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August 31, 2010

**ADVICE LETTER 2092-E-B**  
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: PARTIAL SUPPLEMENTAL FILING: ESTABLISHMENT OF ELECTRIC SCHEDULE - LOCAL GOVERNMENT RENEWABLE ENERGY SELF-GENERATION BILL CREDIT TRANSFER (RES-BCT) PROGRAM IN COMPLIANCE WITH ASSEMBLY BILL (AB) 2466 AND RESOLUTION E-4283**

**PURPOSE**

This partial supplemental advice letter is being filed to supplement San Diego Gas & Electric Company (SDG&E) Advice Letter 2092-E-A, in order to modify Special Condition 8, Billing Process, to remove erroneous language when applying the credit to the Generating Account.

**BACKGROUND**

SDG&E filed Advice Letter (AL) 2092-E-A on May 3, 2010, seeking California Public Utilities Commission (Commission) approval of its RES-BCT Tariff. This AL complied with both Assembly Bill (AB) 2466 and Ordering Paragraph 1 of Resolution E-4283, approved on April 22, 2010, which directed SDG&E to re-file its RES-BCT tariff within 7 days to comply with the orders outlined in the discussion section of Resolution E-4283. The Commission approved SDG&E's AL 2092-E-A on July 6, 2010.

While programming the tariff modifications approved in AL 2092-E-A, SDG&E realized the language contained in Special Condition 8, Billing Process, was inaccurate. In compliance with AB2466 and Resolution E-4283, SDG&E will remove the "up to" language when applying the credit to the Generating Account. Generating accounts will benefit in the same manner as other benefitting accounts. Any excess credit will be carried to a subsequent billing cycle. This language is consistent with PU Code 2830.c.4<sup>1</sup> and mimics the approach taken by both Pacific Gas & Electric (PG&E) and Southern California Edison (SCE).

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<sup>1</sup> 2830.c(4) – "If, during the billing cycle, the bill credit applied pursuant to paragraph (2) exceeds the generation component of the electricity usage charges, the difference shall be carried forward as a financial credit to the next billing cycle."

**EFFECTIVE DATE**

SDG&E believes this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this filing be approved effective September 30, 2010, 30 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 by September 20, 2010, 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: Megan Caulson  
Regulatory Tariff Manager  
8330 Century Park Court, Room 32C  
San Diego, CA 92123-1548  
Facsimile No. (858) 654-1748  
E-mail: [mcaulson@semprautilities.com](mailto:mcaulson@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.08-03-008 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) 654-1748 or by e-mail at [SDG&ETariffs@semprautilities.com](mailto:SDG&ETariffs@semprautilities.com).

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Clay Faber  
Director – Regulatory Affairs

(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) #: 2092-E-B

Subject of AL: Partial Supplemental Filing: Establishment of Electric Schedule - Local Government Renewable Energy Self-Generation Bill Credit Transfer (RES-BCT) Program in Compliance with Assembly Bill (AB) 2466 and Resolution E-4283

Keywords (choose from CPUC listing): Compliance, Local Government, Credit,

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

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

Resolution E-4283 & AB 2466

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

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

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: September 30, 2010

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: Please See Table of Contents

Service affected and changes proposed<sup>1</sup>: 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: Megan Caulson**

**8330 Century Park Ct, Room 32C**

**San Diego, CA 92123**

**mcaulson@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. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties in:

R.08-03-008

ATTACHMENT A  
ADVICE LETTER 2092-E-B

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original 22028-E	SCHEDULE RES-BCT, LOCAL GOVERNMENT RENEWABLE ENERGY SELF-GENERATION BILL CREDIT TRANSFER, Sheet 4	Original 21851-E
Revised 22029-E	TABLE OF CONTENTS, Sheet 1	Revised 22026-E
Revised 22030-E	TABLE OF CONTENTS, Sheet 6	Revised 22018-E



**SCHEDULE RES-BCT**

LOCAL GOVERNMENT RENEWABLE ENERGY SELF-GENERATION BILL CREDIT TRANSFER

SPECIAL CONDITIONS (Continued)

8. Billing Process:

Credits will be applied to the Generating Account and the Benefiting Account(s) based on whole percentages provided by the Local Government – Generation Bill Credit Transfer Allocation Request Form on file with the Utility up to a maximum of 50 Benefiting Accounts. The process of allocating credits shall commence on the effective date of the Generation Bill Credit Transfer Allocation Request Form (form 142-0546) and shall continue for 12 consecutive billing periods (Relevant Period). Credits remaining at the end of the Relevant Period will be applied toward remaining eligible commodity charges on the Benefiting Account(s) or to offset customer payments applied toward commodity charges during the Relevant Period. Any remaining credit shall be reset to zero. Each subsequent 12-month period of service under this schedule shall be considered a new Relevant Period.

- d) Benefiting Account Bill: A Benefiting Account served under this schedule is responsible for all charges billed under its OAS including monthly billed minimum charges, customer charges, meter chargers, facilities charges, and energy and demand charges. Applicable demand charges are defined in the OAS. Credits applied on a monthly basis to a Benefiting Account shall not exceed the electric energy commodity charges incurred during the specific billing period.
- e) Generating Account Bill: A Generating Account served under this schedule is responsible for all charges billed under its OAS including monthly billed minimum charges, customer charges, meter chargers, facilities charges, energy and demand charges. Applicable demand charges are defined in the OAS. Credits applied on a monthly basis to a Generating Account shall not exceed the electric energy commodity charges incurred during the specific billing period.

9. Interconnection: Prior to Parallel Operation, the Local Government customer must execute and comply with the applicable Utility Interconnection Agreement. The Eligible Renewable Generation Facility shall comply with all of SDG&E's tariffs, including but not limited to SDG&E's Rule 21, and any other regulations and laws governing the interconnection of the Eligible Renewable Generating Facility.

10. Generator Limitation: No generator shall be included behind a Net Generator Output Meter recognized by this rate schedule other than an RPS eligible generator.

11. Renewable Energy Credits (RECs): Any RECs would remain with the owner pursuant to Section 2827 of the Public Utilities Code.

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Advice Ltr. No. 2092-E-B

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

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

Date Filed Aug 31, 2010

Effective \_\_\_\_\_

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

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Sheet 1

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. 2092-E-B  
Decision No. \_\_\_\_\_

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

Date Filed Aug 31, 2010  
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Resolution No. \_\_\_\_\_