



December 10, 2018

PUG 100  
C.8209

David K. Lee, Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3398

**Subject: 2019 WORK CREDIT ALLOCATIONS FOR UNDERGROUND CONVERSIONS**

Dear Mr. Lee:

In accordance with Ordering Paragraph 6 of Decision 73078, in Case 8209, San Diego Gas and Electric Company submits this letter to advise the Commission of the 2019 electric underground conversion work credit allocations associated with electric Rule 20.

Pursuant to Section "A" of SDG&E's electric Rule 20, SDG&E is allocating a total of \$28,676,240 in work credits for the purpose of undergrounding existing overhead electric facilities within its service territory for calendar year 2019.

SDG&E has distributed its 2019 allocation budget for all cities in compliance with D.90-05-032 in Case 8209 and the methodology specified in Rule 20A.2.d. Based on the statewide per customer average for 2018, SDG&E has distributed its 2019 allocations in the same ratio that the number of overhead meters in the city or unincorporated area of any county bears to the total system overhead meters, with the exception of the cities of San Diego and Chula Vista. SDG&E has determined that any customer served from an overhead source is considered an overhead-metered customer.

Allocations for The City of San Diego have been calculated in accordance with Section 9 (b) of the franchise agreement as amended in Ordinance 19030 and our Advice Letter 1407-E filed with the CPUC on May 14, 2002 and result in \$19,418,022 work credits. Allocations for the City of Chula Vista have been calculated in accordance with the 2004 Franchise Agreement. The work credits allocated to the City of Chula Vista in 2019 are \$2,000,000.

A complete listing of work credits allocated by each city or county is included in Attachment A of this letter.

In accordance with OP 6 of D.14-01-002, SDG&E is also submitting this letter to advise the Commission of the 2016 electric underground conversion work credit allocations associated with electric Rule 20 Section "D".

Pursuant to Section "D" of SDG&E's electric Rule 20, SDG&E is allocating \$1,000,000 in work credits for the purpose of community fire risk mitigation within the SDG&E Fire Threat Zone in 2019. SDG&E has distributed this 2019 allocation budget for cities as per the methodology described in Rule 20.D.2 using the miles of overhead electric high voltage distribution lines within each city or county as of November 1, 2018.

For practical purposes of allocation, any jurisdiction with less than one half of one percent (0.5%) of the total amount of relevant Rule 20.D mileage will receive an allocation of zero. The reason for this is that granting allocations to jurisdictions with less than this threshold would result in an individual allocation of less than \$9,000. This would require over twenty years for a jurisdiction to accumulate sufficient allocations to do even a small project. Over ninety-eight percent (98%) of the relevant mileage lies within four cities and counties, with less than two percent (2%) spread among ten other jurisdictions. For these reasons going forward, SDG&E will distribute Rule 20.D allocations only to those jurisdictions above the one half of one percent (0.5%) threshold in order to focus on meaningful projects.

The listing of Rule 20.D work credits allocated by each city or county is included in Attachment B of this letter.

If there are any questions regarding this filing, please contact Megan Caulson, Regulatory Tariff Manager, at (858) 654-1748.

Sincerely,

/s/ Clay Faber

Clay Faber, Director – Regulatory Affairs  
Attachments (1)

cc: J. Frost, Energy Division CPUC  
M. Caulson, SDG&E  
T. Taylor, SDG&E  
K. Valdivia, SDG&E  
M. E. Allen, PG&E  
A. Mathis, SCE

## Attachment A

City/County	50/50 Baseline Calculation
Aliso Viejo	\$0
Carlsbad	\$82,265
Chula Vista	\$2,000,000
Coronado	\$196,705
Dana Point	\$163,625
Del Mar	\$71,910
El Cajon	\$610,455
Encinitas	\$341,695
Escondido	\$408,435
Imperial Beach	\$300,755
Laguna Beach	\$51,065
Laguna Hills	\$1,833
Laguna Niguel	\$0
La Mesa	\$578,640
Lemon Grove	\$275,795
Mission Viejo	\$0
National City	\$449,145
Oceanside	\$343,695
Orange County	\$0
Poway	\$104,790
San Clemente	\$262,560
City of San Diego	\$19,418,002
San Diego County	\$2,494,610
San Juan Capistrano	\$0
San Marcos	\$6,200
Santee	\$140,505
Solana Beach	\$62,575
Vista	\$310,980
<b>TOTALS:</b>	<b>\$28,676,240</b>

\* Note: Virtually all SDG&E customers in Aliso Viejo, Laguna Hills, and Mission Viejo are served via an underground electric system. Consequently, calculations performed in accordance with Rule 10A.2.d result in these areas receiving no allocations for the year of 2019.

\*\* Note: The City of Chula Vista and The City of San Diego allocations determined per respective franchise agreements as authorized in CPUC Decision 82-12-069.

## Attachment B

Rule 20.D Work Credits Allocated by City/County

<b>City/County</b>	<b>2019 20.D Allocation</b>
County of Orange	\$13,391.84
Poway	\$13,910.42
San Diego	\$20,191.96
County of San Diego	\$952,505.79
<b>TOTAL:</b>	<b>\$1,000,000.00</b>