

State of California
Department of Water Resources

Revision to the Determination of Revenue Requirements

For the Period

January 1, 2009 through December 31, 2009

Submitted To
The California Public Utilities Commission
Pursuant To
Sections 80110 and 80134 of the California Water Code



October 29, 2008

Table of Contents

A.	THE REVISED DETERMINATION.....	1
	GENERAL.....	1
	DETERMINATION OF REVENUE REQUIREMENTS	2
	FUTURE ADJUSTMENT OF REVENUE REQUIREMENTS.....	5
B.	BACKGROUND	5
	THE ACT AND THE RATE AGREEMENT.....	5
	PROCEEDINGS RELATING TO 2008	5
	THE 2009 DETERMINATION	6
	THE REVISED 2009 DETERMINATION	7
C.	THE DEPARTMENT’S REVISED DETERMINATION OF REVENUE REQUIREMENTS FOR THE PERIOD JANUARY 1, 2009 THROUGH DECEMBER 31, 2009.....	11
	REVISED REVENUE REQUIREMENT DETERMINATION.....	11
D.	ASSUMPTIONS GOVERNING THE DEPARTMENT’S PROJECTION OF REVISED REVENUE REQUIREMENTS FOR THE 2009 REVENUE REQUIREMENT PERIOD	13
	ESTIMATED ENERGY REQUIREMENTS	13
	DIRECT ACCESS	13
	COMMUNITY CHOICE AGGREGATION.....	14
	POWER SUPPLY RELATED ASSUMPTIONS	15
	UTILITY RESOURCES	16
	HYDRO CONDITION ASSUMPTIONS.....	16
	CONTRACT ASSUMPTIONS.....	16
	CONTRACT MANAGEMENT AND DISPOSITION ALTERNATIVES.....	20
	COST RESPONSIBILITY SURCHARGE.....	20
	SALES OF EXCESS ENERGY ASSUMPTIONS	21
	LONG-TERM POWER CONTRACT COST ASSUMPTIONS	21
	NATURAL GAS PRICE FORECAST AND FUELS ASSUMPTIONS.....	22
	GAS HEDGING EXPENSE	23
	CALIFORNIA INDEPENDENT SYSTEM OPERATOR MARKET REDESIGN AND TECHNOLOGY UPGRADE ASSUMPTIONS	24
	ADMINISTRATIVE AND GENERAL COSTS	24
	FINANCING RELATED ASSUMPTIONS	25
	ACCOUNTS AND FLOW OF FUNDS UNDER THE BOND INDENTURE.....	25
	OPERATING ACCOUNT.....	25
	OPERATING RESERVE ACCOUNT	26
	DEBT SERVICE RESERVE ACCOUNT.....	27
	SENSITIVITY ANALYSIS.....	27
	CASE 1	28
	CASE 2	29
E.	POWER CONTRACT SETTLEMENT SUMMARY.....	29
F.	KEY UNCERTAINTIES IN THE REVENUE REQUIREMENT DETERMINATION.....	30
G.	JUST AND REASONABLE DETERMINATION	32
	PRIOR DETERMINATIONS.....	32
	THE 2009 DETERMINATION	32
	PUBLIC PROCESS	32
	JUST AND REASONABLE DETERMINATION.....	33
H.	MARKET SIMULATION.....	34
I.	COMMENTS RECEIVED ON THE REVISED 2009 DETERMINATION AND THE DEPARTMENT’S RESPONSES.....	34
J.	ANNOTATED REFERENCE INDEX OF MATERIALS UPON WHICH THE DEPARTMENT RELIED TO MAKE THE DETERMINATION.....	36

List of Tables

TABLE A-1 SUMMARY OF THE DEPARTMENT'S 2009 POWER CHARGE REVENUE REQUIREMENTS AND POWER CHARGE ACCOUNTS AND COMPARISON TO 2008 ¹	3
TABLE A-2 SUMMARY OF THE DEPARTMENT'S 2009 BOND CHARGE REVENUE REQUIREMENTS AND BOND CHARGE ACCOUNTS AND COMPARISON TO 2008 ¹ . 4	
TABLE B-1 SUMMARY OF THE DEPARTMENT'S 2009 POWER CHARGE REVENUE REQUIREMENTS AND POWER CHARGE ACCOUNTS AND COMPARISON TO AUGUST 6, 2008 DETERMINATION ¹	9
TABLE B-2 SUMMARY OF THE DEPARTMENT'S 2009 BOND CHARGE REVENUE REQUIREMENTS AND BOND CHARGE ACCOUNTS AND COMPARISON TO AUGUST 6, 2008 DETERMINATION ¹	10
TABLE C-1 POWER PURCHASE PROGRAM, REVENUE REQUIREMENT BASE CASE: RETAIL CUSTOMER POWER CHARGE CASH REQUIREMENT	11
TABLE C-2 POWER PURCHASE PROGRAM, REVENUE REQUIREMENT BASE CASE: RETAIL CUSTOMER BOND CHARGE CASH REQUIREMENT.....	12
TABLE D-1 ESTIMATED ANNUAL ENERGY REQUIREMENTS.....	13
TABLE D-2 2009 DIRECT ACCESS FORECAST	14
TABLE D-3 ESTIMATED NET SHORT ENERGY, SUPPLY FROM THE DEPARTMENT'S LONG-TERM POWER CONTRACTS AND THE DEPARTMENT'S ESTIMATE OF THE RESIDUAL NET SHORT	15
TABLE D-4 NET SHORT, SUPPLY FROM THE DEPARTMENT'S LONG-TERM POWER CONTRACTS, OFF-SYSTEM SALES AND RESIDUAL NET SHORT IN 2009 ¹	16
TABLE D-5 LONG-TERM POWER CONTRACT LISTING.....	17
TABLE D-6 PROJECTED SALE OF EXCESS ENERGY ¹	21
TABLE D-7 ESTIMATED POWER SUPPLY COSTS	22
TABLE D-8 NATURAL GAS PRICE FORECAST COMPARISON AT HENRY HUB.....	23
TABLE D-9 NATURAL GAS AVERAGE PRICE FORECASTS	23
TABLE D-10 STRESS CASE – NATURAL GAS PRICE FORECASTS.....	28

A. THE REVISED DETERMINATION

GENERAL

Pursuant to Section 80110 of the California Water Code, the Rate Agreement between the State of California Department of Water Resources (“Department” or “DWR”) and the California Public Utilities Commission (“Commission” or “CPUC”), dated March 8, 2002 (“Rate Agreement”), and Division 23, Chapter 4, Sections 510–517 of the California Code of Regulations (“Regulations”), the Department hereby issues its Revised Determination of Revenue Requirements for the period January 1, 2009 through December 31, 2009 (“2009 Determination”). Capitalized terms used and not otherwise defined herein have the meanings given to such terms in the Rate Agreement or the Indenture under which the Department’s Power Supply Revenue Bonds were issued (the “Bond Indenture”).

The costs of the Department’s purchases to meet the net short requirements of retail end use customers in the three California investor-owned utilities’ (“Utilities” or “IOUs”) service territories, including the costs of administering the long-term contracts, are to be recovered from payments made by customers and collected by the IOUs on behalf of the Department. The terms and conditions for the recovery of the Department’s costs from customers are set forth in the Act, the Regulations, the Rate Agreement and orders of the Commission. Among other things, the Rate Agreement contemplates a “Bond Charge” (as that term is defined in the Rate Agreement) that is designed to recover the Department’s costs associated with its bond financing activity (“Bond Related Costs”) and a “Power Charge” (as that term is defined in the Rate Agreement) that is designed to recover “Department Costs”, or the Department’s “Retail Revenue Requirements” (as those terms are defined in the Rate Agreement), including power supply-related costs. Subject to the conditions described in the Rate Agreement and other Commission Decisions, Bond Charges and certain charges designed to recover Department Costs may also be imposed on the customers of Electric Service Providers (as that term is defined in the Rate Agreement).¹ Additional background material is contained in the Department’s prior Determinations of Revenue Requirements, copies of which have been incorporated into the administrative record supporting this Determination.

Pursuant to Sections 80110 and 80134 of the California Water Code and the Rate Agreement, this Revised 2009 Determination contains information on the amounts required to be recovered, on a cash basis, in the 2009 Revenue Requirement Period (calendar year 2009).

For the 2009 Revenue Requirement Period, this Revised 2009 Determination contains information regarding the following²: (a) the beginning balance of funds on deposit in the Electric Power Fund (“Fund”), including the amounts on deposit in each account and sub-account of the Fund; (b) the amounts projected to be necessary to pay the principal and interest on all bonds as well as all other Bond Related Costs as and when the same are projected to become due, and the projected amount of Bond Charges required to be collected for such

¹ Under the Rate Agreement, the “Retail Revenue Requirement” is the amount to be recovered from “Power Charges” on IOU customers. The assessment on customers of Electric Service Providers of charges to recover Department Costs (e.g., “Direct Access Power Charge Revenues”) reduces the amount of the “Retail Revenue Requirement,” but has no material impact on the Department’s costs.

² Where appropriate, the Department has provided information in this 2009 Revised Determination on a quarterly basis. In other instances, particularly where information might be considered market-sensitive, the Department has provided information on an annual basis. Within this Determination, quantitative statistics presented in tabular form may not add due to rounding.

purpose; and (c) the amount needed to pay the Department's costs, including all Retail Revenue Requirements.

DETERMINATION OF REVENUE REQUIREMENTS

Pursuant to the Act, the Rate Agreement and the Regulations, the Department determines, on the basis of the materials presented and referred to by this Revised 2009 Determination (including the materials referenced in Section J), that its cash basis revenue requirement for 2009 is \$4.410 billion, consisting of \$3.551 billion in Power Charges and \$0.858 billion in Bond Charges.

This Revised 2009 Determination takes into account preliminary actual operating results through September 2008.

Any net surpluses or deficiencies during the 2008 Revenue Requirement Period, which may result from the receipt of funds related to various litigation settlements involving the Department, variances in actual natural gas prices than those forecast and other considerations, are reflected in the Department's projected beginning 2009 operating balances.

Table A-1 shows a summary of the Department's revenue requirements and the accounts associated with projected Department Costs ("Power Charge Accounts") for 2009. These figures are compared to those reflected in the Department's final 2008 revenue requirement determination, as reflected in the Department's Supplemental 2008 Determination of Revenue Requirements for the period of January 1, 2008 through and including December 31, 2008 (as so reflected, the "2008 Determination"). A summary and comparison of the Department's revenue requirements and the accounts associated with its Bond Related Costs ("Bond Charge Accounts") is presented in Table A-2. Definitions of key accounts and sub-accounts are presented within each table.

TABLE A-1
SUMMARY OF THE DEPARTMENT'S 2009 POWER CHARGE REVENUE
REQUIREMENTS AND POWER CHARGE ACCOUNTS
AND COMPARISON TO 2008¹
(\$ Millions)

Line	Description	2009 ²	2008 ³	Difference
1	<i>Beginning Balance in Power Charge Accounts</i>			
2	Operating Account	870	1,109	(239)
3	Priority Contract Account	-	115	(115)
4	Operating Reserve Account	548	612	(64)
5	Total Beginning Balance in Power Charge Accounts	1,418	1,836	(418)
6	<i>Power Charge Accounts Operating Revenues</i>			-
7	Power Charge Revenues ⁴	3,551	3,162	390
8	Other Revenue ⁵	55	60	(5)
9	Interest Earnings on Fund Balances	36	86	(50)
10	Total Power Charge Accounts Operating Revenues	3,642	3,308	335
11	<i>Power Charge Accounts Operating Expenses</i>			-
12	Administrative and General Expenses	28	28	-
13	Total Power Costs ⁶	3,691	3,690	1
14	Total Power Charge Accounts Operating Expenses	3,718	3,718	1
15	Net Operating Revenues	(76)	(410)	334
16	Ending Aggregate Balance in Power Charge Accounts	1,341	1,426	(84)

Target Minimum Power Charge Account Balances	Target (Millions of Dollars)		
Operating Account: This minimum balance is targeted to cover intra-month volatility as measured by the maximum difference in revenues and expenses in a calendar month.	331	337	(6)
Operating Reserve Account: Covers deficiencies in the Operating Account. It is sized as the greater of (i) the maximum seven-month difference between operating revenues and expenses as calculated under a stress scenario, (ii) 12% of the Department's annual operating expenses and (iii) an amount equal to the maximum projected monthly contract cost payment.	543	548	(5)
Total Operating Reserves:	874	885	(11)

¹Numbers may not add due to rounding.

²As included herein.

³As reflected in the 2008 Supplemental Determination.

⁴Includes Bundled customer revenues and Cost Responsibility Surcharge revenues, whether from Direct Access or other sources, such as Community Choice Aggregation.

⁵Other revenues received by the Department are those related to surplus energy sales conducted by the IOUs when the IOUs and the Department have procured more energy than is needed to serve retail customers; details related to surplus energy sales are further discussed in Section D.

⁶Includes gas hedging and collateral amounts.

TABLE A-2
SUMMARY OF THE DEPARTMENT'S 2009 BOND CHARGE REVENUE
REQUIREMENTS AND BOND CHARGE ACCOUNTS
AND COMPARISON TO 2008¹
(\$ Millions)

Line	Description	2009 ²	2008 ³	Difference
1	<i>Beginning Balance in Bond Charge Accounts</i>			
2	Bond Charge Collection Account	241	273	(33)
3	Bond Charge Payment Account	630	560	70
4	Debt Service Reserve Account	917	930	(13)
5	Total Beginning Balance in Bond Charge Accounts	1,788	1,764	24
6	<i>Bond Charge Accounts Revenues</i>			
7	Bond Charge Revenues from Utilities ⁴	858	831	28
8	Interest Earnings on Fund Balances	55	84	(29)
9	Total Bond Charge Accounts Revenues	913	914	(1)
10	<i>Bond Charge Accounts Expenses</i>			
11	Debt Service on Bonds ⁵	945	935	10
12	Total Bond Charge Accounts Expenses	945	935	10
13	Net Bond Charge Revenues	(32)	(21)	(11)
14	Ending Aggregate Balance in Bond Charge Accounts	1,757	1,743	13

Target Minimum Bond Charge Account Balances	Target (Millions of Dollars)		
Bond Charge Collection Account: An amount equal to one month's required deposit to the Bond Charge Payment Account for projected debt service	78 - 80	78 - 80	
Bond Charge Payment Account: An amount equal to the debt service accrued and unpaid through the end of the third next succeeding calendar month	328 - 873	324 - 825	
Debt Service Reserve Account: Established as the maximum annual debt service	950	937	13

¹Numbers may not add due to rounding.

²As included herein.

³As reflected in the 2008 Determination.

⁴Cost Responsibility Surcharge revenues are included in this amount, whether from Direct Access or other sources, such as Community Choice Aggregation.

⁵Debt service on bonds includes net qualified swap payments.

FUTURE ADJUSTMENT OF REVENUE REQUIREMENTS

The Department may propose to revise its revenue requirements for the 2009 Revenue Requirement Period given the potential for significant or material changes in the California energy market including changes in forecasted fuel costs, the status of market participants, decisions made in connection with the California Independent System Operator's Market Redesign and Technology Upgrade ("MRTU") proceeding, the Department's associated obligations and operations, and many other events that may materially affect the realized or projected financial performance of the Power Charge Accounts or the Bond Charge Accounts. In such event, the Department will inform the Commission of such material changes and will revise its revenue requirements accordingly. Several relevant factors are discussed in more detail within Section D.

B. BACKGROUND

THE ACT AND THE RATE AGREEMENT

Information on the Act and the Rate Agreement, which have not changed since 2002, is contained in the Department's prior Determinations of Revenue Requirements, copies of which have been incorporated into the administrative record supporting this Determination.

PROCEEDINGS RELATING TO 2008

On July 20, 2007, the Department issued its Proposed Determination of Revenue Requirements for 2008, consistent with the requirements of Sections 80110 and 80134 of the California Water Code, and provided information consistent with the Regulations. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested persons were advised to submit comments no later than August 10, 2007. The Department included a summary of the comments and its responses in Section I of the 2008 Determination dated August 22, 2007.

On August 22, 2007, the Department published its Determination of Revenue Requirements for the period of January 1, 2008 through and including December 31, 2008 and submitted it to the Commission. Based on an assessment of all comments, the administrative record, the Act, the Regulations, Bond Indenture requirements and the Rate Agreement, the Department found the August 22, 2007 Determination just and reasonable.

The Department reviewed certain matters relating to its August 22, 2007 Determination, including, but not limited to, operating results of the Electric Power Fund (the "Fund") as of September 30, 2007 (the August 22, 2007 Determination incorporated preliminary actual operating results through June 2007) and an updated gas price forecast.

On October 10, 2007, the Department issued its Proposed Revised Determination of Revenue Requirements for 2008, consistent with the requirements of Sections 80110 and 80134 of the California Water Code, and provided information consistent with the Regulations. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested persons were advised to submit comments no later than October 24, 2007. The Department

included a summary of the comments and its responses in Section I of the 2008 Revised Determination.

On October 31, 2007, the Department published its Revised Determination of Revenue Requirements for the period of January 1, 2008 through and including December 31, 2008 and submitted it to the Commission. Based on an assessment of all comments, the administrative record, the Act, the Regulations, Bond Indenture requirements and the Rate Agreement, the Department found the Revised Determination just and reasonable..

On December 20, 2007, the Commission issued Decision 07-12-030: “Order Allocating the 2008 Revenue Requirement Determination of the California Department of Water Resources.”

The Department reviewed certain matters relating to its October 31, 2007 Determination, including, but not limited to, the restructuring of the Department’s long-term power contract with Calpine Energy Services, L.P formerly referred to as the “Long-Term Commodity Sale” transaction, also known as the “Calpine 2” contract. The restructuring culminated in a contract amendment which was entered into on December 7, 2007, that replaced 1000 MW of 7x24 energy deliveries through 2009 with a 180 MW unit-contingent dispatchable capacity during 2008 and 2009, with an extension option by DWR through 2012.

On December 27, 2007, the Department issued its Proposed Supplemental Determination of Revenue Requirements for 2008, consistent with the requirements of Sections 80110 and 80134 of the California Water Code, and provided information consistent with the Regulations. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested persons were advised to submit comments no later than January 17, 2008. The Department included a summary of the comments and its responses in Section I of the 2008 Supplemental Determination.

On February 15, 2008, the Department published its Supplemental 2008 Determination of Revenue Requirements for the period of January 1, 2008 through and including December 31, 2008 and submitted it to the Commission. The Supplemental 2008 Determination resulted in a total decrease in cost of \$630 million compared to the October 31, 2007 Determination.

The Department found that the Supplemental Determination was just and reasonable based on an assessment of all comments, the administrative record, the Act, the Regulations, Bond Indenture requirements and the Rate Agreement.

THE 2009 DETERMINATION

The Department sent requests for information to each IOU on April 14, 2008, which solicited an update of various modeling assumptions and operational considerations. During April and May, the Department received responses to its requests for information from the IOUs.

The information obtained from the IOUs served as the basis for the Department’s analytical and forecasting efforts related to the Proposed 2009 Determination published on July 8, 2008. The Department also considered other important criteria, including, but not limited to, Commission

Decisions and Bond Indenture requirements. The Department incorporated the resulting data into the PROMOD IV market simulation model, and the data became a part of the projections leading to the Proposed Determination. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested parties were advised to submit comments no later than July 29, 2008.

Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) submitted comments. The Department considered the comments prior to this 2009 Determination. A summary of the comments and the Department's responses are included in Section I.

After review of all comments, the Department made the following changes in the 2009 Determination:

1. Corrected a data reporting error that under-stated the variable cost of the Iberdrola Renewables contract. As a result, contract costs are higher than those projected in the Proposed 2009 Determination. The higher contract costs increased the Department's Operating Reserve and Operating Account requirements for the 2009 Revenue Requirement Period.
2. PG&E's most recent estimate of transmission and distribution losses and unaccounted for energy, which was provided to the Department in PG&E's response to the 2009 Revenue Requirement Data Requests, is included in this Determination.
3. Based on market observations, the Department has updated the natural gas price forecast supporting its contract costs for the remainder of 2008. The update to the 2008 gas price forecast results in gas prices that are approximately \$3/MMBtu lower than the forecast previously used to project the Department's cost for the remainder of 2008. The lower gas prices affect this 2009 Determination by increasing the projected January 1, 2009 power charge account balances.

THE REVISED 2009 DETERMINATION

The Department has reviewed certain matters relating to its August 6, 2008 Determination, including, but not limited to, operating results of the Electric Power Fund (the "Fund") as of September 30, 2008 (the August 6, 2008 Determination incorporated preliminary actual operating results through June 2008); and an updated gas price forecast.

On October 17, 2008, the Department issued its Proposed Revised Determination of Revenue Requirements for 2009 (the "Proposed Revised Determination"), consistent with the requirements of Sections 80110 and 80134 of the California Water Code, and provided information consistent with the Regulations. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested persons were advised to submit comments no

later than October 24, 2008. The comments are summarized and the Department's responses are included in Section I of the 2009 Revised Determination.

The Department hereby revises its August 6, 2008 Determination under Section 516 of the Regulations to address the following matters:

1. Updated the preliminary actual Electric Power Fund operating results through September 30, 2008.
2. Updated natural gas price forecasts and related assumptions.
3. Updated modeling assumptions and operational considerations provided by the IOUs pertaining underlying assumptions incorporated into the PROMOD IV market simulation model.
4. Updates to the projections of operating balances for 2010 and 2011, relative to those calculated in the October 17, 2009 Proposed Revised Determination.
5. Updates, relative to the October 17, 2009 Proposed Revised Determination, to the projection of Power Charges for 2009 considering the Department's determination of the minimum Operating Account balance projection in 2010.
6. Updated actual variable rate interest results through September 30, 2008

These revisions result in a total decrease in this Revised 2009 Determination of \$480 million relative to the August 6, 2008 Determination. This decrease is comprised of two components: a \$509 million decrease in the Department's Power Charge Revenue Requirement; and a \$29 million increase in the Department's Bond Charge Revenue Requirement.

The \$509 million Power Charge Revenue Requirement decrease primarily results from (1) the net effects of a decrease in contract costs due to a decrease in the gas price forecast for 2009 and (2) the changes to the Operating Account and Operating Reserve Balances for 2010 and 2011 discussed in Section I. The \$29 million Bond Charge Revenue Requirement increase primarily results from the net effects of an increase in the projections of interest rates for the unhedged variable rate portion of the Department's bond portfolio.

Section D includes additional discussion related to the aforementioned changes reflected in this Revised 2009 Determination.

Upon completion of the procedures set forth in the Regulations, the Department will determine its revised revenue requirements for the 2009 Revenue Requirement Period.

Table B-1 summarizes the changes between this Revised 2009 Determination and the 2009 Determination published August 6, 2008 for the Power Charge revenue requirement and Power Charge Accounts. Likewise, Table B-2 summarizes the changes between this Proposed Revised 2009 Determination and the 2009 Determination published August 6, 2008, for the Bond Charge revenue requirements and Bond Charge Accounts

TABLE B-1
SUMMARY OF THE DEPARTMENT'S 2009 POWER CHARGE REVENUE
REQUIREMENTS AND POWER CHARGE ACCOUNTS
AND COMPARISON TO AUGUST 6, 2008 DETERMINATION¹
(\$ Millions)

Line	Description	2009 ²	August 6, 2008 Determination	Difference
1	<i>Beginning Balance in Power Charge Accounts</i>			
2	Operating Account	870	930	(60)
3	Priority Contract Account	-	-	-
4	Operating Reserve Account	548	548	-
5	Total Beginning Balance in Power Charge Accounts	1,418	1,478	(60)
6	<i>Power Charge Accounts Operating Revenues</i>			-
7	Power Charge Revenues ³	3,551	4,060	(509)
8	Other Revenue ⁴	55	70	(15)
9	Interest Earnings on Fund Balances	36	42	(6)
10	Total Power Charge Accounts Operating Revenues	3,642	4,172	(530)
11	<i>Power Charge Accounts Operating Expenses</i>			-
12	Administrative and General Expenses	28	28	-
13	Total Power Costs ⁵	3,691	4,205	(514)
14	Total Power Charge Accounts Operating Expenses	3,718	4,232	(514)
15	Net Operating Revenues	(76)	(60)	(16)
16	Ending Aggregate Balance in Power Charge Accounts	1,341	1,418	(77)

Target Minimum Power Charge Account Balances	Target (Millions of Dollars)		
Operating Account: This minimum balance is targeted to cover intra-month volatility as measured by the maximum difference in revenues and expenses in a calendar month.	331	425	(94)
Operating Reserve Account: Covers deficiencies in the Operating Account. It is sized as the greater of (i) the maximum seven-month difference between operating revenues and expenses as calculated under a stress scenario, (ii) 12% of the Department's annual operating expenses and (iii) an amount equal to the maximum projected monthly contract cost payments.	543	667	(123)
Total Operating Reserves:	874	1,091	(218)

¹Numbers may not add due to rounding.

²As reflected herein

³Includes Bundled customer revenues and Cost Responsibility Surcharge revenues, whether from Direct Access or other sources, such as Community Choice Aggregation.

⁴Other revenues received by the Department are those related to surplus energy sales conducted by the IOUs when the IOUs and the Department have procured more energy than is needed to serve retail customers; details related to surplus energy sales are further discussed in Section D.

⁵Includes gas hedging and collateral amounts.

TABLE B-2
SUMMARY OF THE DEPARTMENT'S 2009 BOND CHARGE REVENUE
REQUIREMENTS AND BOND CHARGE ACCOUNTS
AND COMPARISON TO AUGUST 6, 2008 DETERMINATION¹
(\$ Millions)

Line	Description	2009 ²	August 6, 2008 Determination	Difference
1	<i>Beginning Balance in Bond Charge Accounts</i>			
2	Bond Charge Collection Account	241	231	10
3	Bond Charge Payment Account	630	621	9
4	Debt Service Reserve Account	917	917	-
5	Total Beginning Balance in Bond Charge Accounts	1,788	1,769	19
6	<i>Bond Charge Accounts Revenues</i>			
7	Bond Charge Revenues from Utilities ³	858	829	29
8	Interest Earnings on Fund Balances	55	58	(3)
9	Total Bond Charge Accounts Revenues	913	887	26
10	<i>Bond Charge Accounts Expenses</i>			
11	Debt Service on Bonds ⁴	945	920	25
12	Total Bond Charge Accounts Expenses	945	920	25
13	Net Bond Charge Revenues	(32)	(33)	1
14	Ending Aggregate Balance in Bond Charge Accounts	1,757	1,736	20

Target Minimum Bond Charge Account Balances	Target (Millions of Dollars)		
Bond Charge Collection Account: An amount equal to one month's required deposit to the Bond Charge Payment Account for projected debt service	78 - 80	76 - 78	
Bond Charge Payment Account: An amount equal to the debt service accrued and unpaid through the end of the third next succeeding calendar month	328 - 873	320 - 860	
Debt Service Reserve Account: Established as the maximum annual debt service	950	919	31

¹Numbers may not add due to rounding.

²As reflected herein

³Cost Responsibility Surcharge revenues are included in this amount, whether from Direct Access or other sources, such as Community Choice Aggregation.

⁴Debt service on bonds includes net qualified swap payments.

C. THE DEPARTMENT'S REVISED DETERMINATION OF REVENUE REQUIREMENTS FOR THE PERIOD JANUARY 1, 2009 THROUGH DECEMBER 31, 2009

REVISED REVENUE REQUIREMENT DETERMINATION

For 2009, the Department's revenue requirements consist of Department Costs and Bond Related Costs, which are to be satisfied primarily by Power Charge Revenues and Bond Charge Revenues, respectively.

During 2009, the Department projects that it will incur the following power procurement-related Costs: (a) \$3.691 billion for long-term power contract purchases to cover the net short requirement of customers; (b) \$28 million in administrative and general expenses; and (c) \$(76) million in other net changes to Power Charge Accounts (including operating reserves). This projection results in a revenue requirement of \$3.642 billion.

Funds to meet these costs (in addition to surplus operating reserves) are projected to be provided from (a) \$55 million from the Department's share of surplus power sales revenues; (b) \$36 million of interest earned on Power Charge Account balances; and (c) \$3.551 billion from Power Charge Revenues and Cost Responsibility Surcharge ("CRS") revenues from customers other than customers of the IOUs and DWR.

Table C-1 provides a quarterly projection of costs and revenues associated with the Power Charge Accounts for the 2009 Revenue Requirement Period.

**TABLE C-1
POWER PURCHASE PROGRAM, REVENUE REQUIREMENT BASE CASE:
RETAIL CUSTOMER POWER CHARGE CASH REQUIREMENT
(\$ Millions)**

Line	Description	Amounts for Revenue Requirement Period				
		2009 - Q1	2009 - Q2	2009 - Q3	2009 - Q4	Total
0	<i>Power Charge Accounts Expenses</i>					-
1	Power Costs	897	831	1,032	931	3,691
2	Administrative and General Expenses	7	7	7	7	28
3	Net Changes to Power Charge Account Balances	(25)	19	(79)	8	(76)
4	Total Power Charge Accounts Expenses	879	857	960	946	3,642
5	<i>Power Charge Accounts Revenues</i>					
6	Other Power Sales Revenues	11	29	9	6	55
7	Interest Earnings on Power Charge Account Balances	9	9	9	9	36
8	Total Power Charge Revenue Requirement	859	819	941	932	3,551
9	Total Power Charge Accounts Revenues	879	857	960	946	3,642

During 2009, the Department projects that it will incur the following Bond Related Costs: (a) \$945 million for debt service on the Bonds and related Qualified Swap payments, payments of credit enhancement and liquidity facilities charges, and costs relating to other financial instruments and servicing arrangements in connection with the Bonds, and (b) \$(32) million for changes to Bond Charge Account balances, resulting in total Bond Charge Account expenses of \$913 million.

Funds to meet these requirements are provided from (a) \$55 million in interest earned on Bond Charge Account balances, and (b) \$858 million from Bond Charge Revenues (including CRS revenues from customers other than customers of the IOUs and DWR). There are no projected net transfers from Power Charge Accounts.

Table C-2 provides a quarterly projection of costs and revenues relating to the Bond Charge Accounts for the 2009 Revenue Requirement Period.

TABLE C-2
POWER PURCHASE PROGRAM, REVENUE REQUIREMENT BASE CASE:
RETAIL CUSTOMER BOND CHARGE CASH REQUIREMENT
(\$ Millions)

Line	Description	Amounts for Revenue Requirement Period				
		2009 - Q1	2009 - Q2	2009 - Q3	2009 - Q4	Total
0	<i>Bond Charge Accounts Expenses</i>					
1	Debt Service Payments	59	666	59	161	945
2	Net Changes to Bond Charge Account Balances	148	(445)	184	82	(32)
3	Total Bond Charge Accounts Expenses	206	221	243	243	913
4	<i>Bond Charge Accounts Revenues</i>					
5	Interest Earnings on Bond Charge Account Balances	8	20	7	19	55
6	Retail Customer Bond Charge Revenue Requirement	198	200	236	224	858
7	Total Bond Charge Accounts Revenues	206	221	243	243	913

In aggregate, the Department's total cash basis expenses are projected to be \$4.663 billion. Revenues from interest earned and other power sales are projected to be \$146 million, and net changes in fund balances are projected to be \$(108) million, resulting in combined customer revenue requirements of \$4.410 billion.

D. ASSUMPTIONS GOVERNING THE DEPARTMENT'S PROJECTION OF REVISED REVENUE REQUIREMENTS FOR THE 2009 REVENUE REQUIREMENT PERIOD

The Department based this 2009 Revised Determination on a number of assumptions regarding retail customer load, demand side management and conservation, power supply, natural gas prices, off-system sales, administrative and general expenses as well as other considerations affecting the Department's revenues and expenses.

ESTIMATED ENERGY REQUIREMENTS

The Department obtained the utilities' most recent retail energy forecasts in April 2008. The Department reviewed the utilities' underlying forecast assumptions, including population growth, changes in employment and labor within the utility's service area, weather effects, growth in distributed generation, and annexation of the utility's service area by publicly owned utilities. In developing its bundled requirements forecast, the Department also reviewed forecasts of direct access and Community Choice Aggregation (CCA) in California. These assumptions are discussed in greater detail below.

Table D-1 shows the projected 2009 energy requirements forecast (quantified in gigawatt hours) for the PG&E, SCE and SDG&E service areas during 2009.

**TABLE D-1
ESTIMATED ANNUAL ENERGY REQUIREMENTS**

Service Area	Total Retail Requirements	Direct Access and CCA Requirements	Bundled Requirements
Pacific Gas & Electric	95,655	7,330	88,324
Southern California Edison	97,903	10,430	87,473
San Diego Gas & Electric	22,373	3,277	19,096
Total	215,931	21,037	194,894

DIRECT ACCESS

The Department's direct access estimates are based on data provided by each IOU in April and May 2008 and a review of monthly direct access reports produced by the Commission. The Department notes a slow but steady decline in direct access loads since the Commission suspended the right of bundled customers to elect direct access service, effective September 20, 2001. The Department regularly reviews each utility's monthly report to the Commission on current direct access load and service request changes to identify any substantive developments that would require Departmental action.

While the option to elect direct access service is suspended until the Department no longer supplies power under Division 27 of the Water Code (see California Water Code § 80110), the Commission recently initiated a Rulemaking (R. 07-05-025) to evaluate lifting the suspension of

direct access prior to 2015 when the last long-term contract expires³. The Commission states that it expects the proceeding to last longer than eighteen months. Given the manifold issues and the timing of the proceeding, the Department does not project that the suspension of direct access will be lifted during the 2009 Revenue Requirement period.

Table D-2 shows each IOU’s direct access forecast, as a percentage of total retail loads, for 2009.

**TABLE D-2
2009 DIRECT ACCESS FORECAST⁴**

Service Area	Percent of Retail Load
Pacific Gas & Electric	6.92%
Southern California Edison	10.49%
San Diego Gas & Electric	14.65%
Total	9.34%

COMMUNITY CHOICE AGGREGATION

CCA refers to the ability of communities or public entities to aggregate load and procure all or a portion of their power requirements independent of the IOUs. Assembly Bill 117, adopted in 2002, modified the Public Utilities Code to allow local governments “...to elect to combine the loads of its residents, businesses, and municipal facilities in a community-wide electric buyers’ program.”⁵ Significant volumes of CCA could lead to changes in Department rates to accommodate reduced IOU retail deliveries of Department power.

At present no load has left bundled utility service to form or become part of a Community Choice Aggregator pursuant to AB 117. However, the San Joaquin Valley Power Authority (SJVPA) filed an Implementation Plan with the CPUC in January 2007 to become a Community Choice Aggregator. That plan was certified by the CPUC in May 2007. At the present time, SJVPA is expected to eventually serve approximately 2,000 GWh of load to eleven cities and one county. SJVPA’s plans to phase in its Community Choice Aggregation program have been delayed and are not expected to result in power procurement for customers prior to November 2008. As a result of these delays, SJVPA is currently expected to phase in approximately 800 GWh of load in 2009, with additional load served in 2010. The SJVPA Community Choice Aggregation load, if implemented, will reduce bundled load in both PG&E’s service territory and SCE’s service territory.

Other communities have indicated an interest in pursuing CCA, including the City and County of San Francisco, several East Bay cities, the City of Chula Vista, Marin County, and the City of Fresno. Because the Department estimates that the process for aggregators to initiate feasibility studies and ultimately procure power on behalf of load to be eighteen to twenty-four months, it

³ Peevey Proposed Decision April 24, 2007, Order Granting Petition for Rulemaking and Instituting Rulemaking as to Whether, When, or How Direct Access Should be Restored.

⁴ Figures in Table D-2 represent direct access as a percentage of total retail loads for 2009. These percentages correspond to direct access loads forecast by the IOUs in 2008. The Department assumes that direct access load will remain constant from 2009 to 2010.

⁵ Public Utilities Code, Section 331.1(a).

does not expect any load from these communities to migrate under the CCA program during the 2009 Revenue Requirement Period.

POWER SUPPLY RELATED ASSUMPTIONS

In this 2009 Revised Determination, the Department considered three types of power supplies needed to meet the requirements of each IOU: (a) IOU supplied resources; (b) supply from the Department’s long-term power contracts; and (c) the residual net short of each IOU.⁶

Table D-3 below shows, for the 2009 Revenue Requirement Period, the estimated energy requirements for the customers of the IOUs, estimated supplies from generation by the three IOUs,⁷ the resulting net short, the expected supply from the Department’s long-term power contracts, off-system energy sales and the residual net short.

**TABLE D-3
ESTIMATED NET SHORT ENERGY, SUPPLY
FROM THE DEPARTMENT’S LONG-TERM POWER CONTRACTS AND THE
DEPARTMENT’S ESTIMATE OF THE RESIDUAL NET SHORT**

	Amount for the Revenue Requirement Period (GWH)
All Investor-Owned Utilities	
Energy Requirements After Adjustments	185,096
Supply from Utility Resources	125,708
Net Short	59,389
Supply from the Department’s Priority Long-Term Power Contracts	43,131
Off-System Sales	(3,440)
Residual Net Short (Surplus)	19,698

Table D-4 shows, on a quarterly basis for the 2009 Revenue Requirement Period, estimated net short volumes in gigawatt-hours supplied from the Department’s long-term power contracts and the residual net short.

⁶ While the Department has calculated and presented the residual net short requirements of the IOUs, pursuant to the Act, the Department has not made any provision for the cost of the residual net short requirements in its Determination for the 2009 Revenue Requirement Period. For purposes of this Revised 2009 Determination, the residual net short for each IOU equals the projected amount of wholesale energy remaining to be procured by such IOU on behalf of ratepayers in its service area.

⁷ For purposes of this Revised 2009 Determination, generation retained by the three IOUs is defined as the sum of generation owned by the IOUs, interruptible load, supply from contracts between the IOUs and qualifying facilities (“QFs”) and other bilateral contracts.

TABLE D-4
NET SHORT, SUPPLY FROM THE DEPARTMENT'S LONG-TERM POWER CONTRACTS, OFF-SYSTEM SALES AND RESIDUAL NET SHORT IN 2009¹

	Net Short (GWH)	Supply from Power Contracts (GWH)	Power Contract Costs (Millions of Dollars)	Off-System Sales Volumes (GWH)	Revenues from Off System Sales (Millions of Dollars)	(Residual Net Short) Spot Volume (GWH)
Q1-2009	15,094	10,589	907	(967)	(57)	5,472
Q2-2009	11,969	10,329	893	(1,818)	(99)	3,459
Q3-2009	16,044	11,670	1,067	(313)	(19)	4,688
Q4-2009	16,280	10,543	935	(342)	(24)	6,080
Total	59,389	43,131	3,802	(3,440)	(198)	19,698

¹All costs and revenues are presented on an accrual basis.

UTILITY RESOURCES

The Department reviewed each utility's 2009 forecast of utility owned generation, qualifying facility ("QF") contract generation, and bilateral contract generation for consistency with the Department's own energy dispatch forecast. Where necessary, the Department updated its assumptions concerning QF contract terms and expiration dates, outage schedules, and net dependable resource capacity, among others, to reflect current details related to each IOU's resource portfolio.

HYDRO CONDITION ASSUMPTIONS

Normal hydrologic conditions are assumed for both California and the Pacific Northwest during 2009 and 2010. Neither the CEC nor the National Weather Service Northwest River Forecast Center has provided meaningful forecasts past the 2008 water year. Therefore, DWR has projected normal hydroelectric dispatch for the 2009 Revenue Requirement Period.

CONTRACT ASSUMPTIONS

During the 2009 Revenue Requirement Period, approximately 43,131 GWhs of energy is projected to be supplied on behalf of the IOUs' retail electric customers through the Department's long-term power contracts. The terms and conditions of each contract have been reflected in the Department's market simulation, resulting in a projection of contract-specific, hourly energy dispatches to meet the projected energy requirements of each IOU's retail customers. The terms and conditions incorporated in the Department's market simulation include, among other details, must-take energy volumes and dispatchable contract capacities, contract heat rates and unit outage rates as well as scheduling limitations. During market simulation, all energy dispatches from the Department's dispatchable long-term power contracts occur based on dispatch of available power supply resources in merit order of the cost of

dispatch and delivery of those resources, subject to transmission delivery constraints, and the effective cost of those constraints. In general, each incremental generating unit is dispatched only if the incremental cost of generating an additional MWh from that unit is less than the cost of alternative sources that can provide to the same location.

Table D-5 provides a listing of all of the long-term power contracts that will be operational during the 2009 Revenue Requirement Period and beyond, describing the term and capacity associated with each contract and the IOU to which the contract has been allocated.

Detailed contract terms can be found on the CERS website, <http://cers.water.ca.gov>

**TABLE D-5
LONG-TERM POWER CONTRACT LISTING**

		Delivery	Delivery		
	Date	Start	End	Capacity	
Counter-Party	Executed	Date	Date	MW	Allocated
Alliance Colton, LLC	4/23/2001 Renegotiated on 9/19/02	8/1/2001	12/31/2010	80	SCE
Bear Energy (Previously Williams Energy)	2/16/2001 Renegotiated on 11/11/02	1/1/2008	12/31/2010	275	SDG&E
"	"	7/1/2003	12/31/2010	50	SDG&E
"	"	1/1/2008	12/31/2010	1045	SCE
CalPeak Power—Panoche, LLC	8/14/2001 Renegotiated on 5/2/02	12/27/2001	12/27/2011	52.6	PG&E
CalPeak Power--Vaca Dixon, LLC	8/14/2001 Renegotiated on 5/2/02	6/21/2002	12/31/2011	51.9	PG&E
CalPeak Power--El Cajon, LLC	8/14/2001 Renegotiated on 5/2/02	5/29/2002	12/31/2011	50.9	SDG&E
CalPeak Power—Border, LLC	8/14/2001 Renegotiated on 5/2/02	12/12/2001	12/12/2011	51.6	SDG&E
CalPeak Power—Enterprise, LLC	8/14/2001 Renegotiated on 5/2/02	12/8/2001	12/8/2011	52.5	SDG&E
Calpine Energy Services, L.P. (Calpine 1)	2/6/2001 Renegotiated on 4/22/02	1/1/2004	12/31/2009	1000	PG&E

		Delivery	Delivery		
	Date	Start	End	Capacity	
Counter-Party	Executed	Date	Date	MW	Allocated
Calpine Energy Services, L.P. (Calpine 2)	2/26/2001 Renegotiated on 4/22/02; Renegotiated on 12/7/2007	1/1/2008	12/31/2009, buyer option to extend to 12/31/2012	180	PG&E
Calpine Energy Services, L.P. (Peaking Capacity)	2/27/2001 Renegotiated on 4/22/02	8/1/2002	7/31/2011	495	PG&E
Coral Power, LLC	5/24/2001	1/1/2006	6/30/2010	400	PG&E
"	"	7/1/2010	6/30/2012	100	PG&E
"	"	7/1/2002	6/30/2012	100	PG&E
"	"	7/1/2003	6/30/2012	175	PG&E
"	"	7/1/2004	6/30/2012	175	PG&E
Power Receivables Finance (formerly Allegheny Energy Supply Company, LLC)	3/23/2001 Renegotiated on 6/10/03	1/1/2006	12/31/2011	800	SCE
GWF Energy, LLC	5/11/2001 Renegotiated on 8/22/02	9/6/2001	12/31/2011	95.8	PG&E
"	"	7/1/2002	12/31/2011	95.8	PG&E
"	"	6/01/2003	10/31/2012	170.5	PG&E
High Desert Power Project	3/9/2001 Renegotiated on 4/22/02	4/22/2003	3/31/2011	Up to 840	SCE
Kings River Conservation District	12/31/2002 Renegotiated on 8/18/04	9/19/2005	9/18/2015	96	PG&E
Mountain View Power Partners, LLC	5/31/2001 Renegotiated on 10/1/02	10/1/2001	9/30/2011	66.6	SCE

		Delivery	Delivery		
	Date	Start	End	Capacity	
Counter-Party	Executed	Date	Date	MW	Allocated
Iberdrola Renewables (formerly PPM Energy)	7/6/2001	7/1/2004	6/30/2011	300	PG&E
City/County of San Francisco	12/30/2002	unknown	unknown	Est. 192	PG&E
Sempra Energy Resources	5/4/2001	1/1/2004	9/30/2011	1200	SCE
"	"	1/1/2008	9/30/2011	400	SCE
Sunrise Power Company, LLC	6/25/2001 Renegotiated on 12/31/02	6/01/2003	6/30/2012	572	SDG&E
(Wellhead) Fresno Cogeneration Partners	8/3/2001 Renegotiated on 12/17/02	8/20/2001	10/31/2011	21.5	PG&E
Wellhead Power Gates, LLC	8/14/2001 Renegotiated on 12/17/02	12/27/2001	10/31/2011	46.4	PG&E
Wellhead Power Panoche, LLC	8/14/2001 Renegotiated on 12/17/02	12/14/2001	10/31/2011	49.9	PG&E
Shell Wind (Cabazon Project)	7/12/2001 Renegotiated on 4/24/02	8/31/2002	12/31/2013	43	SDG&E
Shell Wind (Whitewater Hill Project)	7/12/2001 Renegotiated on 4/24/02	8/31/02 (partial)	12/31/2013	65	SDG&E

The Department, in cooperation with representatives of the Attorney General's office and representatives of the Governor's staff, has continued its efforts to modify terms and conditions of the Department's long-term power contracts consistent with the requirements of the Act and applicable federal law. Three of the remaining original contracts have yet to be renegotiated from their original terms.

CONTRACT MANAGEMENT AND DISPOSITION ALTERNATIVES

The Power Charge component of the revenue requirement is directly related to the costs of power supplied under the Department's long-term power contracts. In considering changes to the contracts to modify its revenue requirements, the Department can (1) continue to use its contracts in their present form, (2) seek to modify the contracts through bilateral renegotiation with its counterparties, or (3) terminate the contracts.

Theoretically, the Department could unilaterally terminate one or more of its contracts. The terms of each of the Department's contracts provide that if the contract is terminated for reasons other than breach or default by the power-supplying counterparty to the contract, then the Department is obligated to pay the entire remaining estimated value of the contract. Any such termination other than for an uncured default or breach by the seller would likely increase the Department's revenue requirements due to timing implications of the payments to the counterparty. In addition, energy no longer supplied by DWR would need to be replaced by the investor-owned utilities in either the short-term market or through new long-term power contracts with other suppliers, to the extent any portion of the energy supplied under a DWR contract is not surplus to the energy needs of the retail customers of the utilities. For this reason, under present market conditions and terms of the contracts, the Department does not believe that unilateral termination of any of the contracts would result in a reduction in its revenue requirements or overall ratepayer costs.

It is possible that additional power contract modifications, including termination of one or more contracts, could be agreed to between the Department and one or more of its long-term power supply counterparties prior to the end of the 2009 Revenue Requirement Period. As of the date of filing of this Revised 2009 Revenue Requirement Determination, the Department has not entered into any such final power contract modifications other than as already noted here.

COST RESPONSIBILITY SURCHARGE

In a series of decisions, the CPUC ordered certain classes of direct access, municipal and customer generation departing load, and Community Choice Aggregation customers to pay the Cost Responsibility Surcharge related to historical stranded costs and ongoing costs. Included in the Cost Responsibility Surcharge is a DWR Bond Charge component, which is assessed to pay debt service associated with DWR's bond issuances and a DWR Power Charge component, which pays a portion of the above-market costs of the DWR power portfolio. The Bond Charge and the Power Charge components are rates imposed on total electricity usage by direct access, departing load and Community Choice Aggregation customers by the CPUC in concert with the establishment of Power Charges and Bond Charges on bundled customers.

Cost Responsibility Surcharge revenues reduce the amount of Bond Charges and Power Charges that must be imposed on bundled customers to recover Bond Related Costs and Department Costs. In the aggregate, the payments by direct access load, departing load, and Community Choice Aggregation load and from bundled customer load for the DWR Bond Charge and the DWR Power Charge flow to DWR to recover the DWR Bond Related Costs and Department Costs.

SALES OF EXCESS ENERGY ASSUMPTIONS⁸

As with any retail provider of energy, from time to time, the combined IOU and Department power supply portfolios provide more energy than is needed to serve their retail customers. In general, these additional purchases result from differences between projected and actual IOU load. This excess energy is sold in wholesale markets by the IOUs under the current operating arrangements governing administration, operation and dispatch of DWR's contracts. On occasion, the price obtained for surplus power sales will be less than the price paid for power. However, these minimal energy transaction losses are an expected incident of appropriate power supply portfolio management, in that losses on sales from over-procurement are on average less than the costs associated with spot market purchases when there has been under-procurement. The income from such sales is used to partially offset the revenue requirements of the Department and the IOUs that would otherwise be recovered from retail customers.

On September 19, 2002, the Commission issued Decision 02-09-053, which, in part, determined that energy and resulting income from the sale of excess energy ("off-system sales") would be shared on a pro-rata basis between the Department and the IOUs.

Projected revenue shares from the sale of excess energy, both the Department's and total IOU, are provided below in Table D-6.

**TABLE D-6
PROJECTED SALE OF EXCESS ENERGY¹**

	DWR Volume	IOU Volume	Total Volume		DWR Revenue	IOU Revenue	Total Revenue		Weighted Average Price
	(GWh)	(GWh)	(GWh)		(Millions of Dollars)	(Millions of Dollars)	(Millions of Dollars)		(\$/MWh)
Q1-2009	285	682	967		17	40	57		58
Q2-2009	493	1,325	1,818		27	72	99		54
Q3-2009	84	229	313		5	14	19		61
Q4-2009	106	236	342		7	16	24		70
Total	968	2,473	3,440		56	142	198		58

¹All revenues presented on an accrual basis

LONG-TERM POWER CONTRACT COST ASSUMPTIONS

The Department has reviewed each long-term power contract identified in Table D-5 to determine the costs that will impact its revenue requirements during 2009. Along with previously noted operational considerations, the Department's electric market simulation reflects all applicable costs. The types of costs included in the Department's contract-specific projections include, but are not limited to, fixed energy, capacity, fixed operation and maintenance, variable operation and maintenance, scheduling coordinator fees, and fuel management fees. Total accrued long-term power contract costs, including requisite natural gas

⁸ The Department is considering the effects of eliminating the sharing of surplus sales revenue on its Revenue Requirements

purchases, are projected to be \$3.802 billion for the 2009 Revenue Requirement Period, as noted in Table D-4. Natural gas costs represent a significant component of the Department’s total energy costs and are discussed below in greater detail.

For informational purposes, Table D-7 shows, for the 2009 Revenue Requirement Period, the expected average cost (in \$/MWh) on a quarterly basis for the Department’s long-term power contracts.

TABLE D-7
ESTIMATED POWER SUPPLY COSTS
(Dollars per Megawatt-Hour)

	Long-Term Priority Contracts
Quarter 1 – 2009	84
Quarter 2 – 2009	85
Quarter 3 – 2009	90
Quarter 4 – 2009	87

NATURAL GAS PRICE FORECAST AND FUELS ASSUMPTIONS

The natural gas price forecast supporting this Revised 2009 Determination is based on the NCI Fall 2008 Natural Gas Price Forecast (“NCI Fall 2008 Forecast”) Base Case prepared by Navigant Consulting, Inc. (“NCI”), consultants to the Department. Assumptions underlying the NCI Fall 2008 Forecast include all significant supply and demand factors affecting the North American natural gas market such as the timing of major gas pipeline capacity changes, resource base additions and subtractions, gas demand, the price of crude oil, the timing and magnitude of certain liquefied natural gas (“LNG”) capacities, imports and exports.

The NCI Fall 2008 Forecast was prepared based upon the GPCM natural gas forecast model and yields long term monthly gas prices. On October 1, 2008, NCI revised prices in the initial eighteen months of the forecast underlying this Revised 2009 Determination to account for short term fluctuations in the natural gas market. NCI revised the near term monthly prices at Henry Hub by averaging the then ten most recent daily settlement prices, and then used the differences between the initial monthly price forecasts at Henry Hub and the recalculated monthly prices to proportionately adjust the forecasted prices at other market hubs, including PG&E Citygate and the Southern California Border.

Compared to the Base Case forecast underlying the 2009 Determination published August 6, 2008, prices in the NCI/DWR Fall 2008 Forecast Base Case supporting this Revised 2009 Determination are shown in Table D-8.

TABLE D-8
NATURAL GAS PRICE FORECAST COMPARISON AT HENRY HUB
(Nominal \$/MMBtu)

	2009	2010
Gas Price Forecast – Revised 2009 Determination	8.43	9.18
Gas Price Forecast – 2009 Determination	12.06	10.02
Difference	(3.64)	(0.84)

Table D-9 below lists the updated natural gas prices by quarter for 2009 and 2010 at two key California market hubs: PG&E Citygate and the Southern California Border.

TABLE D-9
NATURAL GAS AVERAGE PRICE FORECASTS
(Nominal \$/MMBtu)

	Southern California Border		PG&E Citygate	
	2009	2010	2009	2010
Q1 – 2009	8.30	9.26	8.55	9.59
Q2 – 2009	7.93	8.14	8.24	8.50
Q3 – 2009	8.34	9.31	8.54	9.60
Q4 – 2009	8.81	9.72	9.13	10.12
Annual Average	8.35	9.11	8.61	9.46

As part of a 2002 settlement agreement with Williams Energy Marketing and Trading (“Williams”) the Department entered into a Natural Gas Purchase Contract for natural gas deliveries beginning on January 1, 2004 and ending on December 31, 2010. On October 2, 2003, the CPUC issued Decision 03-10-016, which allocated fuel volumes related to the Williams Natural Gas Purchase Contract between SCE (64% in 2009) and SDG&E (36% in 2009).

During the 2009 Revenue Requirement Period, it is projected that the Natural Gas Purchase Contract will result in power cost savings of approximately \$71 million, based on the difference between the contract fuel price of \$4.32 and the Department’s projected average fuel price of \$8.35 at the Southern California Border pricing hub. For the purpose of determining power cost savings related hereto, the weighted average fuel price considered in this analysis accounts for related, seasonal variations in both the base case fuel price forecast and fuel volumes delivered under the Williams Natural Gas Purchase Contract in 2009.

GAS HEDGING EXPENSE

For the 2009 Revenue Requirement Period, the Department has reflected the impact of natural gas price hedges on a portion of the projected gas purchases that will be made to support its power contracts. The Department based the hedging expenses and projected hedged volume on

the IOUs' responses to information requests provided in April and May 2008, monthly activity in the Department's Gas Hedging Account, and the Department's own internal analysis.

The Department estimates that as of September 30, 2008, the IOUs had collectively secured or developed reasonably firm plans to secure, hedges on DWR's behalf that establish the effective price for over 140 million MMBtu during calendar year 2009. The hedged volume represents approximately 69 percent of total projected IOU base case gas requirements (for fuel related to allocated DWR power contracts) for the 2009 Revenue Requirement Period. The Department has effectively hedged 18 million MMBtu of natural gas via firm price deliveries from the Williams contract during both the 2009 and 2010 Revenue Requirement Periods, and this annual volume is included in the aforementioned 140 million MMBtu for 2009.

CALIFORNIA INDEPENDENT SYSTEM OPERATOR MARKET REDESIGN AND TECHNOLOGY UPGRADE ASSUMPTIONS

The Department's 2009 Revenue Requirement was developed using the same fundamental economic dispatch principles used in past revenue requirements. The CAISO currently expects to implement its Market Redesign and Technology Upgrade ("MRTU") in February 2009. Some uncertainty exists with respect to quantifying the effects of the Locational Marginal Price ("LMP") provisions of MRTU on the revenue from off-system sales of excess DWR energy, and the IOUs' congestion costs associated with delivery of DWR's market contracts.

While there may be some increased price volatility in off-system sale prices after implementation of LMP under MRTU, the reduced projected contribution of off-system sales in future years reduces the effect of this volatility on overall DWR revenue requirement levels. DWR anticipates that under the LMP system, the IOUs will pay congestion costs related to delivery of DWR contract energy. DWR is engaged in discussions with each IOU to align dispatch assumptions to assure the power charge revenue stream, and to help reduce the uncertainty of IOU exposure to congestion costs in their separate revenue requirements. The implementation of MRTU does not impact the Bond Charge.

Currently, all of the Department's power is provided through bilateral trades. When the CAISO implements MRTU, some DWR power may be delivered through the CAISO market. Underlying this Revenue Requirement is the assumption that the Commission will direct the IOUs to continue remitting to DWR at the remittance rate on all DWR contract energy delivered to IOU bundled customers, since the energy benefits the retail customers. Any energy in excess of bundled customer load would become a surplus sale with the energy and revenues being shared by the IOU and DWR based on the pro-rata sharing ordered in CPUC Decision D.02-09-053.

ADMINISTRATIVE AND GENERAL COSTS

The Department's administrative and general costs of \$28 million consist of \$24 million for appropriated budget expenditures including funds for labor and benefits, pro rata charges for

services provided to the power supply program by other State agencies and \$4 million for consulting services for development and monitoring of the revenue requirements, litigation and dispute resolution support, power contract management, and financial advisory services for managing the \$10 billion debt portfolio and related reserves.

FINANCING RELATED ASSUMPTIONS

For purposes of calculating the interest earnings on account balances during 2009, the Department assumes a 3.97 percent earnings rate for the Debt Service Reserve Account and a 2.5 percent earnings rate for all other accounts during the 2009 Revenue Requirement Period.

The Department currently has \$4.111 billion of fixed rate bonds outstanding, \$3.939 billion of hedged variable rate bonds outstanding that have corresponding interest rate hedges in place to convert debt service to fixed rate and \$1.475 billion of unhedged variable rate debt. The projected average interest rate for all fixed rate bonds for the 2009 Revenue Requirement Period is 5.187 percent. The projected average interest rate for all hedged variable rate bonds (taking into account the hedges) is 3.954 percent.

For purposes of calculating the interest accruing on unhedged variable rate bonds during 2009, as well as any future revenue requirement periods, in accordance with the Bond Indenture, interest is assumed to accrue at a rate equal to the greater of (a) 130 percent of the highest average interest rate on such Variable Rate Bonds in any calendar month during the twelve (12) calendar months ending with the month preceding the date of calculation, or such shorter period that such Variable Rate Bonds shall have been Outstanding, or (b) 4.0 percent. For the 2009 Revenue Requirement Period, on the basis of these assumptions, the interest rate on Variable Rate Bonds is projected to be 4.935 percent.

The Department projects that the amount of Bond Charge Revenues required for the 2009 Revenue Requirement Period will be \$858 million.

ACCOUNTS AND FLOW OF FUNDS UNDER THE BOND INDENTURE

General information on the Accounts and flow of funds under the Bond Indenture, which has not changed since the bonds were issued in 2002, is contained in the Department's prior Determinations of Revenue Requirements, copies of which have been incorporated into the administrative record supporting this Determination.

Information specific to certain Accounts for this Revised 2009 Revenue Requirement Determination follows.

OPERATING ACCOUNT

In the Bond Indenture, the Department agreed to include in its revenue requirements amounts estimated to be sufficient to cause the amount on deposit in the Operating Account at all times during any calendar month to equal the Minimum Operating Expense Available Balance ("MOEAB"). The Bond Indenture places the determination as to how far into the future this minimum test of sufficiency should be met in the Department's discretion. Moreover, the

covenant concerns the minimum amount required to be projected to be on deposit, and leaves to the Department the determination as to what total reserves are appropriate or required in the fulfillment of its duties under Section 80134 of the Act.

The Department determines the MOEAB at the time of each revenue requirement determination to be an amount equal to the largest projected difference between the Department's projected operating expenses and the Department's projected Power Charge revenues during any one month period during the revenue requirement period, taking into account a range of possible future outcomes (i.e., "stress cases").

For the purposes of this Revised 2009 Determination, the Department has determined the MOEAB to be \$331 million. The Department projects to exceed the MOEAB at all times during 2009. The Department has determined that the amount projected to be on deposit in the Operating Account, including the amount therein that acts as a reserve for Operating Expenses, is just and reasonable, based in part on the following: (1) potential gas price volatility, (2) potential gas price escalation, (3) year-over-year revenue requirement volatility, and (4) credit rating agency and credit and liquidity facility considerations, as well as the factors discussed below under "Sensitivity Analysis" and in Section E—"Key Uncertainties in the Revenue Requirement Determination".

OPERATING RESERVE ACCOUNT

In each Revenue Requirement Period, the Department calculates the Operating Reserve Account Requirement ("ORAR") as the greater of (a) the largest aggregate amount projected by the Department by which Operating Expenses exceed Power Charge Revenues during any consecutive seven calendar months commencing in such Revenue Requirement Period and (b) 12 percent of the Department's projected annual Operating Expenses; provided, however, that the projected amount will not be less than the applicable percentage of Operating Expenses for the most recent 12-month period for which reasonably full and complete Operating Expense information is available, adjusted in accordance with the Indenture to the extent the Department no longer is financially responsible for any particular Power Supply Contract. All projections are to be based on such assumptions as the Department deems to be appropriate after consultation with the Commission and taking into account a range of possible future outcomes (i.e., "Stress Cases").

Additionally, the ORAR shall include, but shall not be limited to, the Priority Contract Contingency Reserve Amount ("PCCRA"). The PCCRA is the maximum amount projected by the Department to be payable by the Department under and pursuant to Priority Long Term Power Contracts in any calendar month during such Revenue Requirement Period. All projections are to be based on such assumptions as the Department deems to be appropriate after consultation with the Commission.

Based on the Stress Cases described below under "Sensitivity Analysis", the Department determines the ORAR for the 2009 Revenue Requirement Period to be \$543 million, reflecting an amount equal to the PCCRA. The Department projects to meet the ORAR on or before June 1, 2009.

DEBT SERVICE RESERVE ACCOUNT

For purposes of calculating the amount of the Debt Service Reserve Requirement from time to time, interest accruing on Variable Rate Bonds during any future period will be assumed to accrue at a rate equal to the greater of (a) 130 percent of the highest average interest rate on such Variable Rate Bonds in any calendar month during the twelve (12) calendar months ending with the month preceding the date of calculation, or such shorter period that such Variable Rate Bonds shall have been outstanding, or (b) 4.0 percent. For the 2009 Revenue Requirement Period, the Department will calculate projected interest on unhedged Variable Rate Bonds at 4.935 percent.

For the 2009 Revenue Requirement Period, the Department has determined the Debt Service Reserve Requirement to be \$950 million. The Department projects to maintain this amount at all times during the Revenue Requirement Period.

SENSITIVITY ANALYSIS

The Rate Agreement requires the Department to evaluate its costs and cash flows on a monthly basis and to notify the Commission of its Retail Revenue Requirements no less than once annually, thereby ensuring that Bond Charges and Power Charges are adequate to meet financial obligations associated with the Bonds and the power supply program. From the date the Department first initiates any necessary revised Retail Revenue Requirement proceeding, it expects no more than seven months will elapse before it receives modified levels of revenues associated with the filing. As explained in prior Department revenue requirement determinations, during this seven month period the Department would endeavor to identify any material changes in its revenue requirement, proceed through its own administrative determination of its modified revenue requirement, notify the Commission of the new revenue requirement for purposes of allocating the costs among customers, and finally begin receiving the modified level of revenue. To ensure its ability to meet its financial obligations during this seven month period, the Department must maintain reserves that are adequate to meet normal anticipated expenses, unexpected variations in these expenses, and/or reductions in revenue receipts resulting from factors beyond the Department's control. The Department determines reserve levels considering among other factors, the potential variations in revenue receipts and power supply program expenses, changes in key variables affecting customer energy requirements, IOU controlled or "retained" generation ("Utility Retained Generation" or "URG") production levels, changing natural gas prices, and Department contract operations.

To assess the adequacy of reserve levels, the Department and its consultants have prepared an additional assessment of Stress Cases based on changes in certain key expense and operating assumptions. The Stress Cases considered in this assessment reflect a sampling of groups of changes in key assumptions that could affect Department expenses and revenues. The Stress Cases are not intended to reflect all possible scenarios, nor are they intended to reflect only those most likely to occur. For the Stress Cases, a market simulation was performed to generate revised net short requirements and associated power supply costs. These revised forecasts were used to generate revised cash flow projections for the Department. These revised results were compared against the base estimate of cash flow projections (the "Base Case").

CASE 1

This Stress Case focuses on decreased Bond Charge and Power Charge revenues resulting from lower sales to Department customers, and increased costs of providing energy under existing contracts.

Higher costs are driven primarily by increased fuel costs. This Stress Case utilizes a higher natural gas price forecast than is presented in Table D-9. This Stress Case gas price forecast, shown in Table D-10, was developed using basic statistical methods to define a high-end range of gas prices at the Henry Hub, Southern California Border and PG&E Citygate delivery points -- the relevant primary delivery points for natural gas that would be procured to support DWR's long-term contracts.

TABLE D-10
STRESS CASE – NATURAL GAS PRICE FORECASTS
(Nominal \$/MMBtu)

	Henry Hub	Southern California Border	PG&E Citygate
	2009	2009	2009
Q1 – 2009	15.36	14.65	15.60
Q2 – 2009	14.87	13.92	14.98
Q3 – 2009	15.40	14.75	15.60
Q4 – 2009	16.29	15.67	16.78
Annual Average	15.48	14.75	15.74

The Department developed the Stress Case gas price forecast for each delivery point by using a set of historical monthly prices from the first of the month starting in April 1998 through May 2008 for Henry Hub gas prices with historical basis differentials used to estimate prices for each delivery point. The Department identified the distribution function that best fits the data through the use of specialized statistical software. Using the identified distribution functions, a Monte Carlo simulation was performed on each monthly Base Case gas price forecast to identify a gas price with a 99 percent probability of all gas prices within that specific distribution falling below it – presuming the Base Case gas price forecast is the mean point of the distribution. This gas price was then used as the Stress Case gas price forecast for that specific delivery point and month. While this methodology appears to provide the best method of statistically identifying a reasonable high-end range for gas prices, no statistical method will perfectly capture the variability in gas prices.

Gas hedges can be used to reduce the impact of changes in the spot market for gas. Based on the IOUS' information, the Department has included the impact of actual and planned gas hedges in place as of September 30, 2008. These hedges, in many instances, limit the price of natural gas purchases under the Stress Cases to levels below the Stress Case gas price forecast for those volumes and time periods for which the hedges are in place.

Lower customer sales by the Department are driven primarily by a decrease in the net short energy requirements, which can occur as a result of increased URG and/or decreased customer

load. In this case, URG is increased by assuming California and Pacific Northwest hydroelectric production at 125 percent of normal for 2009 and 2010.

Lower loads are estimated in this case by assuming cooler-than-normal summers during 2009 and 2010, and by assuming increased non-programmatic conservation. The level of decreased customer load due to temperature variation is simulated by decreasing the Base Case total monthly load forecast for 2009 and 2010 by 3.3 percent, 3.6 percent, 5.1 percent and 4.4 percent for June, July, August, and September, respectively. In addition, an increase in the assumed level of non-programmatic conservation (above the Base Case) results in decreases in total annual load of four percent in 2009 and two percent in 2010. Lower electric loads result in a Stress Case for Department revenue because the fixed component of Department energy contracts must be allocated over fewer MWh of retail electric sales, thereby increasing the Department's required recovery cost per MWh.

CASE 2

This Stress Case focuses on increased costs of providing energy under existing contracts, and considers increased contract dispatch due to higher customer load and reduced URG.

Higher costs are driven primarily by increased fuel costs. As in Case 1, this Stress Case utilizes the higher natural gas price forecast that is presented in Table D-10.

Higher customer sales by the Department are driven primarily by an increase in the net short, which can occur as a result of decreased URG and/or increased customer load. In this case, URG is decreased by assuming California and Pacific Northwest hydroelectric production at 75 percent of normal in 2009 and 2010. URG is further decreased by assuming an unplanned outage at one southern California nuclear power plant unit from January 2009 through March 2009 and at one northern California nuclear power plant unit from April 2009 through March 2010. The expected impact of this type of an assumption is to increase the amount of energy dispatched from the Long-Term Priority Contracts.

The Department estimated higher loads in this case by assuming load growth rates that are 2.0 percentage points higher than those assumed in the Base Case in 2008 and 1.4 percent higher in 2009. It assumed that this growth results from the combination of accelerated economic growth in California and decreases in the expected amount of achieved non-programmatic conservation. In addition, assuming warmer-than-normal summers in 2009 and 2010 will increase load. The level of increased customer load due to temperature variation is simulated by increasing the Base Case total monthly load forecast (inclusive of the accelerated growth rates described above) in 2009 and 2010 by 4.4 percent, 4.8 percent, 6.8 percent, and 5.9 percent for June, July, August, and September, respectively.

E. POWER CONTRACT SETTLEMENT SUMMARY

The California Parties, including the Governor's Office, California Attorney General's Office, CPUC, the Department, and the IOUs, have participated in FERC proceedings to recover excess electricity costs incurred by ratepayers since 2001. These FERC proceedings have led to several

settlement agreements between the California Parties and the responsible energy suppliers. As one of the California Parties, the Department has received distributions from these energy suppliers that have been paid to settle claims against them. Any future settlement distributions will reduce Department costs and, as a result, decrease the Department's revenue requirement. Copies of prior settlement agreements are incorporated into the administrative record supporting this Determination.

F. KEY UNCERTAINTIES IN THE REVENUE REQUIREMENT DETERMINATION

The Department faces a number of uncertainties that may require material changes to its revenue requirements for the 2009 Revenue Requirement Period after this Revised 2009 Determination. Several risk factors are outlined below and additional information may be found in each of the bond financing Official Statements, which may be obtained from the Treasurer of the State of California.

1. Determination of Power Charges and Bond Charges; possible use of amounts in the Bond Charge Collection Account to pay Priority Contract Costs:
 - a. Potential administrative and legal challenges to DWR's revenue requirements;
 - b. Potential litigation regarding inclusion of DWR Priority Contract Costs in its Retail Revenue Requirement; and
 - c. Application and enforcement of the Rate Agreement's Bond Charge rate covenant.
2. Collection of Bond Charges and Power Charges:
 - a. Potential rejection of Servicing Arrangements or other disruption of servicing arrangements.
3. Certain risks associated with DWR's Power Supply Program:
 - a. Long-term power contracts:
 - i. Impact of renegotiated contracts;
 - ii. Off-system sales volume and price variability;
 - iii. Failure or inability of the suppliers to perform as promised including but not limited to any failure to add new capacity to the grid or a possible rejection of a contract in bankruptcy; and
 - b. Gas price volatility.
4. Potential increases in overall electric rates:
 - a. Changes in general economic conditions;
 - b. Energy market-driven increases in wholesale power costs;
 - c. Fuel costs;
 - d. Hydro conditions and availability;
 - e. Market manipulation; and
 - f. Actions affecting retail rates.

5. Potential decrease in DWR customer base:
 - a. Direct Access; and
 - b. Load departing IOU service.

6. Potential variance in dispatch of DWR contracts:
 - a. Actual vs. forecast load variance;
 - b. Dispatch coordination between IOUs and DWR; and
 - c. Modification of sharing of surplus power sales revenues.

7. Uncertainties relating to electric industry and markets:
 - a. Electric transmission constraints;
 - b. Gas transmission constraints; and
 - c. CAISO implementation of its Market Redesign and Technology Upgrade.

8. Uncertainties relating to government action:
 - a. California Emergency Services Act;
 - b. Possible State legislation or action; and
 - c. Possible Federal legislation or action.

9. Uncertainties relating to financial industry and markets:
 - a. Effects of bond refunding or similar action;
 - b. Variance in interest rates; and
 - c. Constraints in the flow and availability of credit facilities and capital.

G. JUST AND REASONABLE DETERMINATION

PRIOR DETERMINATIONS

Each new revenue requirement determination builds, to the extent necessary or appropriate, on the various preceding determinations. Successive determinations incorporate the information from each previous determination into the supporting administrative record. Interested persons may review determinations on the DWR-CERS website, and, subject to applicable non-disclosure requirements, supporting materials at the CERS office in Sacramento,

Determination	Date Issued
2001-2003, including Reexamination and Redetermination for 2001-2002	August 16, 2002
Reconsideration of Just and Reasonableness of 2001 - 2003	August 19, 2004
2003 Supplemental	July 1, 2003
2004	September 18, 2003
2004 Supplemental	April 16, 2004
2005	November 4, 2004
Revised 2005	March 16, 2005
2006	August 3, 2005
Final 2006	October 27, 2005
2007	August 2, 2006
Revised 2007	October 30, 2006
2008	August 22, 2007
Revised 2008	October 31, 2007
Supplemental 2008	February 15, 2008
2009	August 6, 2008

THE 2009 REVISED DETERMINATION

PUBLIC PROCESS

Under the terms of the Rate Agreement between the Department and the Commission, and the terms of the Bond Indenture, the Department has agreed to review, determine and revise its Retail Revenue Requirement at least annually.

On October 17, 2008, the Department issued its Proposed Revised Determination of Revenue Requirements for the period January 1, 2009, through December 31, 2009 for public review and comment under the Regulations promulgated pursuant to the California Administrative Procedures Act. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested persons were advised to submit comments no later than October 24, 2008.

On October 24, 2008, the Department received comments from Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas and Electric. No other persons submitted comments. The Department reviewed and considered each comment and took action as appropriate. The complete comments are included in the administrative record and are referenced in Section I.

JUST AND REASONABLE DETERMINATION

After assessing the administrative record, the Act, the Regulations, Bond Indenture requirements and the Rate Agreement, the Department finds this Revised 2009 Revenue Requirement for the period of January 1, 2009 through December 31, 2009, to be just and reasonable.

H. MARKET SIMULATION

A multitude of factors affect wholesale power costs in the western United States, including, weather and related electricity demand, precipitation and related hydropower production, supply and price of natural gas and coal, power transfer capability of major interties, operating costs, outages and retirement of generating plants, and the cost, fuel efficiency, and timing of new generating resource additions. The Department analyzed the fundamental drivers underlying the electricity market by generating computer simulations of market activity throughout the Western Electricity Coordinating Council (“WECC”) region.

As part of its market report and simulation in developing the 2009 Revenue Requirement, the Department considered all items in the above paragraph and the following:

- California ISO Market Redesign and Technology Upgrade program;
- Potential impacts of market redesign on the Department’s long-term contracts and revenue requirements;
- Use of PROMOD IV as a market simulation tool;
- Analysis of retirement and additions of WECC generation resources; and
- California ISO Locational Marginal Price and Congestion Revenue Rights proposals.

More detailed information about the market simulation utilized by the Department, including descriptions of the inputs and assumptions is referenced in Section J of the 2008 Revenue Requirement⁹.

I. COMMENTS RECEIVED ON THE PROPOSED REVISED 2009 DETERMINATION AND THE DEPARTMENT’S RESPONSES

On October 17, 2008, the Department issued its Proposed Revised Revenue Requirement Determination for the period January 1, 2009 through December 31, 2009. This document was made available for public review and comment. The Department provided interested persons with quantitative results from its PROMOD market simulation and Financial Model, subject to applicable non-disclosure requirements. Interested persons were advised to submit comments no later than October 24, 2008.

The Department received comments from PG&E, SCE and SDG&E. No other persons submitted comments. The Department reviewed and considered each comment and took action as appropriate. The comments and the Department’s responses are reviewed below. The complete comments are included in the administrative record and are referenced in Section J.

Summary of the Common Comments of the IOUs

All three IOUs commented on the Minimum Operating Expense Available Balance (“MOEAB”) for 2011. The IOUs requested that the Department reconsider its estimate of the MOEAB for

⁹ Volume DWR08pRR, Record Number 022, dated 4/10/2007.

2011 since it can affect the Power Charges for 2009. Additionally, SCE commented on the calculation of the Operating Reserve Account Requirement (“ORAR”) for 2010 and 2011 and requested that it be reexamined.

Response:

The Department has reviewed the IOUs’ comments and has made changes to projections to its ORAR and MOEAB balances in 2010 and 2011.

The Department has covenanted in the Bond Indenture to include in its revenue requirements amounts estimated to be sufficient to cause the amount on deposit in the Operating Account at all times during any calendar month to, at a minimum, equal the Minimum Operating Expense Available Balance (“MOEAB”). The Bond Indenture leaves to the Department the determination as to how far into the future this minimum test of sufficiency should be met. Moreover, the covenant addresses the minimum requisite projected amount to be on deposit in the Operating Account, and leaves to the Department the determination as to what total reserves are appropriate or required in the fulfillment of its duties under Section 80134 of the Act.

The MOEAB is to be determined by the Department at the time of each revenue requirement determination and, when the Department is not procuring the residual net short, is to be an amount equal to the largest projected difference between the Department's projected operating expenses and the Department's projected Power Charge revenues during any one month period during the revenue requirement period, taking into account a range of possible future outcomes (i.e., “stress cases”).

In its reexamination of the MOEAB for 2011, the Department considered that the Sempra Contract expires at the end of September 2011 and that the total dispatch from the power contracts decreases significantly from the dispatch amount in 2010. These two factors along with the associated reduction in the fuel volume and price risk for 2011 lead the Department to reduce the MOEAB and the ORAR for 2011 to \$181 million and \$297 million, respectively.

The ORAR for 2011 was projected at 12 percent of 2011 cash expenses and the MOEAB was projected using the ratio of ORAR to MOEAB for the current revenue requirement period. The MOEAB for 2010 remains unchanged and the ORAR for 2010 is set at the Priority Contract Contingency Reserve Amount (“PCCRA”). The PCCRA is the maximum amount projected by the Department to be payable by the Department under and pursuant to Priority Long Term Power Contracts in any calendar month during such Revenue Requirement Period. All projections are to be based on such assumptions as the Department deems to be appropriate after consultation with the Commission.

For the purposes of this Revised 2009 Determination, the MOEAB is determined to be \$331 million. The Department projects to exceed the MOEAB at all times during 2009 and to reach the minimum balance in the fall of 2010. The Department has determined that the amount projected to be on deposit in the Operating Account, including the amount therein that acts as a reserve for Operating Expenses, is just and reasonable, based in part on the following: (1) potential gas price volatility, (2) potential gas price escalation, (3) year-over-year revenue requirement volatility, and (4) credit rating agency and credit and liquidity facility

considerations, as well as the factors discussed below under “Sensitivity Analysis” and in Section E—“Key Uncertainties in the Revenue Requirement Determination”.

Comment by Southern California Edison

In addition to the comment noted above, SCE comments that it believes the Department’s calculation of the Southern California Border gas price projections as of October 1, 2008 is in error.

Response:

The Department’s methodology for calculating near-term monthly price forecasts is to use a recent 10-day average NYMEX futures price at Henry Hub for the delivery months of January 2009 through June 2010. Price forecasts for those delivery months at all other delivery hubs in the WECC are calculated by using a historical basis differential for each hub relative to Henry Hub. The reason for this is that the Department believes that NYMEX futures price data for delivery hubs other than Henry Hub are too thinly-traded to provide a reliable forecast of future prices at those points. For the Southern California Border hub, this resulted in the Department’s calculated annual average Southern California Border price of \$8.35/MMBtu. SCE calculated an annual average Southern California Border price of \$7.79/MMBtu using a 10-day average of NYMEX data in each delivery month for the Southern California Border hub. The variance is attributable to the different methodologies employed, not due to an error by either the Department or SCE.

J. ANNOTATED REFERENCE INDEX OF MATERIALS UPON WHICH THE DEPARTMENT RELIED TO MAKE THE DETERMINATION

Volume	Record Number	Date	Record Title
DWR09pRR	001	02/15/08	Supplemental Determination of Revenue Requirements for 2008, including the Notice and the Determination
DWR09pRR	002	02/22/08	ALJ Ruling inviting comments on the Allocation of the CDWR’s determination of its supplemental revenue requirements for 2008
DWR09pRR	003	04/10/08	Decision 08.04.025: Order Granting In Part, The Petition To Modify Decision 05.06.060
DWR09pRR	004	04/14/08	DWR Data Request 1 including Transmittal, Load Forecast Questions, Load Forecast matrix, CEC Energy Facility Status, Hedging matrix
DWR09pRR	005	04/24/08	Decision 08.04.051: Order Allocating The 2008 Supplemental Revenue Requirement Determination Of The CDWR

DWR09pRR	006	04/30/08	SDG&E Advice 1986-E: Revision To The DWR Power Charge Remittance Rate Pursuant To D.08.04.051
DWR09pRR	007	04/30/08	PG&E Advice 3263-E: Tariff Revision in response to D.08.04.051
DWR09pRR	008	05/08/08	SCE Advice 2239-E: Revision of the 2008 CDWR Power Charge Pursuant to D.08.04.051
DWR09pRR	009	04/28/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to DWR Data Request, questions 2-6
DWR09pRR	010	04/29/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Response to DWR's Data Requests
DWR09pRR	011	05/02/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to DWR Data Request: Load Data
DWR09pRR	012	04/29/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to DWR Data Request, questions 1 and 7
DWR09pRR	013	05/02/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to DWR Data Request, questions 3 and 5
DWR09pRR	014	05/05/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Response to Questions on Load Data
DWR09pRR	015	05/05/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to DWR Data Request, question 8
DWR09pRR	016	05/06/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to DWR Data Request: Q8
DWR09pRR	017	05/08/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to DWR Data Request: Q1, Q8 Update
DWR09pRR	018	05/07/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR Follow up Questions on Data Response from PG&E
DWR09pRR	019	05/12/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR Follow up Questions on Data Response from SCE
DWR09pRR	020	05/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR Follow up Questions on Data Response from SCE
DWR09pRR	021	05/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Response to DWR Follow up Questions
DWR09pRR	022	05/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Supplemental Response to DWR Data Request
DWR09pRR	023	05/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Response to DWR Follow up Questions
DWR09pRR	024	05/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Response to DWR Follow up Questions
DWR09pRR	025	05/14/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to DWR Data Request
DWR09pRR	026	05/14/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to DWR Data Request: Hedging
DWR09pRR	027	05/14/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Supplemental Response to DWR Data Request: Hydro
DWR09pRR	028	05/14/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to DWR Data Request: Losses
DWR09pRR	029	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PROMOD data to SDG&E for Review and Comment
DWR09pRR	030	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PROMOD data to SCE for Review and Comment

DWR09pRR	031	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PROMOD data to PG&E for Review and Comment
DWR09pRR	032	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E comments on PROMOD usage forecast
DWR09pRR	033	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E additional comments on PROMOD data
DWR09pRR	034	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Supplemental Data Request Response
DWR09pRR	035	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR Response to PG&E Questions on PROMOD Data
DWR09pRR	036	05/19/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Additional Response on PROMOD for Pacificorp
DWR09pRR	037	05/20/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Additional Response on PROMOD
DWR09pRR	038	05/20/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Additional Comments on PROMOD Data
DWR09pRR	039	05/21/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Additional Response on PROMOD
DWR09pRR	040	05/21/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Additional Comments on PROMOD Data - Hydro
DWR09pRR	041	05/22/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Additional Response on PROMOD
DWR09pRR	042	05/22/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Additional Response on PROMOD
DWR09pRR	043	05/22/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Further Clarification of QF Data
DWR09pRR	044	05/22/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Further Clarification of QF Data: Pacificorp
DWR09pRR	045	05/23/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Further Clarification of QF Data
DWR09pRR	046	05/23/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Additional Response on PROMOD: Coral Contract
DWR09pRR	047	05/23/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Additional Response on PROMOD: Avoidable – Non-Avoidable Costs
DWR09pRR	048	05/23/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Additional Comments on PROMOD Data
DWR09pRR	049	05/30/08	DWR Data Request for Additional Dispatchable Unit Information to SCE
DWR09pRR	050	05/30/08	DWR Data Request for Additional Dispatchable Unit Information to SDG&E
DWR09pRR	051	05/30/08	DWR Data Request for Additional Dispatchable Unit Information to PG&E
DWR09pRR	052	05/30/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Response to Dispatchable Data Request
DWR09pRR	053	05/30/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to Dispatchable Data Request
DWR09pRR	054	06/03/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Additional questions on PG&E Dispatchable
DWR09pRR	055	06/04/08	DWR Response to PG&E Questions

DWR09pRR	056	05/28/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E Comparison of URG and Base Case Data
DWR09pRR	057	06/04/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to Coral Contract Questions
DWR09pRR	058	06/04/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to Capacity Questions
DWR09pRR	059	06/04/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE Response to Dispatchable Unit Questions
DWR09pRR	060	06/10/08	DWR request to SCE for additional information relating to PROMOD data
DWR09pRR	061	06/10/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR additional questions to PG&E related to PROMOD data
DWR09pRR	062	06/10/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to Additional Questions – Crockett Cogen
DWR09pRR	063	06/10/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E Response to Additional Questions – Wind Generators
DWR09pRR	064	06/10/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E additional response to – Crockett Cogen
DWR09pRR	065	06/10/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E additional response to – Wind Units
DWR09pRR	066	06/10/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E additional response to – Helms and Puget Exchange
DWR09pRR	067	06/12/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE response to additional questions
DWR09pRR	068	06/12/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SDG&E data clarifications
DWR09pRR	069	06/12/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR request to PG&E for data clarifications – contract extensions
DWR09pRR	070	06/12/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E response to contract extensions request
DWR09pRR	071	06/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: DWR request to SCE for data clarifications – contract extensions
DWR09pRR	072	06/13/08	Guidance for modeling SCE contract extensions
DWR09pRR	073	06/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PPM Contract Data
DWR09pRR	074	06/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PPM additional Contract Data
DWR09pRR	075	06/13/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: SCE input on contract extensions
DWR09pRR	076	06/16/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PG&E additional response to contract extensions request
DWR09pRR	077	03/03/08	DWR Electric Power Fund Financial Statements: December 31, 2007
DWR09pRR	078	05/22/08	DWR Electric Power Fund Financial Statements: March 31, 2008
DWR09pRR	079	05/22/08	Bond Refunding Official Statements: Series H, I, J, K
DWR09RR	080	07/03/08	DWR General and Administrative Long Term Cost Forecast

DWR09RR	081	07/08/08	Proposed Determination of Revenue Requirements for 2009 including the Notice, the Regulations and the Proposed Determination
DWR09RR	082	07/08/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Data files supporting the 2009 Proposed Determination of Revenue Requirements, specific to PG&E
DWR09RR	083	07/08/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Data files supporting the 2009 Proposed Determination of Revenue Requirements, specific to SCE
DWR09RR	084	07/08/08	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Data files supporting the 2009 Proposed Determination of Revenue Requirements, specific to SDG&E
DWR09RR	085	07/29/08	PG&E Comments on the Proposed Determination for 2009
DWR09RR	086	07/29/08	SCE Comments on the Proposed Determination for 2009
DWR09RR	087	07/29/08	Long Term Natural Gas Price Forecasts with 10-day NYMEX average prices as of June 24, 2008.
DWR09RR	088	08/01/08	Natural Gas Price Forecasts for 2008 using 10-day NYMEX average prices as of July 31, 2008.
DWR09pRRR	089	08/06/2008	Determination of Revenue Requirements for 2009 including the Notice, the Regulations and the Determination
DWR09pRRR	090	10/01/2008	Natural Gas Price Forecasts for 2008 using 10-day NYMEX average prices as of September 30, 2008.
DWR09pRRR	091	10/16/2008	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: PROMOD Run 14 and related support documentation
DWR09pRRR	092	10/16/2008	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: CFMG5v15H Financial Model and supporting reports
DWR09pRRR	093	10/16/2008	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Data files supporting the 2009 Determination of Revenue Requirements, specific to PG&E
DWR09pRRR	094	10/16/2008	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Data files supporting the 2009 Determination of Revenue Requirements, specific to SCE
DWR09pRRR	095	10/16/2008	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: Data files supporting the 2009 Determination of Revenue Requirements, specific to SDG&E
DWR09RRR	096	10/17/2008	Proposed Revised Determination of Revenue Requirements for 2009 including the Notice, the Regulations and the Proposed Revised Determination
DWR09RRR	097	10/24/2008	Comments from PG&E on Proposed Revised 2009 Revenue Requirement
DWR09RRR	098	10/24/2008	Comments from SCE on Proposed Revised 2009 Revenue Requirement
DWR09RRR	099	10/24/2008	Comments from SDG&E on Proposed Revised 2009 Revenue Requirement
DWR09RRR	100	10/29/2008	CONFIDENTIAL: NOT FOR PUBLIC RELEASE: CFMG5v15j Financial Model and supporting reports