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Exhibit No.: _____
Witness: Benjamin A. Montoya

DIRECT TESTIMONY OF

BENJAMIN A. MONTOYA

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

redacted, public version

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

April 15, 2014

SDGE

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DIRECT TESTIMONY OF
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I. INTRODUCTION

My testimony describes the resources San Diego Gas & Electric Company ("SDG&E") expects to use in calendar year 2015 to provide electric commodity service to its bundled service customers and a forecast of the procurement costs that SDG&E expects to record in 2015 to the Energy Resource Recovery Account ("ERRA"), Transition Cost Balancing Account ("TCBA"), and Local Generation Balancing Account ("LGBA"). A summary of the proposed total 2015 ERRA, TCBA and local generation ("LG") revenue requirement is contained in the direct testimony of SDG&E witness Sheri Miller. SDG&E requests that the California Public Utilities Commission ("Commission" or "CPUC") find that the input assumptions used to develop the ERRA, TCBA and LG revenue requirement are reasonable and should be approved.

Section II of my testimony describes the supply resources that SDG&E forecasts will be utilized to meet SDG&E's bundled customer load in calendar year 2015. These resources include SDG&E's continuing obligations under various long-term power purchase contracts, including Public Utility Regulatory Policies Act ("PURPA") contracts, contracts with conventional generators, contracts with renewable generators and utility owned generators. Section III of my testimony quantifies the costs associated with the resources described in Section II along with other electric procurement costs that are recorded in ERRA, such as market purchases, California Independent System Operator ("CAISO") charges and portfolio hedging costs. All Greenhouse Gas ("GHG") costs, both direct and indirect, associated with SDG&E's compliance with California's Cap-and-Trade Program have been explicitly removed from the

costs addressed in this testimony.[1] My statement of qualifications can be found at the end of my testimony.

My testimony makes reference to the following, which are attachments located directly after my statement of qualifications: Attachment A: SDG&E 2015 ERRA and LG Expenses; Attachment B: SDG&E 2015 URG Delivery Volumes; Attachment C: SDG&E 2015 Long-Term Power Purchase, CTC & Qualifying Facility ("QF") Detail; and Attachment D: SDG&E 2015 Renewable Resource Detail.

II. 2015 FORECAST OF ENERGY REQUIREMENTS AND SUPPLY RESOURCES

A. ENERGY REQUIREMENTS FORECAST

The forecast of SDG&E's 2015 bundled load requirement is based on the California Energy Commission's ("CEC's") 2013 Integrated Energy Policy Report ("IEPR") forecast, adopted December 11, 2013. Using this forecast and adjusting for direct access load, SDG&E projects that the energy requirements for its bundled load for 2015 will be [redacted]. This forecast is [redacted] or [redacted] lower than SDG&E's forecasted bundled energy forecast for 2014 ([redacted]).

[1] The associated, direct testimony of SDG&E witness Benjamin A. Montoya in the GHG OII addresses SDG&E's forecast of GHG compliance obligations for 2015.

B. SUPPLY RESOURCE FORECAST

1. Qualifying Facilities Contracts

In 2015, SDG&E will have about 230 MW of capacity under contract with eight QFs.[2] The five largest QF contracts account for 220 MW or 96% of total QF capacity. All QFs are located in the SDG&E service area except for the Yuma Cogeneration Associates ("YCA") plant, a 56.5 MW natural gas-fired plant in Arizona, the output of which is imported into the CAISO.

SDG&E's QF contracts are a combination of must-take and dispatchable resources. SDG&E is obligated to pay the contract price for all delivered QF generation and schedule it into the CAISO market. SDG&E has executed a contract with Goal Line, and anticipates executing an amendment with YCA, which allows SDG&E to have more economic dispatch rights in each of these contracts. SDG&E forecasted the plants' dispatch in accordance with these terms. The forecast of QF energy supply in 2015 is [redacted], a decrease of [redacted] from the forecasted amount for 2014 ([redacted]).

2. Renewable Energy Contracts

The 2015 forecast of renewable energy supply from CPUC approved contracts is 4,859 GWh, which includes 545 GWh of Renewable Energy Credits ("RECs") quantities that are delivered to SDG&E in conjunction with existing non-renewable imports. This forecast is a decrease of 56 GWh from the forecast for 2014 (4,915 GWh). A table detailing SDG&E's monthly renewable contracts is provided in Attachment D.

For 2015, SDG&E forecasts it will receive 4,928 GWh of bundled renewable energy from 44 contracts that include wind, solar, biogas, biomass, and hydro technologies. The

[2] The actual number of active QF contracts is over 50, but many of these QF resources only serve on-site load and do not deliver net energy to SDG&E. As a result, these are not included in the production cost model run. The eight QFs referenced above deliver net energy to SDG&E and are included in the model.

forecasted quantity is based on forecasts of full deliveries from the projects currently on-line and operating and a probability weighting for those projects still under development but planned to be in effect in 2015.[3]

In addition, SDG&E expects to receive 545 GWh of unbundled renewable energy credits from various out-of-state wind projects. The renewable energy credits are delivered by tagging the physical deliveries of energy imports that SDG&E has already accounted for in its 2015 forecast. SDG&E also forecasts RPS Sales in 2015 for a total of 615 GWh based on SDG&E's efforts to manage its overall RPS compliance and renewable power costs.

3. SDG&E-Owned Dispatchable Generation

SDG&E owns the following generating facilities:

- the 575 MW Palomar Energy Center ("Palomar") combined cycle power plant,
- the 495 MW Desert Star Energy Center ("Desert Star") combined cycle power plant,
- the two 48 MW Miramar Energy Facility ("Miramar I and II") simple cycle combustion turbine units, and
- the 45 MW Cuyamaca Peak Energy Plant simple cycle combustion turbine.

These units are dispatched by the CAISO for generation and Ancillary Services ("A/S") awards based on economic merit.[4]

The forecasted generation for Palomar in 2015 is [redacted], an increase of [redacted] from the forecast for 2014 ([redacted]). The forecasted generation for Miramar I & II

[3] SDG&E did not include renewable energy quantities or costs associated with the Sustainable Communities Photovoltaic program because costs for this program are not charged to ERRA.
[4] SDG&E's dispatch model considered only generation dispatched for energy and not for A/S. The rationale for this approach is that the CAISO co-optimizes market awards between energy and A/S based on the opportunity cost of capacity and, therefore, the economic benefit (and ERRA contribution) of using capacity for generation is equivalent to using capacity for A/S.

(collectively, "Miramar") in 2015 is [redacted], a decrease of [redacted] from the forecast for 2014 ([redacted]). The forecasted generation for Cuyamaca in 2015 is [redacted], a decrease of [redacted] from the forecast for 2014 ([redacted]). The forecasted generation for Desert Star in 2015 is [redacted] an increase of [redacted] from the forecast for 2014 ([redacted]).

4. SDG&E-Contracted Generation

SDG&E has a number of resources under contract in its resource portfolio in 2015. The largest of these contracts is further described below:

- the Otay Mesa Energy Center ("OMEC") Power Purchase Agreement ("PPA"), a 604 MW combined-cycle plant,
- the Orange Grove PPA, made up of two simple cycle peaking units for a combined 99 MW,
- the Wellhead El Cajon Energy Center, a 48 MW simple cycle peaking unit,
- the Wellhead Escondido Energy Center, a 45 MW simple cycle peaking unit,
- the Morgan Stanley PPA that provides firmed and shaped deliveries at the Northern Oregon Border ("NOB").

The forecasted generation from OMEC for 2015 is [redacted], a decrease of [redacted] from the forecast for 2014 ([redacted]). The Orange Grove contract is forecasted to generate [redacted] during 2015, a decrease of [redacted] from the forecast for 2014 ([redacted]). The Wellhead El Cajon Energy Center is forecasted to generate [redacted] during 2015, a decrease of [redacted] from the forecast for 2014 ([redacted]). The Wellhead Escondido Energy Center is forecasted to generate [redacted] during 2015, a decrease of [redacted] from the forecast for 2014 ([redacted]). The Morgan Stanley contract is forecasted to deliver [redacted], a decrease of [redacted] from the forecast for 2014 ([redacted]).

SDG&E also enters into contracts each year to meet its CPUC resource adequacy ("RA") requirements. Under a RA contract, SDG&E receives the right to show this capacity as meeting its RA obligation but SDG&E does not have rights to dispatch the units. For 2015, SDG&E is forecasting it will enter into contracts for [redacted] of capacity, a decrease of [redacted] from the forecast for 2014.

5. Market Purchases and Surplus Sales

Under the Market Redesign and Technology Upgrade ("MRTU"), there is no requirement that SDG&E's bundled load and SDG&E-controlled generation quantities that clear the market must balance. If, in any hour, the quantity of SDG&E's bundled load requirements purchased from the CAISO is greater than SDG&E-controlled generation sold to the CAISO, the difference may be viewed as equivalent to a market purchase.[5] SDG&E forecasts that the quantity of [redacted] will be [redacted] in 2015, a decrease of [redacted] from the forecast for 2014 ([redacted]).

III. 2015 FORECAST OF ERRA EXPENSES

The forecasted results contained in this Application were developed using a production cost model. This model uses the characteristics of the units, including heat rate, variable Operating and Maintenance ("O&M") costs, and other factors that impact the plant's dispatch, and natural gas and market prices to produce a least-cost dispatch of the portfolio of resources. The natural gas and market price forecasts were derived using a recent (March 3, 2014) assessment of 2015 market prices based on the average of forward prices over the previous 22 market trading days.

[5] In some hours the quantity of SDG&E's bundled load requirements purchased from the CAISO is less than SDG&E-controlled generation sold to the CAISO. The difference may be viewed as equivalent to a market sale and the costs and revenues for such transactions are accounted for in the forecast by the total fuel expenses and total ISO Supply revenues.

Electric procurement expenses incurred by SDG&E to serve bundled load are recorded to the ERRA. These expenses include, but are not limited to, costs and revenues for energy and capacity cleared through the MRTU markets, power purchase contract costs, generation fuel costs, market energy purchase costs, CAISO charges, brokerage fees and hedging costs. SDG&E expects to incur $1,192 million of ERRA costs in 2015 (see Attachment A).[6] This forecast is $4 million less than the $1,196 million forecasted for 2014.[7] The key drivers behind the forecast are an increase in renewable generation costs and higher gas prices, which are offset by a lower load forecast and other cost decreases.

The remainder of this testimony will discuss in more detail the costs of specific ERRA items.

A. LOAD ISO CHARGES

The CAISO supplies and sells all energy and A/S to SDG&E to meet SDG&E's bundled load requirement. Based on forecasted prices for energy and A/S, SDG&E expects to incur charges totaling [redacted] for load requirements in 2015 from the CAISO. SDG&E also calculates the indirect GHG cost that is imbedded in the market prices paid for market purchases and deducts this cost from Load ISO Charges. The [redacted] is net of the forecasted indirect GHG costs. GHG quantities and costs are presented in the GHG Cost and Revenue Forecast and Reconciliation Application, and therefore, not included herein.

B. SUPPLY ISO REVENUES

In the CAISO market, all generation from SDG&E's resource portfolio is sold to the CAISO. Based on forecasted prices for energy, SDG&E expects to receive revenues totaling [redacted] for generation produced in 2015.

[6] Does not include Franchise Fees and Uncollectibles ("FF&U").
[7] Application ("A.") 13-09-017 is pending Commission approval.

C. GENERATION FUEL

1. Palomar, Desert Star, Miramar and Cuyamaca (Fuel Expenses that are Recovered through ERRA)

In 2015, the ERRA expense for generation fuel purchased by SDG&E for Palomar, Miramar I & II, Desert Star and Cuyamaca is forecasted to be [redacted].[8] These forecasted expenses include "in lieu" gas fees for Palomar, Miramar I & II and Cuyamaca, which are also recovered in ERRA. These costs are calculated based on SDG&E's forecasted fuel usage for these plants and the applicable tariffs, Schedule GP-SUR[9] and Schedule EG.[10]

D. CONTRACTED ENERGY PURCHASES

1. Qualifying Facilities

All QFs are under contract with SDG&E through as-available capacity or firm capacity PURPA contracts. These contracts include provisions for both energy and capacity payments. The energy payments for QFs that are under firm capacity PURPA contracts are forecasted using the SDG&E Short-Run Avoided Cost ("SRAC") formula.[11] For the dispatchable contracts, SDG&E pays fuel, variable O&M and capacity payments. Most of these contracts, whether PURPA or dispatchable, are considered Competition Transition Charge ("CTC") QF contracts,[12] and the ERRA expenses are based on delivered energy multiplied by the market benchmark price. Any costs, including capacity payments, greater than the market price benchmark are booked to the TCBA. For the purposes of ERRA accounting, ERRA expenses for CTC QF contracts are recorded on Line 18 of Attachment C, "Qualifying Facilities (Up To Market)," and

[8] Capital and non-fuel operating costs for these plants are recovered through the Non-Fuel Generation Balancing Account ("NGBA") as required by D.05-08-005, Resolution E-3896 and D.07-11-046.
[9] Customer-procured Gas Franchise Fee Surcharge.
[10] Natural Gas Intrastate Transportation Service for Electric Generation Customers.
[11] The derivation of the SRAC price for QF contracts is posted monthly on an SDG&E website: http://www2.sdge.com/SRAC/.
[12] CP Kelco contract is not considered a CTC contract.

are forecasted to be [redacted] in 2015. Attachment C details the breakdown of all the units discussed in this section and shows the associated costs, both ERRA and TCBA, and the forecast energy deliveries. Additionally, SDG&E calculates the indirect GHG cost embedded in the market price that flow through the SRAC formula, and SDG&E deducts these costs from the TCBA. The [redacted] is net of the forecasted indirect GHG costs. GHG quantities and costs are quantified and discussed in my testimony in the separate and concurrently filed GHG Cost and Revenue Forecast and Reconciliation Application.

2. Renewable Energy Contracts

SDG&E's renewable energy contracts usually contain an energy payment only and no capacity payment. In 2015, SDG&E's renewable energy portfolio will include a cost for all the renewable power delivered based on contract prices and the renewable energy credits described in Section II under "Renewable Energy Contracts." All costs associated with these contracts are booked as ERRA expenses and are forecasted to be $548 million for 2015. Attachment D details the renewable projects by fuel type, their costs and forecasted energy deliveries.

3. Other Purchased Power Contracts

SDG&E's forecast of total costs for non-renewable power purchase contracts in 2015 is [redacted]. These costs cover capacity payments and variable generation costs for OMEC, Orange Grove, Wellhead El Cajon and several smaller contracts. The largest components in this category are capacity and generation costs for the OMEC unit, expected to be [redacted], and Resource Adequacy capacity costs, expected to be [redacted]. The Morgan Stanley contract is also included in this category and is expected to cost [redacted]. In lieu gas fees for OMEC are recovered in ERRA. This cost is calculated based on SDG&E's forecasted OMEC fuel usage and the applicable tariffs, Schedule GP-SUR and Schedule EG. Escondido Energy Center

forecasted costs and associated CAISO revenues are accounted for in the LGBA. Attachment A details the breakdown of LG expenses.

E. CAISO RELATED COSTS

SDG&E forecasts the miscellaneous CAISO costs to be [redacted] in 2015. SDG&E also forecasts the cost of the FERC Fees and Western Renewable Energy Generation Information System (WREGIS) to be [redacted] in 2015.

F. HEDGING COSTS

SDG&E's resource portfolio has substantial exposure to gas price volatility as a result of fuel requirements for its gas-fired resources as well as the gas price-based pricing formula for its QF contracts. To manage this exposure, SDG&E expects to continue its hedging activity, and will book the resulting hedging costs and any realized gains and losses from hedge transactions to ERRA consistent with its CPUC-approved hedge plan. The current estimate of hedging costs for 2015 is a credit of [redacted], calculated as the marked-to-market profit/loss of hedges already in place, plus expected broker fees. The profit/loss of these and future hedges placed will rise and fall with market prices. Therefore, the final cost or savings will not be known until the settlement process has been completed for the hedge transactions.

SDG&E may also trade short-term financial power products to hedge its long or short position against potentially volatile CAISO market clearing prices. SDG&E does not include a forecast of net cost or benefit from these power hedges due to the unpredictability of market prices relative to the price of the hedges.

G. CONVERGENCE BIDS

SDG&E's primary use of convergence bids is to hedge certain operational risks in the day-to-day management of its portfolio. It is not possible to forecast the gains or losses

associated with potential convergence bidding activity because of the unpredictable relationship between day-ahead and real-time prices. Therefore, SDG&E did not forecast an ERRA revenue/charge for convergence bids.

H. CONGESTION REVENUE RIGHTS ("CRRs")

Market participants, including SDG&E, were allocated CRRs for which they can nominate source and sink P-nodes to match those in their portfolio. If congestion arises between the source and sink P-nodes, the CAISO will pay the market participant holding the CRR the congestion charges to offset the congestion costs incurred. SDG&E expects its CRRs to generate revenues from the CAISO to offset congestion costs incurred within its portfolio. However, expected revenues were not forecast for the 2015 ERRA forecast because SDG&E assumed congestion-free clearing prices to develop forecasts for load requirement costs and generation revenues. A forecast of CRR revenues would have required SDG&E to forecast offsetting market-congestion prices at various P-nodes over the 2015 period, which would have introduced complexity and additional uncertainty into the forecast.

Market participants, including SDG&E, are offered the ability to purchase CRRs through an auction process. SDG&E may elect to participate in the annual and monthly auction processes to procure the incremental CRRs. Since the incremental CRRs volumes cannot be forecasted, the incremental CRR costs and revenues also cannot be forecasted.

I. INTER-SCHEDULING COORDINATOR TRADES ("ISTS")

In the CAISO market, SDG&E may transact ISTs bilaterally with counterparties to hedge long or short positions. Under an IST purchase, SDG&E pays the counterparty the contracted energy price and in return receives payment from the CAISO based on the market clearing price. Under an IST sale, SDG&E receives payment from the counterparty based on the contracted

energy price and in return pays the market clearing price to the CAISO. For IST purchases and sales, the payment to, or revenue from, the counterparty is largely offset by the respective credit from, or payment to, the CAISO. Because ISTs are used as a hedge against unknown market prices, SDG&E does not include a forecast of the net cost or benefit from these transactions.

IV. CONCLUSION

In conclusion, SDG&E requests that the CPUC find that the input assumptions used to develop the ERRA, CTC and LG revenue requirements are reasonable and should be approved. This concludes my direct testimony.

V. QUALIFICATIONS

My name is Benjamin A. Montoya. My business address is 8330 Century Park Court, San Diego, California, 92123.

I have been employed as a Principal Resource Planner in the Resource Planning group of SDG&E since 2000. Prior to that, I was employed at various levels of increasing responsibility in the following SDG&E departments: Gas Engineering, Gas Operations, Gas Control, and Gas System Planning. I have been employed with SDG&E for almost 28 years.

I received a B.S. in Engineering from the United States Naval Academy and a Masters of Business Administration from the University of San Diego. I am a licensed professional Mechanical Engineer in the state of California.

I have previously testified before the Commission on issues related to both gas system planning and electric resource planning.

Attachment A

ATTACHMENT A - SDG&E 2015 ERRA and LGBA EXPENSES

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2015
1	**EXPENSES ($)**													
2	Load ISO Charges (Energy & A/S Costs)													
3	Supply ISO Revenues													
4	Contract Costs (non-CTC)													
5	Contract Costs (CTC up to mkt)													
6	Generation Fuel													
7	CAISO Misc Costs													
8	Hedging Costs (inc. Broker Fees)													
9	Contract Costs - CHP Costs (AB1613)													
10	Customer Incentives - SPP, DR,20/20													
11	Rewards/Penalties - Palomar Energy Ctr													
12	WREGIS Costs													
13	ISO CRRs Costs													
14	ISO Convergence Bidding Costs													
15	Rebalancing Costs (OMEC)													
16	Purchased Tradable Renewable Energy Credits (TRECs)													
17	Sales Tradable Renewable Energy Credits (TRECs)													
18	Net Surplus Compensation Costs (AB920)													
19	Authorized Disallowances													
10	Greenhouse Gas & Carrying Costs													
12	**Total Balancing Account Expenses**													**$ 1,191,837,829**
	Line 4 Contract Costs (non-CTC)													
	Otay Mesa Energy Center PPA payment													
	Otay Mesa Energy Center Energy Costs													
	Lake Hodges													
	Celerity													
	Kelco													
	El Cajon Energy Center Peaker Costs													
	Orange Grove Peaker Costs													
	NRG Capacity Costs													
	Calpeak Capacity Costs													
	Cabrillo 2 Capacity Costs													
	Morgan Stanley Index Costs													
	Renewable Energy													
	Line 4 Total													
	Line 5 Contract Costs (CTC up to mkt)													
	0													
	Line 5 Total													
	Line 6 Generation Fuel													
	Palomar													
	Desert Star													
	Miramar													
	Miramar 2													
	Cuyamaca													
	Line 6 Total													
	In Lieu Gas Fees													
	Palomar													
	Otay Mesa Energy Center													
	Miramar													
	Miramar 2													
	Cuyamaca													
	Total In Lieu Franchise Fees													
	Line 8 Hedging Costs (inc. Broker Fees)													
	Hedging Costs													
	Broker Fees													
	Line 8 Total													
	Market Purchases and Sales													
	Total Sales Revenue													
	Net Short													
	LGBA Expenses													
	Escondido Energy Center cost													
	Escondido Energy Center ISO revenue													
	Total LGBA Expense													**$ 6,865,258**

Attachment B

ATTACHMENT B - SDG&E 2015 GENERATION PORTFOLIO DELIVERY VOLUMES													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2015
CTC QF													
Non-CTC QF													
TOTAL QF													
Renewable - Bio Gas	11.2	10.1	11.0	10.9	11.1	10.8	12.3	12.4	12.2	11.2	10.9	11.1	135.0
Renewable - Bio Mass	4.1	3.3	4.3	3.3	4.2	4.1	7.2	8.2	7.9	4.4	4.1	3.8	58.9
Renewable - Geothermal	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable - Other	1.4	1.3	1.3	1.4	1.4	1.3	2.6	2.5	2.7	1.4	1.5	1.3	20.1
Renewable - Solar	147.8	165.7	253.2	265.0	298.7	295.6	274.0	264.3	238.8	200.7	163.7	152.3	2,719.7
Renewable - Wind	194.4	152.5	218.0	200.2	143.9	148.3	113.8	104.1	150.2	165.6	188.2	215.6	1,994.7
Renewable - Wind REC	55.9	49.5	49.4	48.8	47.1	43.4	32.4	28.0	35.0	44.5	52.6	58.7	545.3
Renewable - RPS Sales	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(51.3)	(615.0)
TOTAL NON-QF RENEWABLE	**363.4**	**331.1**	**485.9**	**478.4**	**455.1**	**452.2**	**391.0**	**368.2**	**395.5**	**376.5**	**369.7**	**391.6**	**4,858.7**
Miramar													
Miramar 2													
Cuyamaca													
Palomar													
Otay Mesa Energy Center													
Desert Star													
Celerity													
Kelco													
Lake Hodges													
Morgan Stanley													
El Cajon Energy Center													
Orange Grove													
Escondido Energy Center													
RPS Sales Residual Generation	51.3	51.3	51.3	51.3	51.3	51.3	51.3	51.3	51.3	51.3	51.3	51.3	615.0
TOTAL GENERATION													
Economic RNS - On Peak													
Economic RNS - Off Peak													
TOTAL MARKET PURCHASE													
TOTAL PORTFOLIO DELIVERIES													
Surplus Energy Sold													
LOAD REQUIREMENT (GWh)													

Note 1: Total URG Deliveries do not include Wind REC

Note 2: Load Requirement is SDG&E bundled load including transmission losses

Attachment C

ATTACHMENT C - SDG&E 2015 CTC QUALIFYING FACILITY (QF) DETAIL													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2015
CTC QF - Dispatchable (GWh)													
Goal Line QF	[redacted]												
Yuma Cogen Associates QF													
CTC QF - SRAC Priced (GWh)													
Naval Station QF	[redacted]												
North Island QF													
Navy Training Center QF													
Navy Training Center QF - Steam Turbine													
Aggregation of Hydro Units (SO1)													
Badger Filteration Plant													
Subtotal													
ERRA Expenses ($000)													
CTC QF	[redacted]												
(to Line 5 of Attachment A)													
TCBA Expenses ($000)													
CTC QF	[redacted]												$ 16,037.8
Total TCBA Expense													**$ 16,037.8**

Attachment D

ATTACHMENT D - SDG&E 2015 RENEWABLE RESOURCE DETAIL

Power Purchase Deliveries (GWh)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2015
BIO GAS													
MM Prima Deshecha Energy LLC	3.3	3.1	3.1	3.4	3.2	3.3	3.7	3.8	3.7	3.3	3.3	3.3	40.3
MM San Diego LLC- Miramar Landfill	2.2	2.0	2.2	2.1	2.2	2.1	2.2	2.2	2.2	2.2	2.1	2.2	25.9
Otay Landfill 1	1.0	0.9	1.0	1.0	0.9	1.0	1.1	1.2	1.2	1.0	1.0	1.0	12.2
Otay Landfill 2	1.0	0.9	1.0	0.9	1.0	0.9	1.2	1.2	1.2	1.0	1.0	1.0	12.4
Otay Landfill 3	2.0	1.8	2.1	1.9	2.1	1.9	2.2	2.0	2.2	2.0	2.0	2.0	24.0
San Marcos Landfill	0.9	0.9	1.0	0.9	0.9	0.9	1.0	1.0	1.0	1.0	0.9	1.0	11.3
Sycamore Landfill	0.7	0.6	0.7	0.7	0.7	0.7	0.9	0.9	0.8	0.8	0.7	0.7	8.9
Subtotal	**11.2**	**10.1**	**11.0**	**10.9**	**11.1**	**10.8**	**12.3**	**12.4**	**12.2**	**11.2**	**10.9**	**11.1**	**135.0**
BIO MASS													
Blue Lake	4.1	3.3	4.3	3.3	4.2	4.1	7.2	8.2	7.9	4.4	4.1	3.8	58.9
Subtotal	**4.1**	**3.3**	**4.3**	**3.3**	**4.2**	**4.1**	**7.2**	**8.2**	**7.9**	**4.4**	**4.1**	**3.8**	**58.9**
OTHER													
Rancho Penasquitos	1.4	1.3	1.3	1.4	1.4	1.3	2.6	2.5	2.7	1.4	1.5	1.3	20.1
Subtotal	**1.4**	**1.3**	**1.3**	**1.4**	**1.4**	**1.3**	**2.6**	**2.5**	**2.7**	**1.4**	**1.5**	**1.3**	**20.1**
SOLAR													
NLP Valley Center Solar	-	-	-	-	-	-	-	1.8	1.5	1.1	1.0	0.9	6.2
NRG Borrego Solar	4.6	4.8	6.5	7.1	7.9	7.5	6.7	6.6	6.1	6.3	5.1	4.6	73.8
Sol Orchard	1.9	1.8	2.5	2.6	2.7	2.6	2.6	2.6	2.3	2.2	2.0	1.8	27.6
Arlington Valley Solar	18.4	20.4	32.0	34.2	36.9	37.4	33.7	31.2	28.2	24.0	18.3	17.0	331.7
Calipatria Solar	-	-	-	2.7	2.7	2.7	2.5	2.1	2.1	1.8	1.1	1.3	18.8
Campo Verde	19.3	21.3	33.5	35.9	38.6	39.2	35.3	32.7	29.6	25.1	19.2	17.8	347.4
Catalina_Solar	13.2	15.9	24.8	23.4	28.2	27.7	26.4	26.0	23.1	17.3	14.9	13.4	254.2
Centinela Solar1	22.2	23.0	31.1	34.2	37.8	35.9	32.2	31.9	29.5	30.2	24.5	22.3	354.6
Centinela Solar2	5.8	5.6	7.8	8.0	8.4	8.1	8.0	7.9	7.2	7.0	6.2	5.7	85.8
Desert Green	0.6	0.6	0.9	1.1	1.2	1.2	1.1	1.0	0.8	0.7	0.6	0.5	10.1
LanEast	-	-	-	-	-	-	-	-	-	-	-	0.1	0.1
Rugged Solar	-	-	-	-	-	-	-	-	-	-	-	0.5	0.5
Tierra Del Sol	-	-	-	-	-	-	-	-	-	-	-	0.3	0.3
LanWest	-	-	-	-	-	-	-	-	-	-	-	0.0	0.0
Imperial Valley Solar I	23.9	28.9	45.0	42.6	51.3	50.3	48.0	47.2	42.0	31.4	27.1	24.4	462.2
Maricopa West Solar	-	0.1	2.1	2.8	3.4	3.5	3.5	3.2	2.8	2.4	1.6	1.2	26.6
TallBear Seville	-	-	-	2.7	2.8	2.7	2.7	2.7	2.4	2.1	1.8	1.8	21.7
SolarGen 2	18.9	20.8	32.8	35.0	37.7	38.3	34.5	32.0	28.9	24.5	18.7	17.4	339.6
Brownfield	-	-	-	-	-	-	-	-	-	-	0.1	0.8	0.8
Cascade SunEdison	3.3	3.5	4.6	4.7	5.4	5.7	5.3	4.7	4.8	4.2	3.8	3.6	53.6
Victorville Landfill Solar	-	-	-	-	-	-	-	-	-	-	-	0.9	0.9
Csolar IV South	15.6	18.8	29.3	27.7	33.4	32.7	31.2	30.7	27.3	20.4	17.6	15.9	300.4
VictorMesa/Western Antelope	0.2	0.2	0.3	0.3	0.3	0.3	0.3	0.3	0.2	0.2	0.2	0.2	2.9
Subtotal	**147.8**	**165.7**	**253.2**	**265.0**	**298.7**	**295.6**	**274.0**	**264.3**	**238.8**	**200.7**	**163.7**	**152.3**	**2,719.7**
WIND													
Glacier Wind (TREC)	55.9	49.5	49.4	48.8	47.1	43.4	32.4	28.0	35.0	44.5	52.6	58.7	545.3
Kumeyaay	15.5	13.2	15.3	13.1	15.7	11.1	7.7	5.3	5.7	10.9	10.7	13.3	137.4
Coram Energy	1.1	1.2	2.1	2.5	3.1	3.0	2.6	1.9	1.7	1.8	1.4	1.4	23.7
Energia Sierra Juarez	-	-	-	-	1.3	22.5	14.2	15.2	23.1	41.5	29.2	43.4	190.4
Iberdrola Renewables	9.8	7.4	10.4	9.4	5.6	5.1	3.4	3.1	5.2	5.7	7.8	8.5	81.2
Manzana Wind	29.9	21.5	29.8	29.1	16.1	14.1	13.7	12.3	20.8	17.4	23.2	25.1	253.1
Oak Creek Wind Power	0.2	0.3	0.8	0.7	0.7	0.9	0.9	0.7	0.5	0.5	0.4	0.3	6.9
Oasis Power Partners	5.3	8.2	12.6	14.1	16.9	16.3	11.9	12.7	9.4	6.1	7.9	5.0	126.4
Ocotillo Express	93.4	70.3	99.6	89.9	53.8	48.3	32.7	29.4	49.5	54.2	74.3	81.1	776.4
Pacific Wind	38.4	27.5	40.8	34.4	22.6	18.2	19.1	17.3	29.1	22.9	29.4	33.9	333.3
San Gorgonio	-	1.5	3.0	4.0	4.5	4.5	3.5	3.2	2.8	2.5	1.4	0.9	32.0
Tehachapi Wind	-	-	-	-	-	-	-	-	-	-	0.6	1.1	1.7
WTE/FPL Acquisition	1.0	1.5	3.6	3.1	3.4	4.4	4.1	3.1	2.5	2.3	1.9	1.4	32.3
Subtotal	**250.2**	**202.0**	**267.4**	**249.0**	**190.9**	**191.7**	**146.2**	**132.1**	**185.2**	**210.1**	**240.8**	**274.3**	**2,540.0**
RPS SALES													
Noble America Energy Solutions LLC II	(17)	(17)	(17)	(17)	(17)	(17)	(17)	(17)	(17)	(17)	(17)	(17)	(200.0)
Pilot Power Group	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)	(115.0)
Exelon II	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(25.0)	(300.0)
Subtotal	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(51.3)**	**(615.0)**
Total Power Purchase Costs ($000)													
BIO GAS	$ 870	$ 784	$ 864	$ 838	$ 859	$ 833	$ 949	$ 959	$ 935	$ 867	$ 839	$ 864	10,459.0
BIO MASS	$ 408	$ 330	$ 427	$ 334	$ 424	$ 408	$ 724	$ 818	$ 792	$ 436	$ 409	$ 382	5,891.6
OTHER	$ 77	$ 68	$ 69	$ 77	$ 74	$ 71	$ 137	$ 135	$ 145	$ 77	$ 79	$ 72	1,079.9
SOLAR	$ 18,808	$ 21,067	$ 31,998	$ 33,234	$ 37,502	$ 37,038	$ 34,328	$ 33,121	$ 29,910	$ 25,223	$ 20,622	$ 19,094	341,944.6
WIND	$ 18,784	$ 14,369	$ 20,593	$ 18,747	$ 12,712	$ 13,412	$ 10,373	$ 9,526	$ 14,504	$ 15,997	$ 18,204	$ 21,121	188,343.1
WIND (REC)	$ 1,424	$ 1,261	$ 1,258	$ 1,243	$ 1,200	$ 1,106	$ 825	$ 713	$ 892	$ 1,133	$ 1,341	$ 1,496	13,891.9
RPS SALES	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	$ (1,162)	(13,940.0)
Subtotal	**$ 39,208**	**$ 36,717**	**$ 54,046**	**$ 53,311**	**$ 51,608**	**$ 51,707**	**$ 46,175**	**$ 44,112**	**$ 46,016**	**$ 42,571**	**$ 40,333**	**$ 41,866**	**547,670.1**

BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION
OF BENJAMIN A. MONTOYA

A.14-04-XXX
Application of San Diego Gas & Electric Company (U 902-E)
for Adoption of its 2015 Energy Resource Recovery Account Revenue Requirement,
Competition Transition Charge Revenue Requirement, and Local Generation Balancing Account
Revenue Requirement Forecasts

I, Benjamin A. Montoya, declare as follows:

1. I am a Principal Resource Planner for San Diego Gas & Electric Company ("SDG&E"). I included my Prepared Direct Testimony ("Testimony") in support of SDG&E's April 15, 2014 Application for Adoption of its 2015 Energy Resource Recovery Account ("ERRA"), Competition Transition Charge ("CTC"), and Local Generation Balancing Account ("LGBA") revenue requirement forecasts. Additionally, as a Principal Resource Planner, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information ("Protected Information") in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix ("Matrix") attached to the Commission's Decision ("D.") 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and

- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.[1] As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

Confidential Information	**Matrix Reference**	**Reason for Confidentiality and Timing**
BAM-2 lines 14-16	V.C	LSE Total Energy Forecast – Bundled Customer; confidential for the front three years
BAM-3 lines 8-9	IV.B	Forecast of Qualifying Facility Generation; confidential for three years
BAM-4 lines 16-21	IV.A	Forecast of IOU Generation Resources; confidential for three years
BAM-5 lines 12-19	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years
BAM-6 line 1	VI.A	Utility Bundled Net Open Position for Capacity; confidential for the front three years
BAM-6 lines 9-10	IV.J	Forecast of Wholesale Market Purchases; confidential for the front three years
BAM-7 lines 12 and 14	II.A.2, V.C	Utility Electric Price Forecasts; confidential for three years, LSE Total Energy Forecast, confidential for the front three years
BAM-7 line 20	II.A.2, II.B.1, II.B.3, II.B.4	Utility Electric Price Forecasts; confidential for three years, Generation Cost Forecasts of Utility Retained Generation, confidential for three years, Generation Cost Forecasts of QF Contracts, confidential for three years, Generation Cost Forecasts of Non-QF Bilateral Contracts, confidential for three years
BAM-8 line 2	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
BAM-8 line 18 and BAM-9 line 2	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years
BAM-10 lines 3, 5-7	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years

[1] In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-C. Accordingly, SDG&E seeks confidential treatment of this data under those provisions, as applicable.

BAM-10 lines 13 and 15	II.A.2	Utility Electric Price Forecasts; confidential for three years
BAM-10 line 22	I.A.4	Long-term Fuel (gas) Buying and Hedging; confidential for three years
Attachment A - SDG&E 2012 ERRA Expenses	XI	Monthly Procurement Costs; confidential for three years
Attachment B - SDG&E 2012 URG Delivery Volumes		
• Cuyamaca,Palomar, Desert Star, and Miramar data	IV.A	Forecast of IOU Generation Resources; confidential for three years
	IV.E	Forecast of Pre-1/1/2003 Bilateral Contracts; confidential for three years
• QF data	IV.B	Forecast of Qualifying Facility Generation; confidential for three years
• Otay Mesa, Celerity, Kelco, Lake Hodges, Wellhead, and Orange Grove data	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years
• Market Purchase data	IV.J	Forecast of Wholesale Market Purchases; confidential for the front three years
• Surplus Energy Sold data	IV.K	Forecast of Wholesale Market Sales; confidential for the front three years
Load Requirement data	V.C	LSE Total Energy Forecast – Bundled Customer; confidential for the front three years
Attachment C - SDG&E 2012 Long-Term Power Purchase, CTC and Qualifying Facility Detail		
	IV.E	Forecast of Pre-1/1/2003 Bilateral Contracts; confidential for three years
• QF data	IV.B	Forecast of Qualifying Facility Generation; confidential for three years
• Long-Term Power Purchase CTC data	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
• CTC QF & Non CTC QF data	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years
• TCBA Expenses data	II.B.3 and	Generation Cost Forecast of QF Contracts; confidential for three years
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years

4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. SDG&E will comply with the limitations on confidentiality specified in the Matrix for the Protected Information.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized, masked or otherwise protected in a manner that would allow further disclosure of the data while still protecting confidential information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 15th day of April, 2014, at San Diego, California.

Benjamin A. Montoya
Principal Resource Planner
San Diego Gas & Electric Company