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August 4, 2009

ADVICE LETTER 2101-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: Establishment of the Pole Attachment Communication Maintenance
Memorandum Account (PACMMA)**

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

PURPOSE

This filing revises SDG&E's electric Preliminary Statement, Section III, Memorandum Accounts, to establish the PACMMA to record costs associated with enforcement of standards for installed communication facilities attached to SDG&E electric structures in compliance with California Public Utilities Commission General Order 95 (GO95).¹

BACKGROUND

On October 22, 1998, the Commission issued Decision (D.) 98-10-058, which contains rules that govern the access of telecommunications carriers and cable television companies to public utility right-of-way and support structures. The rules identify guidelines for parties negotiating right-of-way access agreements with SDG&E. Signed copies of the executed joint pole agreements with Communications Infrastructure Providers (CIPs) are filed with the Commission prior to installation. CIPs are responsible for correcting any infractions that are found through the inspection process in compliance with GO95, which provides rules to protect the safety of their workforce and the reliable and safe installation, operation and repair/replacement of their power cables/devices to ensure reliable service to their customers.

DISCUSSION

SDG&E performs detailed inspections of its electric distribution and transmission systems under General Order 165.² During these inspections, SDG&E discovered and documented GO95 infractions by CIPs using SDG&E's distribution poles. When infractions are discovered, SDG&E sends notifications of these infractions to the CIPs requesting their cooperation in inspecting

¹ GO95 – Rules for Overhead Electric Line Construction

² GO165 – CPUC Inspection Cycles for Electric Distribution Facilities

and resolving the infractions. Additionally, SDG&E reports these third-party infractions to the CPUC through its annual GO165 Annual Report.

In Phase 1 (addressing measures to reduce fire hazards) of the electric safety OIR (R.08-11-005), SDG&E provided documentation on several thousand CIP infractions. Consequently, SDG&E developed an internal plan to resolve CIP infractions located within its high fire risk areas in the SDG&E service territory as defined in OIR R.08-11-005 and the Emergency Power Shut Off Plan. CIPs are responsible for correcting their infractions. However, if the CIPs are unable to make the necessary corrections, SDG&E will have qualified contractors make the necessary corrections to the CIPs' facilities to ensure compliance.³ SDG&E in turn will also invoice the CIP for the cost of the work necessary to correct their infractions.

The following table summarizes infraction data from 2005 to present for those infractions existing in SDG&E's records that are considered safety hazards.

Table 1: CIP Infraction Data
(2005 through YTD 7/9/2009)

Type	Total	Infractions in High Fire Risk Area	Infractions in Wildland Fire Area	Infractions in Urban Area
Insufficient Clearance Issues subtotal	1,616	155	169	1,292
Pole Loading	3	0	2	1
Damaged Pole/ Utility not Transferred	1,358	182	433	743
Sub-Total	2,977	337	604	2,036

Note 1: Excludes infractions involving service drops

SDG&E's proposed PACMMA is included in Attachment A to this Advice Letter. As noted in the proposed tariffs, the amounts invoiced to the CIPs and reimbursements received, if any, will be recorded to the PACMMA until such time as they are reviewed by the Commission and authorized for recovery by the Commission through base rates in the next general rate case or other appropriate proceeding as authorized by the Commission.

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 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 3, 2009, 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

³ The first priority will be the high fire areas (by September 1, 2009), next will be the wildland fire areas (by October 1, 2009) and ultimately the non-fire, urban areas

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 (jjj@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: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1788
E-mail: MCaulson@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.

RON VAN DER LEEDEN
Director – Rates, Revenues & Tariffs

Attachments

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: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: acarrillo@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) #: 2101-E

Subject of AL: Establishment of the Pole Attachment Communication Maintenance Memorandum Account (PACMMA)

Keywords (choose from CPUC listing): 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 AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: _____

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: September 3, 2009

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: Preliminary Statement and 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: Megan Caulson

8330 Century Park Ct, Room 32C

San Diego, CA 92123

mcaulson@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
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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.08-11-005

ATTACHMENT
ADVICE LETTER 2101-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original 21301-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNT, POLE ATTACHMENT COMMUNICATION MAINTENANCE MEMORANDUM ACCOUNT (PACMMA), Sheet 1	
Revised 21302-E	TABLE OF CONTENTS, Sheet 1	Revised 21299-E
Revised 21303-E	TABLE OF CONTENTS, Sheet 3	Revised 21293-E



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Advice Ltr. No. 2101-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President
Regulatory Affairs

Date Filed Aug 4, 2009

Effective _____

Resolution No. _____



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Advice Ltr. No. 2101-E

Decision No. _____

Issued by
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Senior Vice President
Regulatory Affairs

Date Filed Aug 4, 2009

Effective _____

Resolution No. _____

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