

PUBLIC VERSION

Application No.: A.15-06-
Exhibit No.: _____
Witness: Sally Chen
Date: June 1, 2015

SAN DIEGO GAS & ELECTRIC COMPANY
PREPARED DIRECT TESTIMONY OF
SALLY CHEN

****REDACTED AND PUBLIC VERSION****

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

June 1, 2015



PUBLIC VERSION

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1 As described in Section III of Ms. Phan’s testimony, the purpose of the TCBA is to
2 accrue all Competition Transition Charge (“CTC”) eligible revenues and recover all Qualifying
3 Facility (“QF”) generation-costs above a calculated market benchmark. The TCBA was
4 authorized by D.02-12-074 and D.02-11-022.

5 Also described in Section IV of Ms. Phan’s testimony, the purpose of the LGBA is to
6 record the revenues and costs of generating contracts where the Commission has determined that
7 the resource is subject to a cost allocation mechanism. In the record period, the only contract
8 included in SDG&E’s LGBA was the Escondido Energy Center (“EEC”). The LGBA was
9 authorized by D.13-03-029 and established in Advice Letter (“AL”) 2499-E with an effective
10 date of July 31, 2013.

11 **A. CTC Contract Costs**

12 In accordance with D.02-12-074, this category captured expenses recorded in ERRA up
13 to the market benchmark value of the QF PPAs. In D.11-12-018, the responsibility of
14 calculating the benchmark changed from the Energy Division to SDG&E. SDG&E calculated a
15 benchmark of \$53.69MWh in 2014. The residual expenses for QFs were calculated by
16 multiplying the purchased MWh by the effective market benchmark. This category also includes
17 indirect Green House Gas (“GHG”) costs associated with the PPAs. Any expenses above the
18 benchmark were recorded in the TCBA pursuant to Assembly Bill (“AB”) 1890. The 2014
19 activity in SDG&E’s TCBA is described in more detail in Attachment B of the testimony of
20 SDG&E witness Jenny Phan.

21 **B. Contract Costs (non-CTC)**

22 This category captured the expenses for renewable PPAs, SDG&E tolling agreements and
23 other bilateral contracts. The costs include capacity, energy, fuel, transportation costs, and

1 indirect GHG cost associated with the PPAs. Also included in this category are revenues and
2 expenses for real-time bilateral purchases and sales, contract-related California Independent
3 System Operator (“CAISO”) revenue or payment adjustments, any revenues for contract
4 damages or awards, broker fees, and other miscellaneous service fees. The 2014 activity in
5 SDG&E’s LGBA is described in more detail in Attachment C of the testimony of SDG&E
6 witness Jenny Phan.

7 **C. Generation Fuel**

8 In accordance with Commission Resolutions E-3953 and E-3988, D.09-01-008, and
9 D.07-11-046, the monthly recorded fuel and transportation expenses for the following facilities
10 were recorded in ERRA: Miramar Energy Facility I (“MEF I”), Miramar Energy Facility II
11 (“MEF II”) (collectively, MEF I and II are known as “Miramar”), Palomar Energy Center
12 (“Palomar”), Cuyamaca Peak Energy Center (“Cuyamaca”), Desert Star Energy Center (“Desert
13 Star”) and the J&D Labs Fuel Cell (“Vista”).

14 **D. Other CAISO Related Costs**

15 Included in this category are revenues and charges associated with transmission losses,
16 and ancillary services. This also includes SDG&E’s share of imbalance charges and grid
17 management charges.

18 **E. Load CAISO Charges**

19 This category includes the CAISO payments and charges to SDG&E as the Scheduling
20 Coordinator (“SC”) for load, SDG&E’s load Grid Management Charges (“GMC”), Day-Ahead
21 and Real-Time Market load activities, and load imbalance energy.

1 **F. Supply CAISO Revenues**

2 This category captures the CAISO payments and charges to SDG&E as the SC for its
3 supply resources, including inter-SC trades, Day-Ahead and Real-Time Market activities, and
4 their imbalance energy charges and revenues.

5 **G. Hedging Costs & Financial Transactions**

6 This expense category captures the monthly expenses for hedging generation fuel and
7 commissions and other bank fees.

8 **H. Western Renewable Energy Generation Information (“WREGIS”) Costs**

9 This category reflects costs relating to participation in the Renewable Energy
10 Certificate(“REC”) management program administered by WREGIS.

11 **I. Congestion Revenue Rights CAISO Costs**

12 This category includes costs and revenues relating to Congestion Revenue Rights activity
13 charged to SDG&E by the CAISO.

14 **J. CAISO Convergence Bidding Costs**

15 This category includes revenues and costs related to convergence bidding as authorized in
16 D.10-12-034.

17 **K. Rebalancing Costs related to Otay Mesa Energy Center (“OMEC”)/Calpine**

18 SDG&E recorded the monthly rebalancing costs associated with the Revised OMEC
19 power purchase agreement in compliance with D.06-09-021.¹

¹ See also, D.11-07-041, Ordering Paragraph (“OP”) 2.

1 **L. GHG and Carrying Costs**

2 This category includes costs related to GHG procurement costs for SDG&E’s GHG
3 compliance instrument transactions as required under the California cap-and-trade program
4 pursuant to Assembly Bill 32.

5 **III. CONTRACT ADMINISTRATION IN GENERAL**

6 The Settlements and Administration (“SA”) section within SDG&E’s Electric & Fuel
7 Procurement (“E&FP”) department is responsible for administering all of the in PPAs and
8 generation fuel agreements. During the record period, SDG&E’s electricity portfolio consisted
9 of Utility Owned Generation (“UOG”) and bilateral contracts with conventional and renewable
10 power plants. The UOG portion of the portfolio is comprised of SDG&E’s 100% ownership of
11 the Miramar Energy Facilities (96 MW), 100% ownership of the Cuyamaca Energy Center (47
12 MW), 100% ownership of the Palomar Energy Center (560 MW), and 100% ownership of the
13 Desert Star Energy Center (485 MW). At the end of year 2014, SDG&E’s bilateral agreements
14 included 11 QFs (totaling 247 MW), OMEC (598 MW), El Cajon Energy Center (“ECEC”) (47
15 MW), EEC (48 MW), Orange Grove Energy (“OGE”) (96 MW), EnerNoc (25 MW), Lake
16 Hodges Pump Storage Facility (“Hodges”) (40 MW) and 45 renewable projects of wind, biogas,
17 biomass, geothermal and solar (2,265.9 MW).

18 Below are the tasks SA performs on a routine basis to ensure compliance with contract
19 terms and regulatory requirements.

20 **A. Kick-Off Meetings**

21 Before a new project reaches its Commercial Operating Date (“COD”), SA conducts a
22 kick-off meeting with the new counterparty to introduce staff, review the scheduling

1 communication protocols, and discuss the invoicing and settlement procedures. The purpose of
2 the meeting is to ensure a smooth transition from construction phase to operation.

3 **B. Invoice Verification**

4 For all non-QF contracts, the Sellers issue monthly invoices to SDG&E. Based on
5 contract terms, and the daily communication records, the SA staff verifies the details of the
6 invoices, including, but not limited to: prices and quantity of energy delivered or scheduled,
7 verification of excused outages, prices of capacity, time of delivery factors, index prices, number
8 of startups, and validity of any adjustments in the invoice. The SA staff follows the complete
9 payment process to verify it is done in a timely manner according to the contract.

10 If there are any disputes over the historical settlements, the SA staff is responsible for
11 coordinating, investigating, and making corrections if necessary in a timely manner in
12 accordance with terms and conditions of the contract and applicable utility and CAISO tariffs.

13 **C. WREGIS Administration**

14 Starting in 2007, as part of the Renewable Portfolio Standard (“RPS”) compliance effort,
15 the California Energy Commission (“CEC”), Western Governors’ Association and Western
16 Electricity Coordinating Council (“WECC”) jointly launched implementation of WREGIS,
17 which tracks renewable energy generation from units that register in the system using verifiable
18 data and creates RECs for this generation. In 2008, SDG&E became an account holder and
19 qualified reporting entity within WREGIS, and worked with the renewable counterparties to
20 register each facility into the system. SDG&E began reporting renewable generation from these
21 facilities through WREGIS starting on May 1, 2008. During the record period, SA staff
22 diligently monitored and administrated the accounts.

1 **D. Active Monitoring**

2 Most of the PPAs require Contract Administrators to monitor and track generation to
3 ensure Seller’s compliance with the contract terms through the life of the contracts. It includes,
4 but is not limited to: generation, insurance, credit requirements and status, and compliance with
5 regulatory and reporting requirements. The Contract Administrators work closely with the Seller
6 when any contractual issues arise to immediately address any needs they may have from SDG&E
7 regarding the PPAs.

8 Particularly for the renewable contracts, D.10-06-004 mandated SDG&E to actively
9 monitor the Seller’s compliance with Standard Terms and Conditions 6 (“STC 6”), as defined in
10 the P.U. Code.² SDG&E implements the following method of active monitoring:

- 11 (i) request the Seller copy of CEC certification;
- 12 (ii) request the Seller to register the contracted facility with WREGIS;
- 13 (iii) verify the Seller-provided CEC RPS ID through the WREGIS
14 certificates and upload periodically; and
- 15 (iv) request the Seller to certify the product SDG&E received during the
16 record period was indeed in compliance with STC 6.

17 For the record period, as a result of its active monitoring, SDG&E found all RPS Sellers’
18 projects compliant to STC 6 based on above activities (i), (ii) and (iii). All Sellers responded to
19 SDG&E’s questionnaire at year end according to (iv) above, confirming their compliance.

² STC 6 requires the Sellers to warrant throughout the term of the PPA that (i) the Project qualifies and is certified by the CEC as an Eligible Renewable Energy Resource (“ERR”) as such term is defined in the P.U. Code Section 399.12 or Section 399.16; and (ii) the Project’s output delivered to Buyer qualifies under the requirements of the California RPS. To the extent a change in law occurs after execution of this agreement that causes this representation and warranty to be materially false or misleading, it shall not be an Event of Default if Seller has used commercially reasonable efforts to comply with such change in the law.

1 **E. Contract System Administration**

2 During the record period, SDG&E used Allegro, its primary electronic contract
3 management trading and tracking system, in the front, mid and back office of E&FP. Allegro
4 offers repository features for SA contract administration, with flexibility to research the contract
5 information. It also creates an audit trail when changes are made to contracts in the system.

6 **F. Contract Administration Training**

7 During the Record Period, contract administrators received all affiliate and market
8 compliance training provided by the Human Resources department, in addition to the following
9 training classes to improve their administration skills:

- 10 ○ WREGIS Platform Upgrade Training Webinar
- 11 ○ EZHub 101 Training
- 12 ○ New Outage Management Training
- 13 ○ 2014 Sarbanes – Oxley Compliance

14 **G. Contract Administration Performance Incentives**

15 Currently, no specific ERRA-related employee or management incentives exist to
16 encourage efficient and effective administration of contracts. However, other incentives,
17 including the following, encourage contract administrators to manage the contracts in a manner
18 that is compliance driven:

- 19 • Each Contract Administrator is aware of the fact that the administration of
20 contracts is reviewed annually in the ERRA Compliance Filing.
- 21 • Each Contract Administrator has an annual performance review. During these
22 reviews, each person’s performance is critiqued and areas requiring improvement
23 are identified and documented as a future goal. One of the performance criteria is

1 based on the efficient and effective administration of contracts. Annual
2 performance reviews impact annual compensation levels for each administrator.

3 **H. List of Contracts in SDG&E's Portfolio**

4 SDG&E's Table 1 in the Attachment of this testimony lists all the contracts that were in
5 effect and their delivery amounts during the record period. The list identifies all of the electric
6 procurement contracts (including purchased power and capacity) in effect or otherwise acted
7 upon during the Record Period.

8 **I. Non-QF Contract Types**

9 There are generally three Non-QF contract types in SDG&E's portfolio that include,
10 among other benefits, the purchase or sale of as-available capacity and energy, RECs and
11 resource adequacy benefits. Below is a list and definitions of those contracts:

- 12 • *Renewable Contracts:* Power purchase and sale contracts with power suppliers
13 whose generation fuel (wind, solar, geothermal etc.) are certified as renewable.
14 This type includes both bilateral agreements and standard agreements.
- 15 • *Bilateral Contracts:* Contracts that were not originated from a Request for Offer
16 ("RFO") and are not tariff or regulatory mandated contracts. The Buyer and
17 Seller negotiate the contracts and are bound by the provisions. Contracts may be
18 for the purchase of energy and/or capacity, and may be firm or dispatchable.
- 19 • *Tolling Agreements:* Agreements where SDG&E purchases and transports fuel
20 (i.e. natural gas) to the power plants. Typically, SDG&E pays for capacity,
21 variable O&M, startup costs, etc., and economically bids the plant and available
22 ancillary services into the CAISO market.

1 Information of effective non-QF PPAs are included in Table 2 in the Attachment of this
2 testimony. Information of executed non-QF PPAs are listed in Table 4 in the Attachment.

3 **J. Non-QF Contracts & Terminations**

4 Table 3 in the Attachment of this testimony, SDG&E summarizes all its non-QF contracts
5 which expired or terminated during the record period, and their relevant termination information.

6 **K. Contract Amendments, Modifications and Letter Agreements**

7 During the record period, SDG&E modified and amended several contracts. Some
8 contract modifications were material in nature and required Commission approval, whereas,
9 some other modifications were not. Tables 5 & 6 in the Attachment of this testimony summarize
10 changes and modifications to contracts during the record period:

- 11
 - Table 5: SDG&E lists all non-QF electric power, energy, or ancillary services
12 amendments, modifications and/or letters agreements executed during the record
13 period.
- 14
 - Table 6: SDG&E lists all non-QF amendments, modifications, renegotiations,
15 and/or letter agreements executed during the record period that were submitted for
16 review through the ERRA application.

17 **L. Contract Administration of Fuel Procurement Contracts**

18 During the record period, SDG&E had procurement fuel service contracts in effect or
19 under negotiation, initiation, revision, amendment, or termination. SDG&E listed these fuel
20 contracts in Table 7 in the Attachment of this testimony, identifying all fuel services contracts in
21 effect or otherwise acted upon during the Record Period, the execution date of each, the status of
22 the contract as of the end of the record period, and the effective dates of and reasons for any

1 actions taken during the record period. The prices and volumes are not applicable to these
2 contracts.

3 **M. Maximum Disallowance for Standard of Conduct 4 Violations**

4 In D.02-12-074 (mimeo, page 55) of R.01-10-024, the Commission sets “each utility’s
5 maximum disallowance risk equal to two times their annual administrative expenses for all
6 procurement functions, including those related to DWR contract administration, utility-retained
7 generation, renewables, QFs, demand-side resources, and any other procurement resources.”

8 This disallowance cap was established in Ordering Paragraph 25 of D.02-12-074, and modified
9 by Ordering Paragraph 3.a. of D.03-06-067(R.01-10-024). The record period falls under the
10 2012 GRC period which is effective from 2012 through 2015.³

11 In the table below, SDG&E provides the General Rate Case (“GRC”) authorized costs,
12 reflecting a breakdown by three major categories: Long-Term Procurement, Trading &
13 Scheduling, and Middle and Back Office. More information about these categories can be found
14 in the direct testimony of SDG&E witness Sue Garcia within the 2012 GRC proceeding (A.10-
15 12-005), pages SEG-8 through SEG-18 for a description of the activities that fall within LTPP,
16 Trading and Scheduling, and Middle and Back Office. In D. 13-05-010, Finding of Fact
17 (“FOF”) 463, and described on pages 1010-1011 of the decision, the Commission adopted the
18 ORA attrition mechanism proposal which applies escalation only to the total authorized 2012
19 margin instead of to the line item costs in the 2012 test year revenue requirement. In other
20 words, there is no line item escalation, but rather, a single attrition award in the form of a single
21 revenue increase. Given this mechanism, SDG&E is unable to provide a 2014 authorized cost

³ SDG&E provides this information on a hypothetical basis as it is typically requested by the Office of Ratepayer Advocates (“ORA”). However, no facts have been alleged suggesting a SOC 4 violation during 2014.

1 for the individual line item Long-Term procurement, Trading & Scheduling, and Middle and
 2 Back Office. However, the 2012 authorized costs can be used as a proxy for 2014, by using the
 3 authorized post-test-year margin escalation ratio of 2.65% in 2013 and 2.75%⁴ in 2014 to each of
 4 the 3 line items, as shown below.

#	Administration Expenses for all Procurement Functions	SDG&E's Authorized Revenue Requirement for Procurement Expenses (2012\$)			SDG&E's Authorized Revenue Requirement for Procurement Expenses (2014\$)		
		Labor	Non-Labor	Total	Labor	Non-Labor	Total
1	Long Term Procurement	2.009	0.136	2.145	2.119	0.143	2.262
2	Trading and Scheduling	2.419	0.682	3.101	2.552	0.719	3.271
3	Middle and Back Office	2.542	0.889	3.431	2.681	0.938	3.619
4	Total	6.970	1.707	8.677	7.351	1.800	9.152

5 **IV. CONTRACT PORTFOLIO AND ADMINISTRATION**

6 This section lists each of the executed contracts in SDG&E’s portfolio by technology
 7 type and provides a brief description of the contract or project status. SDG&E also describes any
 8 issues that may have occurred in the reporting period.

9 **A. Renewable Resources**

10 SDG&E’s renewable portfolio is comprised of resources from PPAs stemming from
 11 competitive solicitations, bilateral agreements, and standard agreements.

12 A description of renewable resource projects that were delivered to SDG&E during the
 13 record period, arranged by technology type, is provided below along with discussions of
 14 activities unique to each project agreement.

15 **1. BIO-MASS**

16 SDG&E has two (2) projects supplying 60.5 MW of generation from biomass projects in
 17 addition to a REC agreement. The agreements are with:

⁴ The escalation rates are stipulated in Section 27.3.3 on page 1011 in D.13-05-010.

1 o *Covanta Delano*: This is a ten-year PPA executed on January 1, 2008
2 and originally terminates on December 31, 2017. The plant size is
3 49.5 MW and is located in Delano, California. The plant reached
4 Commercial Online Date (“COD”) on January 1, 2008. The annual
5 expected deliveries are 364,854 MWh. On December 1, 2012, an
6 Amendment 1 to the PPA had the following changes, [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED].

15 o *Blue Lake Power* (“aka BLP”): This fifteen-year PPA was executed
16 on June 9, 2008 and reached COD on April 30, 2010. The contract
17 price is \$100.00/MWh. The plant size is 11 MW and is located in the
18 City of Blue Lake, California.

19 **2. BIO-GAS & DIGESTER GAS**

20 SDG&E has agreements with eleven (11) projects supplying approximately 29.2 MW of
21 generation from bio-gas projects during the record period. Eight (8) of the ten projects are
22 located in San Diego County. The agreements are with:

- 1 • *Minnesota Methane San Diego LLC (“MM San Diego”)*:
 - 2 ○ *The MM San Diego – (“Miramar”)* The ten-year Renewable Auction
 - 3 Mechanism (“RAM”) PPA was executed on November 9, 2012. The plant
 - 4 reached COD on May 20, 2013. The price during the Record Period was
 - 5 [REDACTED]. The project’s annual expected deliveries to SDG&E is 17,282
 - 6 MWh. The project size is 4.5 MW and is located in San Diego, California.
 - 7 ○ *MM Prima Deshecha Energy LLC (“Prima”)*: The fifteen-year PPA was
 - 8 executed on September 6, 2005. This existing plant’s delivery term started on
 - 9 October 1, 2007. This facility is under a PPA with a term of fifteen years, and
 - 10 the price increases from \$48.50/MWh to \$68.53/MWh. The estimated annual
 - 11 delivery to SDG&E is 46,894 MWhs. In the record period, the price from
 - 12 January 1 through October 31 was \$56.25/MWh; and the price from
 - 13 November 1 to December 31 was \$57.65/MWh. The project size was 6.1
 - 14 MW during the record period and is located in Orange County, California.
- 15 • *City of San Diego (“Point Loma”)*: The PPA with SDG&E was executed on
- 16 December 21, 2006. This existing plant’s delivery term started on January 1, 2008.
- 17 The delivery of this PPA was through December 31, 2012 with an option by the
- 18 Seller to extend the delivery period by one year up to five times. The Seller exercised
- 19 its option to extend the agreement through the record period. The guaranteed annual
- 20 delivery to SDG&E is 10,000 MWh. The contract price is \$75.60/MWh for the
- 21 duration of the agreement. The total plant size is 4.8 MW with 3.60 MW of digester
- 22 gas. The plant is located in San Diego, California.

1 • *Otay 1, 2, 3, V and VI Landfills*

2 ○ *Otay 1 Landfill:* As authorized by D.08-09-033, Otay Landfill I executed a
3 Customer Renewable Energy (“CRE”) Feed-in-Tariff (“FIT”) Agreement on
4 May 1, 2009. This existing plant’s delivery term started May 1, 2009. The
5 ten-year PPA has a fixed price of \$100.43/MWh. The annual expected
6 deliveries to SDG&E is 13,140 MWh. The plant size is 1.5 MW and is
7 located in Chula Vista, California.

8 ○ *Otay 2 Landfill:* As authorized by D.08-09-033, Otay Landfill II executed a
9 CRE FIT Agreement with SDG&E on February 22, 2011. This plant’s
10 delivery term started on July 1, 2011. The twenty-year PPA has a fixed price
11 of \$100.98/MWh. The annual expected deliveries to SDG&E is 13,140
12 MWh. The plant size is 1.5 MW and is located in Chula Vista, California.

13 ○ *Otay Landfill 3:* This PPA was executed on August 31, 2005. The plant
14 reached COD on March 8, 2007. Otay 3 is expected to deliver to SDG&E
15 24,000 MWh each year. The contract price is \$57.00/MWh. The project size
16 is 3.75 MW and is located in Chula Vista, California.

17 ○ *Otay Landfill V:* Otay V executed a CRE FIT Agreement with SDG&E on
18 December 27, 2011. The term of the agreement is twenty years. The plant
19 reached COD on June 21, 2013. Otay V is expected deliver to SDG&E
20 12,483 MWhw annually. The energy price is \$108.98/MWh. The project size
21 is 1.5 MW and is located in Chula Vista, California.

22 ○ *Otay VI:* Otay VI executed a CRE FIT Agreement with SDG&E on
23 December 27, 2011. The term of the agreement is twenty years. The plant

1 reached COD on June 21, 2013. Otay V is expected to deliver to SDG&E
2 12,483 MWhs annually. The energy price is \$108.98/MWh. The project size
3 is 1.5 MW and is located in Chula Vista, California.

4 • *San Marcos and Sycamore Energy Landfills:*

- 5 ○ *San Marcos Energy, LLC:* San Marcos Energy executed a Customer
6 Renewable Credit (“CRE”) Feed-in-Tariff (“FIT”) Agreement with SDG&E
7 on November 20, 2009. This existing plant’s delivery term began May 18,
8 2011. The PPA has a 20-year term at price of \$117.30/MWh. The annual
9 expected delivery of 11,784 MWh. The plant size is 1.5 MW and is located in
10 San Marcos, California.
- 11 ○ *Sycamore Energy 1, LLC:* (“Sycamore 1”) executed a CRE FIT Agreement
12 with SDG&E on November 20, 2009. This existing plant’s delivery term
13 began on May 16, 2011. The 20-year PPA has a price of \$117.30/MWh. The
14 annual expected delivery is 11,784 MWh. The plant size is 1.5 MW and is
15 located in Santee, California.
- 16 ○ *Sycamore Energy 2, LLC:* Sycamore Energy 2 LLC is a ten-year Renewable
17 Market Adjusting Tariff (“ReMAT”) PPA executed on March 7, 2014. The
18 plant reached COD on March 30, 2014. The contract price is \$89.23/MWh.
19 The annual expected delivery is 13,403 MWh. The plant size is 2.25 MW and
20 is located in Santee, California.

21 **3. WIND**

22 SDG&E had thirteen (13) wind agreements that it administered during the record period.

23 The projects provided regular or test energy during the record period and provided a total

1 combined nameplate capacity up to 1,066.4 MW. Descriptions of the projects, the associated
2 agreements, and administration activities are provided below:

- 3 • *Coram Energy, LLC*: This is a fifteen-year PPA executed on July 12, 2010. The
4 plant reached COD on March 1, 2011. The PPA has a tiered pricing structure starting
5 at \$95.00/MWh and escalates to \$97.88/MWh. The annual expected delivery is
6 26,937 MWh. The project size is 7.5 MW and is located in the Tehachapi area of
7 California.
- 8 • *FPL Energy Green Power Wind, LLC (a.k.a. "WTE" and "FPL")*: This is a fifteen-
9 year PPA executed on October 31, 2002. The project reached COD on June 29, 2004.
10 The contract price is \$52.60/MWh. The annual expected delivery is 23,954 MWh.
11 The project size is 16.5 MW and is located in the Gorgonio Pass area of Riverside
12 County, California.
- 13 • *Iberdrola Renewables, LLC (previously known as Iberdrola Renewables, Inc., PPM*
14 *Energy, Inc., and PacifiCorp Power Marketing)*: Effective April 2, 2012, Iberdrola
15 Renewables, Inc. converted into a limited liability company. Iberdrola has three
16 projects under agreement with SDG&E.
 - 17 ○ *Mountain Wind*: This is a fifteen-year PPA executed on
18 October 31, 2002. The project reached COD on December 15, 2003. The
19 contract price is \$49.15/MWh. SDG&E and Iberdrola Renewables, LLC have
20 been transacting Inter SC Trades ("ISTs") under their Market Redesign and
21 Technology Upgrade ("MRTU") Agreement since April 2009. The annual
22 expected delivery is 76,609 MWh. This project size is 22.8 MW and is
23 located in the Palm Springs area of California.

1 MRTU Agreement since April 2009. The estimated annual output of 167,900 MWh.
2 The project size is 50 MW and is located on the Campo Indian Reservation in eastern
3 San Diego County, California.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

- 8 • *Naturener Glacier1*: This bilateral agreement was executed on May 16, 2008. This
9 is a fifteen-year PPA. The plant reached COD on December 3, 2008. The annual
10 estimated output is 325,000 MWh. The transaction is a combination of two products.
11 First, SDG&E buys the output, including green attributes. Second, Glacier I buys
12 back the output, excluding green attributes, at the same delivery point. The contract
13 prices for the products are \$89.00/MWh and \$68.00/MWh, respectively. The project
14 size 106.5 MW and is located in Ethridge, Montana.

- 15 • *Naturener Glacier 2*: This bilateral agreement was executed on May 23, 2008. This
16 is a fifteen-year PPA. The plant reached COD on October 16, 2009. The annual
17 estimated output is 310,000 MWh. The transaction is a combination of two products.
18 First, SDG&E buys the output, including green attributes. Second, Glacier 2 buys
19 back the output, excluding green attributes, at the same delivery point. On May 5,
20 2009, this PPA was amended, and the prices for the products are \$98.00/MWh and
21 \$68.00/MWh, respectively. The project size is 103.5 MW is located in Ethridge,
22 Montana.

- *Naturener Rim Rock*: This bilateral agreement was executed on May 5, 2009. This is a twenty-year PPA. The plant reached COD on October 15, 2013. The annual estimated output is 678,812 MWh. The transaction is a combination of two products, with the end result being that SDG&E acquires the green attributes from the project. First, SDG&E buys the output, including green attributes. Second, Rim Rock buys back the output excluding green attributes, at the same delivery point. On January 6, 2012, this PPA was amended, and the prices for the products are [REDACTED] and [REDACTED], respectively. The project size is 189 MW and is located in Toole and Glacier County, Montana.

In 2011, the Commission and Federal Energy Regulatory Commission (“FERC”) approved SDG&E’s estimated \$285 million tax equity investment in a wind farm project and its purchase of renewable energy credits from that project. SDG&E’s contractual obligations to both invest in the Rim Rock wind farm and to purchase renewable energy credits from the wind farm under the power purchase agreement are subject to the satisfaction of certain conditions which, if not achieved, would allow SDG&E to terminate the power purchase agreement and not make the investment. In December 2013, SDG&E received a closing notice from the project developer indicating that all such conditions had been met. SDG&E responded to the closing notice asserting that the contractual conditions had not been satisfied. On December 19, 2013, SDG&E filed a complaint against the project developer in San Diego Superior Court, asking that the court determine that SDG&E is entitled to terminate both the investment contract and the power purchase agreement due to the project developer’s failure to satisfy certain conditions. The project developer filed a separate complaint against SDG&E in Montana state court asking that court to determine that SDG&E breached the investment contract and the power purchase

1 agreement, and asking for several categories of relief, including requiring SDG&E to invest in
2 the project, requiring SDG&E to continue performing under the power purchase agreement, and
3 payment of damages. On January 27, 2014, the Montana court ordered SDG&E to continue
4 making payments under the power purchase agreement pending a hearing on the project
5 developer's preliminary injunction motion. On March 14, 2014, SDG&E notified the project
6 developer that the investment agreement expired by its own terms because a closing had not
7 occurred by that date. The project developer is disputing SDG&E's position. On March 28,
8 2014, SDG&E filed an amended complaint against the project developer in San Diego seeking
9 damages and declaratory relief that SDG&E was entitled to terminate the power purchase
10 agreement and to permit the investment agreement to expire. On April 25, 2014, the Montana
11 court granted the project developer's preliminary injunction motion to prevent SDG&E from
12 terminating the power purchase agreement on the grounds that the project developer would be
13 irreparably harmed if the payments were not made while the parties' respective rights were being
14 determined in the litigation. The court did not rule on the merits of the parties' claims. On July
15 18, 2014, the Montana Supreme Court determined that the parties' contractual agreement to
16 resolve any disputes in San Diego was mandatory, and ordered that the Montana action be
17 dismissed. The San Diego court has scheduled a trial for January 22, 2016.

- 18 • *Oak Creek Wind Power, LLC*: This bilateral agreement is a twenty-year PPA
19 executed on April 16, 2013. The contract price is [REDACTED]. The project reached
20 COD on January 25, 2014. The annual estimated output is 6,800 MWh. The project
21 size is 3.5 MW and is located in Imperial Valley, California.
- 22 • *Ocotillo Express, LLC*: This bilateral agreement is a twenty-year PPA executed on
23 February 1, 2011. The contract price is [REDACTED]. The Project reached COD on

1 July 30, 2013. The annual estimated output is 790,140 MWh. The project size is 265
2 MW and is located in Imperial Valley, California.

3 **4. HYDRO**

4 SDG&E had three non-QF hydro-conduit projects totaling 6.1 MW that delivered energy
5 during the record period:

- 6 • *San Diego County Water Authority (“SDCWA”) – Rancho Peñasquitos:* This PPA
7 was executed on November 20, 2003 for a term of ten years starting on January 23,
8 2007. The contract price is \$53.70/MWh. The plant size is 4.5 MW and is located in
9 San Diego, California.
- 10 • *Olivenhain Municipal Water District:* Olivenhain executed a Public Water and
11 Wastewater FIT Agreement on July 23, 2013 and began delivery on October 1, 2013.
12 The annual estimated output to SDG&E is 1,150 MWh. The project size is 0.45 MW,
13 and is located in Encinitas, California. The contract price is \$93.75/MWh.
- 14 • *City of San Diego (“Point Loma”):* This 1.156 MW hydro facility associated with a
15 digester gas plant described above.

16 **5. GEOTHERMAL**

17 SDG&E had one agreement of 13 MW that delivered energy during the record period,
18 which is described as follows:

- 19 • *Calpine Geysers:* This is a five-year geothermal PPA executed on February 26, 2010.
20 The annual estimated output is 212,430 MWh. The project began operating on March
21 2, 2010. The PPA provided firm capacity and energy at a contract price of
22 \$114.00/MWh. Effective March 22, 2013, SDG&E and Calpine Energy Services, LP
23 executed a Settlement Agreement and Mutual Release to the PPA to change the

1 contract capacity from 25 MW to 13 MW from fifteen separate geothermal power
2 plants in Calpine's portfolio located in Sonoma and Lake Counties, California from
3 January 1, 2014 through the end of the delivery term on December 31, 2014.

4 **6. SOLAR**

5 SDG&E had fifteen (15) solar agreements for a total of 1090.74 MW that delivered
6 energy during the record period. The agreement is as follows:

- 7 • *Arlington Valley Solar*: This is a twenty-five year PPA executed on June 3, 2011.

8 The project reached COD on November 5, 2013. The contract price is

9 [REDACTED]. The annual expected delivery is 270,000 MWh. The project size is
10 127 MW and is located in Arlington, Arizona.

- 11 • *Campo Verde Solar*: This is a twenty-year PPA executed on January 31, 2011. The

12 project reached COD on October 25, 2013. The contract price [REDACTED]

13 [REDACTED]. The annual expected
14 delivery is 276,000 MWh. The project size is 139 MW and is located in Imperial

15 Valley, California.

- 16 • *Cascade SunEdison Solar*: This bilateral agreement is a twenty-year PPA executed

17 on October 19, 2012. The project reached COD on December 24, 2013. The contract

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] The

21 annual estimated production is 55,219 MWh. The project size is 18.5 MW and is

22 located in Sun Fair, California.

- 1 • *Catalina Solar*: This is a twenty-five year PPA executed on June 3, 2011. The
2 project reached COD on November 27, 2013. The contract price [REDACTED]
3 [REDACTED]. The annual expected delivery
4 is 223,770 MWh. The project size is 109.44 MW and is located in Mojave Dessert in
5 Kern County, California.
- 6 • *Centinela Solar Energy*: SDG&E executed two PPAs:
- 7 ○ *Centinela Solar Energy 1*: This is a twenty-year PPA executed on May 10,
8 2010. The project began test energy deliveries on July 26, 2013 and reached
9 COD on August 1, 2014. The contract price [REDACTED]. The annual
10 expected delivery is 270,393 MWh. The project size is 125 MW and is
11 located in Calexico, Imperial County, California.
- 12 ○ *Centinela Solar Energy 2*: This expansion of the Centinela Solar plant is a
13 twenty-year PPA executed on July 29, 2010. The project reached COD on
14 August 15, 2014. The contract price [REDACTED]. The annual expected
15 delivery is 65,253/MWh. The project size is 45 MW and is located in
16 Calexico, Imperial County, California.
- 17 • *CSOLAR IV South*: This is a twenty-five year PPA executed on November 10, 2010.
18 The project began test deliveries on April 14, 2013 and reached COD on November 1,
19 2013. The contract price [REDACTED]. The annual expected delivery is 273,312
20 MWh. The project size is 130 MW and is located in Calexico, Imperial County,
21 California.
- 22 • *Desert Green Solar Farm*: This is a twenty-five year PPA executed on March 31,
23 2011. The project began test energy deliveries on November 22, 2014 and reached

1 COD on November 26, 2014. The contract price is [REDACTED]. The annual
2 expected delivery is 15,730 MWh. The project size is 6.3 MW and is located in
3 Borrego Springs, California.

- 4 • *Imperial Valley Solar 1 (Silver Ridge Mt Signal)*: This is a twenty-five year PPA
5 executed on February 3, 2012. The project began test energy deliveries on
6 August 7, 2013 and reached COD on March 4, 2014. The contract price is
7 [REDACTED]. The annual expected delivery is 495,274 MWh. The project size is
8 200 MW and is located in Calexico, Imperial County, California.
- 9 • *NRG Solar Borrego I*: This bilateral agreement is a twenty-five year PPA executed
10 on January 25, 2011. The project began test deliveries on January 1, 2013, and
11 reached COD on February 12, 2013. The contract price is [REDACTED]. The
12 annual estimated output is 59,400 MWh. The project size is 26 MW and is located in
13 Borrego Springs, California.
- 14 • *SG2 Imperial Valley*: This is a twenty-five year renewable PPA executed on June 24,
15 2011. The project began test energy deliveries on March 4, 2014 and reached COD
16 on November 25, 2014. The contract price is [REDACTED]. The annual expected
17 delivery is 360,600 MWh. The project size is 150 MW and is located in Imperial
18 Valley, California.
- 19 • *Sol Orchard LLC*: SDG&E executed four, twenty-five year PPAs with
20 Sol Orchard, LLC on April 11, 2011. All of these projects reached COD on
21 December 31, 2013. The contract price is [REDACTED]
22 [REDACTED].

- 1 ○ *Sol Orchard San Diego 20 LLC (Ramona 1)*: The project began test energy
2 deliveries on December 18, 2013, and reached COD on December 31, 2013.
3 The contract price is [REDACTED]. The annual expected delivery is 4,110
4 MWh. The project size is 2.0 MW and is located in Ramona, California.
- 5 ○ *Sol Orchard San Diego 21 LLC (Ramona 2)*: The project began test energy
6 deliveries on December 18, 2013, and reached COD on December 31, 2013.
7 The contract price is [REDACTED]. The annual expected delivery is 8,220
8 MWh. The project size is 5.0 MW and is located in Ramona, California.
- 9 ○ *Sol Orchard San Diego 22 LLC (Valley Center 1)*: The project began test
10 energy deliveries on December 11, 2013, and reached COD on December 31,
11 2013. The contract price is [REDACTED]. The annual expected delivery is
12 4,054 MWh. The project size is 2.5 MW and is located in Valley Center,
13 California.
- 14 ○ *Sol Orchard San Diego 23 LLC (Valley Center 2)*: The project began test
15 energy deliveries on December 11, 2013, and reached COD on December 31,
16 2013. The contract price is [REDACTED]. The annual expected delivery is
17 8,108 MWh. The project size is 5.0 MW and is located in Valley Center,
18 California.

19 **7. RENEWABLE ENERGY SALES**

20 During the Record Period, SDG&E made several bundled REC energy sales pursuant to
21 CPUC Resolutions E-4579, E-4600, E-4608, E-4608, E-4621, E-4606, E-4606 and E-4606.

22 These bundled REC energy sales amount to 666 GWhs.

1 **B. QF Resources**

2 SDG&E had twelve (11) QF agreements for a total of 247.0 MW that delivered energy
3 during the record period. These QF projects consisted of the following: two Non-standard
4 Agreements; four Standard Offer 4 (“SO4”) Agreements; two Standard Offer 2 (“SO2”)
5 Agreements; and three Uniform Standard Offer 1 (“USO1”)/Standard Offer 1 (“SO1”)
6 Agreements.

7 All QF projects that have agreements with SDG&E are located within SDG&E’s electric
8 service territory with the exception of the Yuma Cogeneration Association (“YCA”) unit, which
9 is located in Yuma, Arizona.

10 **1. Qualifying Facility Contract Administration**

11 In the following table, SDG&E lists the name of the existing non-legacy QFs (by
12 technology) under contract with SDG&E that executed an amendment during the record period
13 as the result of the QF/CHP (“Combined Heat and Power”) Settlement Agreement.

Line No.	QF Project Name	Technology	Type of Pro-Forma PPA	Execution Date	Termination /Expiration Date
1	Yuma Cogeneration Associates	Cogeneration	Amended and Restated Power Purchase Agreement	August 14, 2014	May 27, 2024

14 Although all of the QFs, under PPAs with SDG&E were affected by the QF/CHP
15 Settlement Agreement, there were no dispute resolution agreements resulting from any
16 contractual disputes and requesting Commission’s approval in the ERRR filing.

17 The following table lists the quantity, and nameplate capacity of all QF’s (exporting and
18 non-exporting) that were operational in SDG&E’s service territory during the record period.

Technology	# of Operational QF Projects	Operational Project On-Line Capacity (kW)	# of Non-Operational QF Projects	Non-Operational QF Projects (kW)
Biomass	2	220	0	0
Cogeneration	29	334,901	4	699.9
Hydroelectric	2	1,835	0	0
Steam Turbine	2	6,634	0	0
Total	35	343,590	4	699.9

1 The following table lists the percentages of generation (kWh) supplied by QF projects
2 relative to SDG&E's total energy supply.

Total QF Supply (MWh)	SDG&E's Total Energy Supply (retail sales MWh)	% of QF generation relative to SDG&E's total energy supply
1,031,781	16,467,854	6.3%

3 The following table lists the percentages of renewable energy (kWh) relative to total QFs
4 supply.

PURPA QF RPS Eligible Renewable Energy (MWh)	Total QF Supply (MWh)	% of QF RPS eligible renewable energy relative to total QF supply
2,182	1,031,781	0.21%

5

1 The following table lists the percentages of renewable energy (kWh) relative to total RPS
 2 supply.

PURPA QF RPS Eligible Renewable Energy (MWh)	Total RPS Supply (MWh)	% of QF RPS eligible Renewable Energy relative to total RPS supply
2,182	5,311,278	0.041%

3 The following table lists the Legacy QFs and identifies the pricing option terms it
 4 selected in their Amendment to Legacy PPA executed as a result of the CHP Program
 5 Settlement.

Legacy QF Project Name	Technology	Pricing Option	Execution Date
Goal Line, L.P.	Cogeneration	██████████	May 1, 2012
Naval Station	Cogeneration	█	May 1, 2012
North Island	Cogeneration	█	May 1, 2012
NTC/MCRD	Cogeneration	█	May 1, 2012
YCA	Cogeneration	██████████	April 1, 2012

6 The following table identifies any QF contracts that were amended, modified or
 7 renegotiated during the Record Period and SDG&E's reasons and analyses supporting the
 8 amendment, modification or renegotiation. Included in the table is a summary of important
 9 changes to the projects and side-by-side comparison of the existing PPA terms with the current
 10 amendment.

Contract	Type	Reason	Analysis
YCA	Amendment 5	[REDACTED]	[REDACTED]
Goal Line	1. Amendment 2 2. Letter Agreement 3. Amendment 3	[REDACTED]	[REDACTED]

1 There were no changes to the notional value of the above contracts. The amendments
2 were low risk and offered benefits to SDG&E.

3 In Table 8 in the Attachment, SDG&E provides a list of QFs that sold energy to SDG&E
4 during the record period along with the capacity payments, energy payments and bonuses.

5 **2. Terminated QF Contracts**

6 During the Record Period, there were no QFs terminated in accordance with their existing
7 PPAs, nor were there any requests for early termination.

8 **3. Payments to QFs**

9 During the record period, except as described below, there were no unusual payments or
10 claims by the QFs. However, it was brought to SA’s attention that the City of Escondido Bear
11 Valley, a 1.5 MW small Hydro Plant, had metering issues for the past three years due to incorrect

1 wiring. SDG&E worked with the project to correct the metering. The adjusted amount of
2 \$680,650 was paid to the City of Escondido and was recorded to ERRA in the record period.

3 **4. Efficiency Monitoring**

4 SDG&E solicited and reviewed the operating and efficiency data for calendar year 2014
5 in early 2015. According to the data provided by the generators, all QFs were in compliance
6 with the FERC's QF efficiency standards during the record period.

7 **5. Insurance Monitoring**

8 During the record period, the SA staff tracked the insurance certificates of the QFs for
9 compliance and ensured current insurance is maintained by TrackCertsNow, an Ebix Inc. system.

10 **6. QF Performance**

11 During the record period, the firm capacity operational QFs totaled approximately 201
12 MW. Firm capacity QFs are required to meet minimum performance provisions during the
13 summer on-peak period, unless the QF is unable to perform due to an uncontrollable force
14 outage. In those instances, SDG&E would continue to make firm capacity payments pursuant to
15 the relevant QF contract provisions.

16 Except for YCA (explained further below), the SO2 and SO4 agreements require QFs to
17 maintain a minimum 80% capacity factor during the summer on-peak period. QFs that fail to
18 meet this minimum provision may be placed on probation for a period not to exceed fifteen
19 months. Those who can operate above an 85% capacity factor during the same period can earn a
20 capacity bonus.

21 The following describes the contract provisions of the largest QF PPAs currently under
22 contract with SDG&E and describes any issues that may have occurred during the record period:

- 1 • Applied Energy LLC (“AEI”): SDG&E has five PPAs with AEI: (1) Naval
2 Station SO4, (2) North Island SO1, (3) North Island SO4, (4) Naval Training
3 Center/Marine Corps Recruit Depot SO1 and (5) Naval Training
4 Center/Marine Corps Recruit Depot SO4. The 101.5 MW of firm capacity for
5 the three plants is \$152.5/kW-Year. On May 1, 2012, SDG&E and AEI
6 executed three Amendments to the SO4 Agreements for the Naval Station,
7 North Island and Naval Training Center/Marine Corps Recruit Depot. These
8 Amendments were executed in compliance with the CHP Settlement and
9 D.07-09-040. AEI selected Option A for its energy price which is the
10 published SRAC energy and as-available capacity prices.
- 11 ○ *Naval Station*: This QF is located at the Naval Station, San Diego,
12 California. The agreement terminates November 30, 2019. The SO4
13 contract nameplate is 49.9 MW and provides firm capacity and energy.
14 SRAC was the energy price during the record period.
 - 15 ○ *North Island*: This QF is located at the Navy Base, Coronado, California.
16 The SO4 terminates November 30, 2019. The SO4 nameplate is a 34.0
17 MW, but the plant can deliver up to 42 MW according to their
18 interconnection agreement with CAISO at SRAC. The plant also provides
19 steam to a 4 MW steam turbine under SO1 that provides power to the
20 Navy. The steam plant did not export energy to SDG&E during the record
21 period. The SO1 has an evergreen term. *Naval Training Center/Marine*
22 *Corps Recruit Depot*: The SO4 terminates November 30, 2019. The SO4
23 nameplate is 23.0 MW and provides firm capacity and energy. The energy

1 price during the record period was at the SRAC. The plant also provides
2 steam to a 2.6 MW steam turbine. SDG&E pays as-available energy and
3 capacity payments under an SO1 PPA. The term for the SO1 is evergreen.

- 4 • Yuma Cogeneration Associates: YCA is a cogeneration project located in
5 Yuma, Arizona with an option of being dispatchable to SDG&E. It delivers
6 its energy and capacity through Arizona Public Service Company to SDG&E
7 at the North Gila Substation over SDG&E's 500 kV Southwest Powerlink
8 between Arizona and San Diego. The SO2 terminates on May 28, 2024. Firm
9 capacity is 50 MW at a price of \$140/kW-yr with energy purchased up to 56.5
10 MW at SDG&E's monthly posted SRAC prices. The YCA agreement has
11 economic curtailment provisions where SDG&E may exercise its rights to pay
12 YCA an alternative energy price rather than the SRAC during the curtailment
13 hours. When YCA receives a curtailment notice from SDG&E, YCA may do
14 one of the following: (1) physically curtail generation or (2) continue to
15 generate and receive the alternate energy price, which is the CAISO SP-15
16 hourly LMP for supplemental energy. YCA's curtailment provision was
17 exercised when the CAISO LMP was expected to be lower than the SRAC.
18 The plant is dispatchable under the SO2 and requires the plant be available
19 when called upon by SDG&E. The contract has a Minimum Performance
20 Requirement ("MPR") for the QF to earn a bonus.

21 Pursuant to D.07-09-040, the CHP Settlement, on August 19, 2014, SDG&E
22 and YCA executed an Amendment and Restated Power Purchase Agreement
23 ("Restated PPA") which [REDACTED]

1 The Restated PPA was filed for CPUC approval on November 21, 2014 in
2 Advice Letter 2674-E. During the record period, YCA continued to operate
3 under the original SO2.

- 4 • Goal Line LLP: Goal Line’s nameplate is 49.9 MW. The plant provides firm
5 capacity and energy. The plant is located in Escondido, California. During
6 the record period, the energy price SDG&E paid Goal Line was at the SRAC,
7 and the firm capacity price at \$172/KW-yr. The agreement provides SDG&E
8 the option to economically curtail deliveries of the project. During the record
9 period, Goal Line elected to shut down for the majority of hours of
10 curtailment. The term of this SO2 agreement expires on February 14, 2025.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED].

14 SDG&E and Goal Line executed an Amendment to the Amendment and
15 Restatement of Agreement for Power Purchase with a Firm Capacity
16 Qualifying Facility (“Restatement Agreement”) on June 16, 2014, [REDACTED]

17 [REDACTED]

18 [REDACTED] On December 24, 2014, the Energy Division issued a
19 letter approving Resolution E-4698 of the Restatement Agreement. [REDACTED]

20 [REDACTED]

21 [REDACTED]

- 22 • C.P. Kelco (“Kelco”): This is a facility with an agreement which allows
23 SDG&E to purchase excess power from three gas turbines for a total of 25

1 MW at SRAC prices for both energy and capacity. The original agreement
2 had a fixed price with a term that ended on December 31, 2009. An
3 amendment was executed on January 1, 2010 to extend the term until the
4 parties executed a CPUC-approved Transition Standard Contract for Existing
5 Qualifying Cogeneration Facilities ("Transitional PPA") pursuant to D.07-09-
6 040. On December 20, 2013, the parties executed a Transitional PPA that
7 expires July 1, 2015. However, because [REDACTED]
8 [REDACTED], SDG&E filed advice letter 2517-E on September 5, 2013 seeking
9 approval of the modified Transitional PPA. The Commission approved the
10 Transitional PPA in Resolution E-4642 on March 14, 2014.

11 C. Bilateral Power Purchase Contracts

- 12 • PGE Boardman: The PPA expired on 12/31/13. As reported in the 2013
13 ERRR testimony, the parties conducted a final audit in June 2014 for the
14 operating years of 2011, 2012 and 2013. The parties also agreed to
15 reconcile and settle any exceptions by December 31, 2014. During the
16 auditing process, it was discovered that there were some over and under
17 billing by PGE during the auditing period. [REDACTED]
18 [REDACTED]
- 19 • EnerNOC, Inc.: This is a ten-year contract that was executed on February
20 21, 2005 and became effective on December 31, 2006. The Agreement
21 terminates on December 31, 2016. This agreement allows SDG&E to
22 dispatch 25 MW of customer-owned back up generation. Under the
23 existing contract, these generators can be operated at up to eight hours per

1 day for a maximum of 200 hours per year. This contracted product is
2 dispatchable with a capacity price of \$77.00/kW-year. The cost of energy
3 is based on the index fuel price for the period in which the generators run.

- 4 • Olivenhain-Hodges Pump Storage Facility (“Hodges”): This
5 Hydroelectric Pumped Storage Facility is owned by the San Diego County
6 Water Authority (“SDCWA”) and consists of two 20 MW hydroelectric
7 turbines for a total of 40 MW. The PPA was executed on January 29,
8 2004 and was approved by D.04-08-028. The project reached COD of
9 August 27, 2012, and will terminate on August 26, 2037. The capacity
10 price is a combination of a fixed portion of \$65/kW-year and a variable
11 portion at \$5/kW-year escalated at Consumer Price Index (“CPI”). The
12 O&M is \$2.01/MWh escalated at the CPI.

13 Hodges draws water during off-peak hours using power, and then
14 generates power during on-peak hours by flowing water back. This is to
15 take advantage of the price spread between the on and off-peak time
16 periods. According to the PPA, SDG&E manages the economics through
17 dispatching the generation and pump load.

18 **D. Tolling Agreements**

- 19 • Otay Mesa Energy Center, LLC (“OMEC”): On May 1, 2007, SDG&E
20 and OMEC (a subsidiary of Calpine Corporation) entered into an
21 Amended and Restated PPA. The Agreement has a ten-year term after
22 which SDG&E has the option to purchase the plant. OMEC is a 600 MW
23 combined cycle plant located in Otay Mesa in San Diego County near the

1 United States/Mexico International Border and started operating on
2 October 3, 2009. The plant is comprised of two combustion turbine-
3 generators and one steam turbine. SDG&E is responsible for supply of the
4 fuel. The capacity price is \$117.00/kW-year, and the current O&M cost
5 was \$2.56/MWh during the record period, escalated by 2.5% each
6 calendar year.

- 7 • El Cajon Energy, LLC (“ECEC”): On May 24, 2010, SDG&E and ECEC
8 (a subsidiary of Wellhead Services, Inc.) entered into a Power Purchase
9 Tolling Agreement. The contract has a term of twenty-five years, and the
10 plant started operating on June 16, 2010. ECEC is a quick-start peaking
11 plant with a contract capacity of 47.0 MW after performing their annual
12 performance test in the spring 2014. The 2014 capacity price was
13 \$148.56/kW-year and the O&M price was \$7.65/MWh. Part of the
14 capacity and all of the O&M prices are adjusted by the CPI each calendar
15 year.

- 16 • Escondido Energy, LLC (“ECEC”): On February 25, 2011, SDG&E and
17 EEC (a subsidiary of Wellhead Services, Inc.) entered into a Power
18 Purchase Tolling Agreement. The contract has a term of twenty-five
19 years, and the plant started operating on [REDACTED]. EEC is a
20 quick-start peaking plant with a contract capacity of [REDACTED] MW after
21 performing their commissioning performance test [REDACTED]. The
22 2014 capacity price was [REDACTED]/kW-year and the O&M price was

1 [REDACTED]/MWh. Part of the capacity and all of the O&M prices [REDACTED]

2 [REDACTED]

- 3 • Orange Grove Energy, LP (“OGE”): On July 14, 2009, SDG&E and OGE (a
4 subsidiary of J-Power USA Development Co., Ltd) entered into a Power Purchase
5 Tolling Agreement. The contract has a term of twenty-five years. Pursuant to
6 D.07-09-010, SDG&E leases its land to J-Power, who constructed the peaker
7 generator on the leased land and provides its output to SDG&E for a period of
8 twenty-five years, after which the lease shall expire and the title to the peaker
9 shall be transferred to SDG&E at no additional cost. The plant started operating
10 on June 17, 2010. OGE is comprised of two gas turbines located in Pala,
11 California. OGE is a quick-start peaking plant and had a contract capacity of 95.7
12 MW after performing their annual performance test in spring 2014. The capacity
13 price was \$173.56/kW-year for the term of the agreement, and the O&M price,
14 which was adjusted by the CPI for the calendar year, was \$5.01/MWh during the
15 record period.

16 **V. CONCLUSION**

17 Based on the foregoing, SDG&E’s recorded contract expenses to the ERRRA are in
18 conformance with the P.U. Code, Commission decisions, and the contract terms for the 2014
19 record period. SDG&E respectfully requests that the Commission find that SDG&E’s contract
20 administration and power procurement-related costs for calendar year 2014 were reasonable and
21 therefore should be approved.

22 This concludes my prepared direct testimony.

23

1 **VI. QUALIFICATIONS**

2 My name is Sally Chen. My business address is 8315 Century Park Court, San Diego,
3 CA 92123. I am employed by SDG&E as the Settlement and Administration Manager in the
4 Electric and Fuel Procurement Department. My present duties include management and
5 administration of existing agreements, including renewable agreements, Tolling and QF
6 agreements, allocated CDWR agreements and bilateral agreements. I have been employed by
7 SDG&E since 2001. I have been in my current position since February 2012.

8 I received a MBA, with a Finance concentration, from San Diego State University.

9 I have previously testified before the Commission.

ATTACHMENT

TABLE 1

Contract Class	Contract Name/Counterparty	Technology	Product	2014 Purchased kWh	Contract MW	Contract COD	Contract End Date	CPUC Authorization
Dispatchable	Olivenhain/Hodges Pumped Storage Facility	Hydro	Dispatchable	(9,730,240)	40.0	08/27/12	08/26/37	CPUC Decision 04-08-028
QF	Badger Filtration Plant (Santa Fe Irrigation District)	Hydro	As-Available	1,151,993	1.5	07/01/87	06/30/17	Standard Offer Contracts per CPUC D.82-01-103 on 1/21/82
QF	Bear Valley Hydro (City of Escondido)	Hydro	As-Available	561,898	1.5	04/13/84	Evergreen	Standard Offer Contracts per CPUC D.82-01-103 on 1/21/82
QF	San Francisco Peak Hydro (City of Oceanside)	Hydro	As-Available	468,156	0.35	12/15/85	Evergreen	Standard Offer Contracts per CPUC D.82-01-103 on 1/21/82
QF	AEI North Island	Natural Gas	Firm	320,506,693	49.9	12/01/89	11/30/19	CPUC Decision D.83-09-054
QF	AEI North Island	Natural Gas	Firm	284,645,382	34.0	12/01/89	11/30/19	CPUC Decision D.83-09-054
QF	AEI NTC Steam Turbine	Natural Gas	As-Available	17,372,774	2.6	07/31/84	Evergreen	CPUC Decision 83-01-103
QF	AEI NTC/CMCRD	Natural Gas	As-Available	164,355,724	23.0	12/01/89	11/30/19	CPUC Decision D.83-09-054
QF	GP Kelco	Natural Gas	As-Available	16,125,100	26.0	10/07/02	06/30/15	CPUC Decision D.07-09-040
QF	Goal Line	Natural Gas	As-Available	165,043,233	43.8	06/11/89	02/14/23	CPUC Decision 83-109-071
QF	Crosspoint	Natural Gas	As-Available	61,548,637	56.5	05/28/84	Evergreen	CPUC Decision 83-109-071
Renewable	Yucca Valley Cogeneration Associates	Natural Gas	Dispatchable	2,725,840	2.5	03/30/04	03/27/24	CPUC Decision D.90-06-028
Renewable	GRS - Sacramento 2	Bio-Gas	As-Available	42,013,130	6.1	10/01/07	09/30/23	CPUC Resolution E.3965
Renewable	MIM Prima Deshecha	Bio-Gas	As-Available	28,780,170	4.5	05/20/13	05/19/23	CPUC Resolution E.4114
Renewable	MIM San Diego, LLC - Miramar	Bio-Gas	As-Available	10,020,670	1.5	05/01/09	04/30/19	FIT - CPUC Resolution E-4137
Renewable	Olney Landfill 1	Bio-gas	As-Available	11,465,940	1.5	07/01/11	06/30/31	FIT - CPUC Resolution E-4137
Renewable	Olney Landfill 2	Bio-gas	As-Available	21,110,770	3.76	03/09/07	03/07/17	FIT - CPUC Resolution E-3965
Renewable	Olney Landfill 3	Bio-gas	As-Available	12,330,930	1.5	06/21/13	06/20/33	FIT - CPUC D.07-07-027 and D.08-09-033
Renewable	Olney Landfill V	Bio-gas	As-Available	11,877,760	1.5	06/21/13	06/20/33	FIT - CPUC D.07-07-027 and D.08-09-033
Renewable	San Marcos Landfill	Bio-gas	As-Available	12,008,700	1.5	05/18/11	05/17/31	FIT - CPUC D.07-07-027 & Resolution E-4137
Renewable	Sycamore Landfill 1	Bio-gas	As-Available	5,293,460	1.5	05/16/11	05/15/31	FIT - CPUC D.07-07-027 & Resolution E-4137
Renewable	Sycamore Landfill 2	Bio-gas	As-Available	11,384,030	2.3	03/30/14	03/29/24	FIT-ReMat CPUC D.13-05-034
Renewable	Blue Lake Power	Bio-Mass	As-Available	66,790,300	11.0	04/30/10	2015	CPUC Resolution E-4208 & E-4348
Renewable	Covanta Delano (aka AES)	Bio-Mass	As-Available	346,563,220	49.5	01/01/08	12/31/15	CPUC Resolution E-4070
Renewable	City of San Diego - Point Loma	Digester Gas/hydro	As-Available	21,611,160	4.835	01/01/08	12/31/15	CPUC Resolution E-4081
Renewable	Calpine - Geysers	Geothermal	Firm	112,536,000	13.0	03/01/10	12/31/14	CPUC Resolution E-4081
Renewable	Olivenhain Municipal Water Dist	Hydro	As-Available	1,234,680	0.45	10/01/13	09/30/33	CPUC Resolution E-4342
Renewable	SDCWA - Rancho Penasquitos	Hydro	As-Available	18,716,570	4.5	01/23/07	01/22/37	CPUC Resolution E-3868
Renewable	Various Bundle REC Sales	N/A	Energy/RECs	(666,048,000)	N/A	01/01/14	12/31/14	CPUC Resolutions E-4679, E-4680, E-4686, E-4687, E-4688, E-4689, E-4690, E-4691, E-4692, E-4693, E-4694, E-4695, E-4696, E-4697, E-4698, E-4699, E-4700, E-4701, E-4702, E-4703, E-4704, E-4705, E-4706, E-4707, E-4708, E-4709, E-4710, E-4711, E-4712, E-4713, E-4714, E-4715, E-4716, E-4717, E-4718, E-4719, E-4720, E-4721, E-4722, E-4723, E-4724, E-4725, E-4726, E-4727, E-4728, E-4729, E-4730, E-4731, E-4732, E-4733, E-4734, E-4735, E-4736, E-4737, E-4738, E-4739, E-4740, E-4741, E-4742, E-4743, E-4744, E-4745, E-4746, E-4747, E-4748, E-4749, E-4750, E-4751, E-4752, E-4753, E-4754, E-4755, E-4756, E-4757, E-4758, E-4759, E-4760, E-4761, E-4762, E-4763, E-4764, E-4765, E-4766, E-4767, E-4768, E-4769, E-4770, E-4771, E-4772, E-4773, E-4774, E-4775, E-4776, E-4777, E-4778, E-4779, E-4780, E-4781, E-4782, E-4783, E-4784, E-4785, E-4786, E-4787, E-4788, E-4789, E-4790, E-4791, E-4792, E-4793, E-4794, E-4795, 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ERRA Compliance DATA REQUEST-2014
Contract Administration (Non-QF)
Q. 1.2.10.4.1/Q 1.2.10.4.2/Q1.2.10.4.3/Q1.2.10.4

The information in the section below contains confidential/privileged pursuant to applicable provisions of D.06-06-066, G.O. 66-C and PUC Code Sec. 583 and Sec. 454.5(g)

Contract Name/Counterparty	Termination Date	Termination Contract Provision	Copy of Notice of Termination	1.2.10.4.3 Termination Fees Received OR Retained Security		1.2.10.4.4 Termination Fees Payment
				YES/NO	If Yes, Recorded To Account #	
				1.2.10.4.3.2 If No, Explanation Why		
GRS Sycamore 2	03/29/14	Confirmation Agreement Term - 3/24/2004 through CPUC approval or rejection of the First Amendment to the October 31, 2002 Confirmation Agreement filed with the CPUC on January 12, 2004 under AL-1554-E (Sycamore Plant) or 12/31/2004, whichever comes first.	N/A	NO	N/A	N/A
Calpine Energy Services	12/31/14	Article 2.5 Term The term of this Agreement shall commence upon the Execution Date of this Agreement and shall remain in effect until the conclusion of the Delivery Term or unless terminated sooner pursuant to the terms of this Agreement (the "Term") provided, however, that this Agreement shall remain in effect until (1) the Parties have fulfilled all obligations with respect to this Agreement, including payment in full amounts due for the Product delivered prior to the end of the Term, the Settlement Amount, indemnification payments or other damages (whether directly or indirectly such as through set-off or netting) and (i) the undrawn portion of the Seller security is released and/or returned as applicable (if any is due). All indemnity rights shall survive the termination period of the claim underlying the indemnity obligation.	N/A	NO	N/A	N/A
City of Corona - WSSP Agreement						
Zodiac Solar A (CRE-FT)						
Zodiac Solar E (CRE-FT)						
Western Antelope Dry Ranch (RAM)						
Victor Mesa Linda B (RAM)						
NLP Valley Center Solar LLC (RAM)						
Quail Brush Genco, LLC						
Rugged Solar Farm LLC						
Tierra Del Sol Solar Farm						
LanEast Solar Farm LLC						
LanWest Solar Farm LLC						

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TABLE 4

New non-QF contracts executed during the period	Detail Summaries of important provisions	Applicable references to Commission decision that directed SDG&E to execute contract	If outside ERRA, provide contract status and cite authority of request for approval
Q.1.2.12.1	Q.1.2.12.2	Q.1.2.12.3	Q.1.2.12.4
Axio Power Holdings, LLC (ReMat)	Energy and Green Attributes executed on 1/9/14	ReMat (Advice Letter 2492-E; D.13-05-034)	N/A
Sycamore Energy 2 LLC (ReMat)	Energy and Green Attributes executed on 3/7/2014	ReMat (Advice Letter 2492-E; D.13-05-034)	N/A
OCI Solar Lakeside LLC (ReMAT)	Energy and Green Attributes executed 3/28/2014	ReMat (Advice Letter 2492-E; D.13-05-034)	N/A
NLP Granger A82, LLC (ReMat)	Energy and Green Attributes executed 4/3/2014	ReMat (Advice Letter 2492-E; D.13-05-034)	N/A
SEVP Boulevard, LLC (ReMat)	Energy and Green Attributes executed on 6/16/2014	ReMat (Advice Letter 2492-E; D.13-05-034)	N/A

TABLE 5

The information contained in the attached documents below is confidential/privileged pursuant to applicable provisions of D.06-06-066, G.O. 66-C and PUC Code Sec. 583 and Sec. 454.5(g) Response to DRA Master Data Request Q.1.2.13.1

Type	Counterparty Name	Project Name	Modification Name	Execution Date	Effective Date
Renewable	Covanta Delano, Inc	Covanta Delano	Contract Termination Extension	10/08/14	01/01/15
Renewable	Desert Green Solar Farm LLC	Desert Green	Third Amendment	02/28/14	02/28/14
Renewable	Desimon Power Products LLC	Con Dios	First Amendment	05/27/14	05/27/14
Renewable	LanEast Solar Farm LLC	LanEast	Assignment Assumption & Consent Agreement	09/30/14	09/30/14
Renewable	LanEast Solar Farm LLC	LanEast	Fourth Amendment	02/28/14	02/28/14
Renewable	LanWest Solar Farm LLC	LanWest	Assignment Assumption & Consent Agreement	09/30/14	09/30/14
Renewable	LanWest Solar Farm LLC	LanWest	Fourth Amendment	02/28/14	02/28/14
Renewable	Rugged Solar LLC	Rugged	Assignment Assumption & Consent Agreement	09/30/14	09/30/14
Renewable	Rugged Solar LLC	Rugged	Fourth Amendment	02/28/14	02/28/14
Renewable	Tierra del Sol Solar Farm LLC	Tierra del Sol	Assignment Assumption & Consent Agreement	09/30/14	09/30/14
Renewable	Tierra del Sol Solar Farm LLC	Tierra del Sol	Fourth Amendment	02/28/14	02/28/14
Renewable - Sale	City of Corona	City of Corona (PSA)	First Amendment	05/01/14	05/01/14
Resource Adequacy	NRG Power Marketing LLC	NRG CAB II RA	Extension Option Notice	07/14/14	01/01/15
Resource Adequacy	NRG Power Marketing LLC	NRG CAB II RA	Extension of the License Agreement	07/14/14	01/01/15
Resource Adequacy	NRG Power Marketing LLC	NRG Encina II RA	Extension Option Notice	07/14/14	01/01/15
Resource Adequacy	NRG Power Marketing LLC	NRG CAB II RA	Second Amendment	08/14/14	01/01/15
Resource Adequacy	NRG Power Marketing LLC	NRG CAB II RA	Third Amendment to the License Agreement	08/27/14	01/01/15
Resource Adequacy	Shell Energy North America (US), L.P.	Shell North America	First Amendment	10/17/14	10/20/14
Tolling Agreement	Orange Grove Energy, LP	Orange Grove / J Power	Waiver	03/21/14	03/21/14
Tolling Agreement	Pio Pico Energy Center, LLC	Pio Pico	Seventh Amendment	02/19/14	02/19/14
Tolling Agreement	Pio Pico Energy Center, LLC	Pio Pico	Eighth Amendment	03/31/14	03/31/14
Tolling Agreement	Pio Pico Energy Center, LLC	Pio Pico	Ninth Amendment	06/30/14	06/30/14
Tolling Agreement	Pio Pico Energy Center, LLC	Pio Pico	Tenth Amendment	07/31/14	07/31/14
Tolling Agreement	Pio Pico Energy Center, LLC	Pio Pico	Eleventh Amendment	10/31/14	10/31/14
Tolling Agreement	Pio Pico Energy Center, LLC	Pio Pico	Twelfth Amendment	12/15/14	12/15/14
Tolling Agreement	Quail Brush Cenco, LLC	Quail Brush	Third Standstill Letter Agreement	02/28/14	02/28/14

Note: The NRG CAB II RA Third Amendment to the License Agreement was filed in AL 2655-E and a Disposition Letter was issued dated November 14, 2014. All other modifications were done without an advice letter.

TABLE 6

The information in the section below contains confidential/privileged pursuant to applicable provisions of D.06-06-066, G.O. 66-C and PUC Code Sec. 583 and Sec. 454.5(g)

SD&E Response to 2014 ERRA Compliance Master Data Request Response to DRA Master Data Request Q.1.2.14	Reason why the Modification was not submitted for review via AL or Application	Reasons and analysis supporting the amendment, modification or renegotiation	Summary of important changes to the project	Economic analysis and/or ratepayer benefit analysis	Projects economic and operational viability w/o amendment
Q.1.2.14	Q.1.2.14.1	Q.1.2.14.2	Q.1.2.14.3	Q.1.2.14.4	Q.1.2.14.5
NRG Power Marketing LLC	-	-	-	None	None
City of Corona	-	-	-	None	None
Covanta Delano, Inc.	-	-	-	None	None
Desert Green Solar Farm LLC	-	-	-	None	None
NRG Power Marketing LLC	-	-	-	None	None
NRG Power Marketing LLC	-	-	-	None	None
Orange Grove Energy, LP	-	-	-	None	None
Shell Energy North America (US), L.P.	-	-	-	None	None

Note: This response reports all modifications of contracts where costs were incurred during the 2014 ERRA reporting period.

TABLE 7

Contract type	Contract Description	Tradebook	Contract class	Product	Status	Effective date	Contract type	Contract Description	Tradebook	Contract class	Product	Status	Effective date
BILATERAL	El Paso Natural Gas Company	UEG	Spot	NG	ACTIVE	05/22/86	BILATERAL	Titan Gas, LLC	UEG	NAESB	NG	ACTIVE	03/01/05
TRANSPORT	California Gas Transmission	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	BP Corporation North America Inc	UEG	ISDA	NG	ACTIVE	04/01/05
TRANSPORT	El Paso Natural Gas Company	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	Devon Gas Services LP	UEG	NAESB	NG	ACTIVE	05/01/05
TRANSPORT	Gas Transmission Northwest	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	Occidental Energy Marketing Inc.	UEG	NAESB	NG	ACTIVE	05/01/05
TRANSPORT	Kern River Gas Transmission Company	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	Esolon Generation Company, LLC	UEG	NAESB	NG	ACTIVE	06/12/05
TRANSPORT	Nova Gas Transmission	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	southern California Gas Company Capacity	UEG	NAESB	NG	ACTIVE	06/17/05
TRANSPORT	Southern Trails Pipeline	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	Producers Pacific Summit Energy LLC	UEG	NAESB	NG	ACTIVE	10/11/05
TRANSPORT	TransCanada Pipeline Company	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	Barclays Bank	UEG	ISDA	NG	ACTIVE	10/13/05
TRANSPORT	Transwestern Pipeline Company	UEG	Other	NG	ACTIVE	01/01/93	BILATERAL	Deutsche Bank AG	UEG	ISDA	NG	ACTIVE	12/01/05
BILATERAL	Morgan Stanley Capital Group Inc. - Spot	UEG	Spot	NG	ACTIVE	11/20/95	BILATERAL	Powerex Corporation	UEG	NAESB	NG	ACTIVE	12/01/05
BILATERAL	Tristar Producer Services of Texas, L.P.	UEG	Umbrella	NG	ACTIVE	01/16/96	BILATERAL	Yoko Energy	UEG	NAESB	NG	ACTIVE	02/15/06
BILATERAL	Coast Energy Group	UEG	Umbrella	NG	ACTIVE	03/20/96	BILATERAL	Keir/McGee Energy Services Corporation	UEG	NAESB	NG	ACTIVE	02/20/06
BILATERAL	Castleton Commodities Merchant Trading L.P.	UEG	NAESB	NG	ACTIVE	04/03/96	BILATERAL	Enserco Energy Inc	UEG	NAESB	NG	ACTIVE	05/01/06
BILATERAL	Milant Energy Trading LLC	UEG	Umbrella	NG	ACTIVE	06/01/96	BILATERAL	CIMA ENERGY, LTD.	UEG	NAESB	NG	ACTIVE	07/01/06
BILATERAL	BNP Paribas Energy Trading GP - Umbrella	UEG	Umbrella	NG	ACTIVE	07/01/96	BILATERAL	NextEra Energy Power Marketing, LLC	UEG	NAESB	NG	ACTIVE	07/01/06
BILATERAL	Bank of America	UEG	ERMA	NG	ACTIVE	10/23/96	BILATERAL	Samson Resources Co.	UEG	NAESB	NG	ACTIVE	08/01/06
BILATERAL	Morgan Stanley Capital Group Inc. - ERMA	UEG	ERMA	NG	ACTIVE	10/24/96	BROKER	Amerex	UEG	Other	NG	ACTIVE	08/01/06
BILATERAL	IGI Resources, Inc.	UEG	Umbrella	NG	ACTIVE	10/31/96	BROKER	ICAP	UEG	Other	NG	ACTIVE	08/01/06
BILATERAL	Sempira Energy Trading LLC - ERMA	UEG	ERMA	NG	ACTIVE	12/02/96	BROKER	Saddleback	UEG	Other	NG	ACTIVE	08/01/06
BILATERAL	Sempira Energy Trading LLC - Umbrella	UEG	Umbrella	NG	ACTIVE	12/02/96	BROKER	TFS Brokers	UEG	Other	NG	ACTIVE	08/01/06
BILATERAL	Agave Energy Company	UEG	Umbrella	NG	ACTIVE	02/03/97	BILATERAL	G4 Energy	UEG	NAESB	NG	ACTIVE	09/01/06
BILATERAL	Canadian Imperial Bank of Commerce	UEG	ERMA	NG	ACTIVE	04/01/97	BILATERAL	ICC Energy Corporation	UEG	NAESB	NG	ACTIVE	10/01/06
BILATERAL	Black Hills Energy	UEG	Umbrella	NG	ACTIVE	04/11/97	BILATERAL	Centaurus Energy Master Fund, LP	UEG	NAESB	NG	ACTIVE	01/01/07
BILATERAL	Merill Lynch Commodities, Inc. - Umbrella	UEG	Umbrella	NG	ACTIVE	11/01/97	BILATERAL	Sierra Southwest Cooperative Services, LLC	UEG	NAESB	NG	ACTIVE	01/01/07
BILATERAL	Kimball Energy Corporation	UEG	GISB	NG	ACTIVE	04/19/98	BILATERAL	Wells Fargo Commodities, LLC	UEG	NAESB	NG	ACTIVE	01/01/07
TRANSPORT	Southern California Gas Company	UEG	GISB	NG	ACTIVE	07/01/98	BILATERAL	Clitgroup Energy Inc.	UEG	NAESB	NG	ACTIVE	02/27/07
BILATERAL	Nine Energy Services, LLC	UEG	GISB	NG	ACTIVE	09/01/98	BROKER	Evolution Markets Inc.	UEG	Other	NG	ACTIVE	03/01/07
BILATERAL	AEP Energy Services, Inc.	UEG	GISB	NG	ACTIVE	12/01/98	BILATERAL	Sacramento Municipal Utility District	UEG	NAESB	NG	ACTIVE	04/01/07
BILATERAL	Exxon Mobil Corporation	UEG	GISB	NG	ACTIVE	03/01/99	BILATERAL	Sequent Energy Management, LP.	UEG	NAESB	NG	ACTIVE	09/14/07
BILATERAL	Arizona Public Service Company	UEG	GISB	NG	ACTIVE	03/22/99	BILATERAL	Euel Energy Resources	UEG	ISDA	NG	ACTIVE	12/01/07
BILATERAL	Southwest Gas Corporation	UEG	GISB	NG	ACTIVE	04/01/99	BILATERAL	J.P. Morgan Ventures Energy Corporation - ISDA	UEG	NAESB	NG	ACTIVE	12/01/07
BILATERAL	City of Burbank	UEG	GISB	NG	ACTIVE	05/01/99	BILATERAL	Luminant Energy Company LLC	UEG	NAESB	NG	ACTIVE	01/01/08
BILATERAL	Macquarie Energy LLC - ISDA	UEG	ISDA	NG	ACTIVE	06/10/99	BROKER	Wells Fargo Advisors, LLC	UEG	Other	NG	ACTIVE	01/03/08
BILATERAL	Natural Gas Trading Corporation	UEG	GISB	NG	ACTIVE	08/01/99	BILATERAL	Magnus Energy Marketing, Ltd.	UEG	NAESB	NG	ACTIVE	01/25/08
BILATERAL	City of Long Beach	UEG	Spot	NG	ACTIVE	09/01/99	BILATERAL	Credit Suisse Energy LLC	UEG	ISDA	NG	ACTIVE	04/01/08
BILATERAL	Naughton Energy, Inc.	UEG	GISB	NG	ACTIVE	04/01/00	BILATERAL	UBS AG - ISDA	UEG	ISDA	NG	ACTIVE	04/01/08
BILATERAL	Red Willow Production Company	UEG	GISB	NG	ACTIVE	04/01/00	BILATERAL	CCP Coast to Coast Partners, L.L.C.	UEG	NAESB	NG	ACTIVE	05/23/08
BILATERAL	Marathon Oil Company	UEG	GISB	NG	ACTIVE	07/01/00	BILATERAL	GeanyEnergy, LLC	UEG	NAESB	NG	ACTIVE	05/23/08

TABLE 7 (CONT)

Contract type	Contract Description	Tradebook	Contract class	Product	Status	Effective date	Contract type	Contract Description	Tradebook	Contract class	Product	Status	Effective date
BILATERAL	SG Interests I, Ltd.	UEG	GISB	NG	ACTIVE	07/01/00	BILATERAL	Tiger Natural Gas, Inc.	UEG	NAESB	NG	ACTIVE	05/23/08
BROKER	New York Mercantile Exchange, Inc. (NYMEX)	UEG	Other	NG	ACTIVE	02/13/01	BILATERAL	EnCana Marketing (USA) Inc.	UEG	NAESB	NG	ACTIVE	06/01/08
BILATERAL	Powerspring, Inc.	UEG	GISB	NG	ACTIVE	03/01/01	BILATERAL	IPC (USA), Inc.	UEG	NAESB	NG	ACTIVE	06/16/08
BILATERAL	Twine Gas & Power, Inc.	UEG	GISB	NG	ACTIVE	07/01/01	BILATERAL	RRI Energy Services, LLC	UEG	NAESB	NG	ACTIVE	06/27/08
BILATERAL	Citibank, N.A.	UEG	ISDA	NG	ACTIVE	08/01/01	BILATERAL	J.P. Morgan Ventures Energy Corporation - NAESB	UEG	NAESB	NG	ACTIVE	10/14/08
BILATERAL	ABQ Energy Group, LTD	UEG	GISB	NG	ACTIVE	01/01/02	BILATERAL	EDF Trading North America, LLC	UEG	NAESB	NG	ACTIVE	12/12/08
BILATERAL	National Fuel Marketing Company, LLC	UEG	NAESB	NG	ACTIVE	08/01/02	BILATERAL	Enterprise Products Operating LLC	UEG	NAESB	NG	ACTIVE	04/24/09
BILATERAL	Sandia Resources Corporation	UEG	NAESB	NG	ACTIVE	08/01/02	BILATERAL	Shell Energy North America (US), L.P.	UEG	NAESB	NG	ACTIVE	05/01/09
BILATERAL	Concord Energy LLC	UEG	NAESB	NG	ACTIVE	08/27/02	BILATERAL	Targa Gas Marketing LLC	UEG	NAESB	NG	ACTIVE	05/01/09
BILATERAL	Southern Union Gas Energy, Ltd.	UEG	NAESB	NG	ACTIVE	11/01/02	BILATERAL	DB Energy Trading LLC	UEG	NAESB	NG	ACTIVE	05/15/09
BILATERAL	ConocoPhillips Company	UEG	NAESB	NG	ACTIVE	12/01/02	BILATERAL	Bluesource Energy LLC	UEG	NAESB	NG	ACTIVE	07/21/09
BILATERAL	Suez Energy/Marketing NA, Inc.	UEG	NAESB	NG	ACTIVE	12/10/02	BILATERAL	ETC Endure Energy LLC	UEG	NAESB	NG	ACTIVE	08/01/09
BILATERAL	Visage Energy Corp.	UEG	NAESB	NG	ACTIVE	12/10/02	BILATERAL	DCP Midstream Marketing, LLC	UEG	NAESB	NG	ACTIVE	09/01/09
BILATERAL	Chevron Natural Gas	UEG	NAESB	NG	ACTIVE	01/01/03	BILATERAL	Gazprom Marketing & Trading USA, Inc.	UEG	NAESB	NG	ACTIVE	09/16/09
BILATERAL	Tenaska Gas Storage, LLC	UEG	NAESB	NG	ACTIVE	01/01/03	BILATERAL	NJR Energy Services Company	UEG	NAESB	NG	ACTIVE	10/01/09
BILATERAL	Tenaska Marketing Ventures	UEG	NAESB	NG	ACTIVE	01/01/03	BROKER	Choice Natural Gas, LP and Choice Power, LP	UEG	Other	NG	ACTIVE	01/06/10
BILATERAL	Cargill, Inc.	UEG	NAESB	NG	ACTIVE	02/01/03	BILATERAL	WPX Energy Marketing, LLC	UEG	NAESB	NG	ACTIVE	03/01/10
BILATERAL	Iberdrola Energy Services, LLC	UEG	NAESB	NG	ACTIVE	02/01/03	BROKER	Energy Trade Management GP, LLC	UEG	Other	NG	ACTIVE	03/22/10
BILATERAL	Macquarie Energy LLC - NAESB	UEG	NAESB	NG	ACTIVE	02/01/03	BILATERAL	DES Wholesale, LLC dba DES-Gas	UEG	NAESB	NG	ACTIVE	07/15/11
BILATERAL	One Nation Energy Solutions, LLC	UEG	NAESB	NG	ACTIVE	02/01/03	BILATERAL	Societe Generale Energy Corp.	UEG	NAESB	NG	ACTIVE	08/05/11
BILATERAL	PPL EnergyPlus, LLC	UEG	NAESB	NG	ACTIVE	02/28/03	BILATERAL	GEP Marketing Company	UEG	NAESB	NG	ACTIVE	09/02/11
BILATERAL	J. Aron & Company - ISDA	UEG	ISDA	NG	ACTIVE	04/02/03	TRANSPORT	North Baja Pipeline, LLC	UEG	Other	NG	ACTIVE	09/12/11
BILATERAL	Frontira Gas Supply	UEG	NAESB	NG	ACTIVE	04/30/03	TRANSPORT	Casoducto Bojartorte	UEG	Other	NG	ACTIVE	09/21/11
BILATERAL	Pacific Gas & Electric Company	UEG	NAESB	NG	ACTIVE	05/01/03	TRANSPORT	Transportador de Gas Natural	UEG	Other	NG	ACTIVE	09/21/11
BILATERAL	United Energy Trading, LLC	UEG	NAESB	NG	ACTIVE	05/01/03	TRANSPORT	Southwest Gas Corporation	UEG	Other	NG	ACTIVE	10/01/11
BILATERAL	UBS AG - NAESB	UEG	NAESB	NG	ACTIVE	05/20/03	BILATERAL	Promet Energy Partners, LLC	UEG	NAESB	NG	ACTIVE	12/06/11
BILATERAL	BP Energy Company	UEG	NAESB	NG	ACTIVE	06/01/03	BILATERAL	Freeport Commodities LLC	UEG	NAESB	NG	ACTIVE	02/06/12
BILATERAL	J. Aron & Company - NAESB	UEG	NAESB	NG	ACTIVE	06/01/03	BILATERAL	Noble Americas Gas & Power Corp.	UEG	NAESB	NG	ACTIVE	04/04/12
BILATERAL	Western Gas Resources, Inc.	UEG	NAESB	NG	ACTIVE	07/01/03	BILATERAL	Patten Energy Enterprises, Inc.	UEG	NAESB	NG	ACTIVE	04/10/12
BILATERAL	Bank of Montreal	UEG	ISDA	NG	ACTIVE	07/22/03	BILATERAL	Noble Americas Energy Solutions, LLC	UEG	NAESB	NG	ACTIVE	08/27/12
BILATERAL	Husky Gas Marketing Inc.	UEG	NAESB	NG	ACTIVE	08/01/03	BILATERAL	Ek Mountain Energy, LLC	UEG	NAESB	NG	ACTIVE	08/30/12
BILATERAL	Anadarko Energy Services Company	UEG	NAESB	NG	ACTIVE	09/01/03	BILATERAL	The Fierly Group, Inc. -Gas	UEG	NAESB	NG	ACTIVE	09/13/12
BILATERAL	Merrill Lynch Commodities, Inc. - ISDA	UEG	ISDA	NG	ACTIVE	10/01/03	BILATERAL	Atlantic Coast Energy Corporation - Gas	UEG	NAESB	NG	ACTIVE	10/22/12
BILATERAL	Walden Energy LLC	UEG	NAESB	NG	ACTIVE	12/12/03	BILATERAL	Caerus Energy, LLC	UEG	NAESB	NG	ACTIVE	12/04/12
BILATERAL	ONEOK Energy Services Company, L.P.	UEG	NAESB	NG	ACTIVE	01/01/04	BILATERAL	Twin Eagle Resource Mgmt, LLC	UEG	NAESB	NG	ACTIVE	12/04/12
BILATERAL	Energy Transfer Company	UEG	NAESB	NG	ACTIVE	01/16/04	BILATERAL	Sustana Energy, LLC - Gas	UEG	NAESB	NG	ACTIVE	01/16/13
BILATERAL	Bay International, LLC	UEG	NAESB	NG	ACTIVE	02/23/04	BILATERAL	ATO Power, Inc. - Gas	UEG	NAESB	NG	ACTIVE	02/26/13
BILATERAL	Total Gas & Power North America, Inc.	UEG	NAESB	NG	ACTIVE	04/01/04	BILATERAL	D&L Harris and Associates	UEG	NAESB	NG	ACTIVE	04/01/13
BILATERAL	Citadel Energy Products LLC	UEG	NAESB	NG	ACTIVE	03/25/04	BILATERAL	Mileco Inc.	UEG	NAESB	NG	ACTIVE	07/16/13
BILATERAL	BNP Paribas Energy Trading GP - ISDA	UEG	ISDA	NG	ACTIVE	10/01/04	BILATERAL	Saja Energy LLC	UEG	NAESB	NG	ACTIVE	08/21/13
BILATERAL	American Gas Management, Inc.	UEG	NAESB	NG	ACTIVE	10/01/04	BILATERAL	Aradhu Energy, LLC - Gas	UEG	NAESB	NG	ACTIVE	02/11/14
BILATERAL	Salt River Project	UEG	NAESB	NG	ACTIVE	10/01/04	BILATERAL	CDWR Agency Delegation Agreement	UEG	Other	NG	ACTIVE	02/11/14
BILATERAL	Ultra Resources, Inc.	UEG	NAESB	NG	ACTIVE	11/01/04	BILATERAL	Coyanota Gas Services Corp	UEG	NAESB	NG	ACTIVE	03/08/14
							BILATERAL	Continuum Energy Services, LLC	UEG	NAESB	NG	ACTIVE	41883

TABLE 8

OF Properties - 1.3.6 Items A-K
 Confidential/Proprietary pursuant to application provisions of D.05-08-068, D.08-04-023, G.O. 18-C, and PUC Code Sec. 63 and Sec. 654.9(f)

Technology Type	QFO	Project Name	Operating Status	Location	Contract Type Properties - d			e	f	g. d.]	h. d.]	i. d.]	k
					Contract Type	Energy Option	Capacity Option						
Cogeneration	466	CP - Kelco	Active	2145 E. Bell Dr., San Diego	NSTD PPA	SRAC	As-Delivered	04-02	30 Day Notice by either party	26,000	n/a	26,000	n/a
Cogeneration	431	Coal Line L.P.	Active	555 1/2 Tulp St., Escondido	S02	SRAC	Firm	Feb-95	Feb-25	49,900	49,900	0	\$172/MW-yr
Cogeneration	75	Grossmont Hospital	Active	5555 Grossmont Center Dr. La Mesa	S01	SRAC	As-Delivered	Aug-94	Notification by Seller	1,544	n/a	1,544	n/a
Cogeneration	233	Naval Station	Active	U.S. Naval Station, 213 Ward Road, San Diego	S04	SRAC	Firm	Dec-89	Nov-19	49,900	46,500	3,400	\$152.50/MW-yr
Cogeneration	223	North Island Cogeneration	Active	Naval Air Station, North Island, Coronado	S04	SRAC	Firm	Dec-89	Nov-19	34,500	33,500	1,000	\$152.50/MW-yr
Cogeneration	232	HTCMCRD Cogeneration	Active	MCRD, 3231 Bennett Avenue, San Diego	S04	SRAC	Firm	Dec-89	Nov-19	23,000	21,600	1,400	\$152.50/MW-yr
Cogeneration	416	Yuma Cogeneration Assoc.	Active	280 N. 27th Drive, Yuma, AZ	S02	SRAC	Firm	May-94	May-24	56,500	50,000	6,500	\$140/MW-yr
Cogeneration Total										241,344	201,600	39,744	
Hydro	17	Bedger Filtration Plant	Active	Aliso Canyon Rd, Rancho Santa Fe	S04	SRAC	1.96 GWh allocated by TOU periods	Jul-87	Jul-17	1,465	n/a	1,465	n/a
Hydro	027	Bear Valley Hydro Plant	Active	Bear Valley, Escondido	NSTD PPA	SRAC	As-Delivered	Apr-94	Notification by Seller	1,500	n/a	1,500	n/a
Hydro	119	San Francisco Peak Hydro Plant	Active	South of Lake Blvd. & E. of Waverly Road, Oceanside	S01	SRAC	As-Delivered	Dec-85	Notification by Seller	350	n/a	350	n/a
Hydro Total										3,335	0	3,335	
Steam Turbine	102	HTCMCRD Steam Turbine	Active	MCRD, 3231 Bennett Avenue, San Diego	S01	SRAC	As-Delivered	Jul-04	Notification by Seller	2,560	n/a	2,560	n/a
Steam Turbine Total										2,560	0	2,560	
Grand Total										247,799	201,600	46,209	

TABLE 8 (CONT)

Monthly Energy Purchases (KWh) - 1.3.6 Item L		Confidential/privileged pursuant to applicable provisions of D.06-06-066, D.08-04-023, G.O. 86-C and PUC Code Sec. 583 and Sec. 454.5(g)													
Technology Type	OFID	Project Name	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Grand Total
Cogeneration	466	CP - Kelco													16,125,100
Cogeneration	431	Goal Line L.P.													165,043,243
Cogeneration	75	Grossmont Hospital													1,875
Cogeneration	233	Naval Station													320,506,683
Cogeneration	223	North Island Cogeneration													284,645,382
Cogeneration	232	NTC/MCRD Cogeneration													164,355,724
Cogeneration	416	Yuma Cogeneration Assoc.													61,548,637
Cogeneration Total			90,497,081	84,225,503	62,801,669	68,343,014	90,409,666	100,707,876	98,326,059	93,843,149	94,638,872	77,676,673	60,039,666	90,719,426	1,012,226,644
Hydro	17	Bodger Filtration Plant													1,151,983
Hydro	027	Bear Valley Hydro Plant													561,898
Hydro	119	San Francisco Peak Hydro Plant													468,156
Hydro Total			211,328	43,378	17,691	47,914	196,318	394,921	308,797	383,401	361,415	148,889	31,530	36,455	2,182,037
Steam Turbine	162	NTC/MCRD Steam Turbine													17,372,774
Steam Turbine Total			1,121,818	1,430,236	1,567,062	1,436,148	1,657,368	1,660,802	1,688,703	1,433,130	1,267,574	1,177,738	1,396,906	1,546,289	17,372,774
Grand Total															1,031,781,455

TABLE 8 (CONT)

Monthly Energy Payments (\$) - 1.3.6 Item II		Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Grand Total	
Technology Type	CFD	Project Name													
Cogeneration	466	CP - Kekoa												\$ 810,366.31	
Cogeneration	451	Geol Line L.P.												\$ 9,852,715.90	
Cogeneration	75	Grossmont Hospital												\$ 84.25	
Cogeneration	233	Naval Station												\$ 16,702,942.83	
Cogeneration	223	North Island Cogeneration												\$ 14,339,654.68	
Cogeneration	232	NTC/MCRD Cogeneration												\$ 8,511,102.31	
Cogeneration	416	Yuma Cogeneration Assoc.												\$ 2,672,718.34	
Cogeneration Total			\$ 4,591,396	\$ 4,712,429	\$ 3,641,554	\$ 3,604,105	\$ 5,175,655	\$ 5,447,691	\$ 5,512,957	\$ 4,649,479	\$ 4,803,452	\$ 3,685,565	\$ 2,552,108	\$ 4,512,415	\$ 52,889,594.60
Hydro	17	Bodger Filtration Plant												\$ 59,692.85	
Hydro	127	Bear Valley Hydro Plant												\$ 29,211.89	
Hydro	119	San Francisco Peak Hydro Plant												\$ 23,880.23	
Hydro Total			\$ 10,405	\$ 2,323	\$ 989	\$ 2,652	\$ 10,647	\$ 21,351	\$ 17,228	\$ 18,681	\$ 6,806	\$ 1,284	\$ 1,791	\$ 112,784.97	
Steam Turbine	162	NTC/MCRD Steam Turbine												\$ 886,659.59	
Steam Turbine Total			\$ 55,534	\$ 79,941	\$ 89,150	\$ 72,908	\$ 89,167	\$ 90,250	\$ 94,745	\$ 71,068	\$ 65,292	\$ 55,320	\$ 57,357	\$ 76,127	\$ 886,659.59
														\$ 53,899,239.16	

TABLE 8 (CONT)

Monthly Capacity Payments (\$) - 1.3.6 Item N															
Confidential/privileged pursuant to applicable provisions of D.05-05-006, D.05-04-003, G.O. 65-C and PUC Code Sec. 583 and Sec. 464.5(g)															
Technology Type	OFD	Project Name	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Grand Total
Cogeneration	466	CP - Kervo													\$ 103,910.48
Cogeneration	431	Coal Line L.P.													\$ 10,349,750.11
Cogeneration	75	Crossmont Hospital													\$ 3.56
Cogeneration	233	Naval Station													\$ 8,300,901.49
Cogeneration	223	North Island Cogeneration													\$ 6,153,439.88
Cogeneration	232	NTC/MCRD Cogeneration													\$ 3,074,905.90
Cogeneration	416	Yuma Cogeneration Assoc.													\$ 7,749,912.13
Cogeneration Total			\$ 1,585,716	\$ 1,576,342	\$ 1,467,871	\$ 1,557,659	\$ 5,071,657	\$ 5,227,239	\$ 5,242,706	\$ 5,246,446	\$ 5,319,834	\$ 1,302,137	\$ 1,468,139	\$ 1,467,659	\$ 36,612,903.55
Hydro	17	Badger Filtration Plant													\$ 36,154.35
Hydro	027	Bear Valley Hydro Plant													\$ 6,013.18
Hydro	119	San Francisco Peak Hydro Plant													\$ 3,191.82
Hydro Total			\$ 1,300	\$ 69	\$ 38	\$ 239	\$ 4,642	\$ 9,625	\$ 9,901	\$ 9,430	\$ 8,881	\$ 920	\$ 48	\$ 65	\$ 45,339.35
Steam Turbine	162	NTC/MCRD Steam Turbine													\$ 108,308.20
Steam Turbine Total			\$ 2,438	\$ 3,298	\$ 3,336	\$ 3,025	\$ 16,751	\$ 18,366	\$ 19,543	\$ 16,551	\$ 15,991	\$ 2,850	\$ 2,457	\$ 5,613	\$ 108,308.20
															\$ 36,766,571.10

TABLE 8 (CONT)

Monthly Bonus Payments (\$) - 1.3.6 Item O		Confidential/privileged pursuant to applicable provisions of D.06-06-066, D.08-04-023, G.O. 66-C and PUC Code Sec. 933 and Sec. 454.5(g)													
Technology Type	OFID	Project Name	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Grand Total
Cogeneration	466	CP - Kelco													n/a
Cogeneration	431	Goal Line L.P.													n/a
Cogeneration	75	Grossmont Hospital													
Cogeneration	233	Naval Station													
Cogeneration	223	North Island Cogeneration													
Cogeneration	232	NTC/MCRD Cogeneration													
Cogeneration	416	Yuma Cogeneration Assoc.													
Hydro	17	Badger Filtration Plant													n/a
Hydro	027	Bear Valley Hydro Plant													n/a
Hydro	119	San Francisco Peak Hydro Plant													n/a
Steam Turbine	162	NTC/MCRD Steam Turbine													n/a

TABLE 8 (CONT)

Monthly Summary Purchases and Payments (\$) - 1.3.6 Item P Confidential/privileged pursuant to applicable provisions of D.06-06-066, D.06-04-023, G.O. 66-C and PUC Code Sec. 683 and Sec. 464.5(g)							
Technology Type	QFID	Project Name	Payment Month	kWh	Energy (\$)	Capacity (\$)	Total (\$)
Cogeneration	466	CP - Kelco	Jan-14				
Cogeneration	466	CP - Kelco	Feb-14				
Cogeneration	466	CP - Kelco	Mar-14				
Cogeneration	466	CP - Kelco	Apr-14				
Cogeneration	466	CP - Kelco	May-14				
Cogeneration	466	CP - Kelco	Jun-14				
Cogeneration	466	CP - Kelco	Jul-14				
Cogeneration	466	CP - Kelco	Aug-14				
Cogeneration	466	CP - Kelco	Sep-14				
Cogeneration	466	CP - Kelco	Oct-14				
Cogeneration	466	CP - Kelco	Nov-14				
Cogeneration	466	CP - Kelco	Dec-14				
466 Total				16,125,100	810,356	103,910	914,267
Cogeneration	431	Goal Line L.P.	Jan-14				
Cogeneration	431	Goal Line L.P.	Feb-14				
Cogeneration	431	Goal Line L.P.	Mar-14				
Cogeneration	431	Goal Line L.P.	Apr-14				
Cogeneration	431	Goal Line L.P.	May-14				
Cogeneration	431	Goal Line L.P.	Jun-14				
Cogeneration	431	Goal Line L.P.	Jul-14				
Cogeneration	431	Goal Line L.P.	Aug-14				
Cogeneration	431	Goal Line L.P.	Sep-14				
Cogeneration	431	Goal Line L.P.	Oct-14				
Cogeneration	431	Goal Line L.P.	Nov-14				
Cogeneration	431	Goal Line L.P.	Dec-14				
431 Total				166,043,243	9,852,736	10,349,750	20,202,486
Cogeneration	75	Grossmont Hospital	Jan-14				
Cogeneration	75	Grossmont Hospital	Feb-14				
Cogeneration	75	Grossmont Hospital	Mar-14				
Cogeneration	75	Grossmont Hospital	Apr-14				
Cogeneration	75	Grossmont Hospital	May-14				
Cogeneration	75	Grossmont Hospital	Jun-14				
Cogeneration	75	Grossmont Hospital	Jul-14				
Cogeneration	75	Grossmont Hospital	Aug-14				
Cogeneration	75	Grossmont Hospital	Sep-14				
Cogeneration	75	Grossmont Hospital	Oct-14				
Cogeneration	75	Grossmont Hospital	Nov-14				
Cogeneration	75	Grossmont Hospital	Dec-14				
75 Total				1,874	84	4	88

TABLE 8 (CONT)

Technology Type	QFID	Project Name	Payment Month	kWh	Energy (\$)	Capacity (\$)	Total (\$)
Cogeneration	233	Naval Station	Jan-14				
Cogeneration	233	Naval Station	Feb-14				
Cogeneration	233	Naval Station	Mar-14				
Cogeneration	233	Naval Station	Apr-14				
Cogeneration	233	Naval Station	May-14				
Cogeneration	233	Naval Station	Jun-14				
Cogeneration	233	Naval Station	Jul-14				
Cogeneration	233	Naval Station	Aug-14				
Cogeneration	233	Naval Station	Sep-14				
Cogeneration	233	Naval Station	Oct-14				
Cogeneration	233	Naval Station	Nov-14				
Cogeneration	233	Naval Station	Dec-14				
233 Total				320,506,683	16,702,943	8,380,901	25,083,944
Cogeneration	223	North Island Cogeneration	Jan-14				
Cogeneration	223	North Island Cogeneration	Feb-14				
Cogeneration	223	North Island Cogeneration	Mar-14				
Cogeneration	223	North Island Cogeneration	Apr-14				
Cogeneration	223	North Island Cogeneration	May-14				
Cogeneration	223	North Island Cogeneration	Jun-14				
Cogeneration	223	North Island Cogeneration	Jul-14				
Cogeneration	223	North Island Cogeneration	Aug-14				
Cogeneration	223	North Island Cogeneration	Sep-14				
Cogeneration	223	North Island Cogeneration	Oct-14				
Cogeneration	223	North Island Cogeneration	Nov-14				
Cogeneration	223	North Island Cogeneration	Dec-14				
223 Total				284,645,382	14,339,655	6,163,440	20,493,095
Cogeneration	232	NTC/MCRD Cogeneration	Jan-14				
Cogeneration	232	NTC/MCRD Cogeneration	Feb-14				
Cogeneration	232	NTC/MCRD Cogeneration	Mar-14				
Cogeneration	232	NTC/MCRD Cogeneration	Apr-14				
Cogeneration	232	NTC/MCRD Cogeneration	May-14				
Cogeneration	232	NTC/MCRD Cogeneration	Jun-14				
Cogeneration	232	NTC/MCRD Cogeneration	Jul-14				
Cogeneration	232	NTC/MCRD Cogeneration	Aug-14				
Cogeneration	232	NTC/MCRD Cogeneration	Sep-14				
Cogeneration	232	NTC/MCRD Cogeneration	Oct-14				
Cogeneration	232	NTC/MCRD Cogeneration	Nov-14				
Cogeneration	232	NTC/MCRD Cogeneration	Dec-14				
232 Total				164,355,724	8,511,102	3,874,986	12,386,088

TABLE 8 (CONT)

Technology Type	QFID	Project Name	Payment Month	kWh	Energy (\$)	Capacity (\$)	Total (\$)
Cogeneration	416	Yuma Cogeneration Assoc.	Jan-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Feb-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Mar-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Apr-14				
Cogeneration	416	Yuma Cogeneration Assoc.	May-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Jun-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Jul-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Aug-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Sep-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Oct-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Nov-14				
Cogeneration	416	Yuma Cogeneration Assoc.	Dec-14				
	416 Total			61,548,637	2,672,718	7,749,912	10,422,630
Hydro	17	Badger Filtration Plant	Jan-14				
Hydro	17	Badger Filtration Plant	Feb-14				
Hydro	17	Badger Filtration Plant	Mar-14				
Hydro	17	Badger Filtration Plant	Apr-14				
Hydro	17	Badger Filtration Plant	May-14				
Hydro	17	Badger Filtration Plant	Jun-14				
Hydro	17	Badger Filtration Plant	Jul-14				
Hydro	17	Badger Filtration Plant	Aug-14				
Hydro	17	Badger Filtration Plant	Sep-14				
Hydro	17	Badger Filtration Plant	Oct-14				
Hydro	17	Badger Filtration Plant	Nov-14				
Hydro	17	Badger Filtration Plant	Dec-14				
	17 Total			1,151,983	59,693	36,154	95,847
Hydro	027	Bear Valley Hydro Plant	Jan-14				
Hydro	027	Bear Valley Hydro Plant	Feb-14				
Hydro	027	Bear Valley Hydro Plant	Mar-14				
Hydro	027	Bear Valley Hydro Plant	Apr-14				
Hydro	027	Bear Valley Hydro Plant	May-14				
Hydro	027	Bear Valley Hydro Plant	Jun-14				
Hydro	027	Bear Valley Hydro Plant	Jul-14				
Hydro	027	Bear Valley Hydro Plant	Aug-14				
Hydro	027	Bear Valley Hydro Plant	Sep-14				
Hydro	027	Bear Valley Hydro Plant	Oct-14				
Hydro	027	Bear Valley Hydro Plant	Nov-14				
Hydro	027	Bear Valley Hydro Plant	Dec-14				
	027 Total			561,898	29,212	6,013	35,225

TABLE 8 (CONT)

Technology Type	QFID	Project Name	Payment Month	kWh	Energy (\$)	Capacity (\$)	Total (\$)
Hydro	119	San Francisco Peak Hydro Plant	Jan-14				
Hydro	119	San Francisco Peak Hydro Plant	Feb-14				
Hydro	119	San Francisco Peak Hydro Plant	Mar-14				
Hydro	119	San Francisco Peak Hydro Plant	Apr-14				
Hydro	119	San Francisco Peak Hydro Plant	May-14				
Hydro	119	San Francisco Peak Hydro Plant	Jun-14				
Hydro	119	San Francisco Peak Hydro Plant	Jul-14				
Hydro	119	San Francisco Peak Hydro Plant	Aug-14				
Hydro	119	San Francisco Peak Hydro Plant	Sep-14				
Hydro	119	San Francisco Peak Hydro Plant	Oct-14				
Hydro	119	San Francisco Peak Hydro Plant	Nov-14				
Hydro	119	San Francisco Peak Hydro Plant	Dec-14				
	119 Total			488,156	23,880	3,192	27,072
Steam Turbine	162	NTC/MCRD Steam Turbine	Jan-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Feb-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Mar-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Apr-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	May-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Jun-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Jul-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Aug-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Sep-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Oct-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Nov-14				
Steam Turbine	162	NTC/MCRD Steam Turbine	Dec-14				
	162 Total			17,372,774	896,860	108,308	1,005,168
	Grand Total			1,031,781,454 \$	53,899,239 \$	36,766,572 \$	90,665,811 \$

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

**DECLARATION
OF SALLY CHEN**

A.15-06-XXX

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least Cost Dispatch and Power Procurement Activities in 2014, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2014 and (iii) Costs Recorded in Related Regulatory Accounts in 2014

I, Sally Chen, declare as follows:

1. I am the Settlements & Administration Manager for San Diego Gas & Electric Company (“SDG&E”). I have included my Direct Testimony (“Testimony”) in support of SDG&E’s Application for Approval of: (i) Contract Administration, and (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Incurred During the Record Period January 1, 2014 through December 31, 2014, and (iii) the Entries Recorded in Related Regulatory Accounts. Additionally, as the Settlements & Administration Manager, 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 procedures adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 in 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 confidential 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 provided by SDG&E is allowed confidential treatment in accordance with Appendix 1 – IOU Matrix in D.06-06-066.


Confidential Information	Matrix Reference	Reason for Confidentiality And Timing
SC-13 lines 6-14 SC-14 line 5 SC-18 lines 9 & 19 SC-19 lines 4-7 SC-20 lines 7-8	VII.G	Contract terms; confidential for 3 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 such data under those provisions, as applicable.

Application as intended; however SDG&E is certainly willing to work with the Commission regarding possible aggregations if the Commission seeks to make any of the confidential information provided in the Testimony public.

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

Executed this 1st day of June, 2014, at San Diego, California.



Sally Chen
Settlements & Administration Manager
San Diego Gas & Electric Company