall not exceed \$400,000. In the event that this maximum annual amount is not expended in any year of the contract period, the unspent amount may carry-over and be expended in subsequent years. The total annual costs and any additional carry-over costs shall be paid by each utility (PGE, SCE and SDG&E) on a proportional basis in relationship to retail sales reported each year in the March 1 RPS compliance report (or other report each year as directed by the Executive Director). Payments will be recorded until December 31, 2010 and shall not exceed a total of \$1.6 million.

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2. Applicability

The RPSMA does not have a rate component.

3. Accounting Procedure

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

- a. A debit entry equal to the payments related to RPS technical contractor costs allocated to the Utility.
- b. Interest shall be calculated on the average of the balance at the beginning of the month and the balance after entry 3.a 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.

4. Account Disposition

SDG&E shall request the recovery of the balance in the RPSMA in the annual ERRA proceeding, or other proceeding as authorized by the Commission.



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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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Advice Ltr. No. 2017-E

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

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

Date Filed Aug 19, 2008

Effective Aug 19, 2008

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



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