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November 3, 2005

**ADVICE LETTER 1721-E-A/1551-G-A**  
(U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: SUPPLEMENTAL: REQUEST TO ESTABLISH NEW MEMORANDUM  
ACCOUNTS FOR INTERIM CALL CENTER COSTS**

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

**PURPOSE**

This supplemental Advice Letter (AL) is being filed in compliance with Ordering Paragraph (OP) 7 of Resolution (Res.) E-3958, dated October 27, 2005 and OP 19 of Decision 05-04-052 in Application 04-07-010. OP 7 of Res. E-3958 orders SDG&E to refile AL 1721-E/1551-G to make the tariff revisions required by the order. Pursuant to OPs 3 and 4, SDG&E was ordered to: 1) rename the memorandum account as the Interim Call Center memorandum account (ICCMA), and 2) modify the Disposition language in the Preliminary Statements to indicate that the CARE related call center costs will be recorded to the ICCMA until such time as they are reviewed by the Commission and authorized for recovery by the Commission through base rates in SDG&E's next general rate case or cost of service proceeding, or in a separate proceeding initiated by a formal application. This filing replaces AL 1721-E/1551-G in its entirety.

**BACKGROUND**

On July 1, 2004, the four major investor-owned utilities filed Low Income Energy Efficiency (LIEE) and CARE applications for 2005 program plans and funding at the request of the Commission. The CARE Program provides income-qualified customers with a 20 percent discount on their energy bills. SDG&E's A.04-07-011 contained funding for CARE call center labor costs and indirects as part of the CARE administrative budget. SDG&E has been including call center costs in its CARE administrative budgets since 1989 in accordance with D.89-09-044.

In D.05-05-019<sup>1</sup>, Table 1, the California Public Utilities Commission (Commission) disallowed \$166,400 in CARE call center labor costs and \$111,913 in CARE call center indirects from the CARE

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<sup>1</sup> D.05-05-019 issued May 13, 2005, Order Correcting Errors in Decision 05-04-052. D.05-07-007 issued July 15, 2005, Order Correcting Error in D.05-05-019, corrected a double disallowance for the call center costs and indirect costs.

Outreach budget category. Conclusion of Law 15, in D.05-04-052, finds that call center staff costs should be recovered in a utility's base rates, rather than as part of public purpose program funding.

In D.05-04-052, the Commission states where a cost is one the utility would have to incur regardless of the presence of the low income programs, it should be funded in base rates, rather than the earmarked PGC surcharge. OP 19 states SDG&E may recover in base rates the call center costs disallowed in this decision. Accordingly, SDG&E is making the following revisions in its preliminary statement to record and recover such costs since they are not included in SDG&E's current base rates.

#### Revisions to Preliminary Statement

SDG&E is revising its electric Preliminary Statement, Part III, and gas Preliminary Statement, Part V, to establish an electric and gas ICCMA. The purpose of the ICCMA is to record and recover the incremental labor and indirect expenses incurred as a result of the CARE related program activities for the period beginning January 1, 2005 as directed by D.05-04-052. Incremental CARE related call center costs will be recorded to the ICCMA until such time as they are reviewed by the Commission and authorized for recovery by the Commission through base rates in SDG&E's next general rate case or cost of service proceeding, or in a separate proceeding initiated by a formal application.

This filing will not create any deviations from SDG&E's tariffs, cause withdrawal of service from any present customers, or impose any more or less restrictive conditions.

#### **EFFECTIVE DATE**

In accordance with OP 7 of Res. E-3958, this filing is effective on October 27, 2005, the effective date of the resolution, subject to Energy Division review.

#### **PROTEST**

Anyone may protest this advice letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impacts, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date this advice letter was filed with the CPUC. 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 Jerry Royer (jrr@cpuc.ca.gov) and Honesto Gatchallian (jnj@cpuc.ca.gov) of the Energy Division. It is also requested that a copy of the protest 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: Monica Wiggins  
Regulatory Tariff Manager  
8330 Century Park Court, Room 32C  
San Diego, CA 92123-1548  
Facsimile No. (858) 654-1788  
E-mail: mwiggins@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 in R.04-01-006, by either providing them a copy electronically or by mailing them a copy hereof properly stamped and addressed.

Address changes should be directed to Christina Sondrini by facsimile at (858) 654-1788 or by e-mail at [csondrini@semprautilities.com](mailto:csondrini@semprautilities.com).

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J. STEVE RAHON  
Director — Tariffs & Regulatory Accounts

Enclosures  
(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**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Margee Moore

Phone #: (858) 654-1748

E-mail: mmoore@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) #: 1721-E-A/1551-G-A

Subject of AL: Supplemental: Request to Establish new Memorandum Accounts for Interim Call Center Costs

Keywords (choose from CPUC listing): Compliance, CARE, memorandum account

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

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

Resolution 3958 and D.05-04-052

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>:

Resolution Required?  Yes  No

Requested effective date: 10/27/05

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: Preliminary Statement & TOC

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets: None

**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**

**jjr@cpuc.ca.gov and jnj@cpuc.ca.gov**

**San Diego Gas & Electric**

**Attention: Monica Wiggins**

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

**San Diego, CA 92123**

**mwiggin@semprautilities.com**

<sup>1</sup> Discuss in AL if more space is needed.

General Order No. 96-A, Sec. III. G.  
ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

W. Ahern

ORA

D. Appling  
S. Cauchois  
J. Greig  
L. Maack  
R. Pocta  
W. Scott

Energy Division

W. Franklin  
S. Gallagher  
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D. Lafrenz  
J. Royer

CA. Energy Commission

F. DeLeon  
R. Tavares

Alcantar & Kahl LLP

K. Harteloo

American Energy Institute

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J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

California Energy Markets

S. O'Donnell  
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

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T. Jacoby

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City of Poway

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J. Cervantes  
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M. Valerio

Commerce Energy Group

A. Ahmed  
V. Gan

Constellation New Energy

W. Chen

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill  
J. Pau

Dept. of General Services

C. Torres

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 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

Ista-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard

M. Snow

R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

Pacific Gas & Electric Co.

J. Clark  
M. Huffman  
S. Lawrie

E. Lucha

Robinsons-May Dept. Stores

R. Britt

R. W. Beck, Inc.

C. Elder

San Diego Regional Energy Office

S. Freedman

S. Anders

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

J. Roscher

B. Johnson

R. Hunter

TURN

M. Florio

M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi

N. Furuta

J. Perez

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties in:

R.04-01-006

ATTACHMENT A  
ADVICE LETTER 1721-E-A

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 18670-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, Sheet 1	Revised 18114-E
Original 18671-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, Sheet 61	
Revised 18672-E	TABLE OF CONTENTS, Sheet 1	Revised 18613-E



**PRELIMINARY STATEMENT**

Sheet 1

III. MEMORANDUM ACCOUNTS

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Memorandum Accounts (Definition)	2
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- Note: 1) SONGS 2&3 Property Tax Memorandum Account, see Section V.G.  
 2) SONGS 2&3 Unamortized Nuclear Fuel Inventory Memorandum Account, see Section V.I.  
 3) SONGS 2&3 Permanent Closure Noninvestment-Related Expenses Memorandum Account, see Section V.J.

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**PRELIMINARY STATEMENT**

III. MEMORANDUM ACCOUNTS

LL. INTERIM CALL CENTER MEMORANDUM ACCOUNT (ICCMA)

1. Purpose: The purpose of the Interim Call Center Memorandum Account (ICCMA) is to record and recover the incremental labor and indirect expenses incurred as a result of the California Alternate Rates for Energy (CARE) related program for the period beginning January 1, 2005 as directed by D.05-04-052. The costs recorded to the ICCMA shall reflect those call center expenses that are not currently recovered through base rates authorized in the Utility's most recent Cost of Service decision (D. 04-12-015). The ICCMA shall be allocated 77% and 23% between electric distribution and gas, respectively, consistent with the allocation of authorized operating revenue adopted in D.04-12-015.
2. Applicability: The ICCMA applies to all customer classes, except for those specifically excluded by the Commission.
3. Rates: The ICCMA does not have a rate component. However, the balance is recovered through electric distribution rates as described in Section 5 below.
4. Accounting Procedure: The Utility shall maintain the ICCMA by making entries to this account at the end of each month as follows:
  - a. An entry equal to the Utility's incremental costs incurred for labor and indirect call center expenses assigned to the CARE program.
  - b. An entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entry in 4.a. 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.
5. Disposition: Costs will be recorded to the ICCMA until such time as they are reviewed by the Commission and authorized for recovery by the Commission through base rates in the Utility's next general rate case or cost of service proceeding, or in a separate proceeding initiated by a formal application.

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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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ATTACHMENT B  
ADVICE LETTER 1551-G-A

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 15142-G	PRELIMINARY STATEMENT, V. MEMORANDUM ACCOUNTS	Revised 14505-G
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Revised 15144-G	TABLE OF CONTENTS, Sheet 1	Revised 15112-G



**PRELIMINARY STATEMENT**

V. MEMORANDUM ACCOUNTS

<u>Description</u>	<u>Sheet No.</u>
Memorandum Accounts (defined)	1
A. Catastrophic Event Memorandum Account (CEMA)	1
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C. Gas DSM Memorandum Account	5
D. Cogeneration Shortfall Memorandum Account (CSMA)	6
E. Hazardous Waste Minimization Audit Memorandum Account (HWMAMA)	7
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G. Global Settlement Tracking Account (GLOBAL)	11
H. Energy Efficiency-DSM Memorandum Account (EEDSMMA)	12
I. Self-Generation Program Memorandum Account (SGPMA)	13
J. Annual Earnings Assessment Proceeding Memorandum Account (AEAPMA)	14
K. El Paso Settlement Proceeds Memorandum Account (EPSPMA)	15
L. Interim Call Center Memorandum Account (ICCMA)	16

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**NOTE:** For information relating to the Hazardous Substance Memorandum Account (HSMA), which is part of the Hazardous Substance Cleanup Cost Account (HSCCA), see Section VIII.E.

(Continued)

OP8  
Advice Ltr. No. 1551-G-A  
Decision No. 05-04-052

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

Date Filed Nov 3, 2005  
Effective \_\_\_\_\_  
Resolution No. E-3958



**PRELIMINARY STATEMENT**

V. MEMORANDUM ACCOUNTS

L. INTERIM CALL CENTER MEMORANDUM ACCOUNT (ICCMA)

1. Purpose: The purpose of the Interim Call Center Memorandum Account (ICCMA) is to record and recover the incremental labor and indirect expenses incurred as a result of the California Alternate Rates for Energy (CARE) related program for the period beginning January 1, 2005 as directed by D.05-04-052. The costs recorded to the ICCMA shall reflect those call center expenses that are not currently recovered through base rates authorized in the Utility's Cost of Service Decision (D.04-12-015). The ICCMA shall be allocated 77% and 23% between electric distribution and gas, respectively, consistent with the allocation of authorized operating revenue adopted in D.04-12-015.
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  - b. An entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entry in 4.a. 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.
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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. 1551-G-A

Decision No. 05-04-052

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

Date Filed Nov 3, 2005

Effective \_\_\_\_\_

Resolution No. E-3958