



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

December 22, 2008

ADVICE LETTER 2052-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: ESTABLISHMENT OF THE 2009 SONGS REVENUE REQUIREMENT
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 submits for California Public Utilities Commission (Commission) approval the 2009 San Onofre Nuclear Generating Station (SONGS) Revenue Requirement Memorandum Account (2009-SRRMA), established pursuant to Decision (D.) 08-12-049

BACKGROUND

Due to delays in the issuance of a final decision in Southern California Edison's (SCE) 2009 General Rate Case (GRC) Application (A.07-11-011), on December 18 2008 the Commission approved D.08-12-049, which authorizes both SDG&E and SCE to establish memorandum accounts to track the change in the authorized revenue requirement related to SONGS costs during the period between January 1, 2009 and the effective date of the final decision in SCE's 2009 GRC. SDG&E has therefore created the 2009-SRRMA. The 2009-SRRMA will record the difference between the previously authorized revenue requirement for recovery of SONGS electric generation non-fuel costs and the final SONGS electric generation non-fuel revenue requirement adopted in A.07-11-011, including the authorized revenue requirement associated with SONGS 2&3 refueling outages and SDG&E's 20% ownership in SONGS. The 2009-SRRMA will reflect the revenue requirement recorded from January 1, 2009 until a decision in SCE's GRC becomes effective.

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 this filing become effective on January 1, 2009, the start date for 09-SRRMA tracking, as ordered in D.08-12-049.

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, including interested parties to service list A.07-11-011, 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

(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) #: 2052-E

Subject of AL: Establishment of the 2009 SONGS Revenue Requirement Memorandum Account

Keywords (choose from CPUC listing): SONGS, General Rate Case

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: 1/1/09

No. of tariff sheets: 5

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

Interested Parties

A.07-11-011

ATTACHMENT
ADVICE LETTER 2052-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 20940-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, DESCRIPTION/LISTING OF ACCOUNTS, Sheet 2	Revised 20734-E
Original 20941-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, 2009 SONGS REVENUE REQUIREMENT MEMORANDUM ACCOUNT (2009-SRRMA), Sheet 1	
Revised 20942-E	TABLE OF CONTENTS, Sheet 1	Revised 20934-E
Revised 20943-E	TABLE OF CONTENTS, Sheet 2	Revised 20912-E
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PRELIMINARY STATEMENT

Sheet 2

III. MEMORANDUM ACCOUNTS
DESCRIPTION/LISTING OF ACCOUNTS

Listing of Accounts

- Catastrophic Event Memorandum Account (CEMA)
- Rate Reduction Bond Memorandum Account (RRBMA)
- Generation Divestiture Transaction Costs Memorandum Account (GDTCMA)
- Streamlining Residual Account (SRA)
- Nuclear Claims Memorandum Account (NCMA)
- Real-Time Energy Metering Memorandum Account (RTEMMA)
- Net Energy Metering Memorandum Account (NEMMA)
- Self-Generation Program Memorandum Account (SGPMA)
- Bond Payment Memorandum Account (BPMA)
- Direct Access Cost Responsibility Surcharge Memorandum Account (DACRSMA)
- Advanced Metering and Demand Response Memorandum Account (AMDRMA)
- Procurement Transaction Auditing Memorandum Account (PTAMA)
- Reliability Costs Memorandum Account (RCMA)
- Litigation Cost Memorandum Account (LCMA)
- Community Choice Aggregation Surcharge Memorandum Account (CCASMA)
- Advanced Metering Infrastructure Memorandum Account (AMIMA)
- Independent Evaluator Memorandum Account (IEMA)
- Community Choice Aggregation Procurement Memorandum Account (CCAPMA)
- California Solar Initiative Performance-Based Memorandum Account (CSIPMA)
- Renewables Portfolio Standard Memorandum Account (RPSMA)
- Market Redesign Technology Upgrade Memorandum Account (MRTUMA)
- Gain/Loss On Sale Memorandum Account (GLOSMA)
- General Rate Case Revenue Requirements Memorandum Account (GRCRRMA)
- Non-Residential Submetering Memorandum Account (NRSMA)
- Long Term Procurement Plan Technical Assistance Memorandum Account (LTAMA)
- 2009 SONGS Revenue Requirement Memorandum Account (2009-SRRMA)

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- Note: 1) SONGS 2&3 Unamortized Nuclear Fuel Inventory Memorandum Account, see Section V.
 2) SONGS 2&3 Permanent Closure Noninvestment-Related Expenses Memorandum Account, see Section V.

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Senior Vice President
Regulatory Affairs

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PRELIMINARY STATEMENT

Sheet 1

III. MEMORANDUM ACCOUNTS

2009 SONGS REVENUE REQUIREMENT MEMORANDUM ACCOUNT (2009-SRRMA)

1. Purpose: Pursuant to Commission Decision (D.) 08-12-049, the purpose of this account is to track the difference between the previously authorized revenue requirement for recovery of SONGS electric generation non-fuel costs and the final SONGS electric generation non-fuel revenue requirement adopted in A.07-11-011, the SCE General Rate Case. The 09-SRRMA shall include the authorized revenue requirement changes set forth for SONGS 2 & 3 refueling outages and SDG&E's 20% ownership in SONGS. The entries recorded to the 2009-SRRMA will reflect the revenue requirement recorded from January 1, 2009 until a decision in A.07-11-011 becomes effective.
2. Applicability: The 2009-SRRMA shall be applied to the Utility's bundled service customers.
3. Rates: The 2009-SRRMA does not have a rate component.
4. Accounting Procedure: The Utility shall maintain the 09-SRRMA by making entries at the end of the month after a final decision is adopted in this proceeding as follows:
 - a. A debit entry equal to a pro rata allocation of the 2009 authorized SONGS non-fuel revenue requirement adopted in A.07-11-011, including the revenue requirement associated with refueling outages, for the period January 1, 2009 until such time a final decision in this proceeding becomes effective.
 - b. A credit entry equal to a pro rata share of the previously authorized SONGS non-fuel revenue requirement recovered through the Non-fuel Generation Balancing Account (NGBA), including the revenue requirement associated with refueling outages for each month beginning January 1, 2009 until such time a final decision in this proceeding becomes effective.
 - c. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after entry 4.a and 4.b 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.
5. Disposition: The balance in the 09-SRRMA shall be transferred to the NGBA at the end of 2009, future rate recovery addressed in the annual NGBA advice filing and the 2009-SRRMA will be eliminated at the end of 2009, unless otherwise specified by the Final Decision in A.07-11-011.

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