



Aimee M. Smith
Senior Counsel

101 Ash Street, HQ-13
San Diego, CA 92101

Telephone: (619) 699-5042
Facsimile: (619) 699-5027
amsmith@sempa.com

February 28, 2007

B.B. Blevins, Executive Director
California Energy Commission
Dockets Unit
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512

DOCKET	
00-SB-1305	
DATE	FEB 28 2007
RECD.	MAR 01 2007

**Re: Docket 00-SB-1305: Power Source Disclosure Program Compliance
Filing - Independent Audit/Verification of SDG&E's 2005 Annual
Power Content Label and Annual Report; Withdrawal of Application
for Confidential Designation**

Dear Mr. Blevins:

On January 11, 2007, San Diego Gas & Electric Company ("SDG&E") filed its Independent Audit Report (the "Report") verifying its 2005 Annual Report on the Power Source Disclosure Program (Docket 00-SB-1305). It concurrently filed an application requesting confidential designation of certain data contained within the Report.

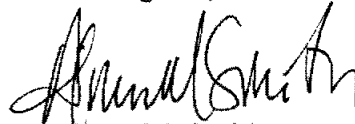
The Commission denied SDG&E's request for confidential designation by letter dated February 2, 2007. Subsequently, SDG&E and Commission staff met to determine whether confidential monthly data contained in the Report could be replaced with publicly disclosed annual data. In addition, SDG&E and Commission staff discussed the public availability of other data contained within the Report. An extension of the statutory deadline to respond to the denial of SDG&E's application was granted via e-mail.

As the result of these discussions, SDG&E hereby seeks to withdraw the version of the Report submitted on January 11, as well as its request for confidential designation. It requests that the Commission either return the documents to SDG&E counsel, Aimee Smith, at the above-listed address or provide confirmation that the documents have been destroyed. SDG&E submits herewith a revised version of the Report that contains no confidential information.

Letter to B.B. Blevins
California Energy Commission
February 28, 2007
Page 2

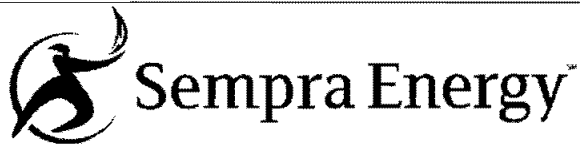
Should you have any questions concerning this filing, please do not hesitate to contact me directly at (619) 699-5042 or amsmith@sempra.com.

Best regards,

A handwritten signature in black ink, appearing to read 'Ammee M. Smith', written in a cursive style.

Ammee M. Smith

Cc: Fernando De Leon (CEC)



AUDIT SERVICES DEPARTMENT

SAN DIEGO GAS AND ELECTRIC (SDG&E)

POWER SOURCE DISCLOSURE PROGRAM

To Dan Frank and Sue Garcia,
And the California Energy Commission, Technology Evaluation office

We have performed the procedures enumerated below, which were agreed to by SDGE Energy and Power Procurement, solely to assist you with respect to complying with annual reporting requirements of the California Energy Commission's Power Source Disclosure and Customer Credit Programs for the year ended December 31, 2005. This agreed-upon procedure engagement was performed in accordance with standards established by the Institute of Internal Auditors. The sufficiency of the procedures is solely the responsibility off the specified users of the report.

Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. Please note that certain information included herein is confidential, as detailed in the concurrently-filed Application for Confidential Designation. Confidential information is highlighted in yellow within the individual schedules.

1. We obtained the SB1305 Schedule 1 and agreed supporting balances by product to the following internally generated schedules;

- a. Renewable resources to "Report Card (for 2006 Power Content Label forecast).xls," "Power Content QF facilities - 2005.xls," and "DWR 2005.xls"



Report Card (for
2006 Power Content



Power content - QF
Deliveries 2005.xls



2005 DWR.xls

- b. Coal to 2005 Boardman Coal Summary (hardcopy quarterly summaries received from Boardman for 2005)
- c. Natural Gas to ""Power Content QF facilities - 2005.xls," "DWR 2005.xls, " and "ERRA-06.xls"





ERRA-06.xls

- d. Nuclear to "Songs 2005.xls"

 Songs 2005.xls

- e. Other to "Bilateral Purchases and Sales, 2005 (Scheduled MWh).xls," "DWR 2005.xls," and "2005 CAISO Imbalance Energy"

 
Bilateral Purchases and Sales, 2005 2005 CAISO Imbalance Energy.rtf

We noted the following three reporting errors, in kWh, between SB1305 Schedule 1 and internally generated schedules;

Facility	SB1305 Schedule 1	Internal Schedule	Difference
Miramar Energy Facility	9,836,364	4,431,000	5,405,364
MM San Diego Miramar	27,897,687	27,947,000	(49,313)

In addition, the reported volumes (33,500 kWh) for Rincon were incorrectly reflected as a purchase in SB1305 Schedule 1, instead of as a sale to City of Escondido.

- Using a random number generator, we selected 20 Facilities for testing from SB1305 Schedule 1. The 20 selected consisted of 10 generation/purchases and 10 sales. For each selected, we verified "Net kWh Procured" to supporting invoices noting the kWhs purchased or sold and the date were in agreement.
We noted the following reporting errors, in kWh, between SB1305 Schedule 1 and invoices;

Facility	SB1305 Schedule 1	Invoices	Difference
Boardman	537,413,000	537,393,000	20,000
Cabezon	113,328,620	114,891,887	(1,563,267)

- SB 1305 Schedule 2A, we recalculated sales by fuel type noting a difference between gross kWh purchased and kWh resold represents approximately 4.7% of line losses (as reported on SB 1305 Schedule 2B). SDG&E believes that this line loss is reasonable. KWh resold agrees to SDG&E 2005 Annual Report (10k).
- SB 1305 Schedule 2B, we verified supporting net purchases and generic power sold balances by product agrees to SB 1305 Schedule 1. Retail sales kWh agree to SB 1305 Schedule 2A.

We were not engaged to, and did not, perform an examination, the objective of which would be the expression of an opinion on the compliance of the annual reporting requirements of the California Energy Commission's Power Source Disclosure and Customer Credit Programs. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

December 21, 2006

Patty McMahon [s]
Certified Public Accountant
Audit Services

Bruce Ellis[s]
Certified Public Accountant
Audit Services Manager

**Section 1(a)
Attachments**

ATTACHMENT: "Report Card (for 2006 Power Content Label Forecast).xls"

2005 Deliveries to Date (MWH)														
	Technology	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Total
PRE-2003 GRANDFATHERED AGREEMENTS ²														
Prima Deshecha	Bio-gas	0	0	0										0
Miramar	Bio-gas	0	0	0										0
North City	Bio-gas	0	0	0										0
Otay Landfill I	Bio-gas	493	788	1,082	1,016	1,152	1,117	1,130	1,090	1,103	1,043	903		10,917
Otay Landfill II	Bio-gas	201	615	1,094	497	1,085	883	956	1,018	1,049	1,079	1,077	1,115	10,669
San Marcos Landfill	Bio-gas	796	687	800	661	841	848	782	831	795	808	628	413	8,891
Sycamore Landfill	Bio-gas	858	725	795	606	784	763	762	753	517	713	684	771	8,731
Sub-Total		2,348	2,816	3,771	2,780	3,861	3,610	3,629	3,692	3,463	3,644	3,293	2,300	39,207
Alvarado Hydro Facility	Hydro	712	503	94	306	59	72	0	305	234	211			2,497
Badger Filtration Plant	Hydro	71	31	11	150	149	233	299	386	393	241	204	143	2,311
Bear Valley Hydro	Hydro	0	0	13	200	397	487	402	988	945	688	567	84	4,773
Miramar Hydro Facility	Hydro	0	0	0	0	0	0	0	0	0	0	0	0	0
Olivenhain Municipal Water Dist	Hydro	69	65	44	0	103	191	188	196	209	177	138	115	1,495
San Francisco Peak Hydro Plant	Hydro	62	75	36	71	71	77	61	52	51	41	28	63	687
Sub-Total		914	673	200	727	779	1,060	949	1,928	1,833	1,357	938	406	11,764
Cal West Industrial Park (last day was 2/28/05)	Photovoltaic	5	5	12	9	0	0	0	0	0	0	0	0	32
Sub-Total		5	5	12	9	0	0	0	0	0	0	0	0	32
2003 TRANSITIONED AGREEMENTS ²														
MM San Diego - Miramar	Bio-gas	2,363	2,120	2,114	2,448	2,555	2,510	2,311	2,286	2,310	2,288	2,243	2,399	27,947
MM San Diego - North City	Bio-gas	1,214	1,059	1,009	757	788	1,106	749	651	670	819	761	1,236	10,819
MM Prima Deshecha	Bio-gas	3,145	3,493	3,678	2,959	2,565	2,242	2,162	2,746	2,120	1,603	3,373	3,373	33,459
Sub-Total		6,722	6,672	6,801	6,164	5,908	5,858	5,222	5,683	5,100	4,710	6,377	7,008	72,225
RPS AGREEMENTS														
GRS - Coyote Canyon	Bio-gas	5,181	5,040	5,393	5,752	5,952	5,760	4,977	6,072	5,552	5,960	5,560	5,186	66,385
GRS - San Marcos	Bio-gas	0	0	0	0	0	0	0						0
GRS - Sycamore	Bio-gas	1,488	1,344	714	1,438	1,488	876	948	1,488	1,440	1,118	1,080	1,080	14,502
San Diego MWD (Point Loma)	Bio-gas/Hydro/Diesel	1,994	1,881	2,168	1,664	2,031	1,601	2,326	1,892	2,112	2,185	2,087	1,827	23,768
Sub-Total		8,663	8,265	8,275	8,854	9,471	8,237	8,251	9,452	9,104	9,263	8,727	8,093	104,655
AES Delano	Bio-mass	21,684	18,321	29,297	31,061	28,158	26,483	28,418	23,824	22,935	26,071	20,614	22,079	298,945
Envirepel	Bio-mass	0	0	0	0	0	0	0	0	0	0	0	0	0
Sub-Total		21,684	18,321	29,297	31,061	28,158	26,483	28,418	23,824	22,935	26,071	20,614	22,079	298,945
Kumeyaay	Wind													
Oasis Power Partners	Wind													
metered		2,478	6,076	14,899	18,450	27,404	23,068	22,128	15,823	15,185	15,552	11,057	10,074	182,194
PPM Energy	Wind													
metered		2,485	2,551	8,251	9,214	12,085	13,255	9,274	7,387	9,077	6,442	3,433	2,535	85,989
WTE Acquisition	Wind													
metered		1,025	1,265	4,340	2,850	4,472	4,684	9,274	1,991	2,070	1,519	579	359	34,428
Sub-Total		5,988	9,892	27,490	30,514	43,961	41,007	40,676	25,201	26,332	23,513	15,069	12,969	302,611
SDCWA - Rancho Penasquitos	Hydro	0	0	0	0	0	0	0	0	0	0	0	0	0
Sub-Total		0	0	0	0	0	0	0	0	0	0	0	0	0
	Solar													0
Sub-Total		0	0	0	0	0	0	0	0	0	0	0	0	0
Total		46,324	46,645	75,846	80,109	92,138	86,256	87,145	69,780	68,767	68,558	55,017	52,854	829,435

ATTACHMENT: "Power Content QF facilities - 2005.xls"

QFs Deliveries in 2005
SDG&E Internal Use Only

QF NAME	PROJECT ID	FACILITY DESCRIPTION	2005 Deliveries (kWh)
RECIPROCATING ENGINE			
Cal West Industrial Park	476	RECIP ENGINE	37,909
		TOTAL	37,909
MICROTURBINES			
Otay Landfill 1	153	RECIP ENGINE	12,003,637
Otay Landfill 2	154	RECIP ENGINE	10,668,897
San Marcos Landfill	155	RECIP ENGINE	8,890,814
Jamacha Landfill	480	MICROTURBINES	1,098,518
Sycamore Landfill	152	RECIP ENGINE	8,731,256
		TOTAL	41,393,122
HYDROELECTRIC			
San Francisco Peak Hydro Plant	119	HYDROELECTRIC	686,994
Miramar Hydro Facility	150	HYDROELECTRIC	-
Alvarado Hydro Facility	151	HYDROELECTRIC	2,286,262
Olivenhain Municipal Water District	225	HYDROELECTRIC	1,495,553
Badger Filtration Plant	17	HYDROELECTRIC	2,247,523
Bear Valley Hydro Plant	5005	HYDROELECTRIC	4,688,960
		TOTAL	11,405,292
COGENERATION			
Grossmont Hospital	75	GAS TURBINE	3,221
Palomar Medical Center	77	RECIP ENGINE	-
TRW Plant	92	RECIP ENGINE	683,411
Marriott Hotel and Marina I - North	259	RECIP ENGINE	-
Pomerado Hospital	304	RECIP ENGINE	-
Marriott Hotel and Marina II - South	368	RECIP ENGINE	-
Coronado Island Marriott I	374	RECIP ENGINE	478,842
Kyocera International, Inc.	388	RECIP ENGINE	993,057
Yuma Cogeneration Assoc.	416	GAS TURBINE	348,169,394
Goal Line L.P.	431	COMBINED CYCLE	241,965,313
Barone, Galasso & Associates	206	RECIP ENGINE	-
Coronado Island Marriott II	382	RECIP ENGINE	65
Jolly Clean Giant Launderland	422	RECIP ENGINE	-
YMCA Mission Valley	426	RECIP ENGINE	-
Thompson Coin Laundry	429	RECIP ENGINE	-
River Scene Homeowners	442	RECIP ENGINE	-
CP - Kelco	466	GAS TURBINE	85,653,902
North Island Cogeneration	223	COMBINED CYCLE	211,699,866
NTC/MCRD Cogeneration	232	COMBINED CYCLE	136,993,022
Naval Station	233	COMBINED CYCLE	219,658,514
Other CoGeneration no PPA	VARIOUS	VARIOUS	2,342,031
		TOTAL	1,248,640,638
STEAM TURBINE			
AEI MCRD Steam Turbine	162	STEAM TURBINE	15,046,691
North Island Steam Turbine	163	STEAM TURBINE	-
		TOTAL	15,046,691

LEGEND:

Renewable Resource
Natural Gas

GRAND TOTAL

1,316,523,652.0

ATTACHMENT: "2005 DWR.xls"

Name	Type			MW	KW
Cabazon	Renewable	Wind		113,328.62	113,328,620.00
Whitewater	Renewable	Wind		190,133.38	190,133,380.00
					-
CalPeak Border	Generator	Gas		2,408.10	2,408,100.00
Cal Peak El Cajon	Generator	Gas		2,719.80	2,719,800.00
Cal Peak Enterprise	Generator	Gas		2,557.40	2,557,400.00
					-
Alamitos 5	Generator	Gas		168,641.00	168,641,000.00
Alamitos 6	Generator	Gas		233,031.00	233,031,000.00
Huntington Beach 1	Generator	Gas		164,990.00	164,990,000.00
					-
Sunrise	Generator	Gas		3,216,257.00	3,216,257,000.00
					-
Williams A	General	Bi Lateral Contract		1,752,000.00	1,752,000,000.00
Williams B	General	Bi Lateral Contract		2,210,400.00	2,210,400,000.00
Williams C	General	Bi Lateral Contract		245,600.00	245,600,000.00
					-
Morgan Stanley	General	Bi Lateral Contract		306,600.00	306,600,000.00
					-
Total					8,608,666,300.00

-

**Section 1(c)
Attachments**

ATTACHMENT: "ERRA-06.xls"

Miramar NGBA Revenue Requirement

	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05
Fixed Monthly Revenue Requirement	\$97,839	\$505,500	\$505,500	\$505,500	\$505,500	\$505,500
Monthly Variable O&M Non-Fuel Costs						
Generation Output (Mwh)	138.8	1,816.0	1,495.2	106.6	374.1	500.6
Multiplied by Non-Fuel Rate (\$/Mwh)	<u>\$5.93</u>	<u>\$5.93</u>	<u>\$5.93</u>	<u>\$5.93</u>	<u>\$5.93</u>	<u>\$5.93</u>
Total	\$823	\$10,769	\$8,867	\$632	\$2,218	\$2,969
Monthly Revenue Requirement	\$98,662	\$516,269	\$514,367	\$506,132	\$507,718	\$508,469

Total 2005 4,431.3

**Section 1(d)
Attachments**

ATTACHMENT: "Songs 2005.xls"

2005 SDG&E NET GENERATION (MWH)

<u>MONTH</u>	<u>SONGS 2</u>	<u>SONGS 3</u>	<u>SONGS 2&3</u>	<u>YTD</u>	<u>Kwhrs</u>
Jan-05	156,789	135,574	292,362	292,362	292,362,300
Feb-05	46,338	150,772	197,110	489,472	197,110,134
Mar-05	123,179	166,872	290,051	779,524	290,051,227
Apr-05	150,931	162,019	312,950	1,092,474	312,949,951
May-05	165,971	130,817	296,788	1,389,262	296,787,906
Jun-05	160,499	161,528	322,027	1,711,288	322,026,932
Jul-05	165,618	166,036	331,653	2,042,942	331,653,481
Aug-05	165,975	166,847	332,821	2,375,763	332,821,347
Sep-05	161,403	161,681	323,084	2,698,847	323,083,720
Oct-05	164,419	166,846	331,265	3,030,112	331,265,416
Nov-05	161,477	160,137	321,613	3,351,726	321,613,220
Dec-05	<u>163,749</u>	<u>164,527</u>	<u>328,276</u>	3,680,002	328,276,000
					3,680,001,633
TOTAL	1,786,346	1,893,656	3,680,002		

**Section 1(e)
Attachments**

ATTACHMENT: "Bilateral Purchases and Sales, 2005 (Scheduled MWh).xls"

San Diego Gas & Electric
2005 Monthly Purchases (Page 3 RECAP)

Company	YTD Mwh	YTD \$
Totals	2,424,353	\$160,876,181.28

ATTACHMENT: “2005 CAISO Imbalance Energy”

From: Nelson, Tiffany
Sent: Wednesday, March 08, 2006 1:32 PM
To: Nguyen, Uyen - E&GP; Frank, Daniel - E&GP
Subject: 2005 CAISO Imbalance Energy

Attachments: Picture (Metafile)
Here is CAISO imbalance energy buys and sells for 2005 for CEC report.

	CAISO IMBALANCE ENERGY BUY MWH	CAISO IMBALANCE ENERGY (SELL) MWH	NET CAISO IMBALANCE ENERGY MWH
2005	187,430.050	(362,515.630)	(175,085.580)