

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Proposed Policies and
Programs Governing Post-2003 Low
Income Assistance Programs.

R 04-01-006, A. 04-06-038; A. 04-07-002;
A. 04-07-010; A. 04-07-011; A. 04-07-012;
A. 04-07-013; A. 04-07-014; A. 0407015;
A. 04-07-020; A. 04-07-027; A. 0407050

**Motion of San Diego Gas & Electric Company Seeking Correction of a
Clerical Error in Decision 05-05-019**

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June 27, 2005

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I. INTRODUCTION

Pursuant to Rule 45 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure and instructions of Administrative Law Judge Steven A. Weissman (ALJ Instructions), dated June 23, 2005, San Diego Gas & Electric Company (SDG&E) files this Motion Seeking Correction of a Clerical Error in Decision (D.) 05-05-019.¹ This Motion is being filed concurrently with SDG&E's Advice Letter that is being filed to comply with Ordering Paragraph 13 of D.05-05-019.² Consistent with the ALJ Instructions, the Advice Letter reflects the corrected numbers.

II. SUMMARY

The Outreach and Total Program Costs line items in Tables 1 and 17 of D.05-05-019 reflect double disallowances for SDG&E's Call Center Costs

¹ D.05-05-019 was issued on May 13, 2005 to correct computational errors contained in D.05-04-052, issued April 21, 2005.

² Ordering Paragraph 13 of D. 05-04-052 required utilities such as SDG&E to file an advice letter to remove expenditures for the California Alternate Rates for Energy (CARE) Management and Financial Audit from their PY 2005 CARE budget.

(\$166,400) and Call Center Indirects (\$111,913). These double disallowances result in an incorrect authorized amount for the Outreach line item of \$1,187,014 and an incorrect authorized amount for the Total Program Costs and Discounts line item of \$35,253,804.

SDG&E respectfully requests the Commission to remove the double disallowances from Tables 1 and 17 and find that the correct authorized Outreach amount is \$1,465,327 and the correct Total Program Costs and Discounts amount is \$35,280,767. Attachment 1, hereto, illustrates the mathematical calculations. SDG&E also requests the Commission to make corresponding conforming changes to Tables 1, 3, 9, 15 and 17 as set forth in Attachment 2, hereto.

III. DISCUSSION

Table 1 of D. 05-05-019 contains budget disallowances for "SDG&E/CARE Call Center" (\$166,400) and "SDG&E CARE Call Center Indirects" (\$111,913). Table 1 also deducts for "SDG&E Indirect Costs" (\$703,154). The \$703,154 deduction, however, already includes the \$111,913, and to deduct that figure again separately is a double deduction of indirect costs.

Table 17 "includes a double deduction" of \$166,400 in Call Center Labor. The double deduction occurs in the Outreach line item total of \$1,187,014 in Table 15. The double deduction is illustrated on Attachment 1 and summarized in the following calculation:

\$1,631,727 -- Amount Requested in Application -- Table 12 (Outreach)
(\$166,400) -- Call Center Costs -- Table 17 *
(\$111,913) -- Call Center Indirect Costs -- Table 17 *
(\$166,400) -- Call Center Costs Deducted Second time

\$1,187,014 -- Amount Shown in Decision -- Table 15 (Outreach)

* \$166,400 plus \$111,913 equals \$278,313 shown on worksheet provided on June 15, 2005. The Call Center Indirect Costs are included in the Indirect Costs adjustment of \$703,154 shown on Tables 1 and 17.

If the double deductions for Call Center costs of \$166,400 and Call Center Indirects of \$111,913 are eliminated, the correct authorized Outreach amount would be \$1,465,327 and the correct authorized amount for total Program Costs and Discounts would be \$35,280,767.

SDG&E further requests the Commission to make the corresponding changes reflecting these corrections to Tables 1, 3, 9, 15 and 17, including eliminating the separate line item for CARE Call Center Indirects (\$111, 913) on Tables 1 and 17. See Attachment 2 hereto.

IV. CONCLUSION

In view of the foregoing, SDG&E respectfully requests the Commission to correct the technical errors reflected in D.05-05-019.

Respectfully submitted,



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ATTACHMENT 1

SDG&E's 2005 CARE Budget

	Requested in A. 04-07-011	Disallowances Table 17 (D. 05-04-052 & D. 05- 05-019)	Explanation	Authorized Amts In Table 15 D. 05-05-019	Difference	Corrected Budget
Outreach	\$1,631,727	-\$278,313	CARE Call Center Costs - \$166,400 Plus CARE Call Center Indirects of \$111,913	\$1,187,014	\$166,400	\$1,465,327
Automatic Enrollment	21,200	\$0	No change	\$21,200	\$0	\$21,200
Proc, Certification, & Verification	227,269	\$0	No change	\$227,269	\$0	\$227,269
Bill Systems/Programming	72,800	\$0	No change	\$72,800	\$0	\$72,800
Pilots	0	\$0	No change	\$0	\$0	\$0
Measurement & Evaluation	320,700	-\$85,000	CARE Audit Costs	\$235,700	\$0	\$235,700
Regulatory Compliance	123,872	\$0	No change	\$123,872	\$0	\$123,872
General Administration	177,314	\$0	No change	\$177,314	\$0	\$177,314
Indirect Costs	703,154	-\$703,154	Indirect Costs + Call Center Indirect Costs	\$0	\$0	\$0
LIOB	1,000	-\$1,000	LIOB Expenses	\$0	\$0	\$0
CPUC Energy Division Staff	50,000	\$0	No change	\$50,000	\$0	\$50,000
Total Expenses	3,329,036	-\$1,067,467		\$2,346,519		\$2,373,482
Subsidies and Benefits	32,907,285	\$0		\$32,907,285	\$0	\$32,907,285
Merger Credit	0	\$0		\$0	\$0	\$0
Total Program & Discounts	36,236,321	-\$1,067,467		\$35,253,804		\$35,280,767

Call Center Indirect Costs of \$111,913 was deducted from the Outreach category. However it was already included in \$703,154 and therefore was deducted twice in Table 15.

Column does not total to \$2,346,519. The sum of this column is \$2,095,169. However, the \$2,095,169 total is incorrect because it includes a double deduction of call center labor of \$166,400 and call center labor indirect of \$111,913. If those double deductions are reversed out, the correct total for the Outreach category is \$1,465,327, and the total expenses would sum to \$2,373,482.

Calculation of Corrected Budget	
\$36,236,321	Total Budget Requested in A. 04-07-011
(\$166,400)	Call Center Labor Disallowance
(\$85,000)	CARE Audit
(\$703,154)	Indirects (includes call center labor indirects of \$111,913)
(\$1,000)	LIOB Expenses
\$35,280,767	Corrected Budget Amount

CORRECTED TABLE 15 FOR SDG&E

Outreach	\$1,465,327
Automatic Enrollment	\$21,200
Cool Centers	\$0
Proc, Certification, & Verification	\$227,269
Bill Systems/Programming	\$72,800
Measurement & Evaluation	\$235,700
Regulatory Compliance	\$123,872
General Administration	\$177,314
LIOB	\$0
CPUC Energy Division	\$50,000
Total Expenses	\$2,373,482
Subsidies and Benefits	\$32,907,285
Total Program & Discounts	\$35,280,767

ATTACHMENT 2

TABLE 1 -- BUDGET DISALLOWANCES

Utility	Description of Request	Disallowance (\$)	Reason for Disallowance
SCE	Cool Center	<\$142,500>	Fixed costs are too high
SCE	Cool Center Transportation	<\$42,750>	PGC not designed to fund
SCE	Cool Center Personnel	<\$175,750>	The program should only fund personnel that directly support Cool
SCE	Cool Center Snacks	<\$19,000>	Ratepayer funds should only be used to fund the energy efficiency measures themselves
SoCal Gas	Carbon Monoxide (CO) Testing	<\$1,800,000>	CO testing should be funded from base rates
SoCalGas	CARE Indirect Costs	<\$641,628>	Indirect Costs not included in CARE
SoCal Gas	CARE Audit	<\$141,000>	Audit cancelled
SoCalGas	CARE Call Center	<\$453,000>	Not incremental costs recovered in base rates
SoCalGas	CARE LIOB	<\$1,000>	LIOB expenses are absorbed by CPUC
SDG&E	Performance Incentives included in Indirect Costs	<\$104,821>	Outside the scope of this proceeding
SDG&E	Cool Center	<\$55,000>	Not a LIEE Expense
SDG&E	CO Testing	<353,100>	CO testing should be funded from base rates
SDG&E	CARE Indirect Costs	<\$703,154>	Indirect costs are not charged to CARE
SDG&E	CARE LIOB	<\$1,000>	LIOB expenses are absorbed by CPUC
SDG&E	CARE Audit	<\$85,000>	Audit cancelled
SDG&E	CARE Call Center	<\$166,400>	Not incremental costs recovered in base rates

TABLE 3
LARGE IOU 2005 AUTHORIZED CARE BUDGETS

	PG&E	SCE	SoCalGas	SDG&E
Outreach	\$3,850,000	\$1,633,000	\$1,949,750	\$1,465,327
Automatic Enrollment	150,000	60,000	30,000	21,200
Cool Centers		95,000		
Proc., Certification & Verification	2,100,000	600,000	925,334	227,269
Bill System / Programming	150,000	557,000	265,045	72,800
Measurement & Evaluation	487,000	58,000	393,560	235,700
Regulatory Compliance	170,000	50,000	163,306	123,872
General Administration	450,000	1,063,300	297,315	177,314
Low Income Oversight	0	0	0	0
Board				
CPUC Energy Division	100,000	82,700	83,000	50,000
Total CARE Expenses	\$7,457,000	\$4,199,000	4,108,310	\$2,373,482
Subsidies & Benefits	191,300,000	168,100,000	75,315,876	32,907,285
Authorized CARE Budget	\$198,757,000	\$172,299,000	\$79,424,186	\$35,280,767

TABLE 9
AUTHORIZED PY 2005 CARE BUDGETS

	PG&E	SCE	SoCalGas	SDG&E
Outreach	\$3,850,000	\$1,633,000	\$1,949,750	\$1,465,327
Automatic Enrollment	150,000	60,000	30,000	21,200
Cool Centers		95,000		
Proc., Certification & Bill System / Programming	2,100,000	600,000	925,334	227,269
Measurement & Evaluation	150,000	557,000	265,045	72,800
Regulatory Compliance	487,000	58,000	393,560	235,700
General Administration	170,000	50,000	163,306	123,872
Low Income Oversight Board	450,000	1,063,300	297,315	177,314
CPUC Energy Division	0	0	0	0
Total CARE Expenses	100,000	82,700	83,000	50,000
Subsidies & Benefits	\$7,457,000	\$4,199,000	\$4,108,310	\$2,373,482
Authorized CARE Budget	191,300,000	168,100,000	75,315,876	32,907,285
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TABLE 15
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Subsidies & Benefits	191,300,000	168,100,000	75,315,876	32,907,285
Total Program Costs and Discounts	\$198,757,000	\$172,299,000	\$79,424,186	\$35,280,767

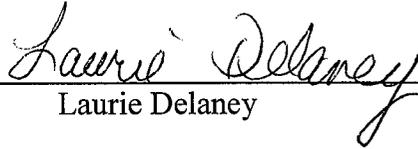
TABLE 17 -- BUDGET DISALLOWANCES

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SDG&E	CARE Audit	<\$85,000>	Audit cancelled
SDG&E	CARE Call Center	<\$166,400>	Not incremental costs recovered in base rates

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion of San Diego Gas & Electric Company Seeking Correction of a Clerical Error in Decision 05-05-019 has been served electronically on all parties of record on the Commission's service list in proceeding R.04-01-006, et al.

Executed this 27th day of June 2005 at San Diego, California.



Laurie Delaney

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0401006 - PUC - LOW-INCOME PRO

Filer: CPUC

List Name: LIST

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