

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**Application of SAN DIEGO GAS & ELECTRIC  
COMPANY for Review of its Proactive De-  
Energization Measures and Approval of  
Proposed Tariff Revisions  
(U 902-E)**

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Application 08-12-021  
(Filed December 22, 2008)

**REPLY COMMENTS OF THE  
CALIFORNIA FARM BUREAU FEDERATION IN SUPPORT  
OF COST CONCERNS RAISED BY THE COMMENTS OF  
THE WATER DISTRICTS**

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Dated: April 10, 2009

In accordance with the established schedule, the California Farm Bureau Federation<sup>1</sup> ("Farm Bureau") submits these Reply Comments in support of important points raised by the Water Districts in their Opening Comments. Farm Bureau members include farmers and ranchers in SDG&E's territory. An overwhelming majority of agricultural water users are dependent upon the services provided by the Water Districts and, of course, are ratepayers of them as well. Water rates for agricultural users in San Diego are skyrocketing due to a ramp down of agricultural discounts provided for reduced reliability and a projected increase in Metropolitan Water District rates. Water rates could increase even more in response to the SDG&E proposed de-energization measures, if it is approved.

It is understandable that those who had any direct contact with the 2007 fires in San Diego would explore effective measures to preclude a recurrence of those events. But the implications of any measure needs to be fully assessed to ensure the solutions adopted don't precipitate significant problems as well. The Water Districts raise important issues regarding the cost consequences of SDG&E's proposal.

SDG&E's customers have spent decades developing operations and practices based on a variety of expectations about the availability of power from SDG&E. The SDG&E proposal fundamentally changes years of operations and

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<sup>1</sup> The California Farm Bureau Federation is California's largest farm organization with more than 85,000 members in 53 county Farm Bureaus. California farmers and ranchers sell \$24.8 billion in agricultural products annually, accounting for 9 percent of the gross state product, and hundreds of thousands of jobs in California.

long-standing assumptions. The proposal would precipitate a change at times of utmost vulnerability to the customer.

Farm Bureau, on behalf of its affected members, is particularly concerned about the projected costs the Water Districts have identified they will face if SDG&E's proposal is approved as currently presented. While current projections are over ten million dollars collectively, the costs are expected to rise above that figure to fully account for needs associated with back-up generators. Unlike long-standing electric interruptible rates, no corresponding discount to discontinue service at particular times to ameliorate the anticipated economic consequences is being offered in conjunction with the SDG&E proposal. The Water Districts only have one source to look to for collecting the increased costs - their ratepayers. Agricultural users are already having to weigh the ability to maintain crops in light of water availability and costs, any further cost impacts will place additional pressure on that ability.

A review of the comments submitted by parties indicates there are significant questions left unanswered about SDG&E's proposal. A proposal of this magnitude requires absolute clarity about the parameters, because the operational and economic impacts are so pervasive. In rural areas water and electrically are inextricably linked, making rural customers under this proposal extremely vulnerable.

Further refinement of the proposal is needed to account for the costs identified by Water Districts. SDG&E should be in the forefront of providing realistic solutions to the proposal. As noted by the Water Districts, part of any

solution considered needs to be an appropriate remedy to any unanticipated consequences if the proposal is implemented. A pre-identified contact person and process should be established to allow quick resolution of any issues that arise.

Farm Bureau appreciates the extensive efforts the Water Districts have made to ensure its members' needs are addressed should SDG&E's proposal be adopted and urges the Commission to weigh the issues raised as it considers the de-energization proposal.

Dated: April 10, 2009

Respectfully submitted,

**California Farm Bureau Federation**

By 

**KAREN NORENE MILLS**

Attorney

## VERIFICATION

I am Associate Counsel to the California Farm Bureau Federation and am authorized to make this verification on its behalf. The statements in the foregoing REPLY COMMENTS OF THE CALIFORNIA FARM BUREAU FEDERATION IN SUPPORT OF COST CONCERNS RAISED BY THE COMMENTS OF THE WATER DISTRICTS are true to my own knowledge, except as to matters which are therein stated on information and belief and, as to those matters, I believe them to be true.

Executed at Sacramento, California.

Dated: April 10, 2009

/s/ - Karen Norene Mills

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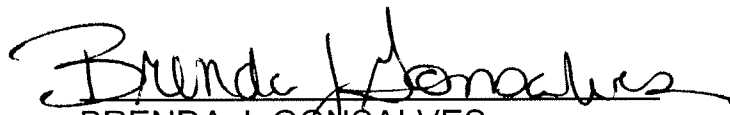
**KAREN NORENE MILLS**

## CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the **REPLY COMMENTS OF THE CALIFORNIA FARM BUREAU IN SUPPORT OF COST CONCERNS RAISED BY THE COMMENTS OF THE WATER DISTRICTS** on all parties identified on the attached service list. Service was affected as appropriate by means indicated below:

- ✓ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail); and
- ✓ Transmitting the copies via facsimile, modem, or other electronic means (Via Electronic Means).

Executed this 10th day of April 2009, at Sacramento, California.

  
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