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August 26, 2005

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

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: REQUEST TO ESTABLISH NEW MEMORANDUM ACCOUNTS FOR
INCREMENTAL 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

In accordance with Ordering Paragraph (OP) 19 of Decision (D.) 05-04-052 in Application (A.) 04-07-011, SDG&E is revising its electric and gas Preliminary Statements to establish the Call Center Memorandum Account (CCMA) to record call center labor costs incurred as a result of the California Alternate Rates for Energy (CARE) Program.

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.05-05-019¹, 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 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

¹ 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.

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 CCMA. The purpose of the CCMA 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. SDG&E will request recovery of the balance in the electric CCMA through an annual transfer to its Electric Distribution Fixed Cost Account (EDFCA) and the balance in the gas CCMA through the Gas Fixed Cost Account (GFCA)², or other mechanism as authorized by the Commission. Incremental CARE related call center costs will continue to be recorded to the CCMA until such time they are placed into base margin through SDG&E's next Cost of Service proceeding.

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

SDG&E believes this filing is subject to Energy Division disposition and therefore respectfully requests that this filing become effective on September 25, 2005, which is 30 calendar days after the date filed.

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 (jir@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

² The GFCA consists of two separate accounts: the Core Fixed Cost Account (CFCA) and the Non-Core Fixed Cost Account (NFCA). The amount transferred from the CCMA will be allocated to the CFCA and NFCA consistent with the adopted allocation of SDG&E's base margin.

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.

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/1551-G

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

Keywords (choose from CPUC listing): CARE, Compliance

AL filing type: Monthly Quarterly Annual One-Time Other

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

D.05-04-052

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:

Resolution Required? Yes No

Requested effective date: 9/25/05

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 proposed¹: establishment of Call Center memorandum accounts

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

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

mwiggins@semprautilities.com

¹ 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

R. Birdsell
S. Cauchois
J. Greig
L. Maack
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

California Energy Markets

S. O'Donnell
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Calpine

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

W. Gaters

City of Poway

R. Willcox

City of San Diego

J. Cervantes
G. Lonergan
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

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. Pdersen

Henwood Energy Services

Ista-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luca, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard

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

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

Sheila Dey

White & Case LLP

L. Cottle

Interested Parties in:

R.04-01-006

ATTACHMENT A
ADVICE LETTER 1721-E

| Cal. P.U.C. Sheet No. | Title of Sheet | Canceling Cal. P.U.C. Sheet No. |
|--------------------------|--|------------------------------------|
| Revised 18568-E | PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, Sheet 1 | Revised 18114-E |
| Original 18569-E | PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, Sheet 61 | |
| Revised 18570-E | TABLE OF CONTENTS, Sheet 1 | Revised 18567-E |



PRELIMINARY STATEMENT

Sheet 1

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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. CALL CENTER MEMORANDUM ACCOUNT (CCMA)

1. Purpose: The purpose of the Call Center Memorandum Account (CCMA) 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 CCMA 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 CCMA 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 CCMA applies to all customer classes, except for those specifically excluded by the Commission.
3. Rates: The CCMA 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 CCMA 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: At the end of each year, the balance in the CCMA shall be transferred to the Electric Distribution Fixed Cost Account (EDFCA), or other balancing account as may be directed by the Commission for rate recovery. For the EDFCA, the Utility will file an advice letter to make this change in October of each year, with rates effective the following January 1st. Incremental CARE related call center costs will continue to be recorded to the CCMA until such time they are placed into base margin through the Utility's next Cost of Service proceeding.



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Advice Ltr. No. 1721-E

Decision No. _____

Issued by
Lee Schavrien
Vice President
Regulatory Affairs

Date Filed Aug 26, 2005

Effective _____

Resolution No. _____

ATTACHMENT B
ADVICE LETTER 1551-G

| Cal. P.U.C. Sheet No. | Title of Sheet | Canceling Cal. P.U.C. Sheet No. |
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PRELIMINARY STATEMENT

V. MEMORANDUM ACCOUNTS

| <u>Description</u> | <u>Sheet No.</u> |
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| Memorandum Accounts (defined) | 1 |
| A. Catastrophic Event Memorandum Account (CEMA) | 1 |
| B. Core Reclassification Shortfall Memorandum Account (CRSMA) | 4 |
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| J. Annual Earnings Assessment Proceeding Memorandum Account (AEAPMA) | 14 |
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| L. Call Center Memorandum Account (CCMA) | 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)

OP15
Advice Ltr. No. 1551-G
Decision No. _____

Issued by
Lee Schavrien
Vice President
Regulatory Affairs

Date Filed Aug 26, 2005
Effective _____
Resolution No. _____



PRELIMINARY STATEMENT

V. MEMORANDUM ACCOUNTS

L. CALL CENTER MEMORANDUM ACCOUNT (CCMA)

1. Purpose: The purpose of the Call Center Memorandum Account (CCMA) 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 CCMA 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 CCMA 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.
5. Disposition: At the end of each year, the balance in the CCMA shall be transferred to the Gas Fixed Cost Account (GFCA), or other balancing account as may be directed by the Commission for rate recovery. For the GFCA, the Utility will file an advice letter to make this change in October of each year, with rates effective the following January 1st. Incremental call center costs will continue to be recorded to the CCMA until such time they are placed into base margin through the Utility's next Cost of Service proceeding.



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