



J. Steve Rahon  
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August 16, 2006

**ADVICE LETTER 1821-E/1633-G**  
(U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: REVISIONS TO THE SELF-GENERATION PROGRAM MEMORANDUM  
ACCOUNT (SGPMA)**

San Diego Gas & Electric (SDG&E) hereby submits for filing the following modifications to its electric and gas Preliminary Statements as shown on Attachments A and B, respectively.

**Purpose**

This filing revises SDG&E's SGPMA to record the authorized revenue requirements beginning January 1, 2007 in accordance with the provisions of California Public Utilities Commission (Commission) Decision (D.) 06-01-024. In addition, consistent with the D.06-01-024, SDG&E plans to transfer any remaining solar program funds in the SGPMA at December 31, 2006 to the California Solar Initiative Balancing Account (CSIBA).

**Background**

Pursuant to D.05-12-044, the Commission authorized increased funding for California utilities by \$300 million in 2006 for solar photovoltaic technologies that are currently part of the Self-Generation Incentive Program (SGIP). The California Solar Initiative (CSI) responds to a policy proclamation by the Governor favoring solar development and strong interest by the State Legislature in an expanded solar incentives program in California. The CSI is a long-term program to provide incentives for the installation of solar energy technologies in California over the next ten years. Pursuant to D.05-12-044, SDG&E incorporated the annual CSI revenue requirement in 2006 rates and requested modification to its SGPMA to begin recording the authorized annual revenue requirement associated with the CSI program<sup>1</sup>.

On January 12, 2006, the Commission issued D.06-01-024, which establishes additional policies and program elements designed to promote solar development and provides additional funding of \$2.5 billion over the next ten years. In D.06-01-024, the Commission also authorized

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<sup>1</sup> Changes to the SGPMA were filed in Advice Letter 1761-E/1585-G on December 30, 2005 and approved by the Commission on January 30, 2006.

the utilities to collect the revenue requirement for the program concurrent with program spending for both the SGIP and CSI rather than requiring the utilities to wait until the end of the funding cycle to collect the program costs from customers. Consequently, SDG&E established the CSIBA to record solar program expenses and the corresponding revenue requirement beginning January 1, 2007<sup>2</sup>.

### Modification of the SGPMA

Consistent with the discussion on page 8 of D.06-01-024, to ensure timely funding of SGIP costs in the future SDG&E will collect in rates and modify its SGPMA to record the annual revenue requirements associated with the SGIP beginning in 2007.

In addition, Conclusion of Law 2 of D.06-01-024 directs utilities to separate the CSI from the SGIP, ordering that all solar components of the SGIP be incorporated into the CSI, effective 2007, and recorded in a separate account. As such, SDG&E plans to transfer any remaining solar funds in the SGPMA at December 31, 2006 to the CSIBA.

### 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 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 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 be sent via electronic mail and facsimile to SDG&E on the same date it is mailed or delivered to the Commission (at the addresses shown below).

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

### EFFECTIVE DATE:

SDG&E believes that this filing is subject to Energy Division disposition, and therefore respectively requests that this advice letter be approved September 15, 2006, which is 30 calendar days after the date filed.

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<sup>2</sup> Advice Letter 1774-E/1597-G dated February 16, 2006 and approved by the Commission on March 29, 2006.

**NOTICE**

In accordance with Section III.G of General Order No. 96-A, a copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties in R.04-03-017 (Distribution Generation OIR), 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.

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J. STEVE RAHON  
Director — Tariffs & Regulatory Accounts

# 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: Todd Cahill

Phone #: (858) 654-1745

E-mail: tcahill@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) #: 1821-E/1633-G

Subject of AL: Revisions to the Self-Generation Programs Memorandum Account (SGPMA)

Keywords (choose from CPUC listing): Compliance, Generation

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

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

D.06-01-024

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL \_\_\_\_\_

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

Resolution Required?  Yes  No

Requested effective date: 9/15/06

No. of tariff sheets: 8

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: Memorandum Account SGPMA & TOC

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

Pending advice letters that revise the same tariff sheets: 1820-E/1632-G

**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: Todd Cahill**

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

**San Diego, CA 92123**

**tcahill@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

DRA

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

Energy Division

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

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

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

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 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

Pacific Gas & Electric Co.

J. Clark  
M. Huffman  
S. Lawrie  
E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

San Diego Regional Energy Office

S. Freedman  
J. Porter

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

J. Perez

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties

R.04-03-017

ATTACHMENT A  
ADVICE LETTER 1821-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 19530-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA), Sheet 1	Original 19477-E
Revised 19531-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA), Sheet 2	Original 19478-E
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Revised 19533-E	TABLE OF CONTENTS, Sheet 2	Original 19518-E



**PRELIMINARY STATEMENT**

Sheet 1

**III. MEMORANDUM ACCOUNTS**  
**SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA)**

1. Purpose

The purpose of the SGPMA is to record the incremental costs associated with the Utility's Self-Generation Incentive Program (SGIP) as outlined in Decision (D.) 04-12-045, dated December 16, 2004, Commission Resolution E-3860, dated December 18, 2003, D.02-02-026, dated February 7, 2002, D.01-09-012, dated September 6, 2001, D.01-07-028, dated July 12, 2001, and D.01-03-073, dated March 27, 2001. Self-generation, as defined in D. 01-03-073, refers to distributed generation technologies, such as microturbines, small gas turbines, wind turbines, photovoltaics, fuel cells, internal combustion engines, and combined heat and power (or cogeneration). Self-generation units, with a 5 MW maximum system size limit, are installed on the customer's side of the utility meter and provide electricity for all or a portion of that customer's electric load. Commission D.05-12-044 and D.06-01-024, dated December 15, 2005 and January 12, 2006, respectively, adopt incremental costs associated with the California Solar Initiative (CSI) beginning in 2006. Effective January 1, 2006, the self-generation program budget shall be allocated between electric and gas customers, with 93 percent and 7 percent respectively.

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2. Applicability

The SGPMA shall apply to all customer classes, except for any classes that may be specifically excluded by the Commission.

3. Rates

Amounts in the SGPMA will be included in electric distribution rates annually.

4. Accounting Procedure

The Utility shall maintain the SGPMA by making entries at the end of each month as follows:

- a. A debit entry equal to the program costs including amounts remitted to the San Diego Regional Energy Office (SDREO) associated with this program in conformance with the contract between the Utility and SDREO. Costs may include marketing, contract administration, regulatory reporting, program evaluation, customers' incentives, incremental capital costs and expenses associated with the CSI program.
- b. A credit entry related to one-twelfth of the CSI revenue requirement authorized for recovery in rates (for 2006 only).
- c. A credit entry related to one-twelfth of the authorized SGIP revenue requirement.
- d. An entry equal to the amortization as authorized by the Commission.
- e. A debit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries 4a-d 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.

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A separate accounting of costs and benefits, by customer class, will be accomplished.

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**PRELIMINARY STATEMENT**

Sheet 2

III. MEMORANDUM ACCOUNTS

SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA)

5. Program Funding Limit

The total authorized program cost for SDG&E is \$15.5 million annually over a four-year period. Any unused funding can be carried over from one year to the next up to a maximum limit of \$62 million for the four-year period. The program administrator, SDREO, may request approval to borrow against the annual budget of a subsequent year if program participation is larger than anticipated in the current year. For 2006, an additional \$39 million is authorized for the CSI program.

6. Disposition

SDG&E will request the amortization change and current year's revenue requirement in the annual Regulatory Electric Update filing in October of each year with rates effective the following January 1<sup>st</sup>. Recovery of the undepreciated portion of the capital costs shall be determined in the Utility's next cost of service proceeding. Pursuant to D.05-12-044, SDG&E may recover its share of the amount authorized for the SGIP in the utility's next rate change following the effective date of D.05-12-044, subject to review of program costs at any time.

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Advice Ltr. No. 1821-E

Decision No. 06-01-024

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

Date Filed Aug 16, 2006

Effective \_\_\_\_\_

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





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Advice Ltr. No. 1821-E

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**Lee Schavrien**  
Vice President  
Regulatory Affairs

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Advice Ltr. No. 1821-E

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Issued by  
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Resolution No. \_\_\_\_\_

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ATTACHMENT B  
ADVICE LETTER 1633-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 15761-G	PRELIMINARY STATEMENT, V. MEMORANDUM ACCOUNTS, SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA), Sheet 1	Original 15727-G
Revised 15762-G	PRELIMINARY STATEMENT, V. MEMORANDUM ACCOUNTS, SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA), Sheet 2	Original 15728-G
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**PRELIMINARY STATEMENT**

Sheet 1

V. MEMORANDUM ACCOUNTS  
SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA)

1. Purpose

The purpose of the SGPMA is to record the incremental costs associated with the Utility's Self-Generation Incentive Program (SGIP) as outlined in Decision (D.) 04-12-045, dated December 16, 2004, Commission Resolution E-3860, dated December 18, 2003, D.02-02-026, dated February 7, 2002, D.01-09-012, dated September 6, 2001, D.01-07-028, dated July 12, 2001, and D.01-03-073, dated March 27, 2001. Self-generation, as defined in D.01-03-073, refers to distributed generation technologies, such as microturbines, small gas turbines, wind turbines, photovoltaics, fuel cells, internal combustion engines, and combined heat and power (or cogeneration). Commission D.05-12-044 and D.06-01-024, dated December 15, 2005 and January 12, 2006, respectively, adopt incremental costs associated with the California Solar Initiative (CSI) beginning in 2006. Effective January 1, 2006, the self-generation program budget shall be allocated between electric and gas customers, with 93 percent and 7 percent respectively.

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2. Applicability

The SGPMA shall apply to all customer classes, except for any classes that may be specifically excluded by the Commission.

3. Rates

Amounts in the SGPMA will be included in gas rates annually.

4. Accounting Procedure

The Utility shall maintain the SGPMA by making entries at the end of each month as follows:

- a. A debit entry equal to self generation program costs, including amounts remitted to the San Diego Regional Energy Office (SDREO) associated with this program in conformance with the contract between the Utility and SDREO. Costs may include O&M and capital-related costs associated with marketing, contract administration, regulatory reporting, program evaluation, customers' incentives, and expenses associated with the CSI program.
- b. A credit entry related to one-twelfth of the CSI revenue requirement authorized for recovery in rates (for 2006 only).
- c. A credit entry related to one-twelfth of the authorized SGIP revenue requirement.
- d. A credit entry equal to the revenues from amortization rates as authorized by the Commission.
- e. A debit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries 4a-d 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.

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A separate accounting of costs and benefits, by customer class, will be accomplished.

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Advice Ltr. No. 1633-G

Decision No. 06-01-024

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

Date Filed Aug 16, 2006

Effective \_\_\_\_\_

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



**PRELIMINARY STATEMENT**

Sheet 2

V. MEMORANDUM ACCOUNTS

SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA)

5. Program Funding Limit

The total authorized program cost for SDG&E is \$15.5 million annually over a four-year period. Any unused funding can be carried over from one year to the next up to a maximum limit of \$62 million for the four-year period. The program administrator, SDREO, may request approval to borrow against the annual budget of a subsequent year if program participation is larger than anticipated in the current year. For 2006, an additional \$39 million is authorized for the CSI program.

6. Disposition

SDG&E will request the amortization change and current year's revenue requirement in the annual Regulatory Gas Update filing in October of each year with rates effective the following January 1<sup>st</sup>. Recovery of the undepreciated portion of the capital costs shall be determined in the Utility's next cost of service proceeding. Pursuant to D.05-12-044, SDG&E may recover its share of the amount authorized for the SGIP in the Utility's next rate change following the effective date of D.05-12-044, subject to review of program costs at any time.

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Advice Ltr. No. 1633-G

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Advice Ltr. No. 1633-G

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