



Ken Deremer
Director
Tariffs & Regulatory Accounts
8330 Century Park Court
San Diego, CA 92123-1548

Tel: 858.654.1756
Fax: 858.654.1788
kderemer@semprautilities.com

September 18, 2008

ADVICE LETTER 2024-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: MODIFICATIONS TO THE ADVANCED METERING AND DEMAND
RESPONSE MEMORANDUM ACCOUNT**

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

This Advice Letter requests California Public Utilities Commission (Commission) approval of revisions to SDG&E's Advanced Metering and Demand Response Memorandum Account (AMDRMA), in order to create a sub account that will separately record Market Redesign Technology Update (MRTU) costs related to demand response.

DISCUSSION

The California Independent System Operator's (CAISO) MRTU initiative involves a complete renovation of the electricity markets administered by the CAISO and implements a new network model that will accurately mirror operations of the CAISO controlled grid. SDG&E's Market Redesign Technology Update Memorandum Account (MRTUMA) was established via Advice Letter 1867-E, dated January 29, 2007 and effective May 24, 2007, to record costs associated with implementation of the CAISO's MRTU Tariff.

Resolution E-4093 dated June 7, 2007, maintains that:

The IOUs should be prepared with the necessary resources, tools, computer software and hardware to be able to implement MRTU Release 1, currently scheduled for February 2008, and all subsequent Releases. To meet this objective, the IOUs should be permitted to track incremental MRTU-related costs in a memorandum account.¹

MRTU release 1 A, otherwise known as Markets and Performance (MAP), is expected to become effective in Fall 2009 and will include the incorporation of demand response into the CAISO's markets. Demand response costs are currently collected from all customers through distribution rates. However, MRTU costs recorded in the MRTUMA are recovered from bundled customers through commodity rates. Therefore, in order to separately record MRTU costs related to demand response and to request appropriate recovery of these costs through

¹ Resolution E-4093, Page 5

distribution rates, SDG&E has established a new AMDRMA sub account titled Participating Load Program (PLP).

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 2 (effective after staff approval) pursuant to GO 96-B. Therefore, SDG&E respectfully requests that the Advice Letter become effective October 17, 2008, thirty days from 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 (ini@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

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) #: 2024-E

Subject of AL: Modifications to the Advanced Metering and Demand Response Memorandum Account

Keywords (choose from CPUC listing): MRTU, Demand Response

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: 10/17/08

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: 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.

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
ADVICE LETTER 2024-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 20872-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA), Sheet 1	Revised 19673-E
Revised 20873-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA), Sheet 2	Original 19486-E
Revised 20874-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA), Sheet 3	Original 19487-E
Revised 20875-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA), Sheet 5	Original 19489-E
Revised 20876-E	TABLE OF CONTENTS, Sheet 1	Revised 20870-E
Revised 20877-E	TABLE OF CONTENTS, Sheet 2	Revised 20748-E



PRELIMINARY STATEMENT

Sheet 1

III. MEMORANDUM ACCOUNTS

ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA)

1. Purpose

The purpose of the Advanced Metering and Demand Response Memorandum Account (AMDRMA) is to record and recover the incremental, one-time set-up and on-going Operating and Maintenance (O&M) and Administrative and General (A&G) expenses incurred to develop and implement, or in reasonable anticipation of implementing, the demand response programs adopted in Phase I of the Advanced Metering, Demand Response, and Dynamic Pricing Proceeding, pursuant to Ordering Paragraph 8 of Decision (D.) 03-03-036. Furthermore, D.03-06-032, Ordering Paragraph 22, adopts the same cost recovery mechanism as defined in D.03-03-036 for large commercial and industrial customer demand response programs. Pursuant to D.04-01-012 and D.05-07-011, the AMDRMA will also record the Statewide Pricing Pilot (SPP) 2004 and 2005 activities, and the administrative costs associated with Phase 2 of Rulemaking (R.) 02-06-001. Pursuant to D.05-01-056, additional demand response programs are approved for implementation and authorized for recovery in the AMDRMA. D.05-04-053 addressed Critical Peak Pricing programs and authorized recovery of 20/20 programs for customers over 200 kW.

Pursuant to D.06-03-024, approved 2006-2008 demand response program expenses will be recorded to the AMDRMA, including residential demand response programs and electric resource contract costs formerly recorded to the Residential Demand Responsiveness Program Memorandum Account and the Interruptible Load and Rotating Outage Programs Memorandum Account. The AMDRMA also records the costs associated with the On-Bill Financing (OBF) Program adopted in Decision 05-09-043.

The Participating Load Program (PLP) sub-account is established to record Demand Response costs associated with the implementation of the CAISO's Market Redesign and Technology Upgrade (MRTU) Initiative for the 2009 – 2011 Demand Response program cycle,

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2. Applicability

The AMDRMA applies to all customer classes, except for those specifically excluded by the Commission.

3. Revisions

The revision dates applicable to the AMDRMA shall be upon approval of the annual advice letter referenced below or as otherwise ordered by the Commission.

4. Rates

The current AMDRMA does not have a rate component.

(Continued)

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Advice Ltr. No. 2024-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Sep 18, 2008

Effective _____

Resolution No. _____



PRELIMINARY STATEMENT

Sheet 2

III. MEMORANDUM ACCOUNTS

ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA)

5. Accounting Procedure

The Utility shall maintain the AMDRMA by making entries to this account at the end of each month as follows:

- a. An entry equal to the UDC's incremental one-time "set up" and on-going O&M and A&G expenses, incurred to develop and implement, or incurred in reasonable anticipation of implementation. The expenses shall also include applicable capital-related costs, including depreciation, return on investment and related taxes. The AMDRMA shall include the following programs as directed in R. 02-06-001, D.03-06-032: (1) the SPP for small customers (residential and commercial, under 200 kW), and (2) demand response tariffs and programs for large customers (greater than or equal to 100 kW).
- b. An entry equal to the SPP program costs defined in D.03-03-036, D.04-01-012 and D.05-07-011 which include, but are not restricted to, the following:
 - Market research prerequisite to SPP implementation;
 - Development of rate, information, and technology treatments for various SPP cells;
 - Sample design for various SPP cells;
 - Miscellaneous pilot design refinement and implementation activities;
 - Incremental activities in 2004 and 2005 as described in D.04-01-012, D.05-04-053, and D.05-07-011 which include (1) Automated Demand Response System Pilot and Enabling Technologies, (2) CPP-V Track A/Enhanced Website Information, (3) Additional Pilot Evaluation and Customer Research Activities and (4) Information Display Pilot (IDP).
- c. An entry equal to expenditures for large customer (greater than or equal to 100 kW) demand response tariffs and programs, as described in Attachment B of D.03-06-032, D.04-01-012, Resolution E-3886 and D.05-01-056, including all program administration costs (O&M and A&G), enrollment and customer educational material, billing and customer information systems development costs, program measurement and evaluation costs, capital costs and transitional incentive costs. The AMDRMA shall include a specific entry for UDC's expenses incurred to develop, implement and evaluate, or incurred in a reasonable anticipation of implementation of the following large customer programs:
 - California Power Authority's Call Option Demand Reserve Partnership
 - California Power Authority's Non-spinning Reserve Ancillary Services Demand Reserve Partnership
 - California Power Authority's Supplemental Energy Demand Reserve Partnership
 - Critical Peak Pricing

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Issued by

Date Filed

Sep 18, 2008

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Lee Schavrien

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Senior Vice President
Regulatory Affairs

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PRELIMINARY STATEMENT

Sheet 3

III. MEMORANDUM ACCOUNTS

ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA)

5. Accounting Procedure (Continued)

- Demand Bidding Program
- Two-part Real Time Pricing
- Real Time Pricing
- Ongoing implementation issues
- Flex Your Power NOW

d. An entry equal to UDC's incremental O&M and A&G expenses, including costs of consultants and internal staff, incurred in (1) developing an advanced metering infrastructure (AMI) business case analysis as contemplated by the November 24, 2003 Assigned Commissioner's Ruling and Scoping Memo (Phase 2) and the February 19, 2004 Joint Assigned Commissioner and Administrative Law Judge's Ruling issued in R.02-06-001, and subsequent workshops facilitated by CPUC and CEC staff, and (2) pre-planning evaluation and assessment activities carried out in reasonable anticipation of deployment of AMI systems under the time frame in the proposed schedule discussed by the CPUC & CEC staff in the workshops held in R.02-06-001 on March 29 and 30, 2004, including, without limitation:

- All incremental costs reasonably necessary for the development of an AMI business case analysis such as:
- Assessment of technical and functional requirements for AMI and demand response rates such as: metering, communication, integration with existing utility systems, customer service, rate support and deployment.
- Evaluation of AMI hardware and software technology options such as: RFI/RFP issuance and analysis, sample testing and evaluation, integration with existing utility hardware and software technology.
- Estimation of projected utility operational costs and benefits associated with deployment of AMI and demand response rates.
- Valuation of benefits associated with demand response rates.
- Participation in workshops associated with AMI analysis and deployment.

e. An entry equal to expenditures for demand response programs, as approved in D.05-01-056, D.05-04-053, and D.06-03-024, including all program O&M, M&E, and capacity incentive costs. An entry shall include capital costs incurred including depreciation, return on investment, and related taxes. The AMDRMA shall include UDC's expenses incurred to develop, implement and evaluate, or incurred in a reasonable anticipation of implementation of the following customer programs:

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Advice Ltr. No. 2024-E

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Regulatory Affairs

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PRELIMINARY STATEMENT

Sheet 5

III. MEMORANDUM ACCOUNTS

ADVANCED METERING AND DEMAND RESPONSE MEMORANDUM ACCOUNT (AMDRMA)

5. Accounting Procedure (Continued)

- f. An entry equal to O&M and capital-related expenses incurred by the Utility for electric resource contracts costs, including applicable incentive payments as authorized in D.04-06-011 and D.06-03-024. This includes contracts with Converge and Celerity as approved by D.04-06-011.
- g. An entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entries in a thru e at a rate equal to one-twelfth 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.
- h. An entry equal to the cost of funds calculated at the utilities' weighted average cost of capital rate of 8.43% on the average monthly balance of net funds loaned for the On-Bill Finance (OBF) Program pursuant to D.05-09-043.
- i. An entry equal to the actual cost of defaults associated with the OBF program pursuant to D.05-09-043.
- j. An entry in the PLP sub-account equal to the actual costs associated with the PLP Program related to implementing the CAISO's MRTU Initiative.

6. Disposition

At the end of each year, the balance in the AMDRMA (including all sub-accounts) shall be transferred to the Rewards and Penalties Balancing Account (RPBA), or another balancing account as may be directed by the Commission for future rate recovery. For the RPBA, the Utility will file an advice letter to make this change in October of each year, with rates effective the following January 1st. The October filing will also request rate recovery of the un-depreciated capital additions through an increase to SDG&E's revenue requirement.

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Advice Ltr. No. 2024-E

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San Diego Gas & Electric Company
San Diego, California

	<u>Revised</u>	Cal. P.U.C. Sheet No.	<u>20876-E</u>
	<u>Revised</u>		<u>20870-E</u>
Canceling	<u>Revised</u>	Cal. P.U.C. Sheet No.	<u>20713-E</u>

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San Diego Gas & Electric Company
San Diego, California

	Revised	Cal. P.U.C. Sheet No.	20877-E
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Advice Ltr. No. <u>2024-E</u>	Lee Schavrien	Effective	
Decision No. _____	Senior Vice President Regulatory Affairs	Resolution No. _____	

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