

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

Application of San Diego Gas & Electric
Company (U 902 M) for Authority to
Implement Rate Relief and Increase Spend in
Support of the San Diego Unified Port
District's Energy Management Plan

Application No. 17-09-_____
(Filed September 13, 2017)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR
AUTHORITY TO IMPLEMENT RATE RELIEF AND INCREASE SPEND IN
SUPPORT OF THE SAN DIEGO UNIFIED PORT DISTRICT'S ENERGY
MANAGEMENT PLAN**

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I. INTRODUCTION

Pursuant to the directive set forth in California Public Utilities Commission (Commission) Resolution E-4812, Public Utilities Code Section 454, Public Resources Code section 25990, and Commission Rules 2.1-2.3 and 3.2, San Diego Gas & Electric Company (SDG&E) hereby submits this application (Application) for authorization to implement a five-year rate adjustment for the District's cruise ship terminal account and increase funding for energy efficiency (EE) and an Enhanced Partnership Program (EPP) in support of the San Diego Unified Port District's (District) Energy Management Plan (EMP).¹

California Assembly Bill (AB) 628 , approved by Governor Brown on October 11, 2013, recognizes the need for California harbor and port districts to reduce energy costs and air pollution emissions in their operations and to increase business development within their boundaries.² AB 628 authorizes port and harbor districts to jointly prepare and implement EMPs with electrical corporations, gas corporations, community choice aggregators established on or

¹ *Port of San Diego Energy Management Plan* (as Exhibit A to Energy Management Plan Contract filed August 22, 2017).

² AB 628 (Ch. 741) is codified at Section 25990 of the California Public Resources Code (Cal. Pub. Res. Code).

before July 1, 2013, or publicly-owned electric or gas utilities to accomplish those goals.³ AB 628 directs the Commission to encourage electric and gas corporations to participate with local port districts to develop, implement and administer these EMPs, and allows the Commission to provide technical assistance in the preparation of EMPs.⁴

The District was formed in 1962 to promote the maritime industries that stimulate the San Diego economy, and to responsibly manage the social and environmental assets of San Diego Bay. The District encompasses portions of five cities: San Diego, National City, Chula Vista, Imperial Beach and Coronado. The District oversees two maritime cargo terminals, the cruise ship terminals, 20 public parks, protected wildlife habitat, the Harbor Police department, and tenant leases with over 600 businesses around San Diego Bay, including recreational and commercial marinas, hotels, restaurants and industrial businesses.⁵

The EMP developed by SDG&E and the District⁶ is intended to provide a comprehensive energy roadmap for the District and its various stakeholders, especially the disadvantaged communities of National City and Chula Vista,⁷ to achieve significant reductions in greenhouse gas (GHG) emissions and increase energy efficiency. The District was one of the first ports in the nation to voluntarily adopt a Climate Action Plan (CAP) to manage GHG emissions by

³ Cal. Pub. Res. Code §25990(a).

⁴ Cal. Pub. Res. Code §25990(d), (e).

⁵ Port of San Diego Climate Action Plan, pg. 8, available at <https://www.portofsandiego.org/document/environment/climate-mitigation-and-adaptation-plan/documents-1/5515-port-of-san-diego-climate-action-plan/file.html>.

⁶ Energy Management Plan Contract and Energy Management Plan, Document No. 67145, filed at the Office of the District Clerk of the San Diego Unified Port District on August 22, 2017, and attached as Appendix G.

⁷ Disadvantaged communities as ranked in the top 25% of disadvantaged communities by the California Environmental Protection Agency (CalEPA) CalEnviroScreen 3.0, available at <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

setting specific GHG emissions goals in accordance with AB 32, California's Global Warming Solutions Act of 2006, which sets a statewide goal to reduce GHG emissions to 1990 levels by 2020,⁸ and Executive Order S-3-05, which extends statewide GHG emission reduction goals to 80% below 1990 levels by 2050.⁹ The EMP focuses on five main areas in support of the District's CAP: Energy Efficiency, Advanced Technologies, Clean Generation, Clean Transportation and Electric Rates. This EMP is intended to be the first of multiple EMPs developed with SDG&E in the next 15 years. The EPP is the mechanism supporting the EMP through which these various programs will be implemented, managed and overseen.

This Application requests (1) approval and cost recovery of a rate adjustment to be applied to the District's cruise ship terminal account's monthly bills as a just and reasonable method of managing the District's shore power charges and associated rate uncertainty resulting from shore power requirements for cruise ships set forth by the California Air Resources Board for a limited term of five years, (2) approval and cost recovery of EE funds for the development of specialized EE measures for the District and its tenants as a just and reasonable method of reducing GHG emissions and reducing the District's overall energy load for three years starting in 2019, and (3) approval and cost recovery for funds to support the EPP as a just and reasonable method of ensuring the lawful and effective implementation of the EMP's programs and measures for the term of the EMP (five years). Consistent with current public policy programs, as these funding requests are made in support of an EMP developed under AB 628, SDG&E

⁸ AB 32 (Ch. 488), California Global Warming Solutions Act of 2006, approved on September 27, 2006.

⁹ EO 2-30-05 (June 1, 2005), accessible at: <https://www.gov.ca.gov/news.php?id=1861>.

proposes to obtain the cost recovery requested herein through an increase in Public Purpose Programs (PPP) rates from all customers.

The District plans to file a response to this Application and concurrently therewith serve prepared direct testimony of two District witnesses, Stephen Shafer and Dr. Adam Borison, in support of this Application.

II. FIVE-YEAR RATE ADJUSTMENT FOR CRUISE SHIP TERMINAL ACCOUNT TO SUPPORT SHORE-BASED POWER TO REDUCE CRUISE SHIP EMISSIONS

The District manages three deepwater cruise ship berths, equaling half of all deepwater cruise ship berths in Southern California that can accept both home port and visitation calls.¹⁰ Cruise ships berth at these terminals for four to sixteen days per month during the cruise season. Cruise ship season is approximately nine months long, from September to late May or early June.¹¹ Economic analyses shows that cruise ship visits to San Diego generate significant income for the region. In 2015, the 77 cruise ship calls at the Port of San Diego were reportedly responsible for the generation of approximately \$82 million in sales among San Diego businesses and supported more than 650 full time equivalent (FTE) positions in the San Diego metropolitan area.¹²

In 2010, the District installed a shore power system at its cruise ship berths, pursuant to regulations developed by the California Air Resources Board to reduce GHG emissions of

¹⁰ Prepared direct testimony of Stephen Shafer, District witness, Section IV.A.

¹¹ *Id.*

¹² Economic Impacts of the San Diego Unified Port District in 2015, Final Report (Dec. 20, 2016), Appendix B (Business Research and Economic Advisors (BREA) Economic Impact Analysis of the San Diego Cruise Sector 2015), pg. 2, available at: <https://www.portofsandiego.org/document/about-port-of-san-diego-documents/strategic-plan/8037-economic-impact-analysis-2015/file.html>.

docked cruise ships.¹³ These regulations prohibit cruise lines from docking more than five times a year at the District's berths unless they use shore-based power.¹⁴ Charges for the use of shore-based power by a cruise ship are charged to the District's cruise ship terminal account and then passed through by the District to the cruise line. At the time of installation of the shore-based power system, the seasonality of cruise ship visits allowed the District to obtain service for the cruise ship terminal account under SDG&E's Schedule A, Time of Use (Schedule TOU-A) a small commercial rate that does not include demand charges.¹⁵ However, pursuant to Decision (D.) 17-08-030, the decision approving SDG&E's 2016 General Rate Case (GRC) Phase 2 Application, SDG&E will be amending the applicability of SDG&E's standard small commercial rates (including Schedule TOU-A), effective July 1, 2018. Specifically, SDG&E is modifying the applicability of these rates such that any commercial customer whose demand exceeds 200 kW in two out of twelve consecutive months will no longer be eligible for service on such rate. Energy use on the cruise ship terminal account exceeds that amount, as described in Cynthia Fang's testimony (Chapter 4). Thus, starting in July 2018, the cruise ship terminal account will be transferred to Schedule A6-TOU, an optional medium/large commercial and industrial rate (M/L C&I) applicable to customers whose demand is 500 kW or greater. Unlike small commercial rates, M/L C&I rates include both price per kWh charges as well as coincident and

¹³ California Air Resources Board, Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port, available online at: <https://www.arb.ca.gov/ports/shorepower/finalregulation.pdf>. The regulations apply to cruise ships that call at a specific California port five or more times per calendar year.

¹⁴ *Id.* at 2 (see exception at Section 93118.3(b)(3)(E)(2)).

¹⁵ SDG&E Schedule TOU-A, available at http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_TOU-A.pdf.

non-coincident demand charges to account for system costs associated with demand peaks.¹⁶

These charges are assessed every month, even in months of no energy use.¹⁷

The assessment of demand charges on the cruise ship terminal account poses two major issues. First, although cruise ships use shore power only a handful of days in any month, when a cruise ship plugs into the system, it is as if a town with thousands of residents has come online.¹⁸ This causes the cruise ship terminal account to experience high demand peaks, which translate into high demand charges, increasing the total energy charges billed to the account, which are then passed through to the cruise lines. Demand charges on the District's shore power account may climb to upwards of \$100,000 a month if the District is switched to an M/L C&I rate.¹⁹ Second, non-coincident demand charges are calculated monthly, based on the greater of the highest demand on the account over the previous 11 months or the maximum monthly demand.²⁰ For illustration, this means that demand charges assessed against the cruise ship terminal account on its February 2018 bill could be the result of a cruise ship that used shore power in April 2017. This also means that charges will be assessed to the cruise ship terminal account even in the off-season when no cruise ships call at the District's berths. The District currently has no mechanism to divide the costs of non-coincident demand charges among the District's cruise line

¹⁶ As noted in Cynthia Fang's testimony and described in SDG&E's A6-TOU tariff, non-coincident demand charges are the greater of 50% of the highest demand peak in the last 11 months or monthly maximum demand, whichever is higher. Therefore, even in a month of no demand, the District would incur non-coincident demand charges. See http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_A6-TOU.pdf.

¹⁷ *Id.*

¹⁸ Prepared direct testimony of Dr. Adam Borison, District witness, Section IV (2).

¹⁹ Resolution E-4812, August 10, 2017 (Resolution E-4812), pg. 4.

²⁰ SDG&E Schedule A6-TOU tariff, available at http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_A6-TOU.pdf.

customers, especially in months with no cruise visits. This is further complicated by the problem of assessing charges to a cruise ship associated with another cruise ship's usage. The pass-through nature of shore power coupled with the seasonality and high peak demand of cruise ship visits make demand charges very difficult to manage, and create serious cost uncertainty for the District's cruise-line business.

Last year, in preparation for these upcoming rate changes, SDG&E requested interim rate relief from Commission to allow the cruise ship terminal account to remain on its small commercial rate for a limited time until a longer-term solution could be implemented.²¹ The Commission approved SDG&E's Advice Letter (AL) 2896-E on August 15, 2017. In approving such request, the Commission found that the high demand charges and cost uncertainty that would otherwise be experienced on this account are "contrary to AB 628's goal of greater stability and certainty in the cost of energy services for ports."²² The Commission acknowledged that cruise ship visits "are an important aspect of the San Diego economy" and that the District should not face "such significant negative bill impacts that may affect the continued operation of the Port and docking of cruise ships."²³ Without longer term relief, the District, and by extension the cruise ship industry in San Diego, will experience exponentially higher energy costs and rate uncertainty in part because of the District's efforts to support the State's GHG emissions goals through the provision and incentivization of shore power. This would be antithetical to the goals of AB 628.

²¹ SDG&E AL 2896-E, filed May 13, 2016, approved August 15, 2017 and effective August 10, 2017.

²² Resolution E-4812, pg. 4.

²³ *Id.* at 5.

The Commission has also recognized, however, that SDG&E cannot allow cross subsidization to occur indefinitely.²⁴ The District and SDG&E are committed to resolving these shore power rate issues. In 2016, the parties adopted a Memorandum of Understanding concerning this issues. Pursuant to that memorandum, as described in the testimony of Todd Cahill (Chapter 1), SDG&E hired Rocky Mountain Institute (RMI), a nonprofit organization that works to accelerate the adoption of market-based solutions that favor renewable energy sources,²⁵ to identify possible solutions for the District by researching methods of managing peak demand used at other ports around the world. RMI considered solar distributed generation, energy storage, shore power capacity expansion, liquefied natural gas (LNG) barges, and fuel cells powered by water electrolysis as possible means of reducing the District demand charges, and produced a workshop report on behalf of SDG&E and the District, attached to this Application as Appendix I. The conclusion of the workshop was that none of these solutions was immediately feasible or viable within the time frame imposed by SDG&E's 2016 GRC Phase 2 Application, and development of an EMP between the parties was necessary to further this research.²⁶

For these reasons, SDG&E requests implementation of a five-year rate adjustment of approximately \$10.8 million²⁷ (Discount). As described in Cynthia Fang's testimony (Chapter 4), SDG&E proposes to bill the cruise ship terminal account on Schedule A6-TOU, a lawful M/L

²⁴ *Id.*

²⁵ Rocky Mountain Institute website, available at <https://www.rmi.org/our-work/>.

²⁶ Appendix I, Rocky Mountain Institute Workshop Report.

²⁷ As described in the testimony of Cynthia Fang (Chapter 4), this fiscal projection is an estimate based on historical usage from July 2016 to June 2017. The total cost of the shore power rate discount will be dependent on the electricity usage at the District's shore power account.

C&I cost-based rate, and then deduct the Discount as a line-item reduction off the cruise ship terminal account on a monthly basis. Schedule A6-TOU provides “real-time” price signals of Maximum Demand at Time of System Peak.²⁸ On this rate schedule, the District will see the price signals associated with being on a rate that reflects demand at the time of SDG&E’s system peak.²⁹ The District’s bill will then be adjusted by the Discount so that the District’s total charges are equivalent to the current effective M/L C&I class-average rate per kWh of energy used in that month. The total account charges will be recalculated each billing period to ensure the electric rate paid by the District equals the then-effective M/L C&I class-average rate. As the energy costs charged to the District will equal the price per kWh of shore power used by the cruise ships on an M/L C&I rate, the District will be able to allocate energy costs among its cruise ship customers as it did previously, but on a rate appropriate for large customers that continues to reflect time of use rates. As the current effective M/L C&I class average rate has historically low variability, the adjusted rate will translate into more predictable pricing and less rate shock for cruise lines over the term of the Discount.

The rate adjustment would be in effect for the five-year term of the EMP while the District and SDG&E develop a “glide path” towards a permanent solution that addresses the District’s needs and ensures that it is the cruise ships and their ridership who pay the cost of service associated with their energy use, in a manner that continues to limit GHG and other harmful emissions in the tidelands. In accordance with the Commission’s direction that “the

²⁸ Special Condition 7 of Schedule A6-TOU defines the Maximum Demand at the Time of System Peak to be based on the kilowatts of Maximum Demand measured at the time of system peak occurring during each billing period during the on-peak period.

²⁹ Initially, SDG&E will provide the transparent discount to the District through a monthly refund check, but will pursue implementation of the discount through a line-item on the District’s bill, with timing of the line-item discount dependent on system demands and limitations.

energy management plan . . . minimize the Port’s demand on SDG&E’s system in order to align the Port’s rate treatment with its cost of service,”³⁰ the intent is that the newly developed technologies described in the EMP and supported by the funding for the EE and EPP proposals requested as part of this Application will also gradually reduce the District’s cost of service on this account and at other District facilities.

SDG&E believes this Discount proposal is an appropriate step in support of shore power and reduced GHG emissions. The demand charges that would otherwise be incurred by the District are a direct result of CARB’s At-Berth Regulation, which seeks to reduce GHG emissions emitted by diesel generation from cruise ships in the tidelands.³¹ Increasing the costs of shore power use or making such costs uncertain would send the wrong signal to cruise lines if the state wants to encourage less diesel generation and more shore power use. It would also ignore the indirect costs of GHG and other harmful emissions experienced by the disadvantaged communities located within or immediately adjacent to the tidelands, as well as the benefits tidelands communities and businesses gain from cruise ship visits. SDG&E and the District have received more than 20 letters of support for this Application from key stakeholders, such as the mayors of the District’s member cities of San Diego, Chula Vista, National City, and Imperial Beach, City of San Diego councilmembers representing tidelands areas, non-profit groups, District businesses, and the Port Tenants Association.³² These community leaders and businesses understand the value of the cruise ship industry in the San Diego region, and want to

³⁰ Resolution E-4812, pg. 5.

³¹ California Air Resources Board, Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port, available online at: <https://www.arb.ca.gov/ports/shorepower/finalregulation.pdf>.

³² Appendix H, Letters of Support.

encourage the environmental stewardship shown by the District in the provision of shore power to cruise ships and the development of the EMP to reduce emissions and develop new technologies to manage energy use, as further described below.

III. ENERGY EFFICIENCY MEASURES AND ENHANCED PARTNERSHIP PROGRAM

In addition to the Discount, and in accordance with the policy directives set forth in AB 628, this Application seeks cost recovery through Public Purpose Program rates from all customers to fund the implementation of two key components of the EMP: (1) specialized EE measures and incentives for customers located within the District tidelands, including tenant businesses within the District; and (2) an EPP between SDG&E and the District to oversee and effectively manage the EMP. The total cost of the EE and EPP proposals is \$6.58 million in total incremental funding.

A. EE Proposal

The EMP's EE Proposal describes a comprehensive effort to implement both standard and specialized EE measures within the District. Through the EMP, SDG&E seeks to build on work begun in 2015 to achieve 19.9 million kWh in cumulative energy efficiency savings by the end of 2020.³³ These savings will be achieved through two approaches. The first will be to inform and encourage District tenants to participate in EE projects and measures that qualify for rebates and incentives under existing EE programs already approved in SDG&E's EE Portfolio.³⁴ SDG&E is not requesting any additional funds for these measures, nor is SDG&E earmarking previously allocated funds except as otherwise directed. Instead, SDG&E will publish a Request for Offers (RFO) to vendors who can leverage existing EE programs to

³³ EMP, pg. 19.

³⁴ D.14-10-046, October 16, 2014.

provide turnkey EE solutions to tenant businesses, including evaluation, measurement and verification services to verify the savings achieved.

The second approach involves specialized EE measures that are not eligible for SDG&E's standard EE portfolio. The District and its tenants are a unique set of customers with significant variations in energy use. They include industrial, small commercial and large commercial customers with specialized energy uses, such as sandblasting and temporary power services, which do not always qualify for standard EE measures. SDG&E will leverage the RFO process described above to deliver EE services specifically for the District and its tenants. SDG&E is requesting approval of cost recovery of \$2.55 million in total incremental funding to fund the direct costs of these specialized measures.

B. EPP Proposal

The EPP Proposal is intended to ensure that the District and SDG&E are adequately staffed and supported to oversee the implementation of the EMP Proposals. The District participates in a Local Government Partnership (LGP) agreement with SDG&E, whereby the District receives funding to support EE programs for both the District and its tenants. The LGP includes a five-year budget of \$3.464 million for years 2016-2020 to support administration, marketing, education, outreach and direct implementation. Similarly, the EPP Proposal in the EMP seeks funding to support implementation of all the EMP tasks, including proposals concerning the development and adoption of Advanced Technologies, Clean Generation, and Clean Transportation. These proposals are not discussed in detail in this Application because, to the extent such proposals require funding, such funding requests are part of separate filings before the Commission on such topics. Specifically, the EPP will provide (a) a governance framework for EMP activities both within the five-year term of this initial EMP and for future EMPs between the District and SDG&E, (b) labor and non-labor resources necessary to manage

the implementation of EMP measures at hundreds of tenant locations, governed by varying lease terms and managed within different local jurisdictions, (c) stakeholder outreach and coordination, and (d) grant writing.³⁵ SDG&E is requesting \$5.506 million³⁶ in total incremental funding over five years to fund the implementation of the EPP Proposal.

IV. AUTHORIZATION TO APPROVE RATE RECOVERY

The funding requested in this Application is authorized by the Commission and state law. In Resolution E-4812, the Commission ordered SDG&E to file this Application to propose an appropriate long-term rate design for the District as part of a larger filing in support of the EMP, finding that it is in “the best interest of the state, SDG&E and the Port to come to agreement on an appropriate long-term rate solution for the Port.”³⁷ AB 628 authorizes port districts and utilities to work together to implement EMPs to reduce emissions and encourage economic development, as addressed by the rate adjustment proposal described herein, and specifically requires that such EMP include, among other things, a list of recommendations developed with the local utility for the “enhanced use of cost-effective energy efficiency” in existing buildings³⁸ as well as proposed methods to fund the programs described in the EMP, including funding obtained through utility ratepayer funded programs.³⁹

³⁵ EMP, pg. 52.

³⁶ The allocation of these funds between the District and SDG&E in 2017 dollars is described in Julia Mendoza’s testimony (Chapter 3).

³⁷ Resolution E-4812, Finding 7, pg. 7.

³⁸ Cal. Pub. Res. Code § 25990(b)(4).

³⁹ *Id.*, § 25990(b)(8).

V. SUPPORTING TESTIMONY

In support of this Application, SDG&E includes the testimony of the following witnesses, organized by chapter as shown:

- Chapter 1: (Todd J. Cahill) provides policy support for the EE, EPP, and Electric Shore Power Rate Discount Proposals of the District's EMP, and describes:
 - how the EMP meets the objectives of AB 628, the State's GHG emissions goals, and the District's CAP;
 - how the EE Proposal will achieve incremental savings opportunities, reducing GHG emissions and reducing the amount of money District tenants must spend on their energy bills;
 - how the EPP provides a funding and governance vehicle necessary to implement the EE and Discount Proposals described herein; and.
 - how the Electric Shore Power Rate Discount Proposal will help bolster the viability of the cruise ship industry in San Diego by providing the District cost certainty and averting a dramatic rate shock, which would likely have a significant impact on cruise ship traffic.
- Chapter 2: (Paul Pruschki) describes the two main components of the EE Proposal, as follows:
 - describes the implementation of EE initiatives through the EMP that concern facilities owned and operated by the District and those facilities operated by District tenants;
 - how the proposed development of EE measures will support energy savings for the District and its tenants in two ways: (1) the employment of standard EE measures already offered in SDG&E's EE Programs, and (2) the creation of specialized incremental District-specific EE measures that do not fall within SDG&E's existing EE portfolio; and

- how the proposed Request for Offer (RFO) process conceived by the District and SDG&E will facilitate the implementation of EE measures to reach the EMP's goals.
- Chapter 3 (Julia Mendoza) discusses the need for funding for the EPP Proposal to provide structure and oversight of EMP implementation, and describes:
 - how effective collaboration with the District and execution of the goals set forth in the EMP in support of the District's CAP can only be achieved with the appropriate staff, marketing, and technical resources as requested in this Application; and
 - how funding for the EPP will be divided between the District and SDG&E to support the EMP over its five-year term.
- Chapter 4: (Cynthia Fang) describes SDG&E's proposed electric ratemaking treatment of the EE, EPP, and Electric Shore Power Rate Discount Proposals, as follows:
 - requests recovery of the incremental costs associated with SDG&E's EMP proposals, which include specialized EE measures and EPP, through PPP rates from all customers; and
 - requests recovery of the costs associated with the Electric District Shore Power Rate Discount to be recovered from customers through the PPP rate component.
- Chapter 5: (Michael Foster) describes SDG&E's proposed gas ratemaking treatment of the EE and EPP Proposals in this Application.
- Chapter 6: (Jenny Phan) describes the cost recovery mechanism for the proposals described in this Application, and specifically requests authority to establish the Port Energy Management Plan Balancing Accounts (PEMPBA) to record electric and gas revenues and costs associated with the proposals described herein.

As noted above, the District will be submitting testimony as a response in support of this Application to present comprehensive evidentiary support for Commission approval for these proposals, in addition to the testimony presented herein.

VI. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1(c)

1. Proposed Category of Proceeding

In accordance with Rule 2.1, SDG&E requests that this Application be categorized as “ratesetting” because SDG&E proposes herein specific rate treatment for the District, including the Discount, and to recover costs described in this Application from its ratepayers.

2. Need for Hearings

In the event hearings are necessary, SDG&E has provided a proposed schedule below.

3. Issues to be Considered

The issues to be considered are described in this Application and the accompanying testimony and exhibits. Regarding safety considerations, based on current information, SDG&E’s proposals will not result in any adverse safety impacts on the facilities or operations of SDG&E. Moreover, if approved, SDG&E intends to partner with skilled labor as required by applicable law to implement the installations of EE measures and other technologies pursuant to the EMP. In addition, SDG&E will comply with all applicable safety laws, rules and procedures.

4. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
SDG&E files Application	September 13, 2017
Responses/Protests Due	October 18, 2017
Reply to Responses/Protests	October 30, 2017
Prehearing Conference	November 27, 2017
Scoping Memo Issued	January 5, 2018
ORA and Intervenor Testimony	January 19, 2018

Rebuttal Testimony	February 2, 2018
Evidentiary Hearings, if necessary	February 22, 2018
Concurrent Opening Briefs	March 23, 2018
Concurrent Reply Briefs	April 13, 2018
Proposed Decision	July 13, 2018

B. Authority - Rule 2.1

This Application is filed pursuant to Commission Resolution E-4812, Public Utilities Code sections 454, Public Resources Code section 25990, and in compliance with the Commission’s Rules of Practice and Procedure.

C. Corporate Information and Correspondence - Rules 2.1(a) and 2.1(b)

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service to portions of southern Orange County and electric and gas service throughout San Diego County. The exact legal name of the Applicant is San Diego Gas & Electric Company. The location of Applicant’s principle place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E’s counsel in this matter is Hollie Bierman.

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E-Mail: HBierman@semprautilities.com

With copies to:

William Fuller
Regulatory Case Administrator
San Diego Gas & Electric Company
8330 Century Park Court, CP32F
San Diego, CA 92123
Telephone: (858) 654-1885
E-Mail: WFuller@semprautilities.com

D. Organization and Qualification to Transact Business – Rule 2.2

A certified copy of SDG&E’s Restated Articles of Incorporation, as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014, in connection with SDG&E’s Application No. 14-09-008, and is incorporated herein by reference.

E. Authority to Change Rates – Rule 3.2 (a) – (d)

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.⁴⁰

1. Rule 3.2(a)(1) – Balance Sheet

SDG&E’s financial statement, balance sheet and income statement for the three-month period ending March 31, 2017 are included with this Application as Appendix A.

2. Rule 3.2(a)(2) – Statement of Effective Rates

A statement of all of SDG&E’s presently effective gas and electric rates can be viewed on SDG&E’s website. Appendix B to this Application provides the current table of contents from SDG&E’s gas and electric tariffs on file with the Commission.

3. Rule 3.2(a)(3) – Statement of Proposed Rate Change

A statement of proposed rate increases is attached as Appendix C.

⁴⁰ Note: Rule 3.2(a)(9) is not applicable to SDG&E.

4. Rule 3.2(a)(4) – Description of Property and Equipment

SDG&E is in the business of generating, transmitting and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange and Imperial Counties. This includes a composite 92% ownership in the 500,000-volt Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500,000-volt Sunrise Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of the Moreno gas compressor station in Riverside County and the Rainbow compressor station located in San Diego County. The gas is transmitted through high and low-pressure distribution mains and service lines.

Applicant's original cost of utility plant, together with the related reserves for depreciation and amortization for the three-month period ending March 31, 2017, is shown on the Statement of Original Cost and Depreciation Reserves included as Appendix D.

5. Rule 3.2(a)(5) and (6) – Summary of Earnings

A summary of SDG&E's earnings (for the total utility operations for the company) for three-month period ending March 31, 2017, is included as Appendix E to this Application.

6. Rule 3.2(a)(7) – Statement Regarding Tax Depreciation

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954

and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

7. Rule 3.2(a)(8) – Proxy Statement

A copy of the most recent proxy statement sent to all shareholders of SDG&E’s parent company, Sempra Energy, dated March 24, 2017, was mailed to the Commission on April 10, 2017, and is incorporated herein by reference.

8. Rule 3.2(a)(10) – Statement re Pass Through to Customers

The rate increase reflected in this Application passes through to customers increased costs to SDG&E for the services or commodities furnished by it.

9. Rule 3.2(b) – Notice to State, Cities and Counties

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing this Application, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in Appendix F to this Application.

10. Rule 3.2(c) – Newspaper Publication

In compliance with Rule 3.2(c) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing of this Application, publish in newspapers of general circulation in each county in its service territory notice of this Application.

11. Rule 3.2(d) – Bill Insert Notice

In compliance with Rule 3.2(d) of the Commission’s Rules of Practice and Procedure, SDG&E will, within 45 days after the filing of this Application, provide notice of this Application to all of its customers along with the regular bills sent to those customers that will generally describe the proposed rate changes addressed in this Application.

VII. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application on all parties to the service lists of SDG&E’s recent General Rate Case Phase 2 proceeding (A.15-04-012), and Assigned Administrative Law Judge in A.15-04-012, Michelle Cooke.⁴¹ Hard copies will be sent by overnight mail to the Assigned Commissioner in A.15-04-012, President Michael Picker and Chief ALJ Karen V. Clopton.

VIII. CONCLUSION

SDG&E respectfully requests that the Commission approve this Application in all respects and grant such additional relief as the Commission believes is just and reasonable.

Respectfully submitted,

/s/ Hollie Bierman

Hollie Bierman
San Diego Gas & Electric Company
8330 Century Park Court, CP32B
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Facsimile: (619) 696-4838
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September 13, 2017

⁴¹ Administrative Law Judge Cooke is receiving electronic service in accordance with her standing request.

OFFICER VERIFICATION

I, Scott Crider, declare the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing Application are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed this 13th day of September, 2017 at San Diego, California.

/s/ Scott Crider

Scott Crider

Vice President

Customer Services

San Diego Gas & Electric Company

APPENDIX A

Financials, Balance Sheet, Income Statement

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
Mar 31, 2017

(a) Amounts and Kinds of Stock Authorized:			
Common Stock		255,000,000	shares
Without Par Value			
Amounts and Kinds of Stock Outstanding:			
Common Stock		116,583,358	shares
291,458,395			

(b) Brief Description of Mortgage:

Full information as to this item is given in Application Nos. 93-09-069, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, and 15-08-011 to which references are hereby made.

(c) Number and Amount of Bonds Authorized and Issued:

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2016
Var% Series OO, due 2027	12-01-92	0	0	2,625,000
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,346
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,350,000
5.875% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,250
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,410,000
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,938
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	3,000,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	161,240,000	2,660,460
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
Variable Series OOO, due 2017	03-12-15	0	0	1,210,959
1.9140% Series PPP, due 2022	03-12-15	60,308,670	60,308,670	4,272,326
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	6,111,111
Total 1st. Mortgage Bonds:			4,072,813,670	175,122,889
<hr/>				
TOTAL LONG-TERM DEBT			4,072,813,670	

**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT**

Mar 31, 2017

Other Indebtedness:	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2017
Commercial Paper & ST Bank	Various	Various	Various	343,075,000	\$400,990

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

Preferred Stock	Shares Outstanding	2013	2014	2015	2016	2017
5.00%	-	\$281,250	-	-	-	-
4.50%	-	202,500	-	-	-	-
4.40%	-	214,500	-	-	-	-
4.60%	-	257,901	-	-	-	-
1.70%	-	1,785,000	-	-	-	-
1.82%	-	873,600	-	-	-	-
Total	-	\$3,614,751	-	-	-	-

Common Stock	2013	2014	2015	2016	2017
[1]	-	\$200,000,000	300,000,000	175,000,000	175,000,000

NOTE 11 PREFERRED STOCK 10K:

On October 15, 2013, SDG&E redeemed all six series of its outstanding shares of contingently redeemable preferred stock for \$82 million, including a \$3 million early call premium.

A balance sheet and a statement of income and retained earnings of applicant for the twelve months ended Dec 31, 2016 are attached hereto.

[1] San Diego Gas & Electric Company dividend to parent.

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
March 31, 2017

	1. UTILITY PLANT	<u>2017</u>
101	UTILITY PLANT IN SERVICE	\$15,753,655,851
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	5,302,630
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,154,863,805
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,982,217,983)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(676,875,320)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,312,752)
118	OTHER UTILITY PLANT	1,194,065,652
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(282,362,921)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	<u>12,254,063,685</u>
	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	5,846,616
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(364,300)
158	NON-CURRENT PORTION OF ALLOWANCES	184,002,365
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,061,658,206
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	74,059,653
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>1,325,202,540</u>

Data from SPL as of June 13, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
March 31, 2017

3. CURRENT AND ACCRUED ASSETS		2017
131	CASH	2,216,321
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	300,999,029
143	OTHER ACCOUNTS RECEIVABLE	23,075,717
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,739,169)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	480,861
151	FUEL STOCK	56,056
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	116,132,002
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	200,264,322
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(184,002,365)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	311,133
165	PREPAYMENTS	137,882,791
171	INTEREST AND DIVIDENDS RECEIVABLE	714,407
173	ACCRUED UTILITY REVENUES	61,959,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	2,294,000
175	DERIVATIVE INSTRUMENT ASSETS	112,693,348
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(74,059,653)
TOTAL CURRENT AND ACCRUED ASSETS		697,278,300
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	31,648,875
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,830,119,208
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	122,205
184	CLEARING ACCOUNTS	2,553,398
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	23,000,499
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	11,333,633
190	ACCUMULATED DEFERRED INCOME TAXES	314,652,629
TOTAL DEFERRED DEBITS		3,213,430,447
TOTAL ASSETS AND OTHER DEBITS		17,489,974,972

Data from SPL as of June 13, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
March 31, 2017

5. PROPRIETARY CAPITAL

		2017
201	COMMON STOCK ISSUED	(\$291,458,395)
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	(591,282,978)
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	(479,665,368)
214	CAPITAL STOCK EXPENSE	24,605,640
216	UNAPPROPRIATED RETAINED EARNINGS	(4,290,144,490)
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	7,357,514
	TOTAL PROPRIETARY CAPITAL	(5,620,588,077)

6. LONG-TERM DEBT

221	BONDS	(4,191,077,000)
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	10,476,491
	TOTAL LONG-TERM DEBT	(4,180,600,509)

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(577,392,379)
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(24,140,940)
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(241,404,203)
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	(187,763,824)
230	ASSET RETIREMENT OBLIGATIONS	(839,556,661)
	TOTAL OTHER NONCURRENT LIABILITIES	(1,870,258,007)

Data from SPL as of June 13, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
March 31, 2017

8. CURRENT AND ACCRUED LIABILITES

		2017
231	NOTES PAYABLE	(343,039,115)
232	ACCOUNTS PAYABLE	(380,226,198)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(45,483,320)
235	CUSTOMER DEPOSITS	(76,156,698)
236	TAXES ACCRUED	(30,251,907)
237	INTEREST ACCRUED	(52,046,890)
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	(4,928,579)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(125,209,873)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(44,078,126)
244	DERIVATIVE INSTRUMENT LIABILITIES	(239,671,505)
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	187,763,824
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	(1,153,328,387)

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	(58,118,230)
253	OTHER DEFERRED CREDITS	(377,883,808)
254	OTHER REGULATORY LIABILITIES	(1,052,623,332)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(15,242,742)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(2,291,244,848)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(870,087,032)
	TOTAL DEFERRED CREDITS	(4,665,199,992)

TOTAL LIABILITIES AND OTHER CREDITS (\$17,489,974,972)

(\$4,665,199,992)

Data from SPL as of June 13, 2017

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Three Months Ended March 31, 2017

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$1,134,864,908
401	OPERATING EXPENSES	\$640,479,968	
402	MAINTENANCE EXPENSES	36,550,761	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	155,395,796	
408.1	TAXES OTHER THAN INCOME TAXES	32,322,974	
409.1	INCOME TAXES	55,302,418	
410.1	PROVISION FOR DEFERRED INCOME TAXES	33,478,402	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	118,112	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(792,530)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		952,855,901
	NET OPERATING INCOME		182,009,007

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	0	
417.1	EXPENSES OF NONUTILITY OPERATIONS	14,588	
418	NONOPERATING RENTAL INCOME	8,224	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	2,304,526	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	14,987,471	
421	MISCELLANEOUS NONOPERATING INCOME	128,189	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	17,442,998	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	62,512	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	(1,225,777)	
	TOTAL OTHER INCOME DEDUCTIONS	(1,163,265)	
408.2	TAXES OTHER THAN INCOME TAXES	162,170	
409.2	INCOME TAXES	227,164	
410.2	PROVISION FOR DEFERRED INCOME TAXES	12,105,184	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(10,818,657)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	1,675,861	
	TOTAL OTHER INCOME AND DEDUCTIONS		16,930,402
	INCOME BEFORE INTEREST CHARGES		198,939,409
	EXTRAORDINARY ITEMS AFTER TAXES		233,112
	NET INTEREST CHARGES*		44,165,648
	NET INCOME		\$155,006,873

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$5,027,515)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Three Months Ended March 31, 2017

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$4,310,137,617
NET INCOME (FROM PRECEDING PAGE)	155,006,873
DIVIDEND TO PARENT COMPANY	(175,000,000)
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$4,290,144,490</u>

APPENDIX B

Electric Tariff Table of Contents



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Advice Ltr. No. 2514-G-A

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Date Filed Nov 16, 2016

Effective Dec 16, 2016

Resolution No. _____



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 19182-G

Canceling Revised Cal. P.U.C. Sheet No. 15760-G

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Advice Ltr. No. 2087-G

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Date Filed Jan 19, 2012

Effective Feb 15, 2012

Resolution No. _____

APPENDIX C

Statement of Proposed Rate Increases

ILLUSTRATIVE INCREASE ON ELECTRIC RATES AND BILLS

If the CPUC approves SDG&E's request, a typical non-CARE residential customer living in the inland climate zone and using 500 kilowatt-hours (kWh) of electricity per month could see a monthly summer bill increase of \$0.04, or 0.03% in 2021. A typical current monthly summer bill could increase from \$128.95 to \$128.99. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

The charts shown below illustrate the changes in rates that would result from CPUC approval of this application, compared to current rate levels.

Customer Class	Class Average Rates Effective 9/1/2017 (¢ / kWh)	2021 Class Average Rates Reflecting Proposed Revenue Increase Included in this Application (¢ / kWh)	Total Rate Increase (¢ / kWh)	Percentage Rate Increase (%)
Residential	24.990	24.999	0.009	0.04
Small Commercial	23.928	23.942	0.014	0.06
Medium & Large C&I*	19.850	19.860	0.010	0.05
Agriculture	17.735	17.746	0.011	0.06
Lighting	19.917	19.926	0.009	0.05
System Total	22.122	22.131	0.009	0.04

*C&I stands for Commercial and Industrial.

ILLUSTRATIVE INCREASE ON GAS RATES

SDG&E has estimated the impact of the requested \$0.20 million increase for 2019 in gas revenues under the proposed rates as shown in the tables below. The actual distribution of the rate increase for each customer class depends on how the CPUC ultimately decides all issues in the application.

Customer Class	PPPS Rate Annual ¢ / Therm	Percentage Rate Increase (%)
Residential	\$0.06674	0.2%
Natural Gas Vehicles	\$0.02427	0.0%
Core Commercial and Industrial	\$0.07303	0.9%
Non-core Commercial and Industrial	\$0.06810	1.0%
System Total	\$0.06743	0.5%

If the CPUC approves SDG&E's request for a gas rate increase and the proposed rate allocation method, the bill for a typical bundled residential customer using 26 therms per month would increase by \$0.01, or 0.01 percent, from \$47.62 to \$47.63. Individual customer bills may differ.

APPENDIX D

Original Cost and Depreciation

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF MARCH 31, 2017

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	156,595,347.27	89,078,392.14
	TOTAL INTANGIBLE PLANT	156,818,188.63	89,281,292.44
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	96,324,570.39	43,915,706.06
312	Boiler Plant Equipment	168,156,833.85	74,434,270.85
314	Turbogenerator Units	138,276,524.45	50,835,474.04
315	Accessory Electric Equipment	85,716,403.89	36,766,285.68
316	Miscellaneous Power Plant Equipment	48,027,894.42	11,521,808.55
	Steam Production Decommissioning	0.00	0.00
	TOTAL STEAM PRODUCTION	551,028,745.29	217,520,063.47
320.1	Land	0.00	0.00
320.2	Land Rights	0.00	0.00
321	Structures and Improvements	27,285,711.08	2,658,162.87
322	Boiler Plant Equipment	243,225,717.06	21,662,290.99
323	Turbogenerator Units	26,982,364.66	2,370,893.39
324	Accessory Electric Equipment	10,878,214.63	1,458,232.53
325	Miscellaneous Power Plant Equipment	166,754,468.81	48,807,803.51
101	SONGS PLANT CLOSURE GROSS PLANT-	(475,126,476.33)	(76,957,383.29)
	TOTAL NUCLEAR PRODUCTION	(0.09)	0.00
340.1	Land	143,475.87	0.00
340.2	Land Rights	56,032.61	9,675.91
341	Structures and Improvements	22,720,260.80	7,439,513.59
342	Fuel Holders, Producers & Accessories	21,324,500.79	6,794,094.98
343	Prime Movers	87,698,835.79	35,237,262.30
344	Generators	344,298,718.20	137,056,695.98
345	Accessory Electric Equipment	32,510,919.85	12,943,204.98
346	Miscellaneous Power Plant Equipment	26,173,720.53	13,490,763.44
	TOTAL OTHER PRODUCTION	534,926,464.44	212,971,211.18
	TOTAL ELECTRIC PRODUCTION	1,085,955,209.64	430,491,274.65

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	72,542,542.02	0.00
350.2	Land Rights	159,640,269.46	20,899,038.32
352	Structures and Improvements	477,709,089.05	66,127,932.76
353	Station Equipment	1,409,383,002.42	280,129,920.72
354	Towers and Fixtures	894,912,028.32	162,480,757.48
355	Poles and Fixtures	468,775,036.14	97,253,912.17
356	Overhead Conductors and Devices	578,303,074.80	224,702,525.57
357	Underground Conduit	356,340,941.52	55,186,202.73
358	Underground Conductors and Devices	374,887,770.71	54,481,027.31
359	Roads and Trails	310,746,702.28	29,510,369.71
101	SONGS PLANT CLOSURE GROSS PLANT-	0.00	0.00
	TOTAL TRANSMISSION	<u>5,103,240,456.72</u>	<u>990,771,686.77</u>
360.1	Land	16,176,227.80	0.00
360.2	Land Rights	85,497,795.07	41,178,926.89
361	Structures and Improvements	4,650,797.97	1,835,651.86
362	Station Equipment	499,432,818.72	171,516,846.22
363	Storage Battery Equipment	111,903,472.94	8,127,869.11
364	Poles, Towers and Fixtures	680,645,962.43	268,713,478.08
365	Overhead Conductors and Devices	625,044,650.86	205,114,775.34
366	Underground Conduit	1,190,212,643.67	469,704,646.68
367	Underground Conductors and Devices	1,492,434,518.96	892,732,092.07
368.1	Line Transformers	605,213,021.27	144,593,904.71
368.2	Protective Devices and Capacitors	35,209,594.17	4,243,821.59
369.1	Services Overhead	150,922,865.83	119,857,725.34
369.2	Services Underground	344,714,407.90	243,393,642.98
370.1	Meters	193,772,920.54	80,646,852.58
370.2	Meter Installations	55,909,876.18	21,177,431.15
371	Installations on Customers' Premises	8,814,012.32	10,306,248.65
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	29,720,845.42	18,729,839.27
	TOTAL DISTRIBUTION PLANT	<u>6,130,276,432.05</u>	<u>2,701,873,752.52</u>
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	34,382,065.88	24,381,090.13
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	14,187.70
393	Stores Equipment	8,545.97	8,350.96
394.1	Portable Tools	26,058,516.76	8,877,679.23
394.2	Shop Equipment	341,135.67	256,469.50
395	Laboratory Equipment	5,152,106.01	529,436.89
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	274,630,636.49	106,782,736.25
398	Miscellaneous Equipment	6,383,977.84	1,099,037.97
	TOTAL GENERAL PLANT	<u>354,387,801.76</u>	<u>142,116,374.51</u>
101	TOTAL ELECTRIC PLANT	<u>12,830,678,088.80</u>	<u>4,354,534,380.89</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,242,164.87	1,103,976.34
	TOTAL STORAGE PLANT	2,242,164.87	1,103,976.34
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	2,232,291.80	1,398,115.67
366	Structures and Improvements	19,167,110.58	10,111,137.07
367	Mains	233,639,824.11	76,996,598.76
368	Compressor Station Equipment	90,382,096.25	68,995,987.45
369	Measuring and Regulating Equipment	23,148,746.55	16,805,442.07
371	Other Equipment	117,058.52	4,009.83
	TOTAL TRANSMISSION PLANT	373,336,271.56	174,311,290.85
374.1	Land	1,083,616.95	0.00
374.2	Land Rights	8,327,072.51	6,942,331.55
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	968,143,065.91	372,869,440.51
378	Measuring & Regulating Station Equipment	18,055,887.32	8,141,647.83
380	Distribution Services	271,918,952.44	296,777,995.91
381	Meters and Regulators	158,105,740.12	56,314,231.62
382	Meter and Regulator Installations	96,194,291.61	40,243,987.41
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,207,955.12
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	9,736,109.83	4,964,509.38
	TOTAL DISTRIBUTION PLANT	1,533,124,994.30	787,523,352.43

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	74,500.55	74,500.68
394.1	Portable Tools	10,147,604.45	4,163,836.14
394.2	Shop Equipment	76,864.06	52,463.80
395	Laboratory Equipment	283,093.66	275,410.97
396	Power Operated Equipment	16,162.40	8,791.62
397	Communication Equipment	2,705,551.88	1,131,879.60
398	Miscellaneous Equipment	473,379.95	78,645.26
	TOTAL GENERAL PLANT	13,777,156.95	5,811,031.07
101	TOTAL GAS PLANT	1,922,566,691.88	968,835,754.89
COMMON PLANT			
303	Miscellaneous Intangible Plant	402,374,349.98	264,703,683.02
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,168,914.56	0.00
389.2	Land Rights	857,384.59	27,776.34
390	Structures and Improvements	374,146,473.20	150,930,345.98
391.1	Office Furniture and Equipment - Other	35,130,729.33	15,423,041.82
391.2	Office Furniture and Equipment - Computer E	52,602,131.65	32,661,862.41
392.1	Transportation Equipment - Autos	440,360.51	(271,986.65)
392.2	Transportation Equipment - Trailers	12,195.98	5,244.54
393	Stores Equipment	58,941.18	45,900.54
394.1	Portable Tools	1,325,859.06	380,809.90
394.2	Shop Equipment	191,385.80	122,584.20
394.3	Garage Equipment	1,626,443.82	256,261.38
395	Laboratory Equipment	2,095,455.34	1,008,801.18
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	188,431,411.62	79,081,345.57
398	Miscellaneous Equipment	2,447,982.25	504,990.95
118.1	TOTAL COMMON PLANT	1,068,910,018.87	544,687,682.08
	TOTAL ELECTRIC PLANT	12,830,678,088.80	4,354,534,380.89
	TOTAL GAS PLANT	1,922,566,691.88	968,835,754.89
	TOTAL COMMON PLANT	1,068,910,018.87	544,687,682.08
101 & 118.1	TOTAL	15,822,154,799.55	5,868,057,817.86
101	PLANT IN SERV-SONGS FULLY RECOVER	0.00	0.00
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	14,857,396.33	0.00
		14,857,396.33	0.00

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-ASSETS HELD FOR SALE		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-LEGACY METER RECLASS		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,627,745.96)	(1,627,745.96)
		<u>(1,627,745.96)</u>	<u>(1,627,745.96)</u>
101	Accrual for Retirements		
	Electric	(4,567,920.92)	(4,567,920.92)
	Gas	(215,348.33)	(215,348.33)
		<u>(4,783,269.25)</u>	<u>(4,783,269.25)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE		
		<u>(4,783,269.25)</u>	<u>(4,783,269.25)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
104	Electric	85,194,000.02	14,970,283.92
	Gas	0.00	0.00
		<u>85,194,000.02</u>	<u>14,970,283.92</u>
	TOTAL PLANT LEASED TO OTHERS	85,194,000.02	14,970,283.92
		<u>85,194,000.02</u>	<u>14,970,283.92</u>
105	Plant Held for Future Use		
	Electric	5,302,629.50	0.00
	Gas	0.00	0.00
		<u>5,302,629.50</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	5,302,629.50	0.00
		<u>5,302,629.50</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,026,184,613.67	
	Gas	127,258,443.12	
	Common	122,268,879.28	
		<u>1,275,711,936.07</u>	<u>0.00</u>
	TOTAL CONSTRUCTION WORK IN PROGRESS	1,275,711,936.07	0.00
		<u>1,275,711,936.07</u>	<u>0.00</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	1,060,749,496.74
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,060,749,496.74
101.1	ELECTRIC CAPITAL LEASES	852,823,281.00	231,803,596.00
118.1	COMMON CAPITAL LEASE	20,949,080.86	20,498,261.14
		873,772,361.86	252,301,857.14
120	NUCLEAR FUEL FABRICATION	62,963,775.37	40,861,208.00
120	SONGS PLANT CLOSURE-NUCLEAR FUEL	(62,963,775.37)	(40,861,208.00)
143	FAS 143 ASSETS - Legal Obligation	17,240,858.67	(1,056,951,489.75)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	84,742,931.67	35,495,840.62
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,497,567,250.35)
	TOTAL FAS 143	101,983,790.34	(2,519,022,899.48)
	UTILITY PLANT TOTAL	18,172,565,898.46	4,670,645,540.97

APPENDIX E

Summary of Earnings

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
Three Months Ended March 31, 2017
(DOLLARS IN MILLIONS)

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$1,135
2	Operating Expenses	<u>953</u>
3	Net Operating Income	<u><u>\$182</u></u>
4	Weighted Average Rate Base	\$8,080
5	Rate of Return*	7.79%

*Authorized Cost of Capital

APPENDIX F

Service List

Notice to State, Cities, and Counties

State of California
Attorney General's Office
P.O. Box 944255
Sacramento, CA 94244-2550

State of California
Attn. Director Dept of General
Services
PO Box 989052
West Sacramento, CA 95798-9052

Department of U.S. Administration
General Services Administration
300 N. Los Angeles St. #3108
Los Angeles, CA 90012

Naval Facilities Engineering
Command
Navy Rate Intervention
1314 Harwood Street SE
Washing Navy Yard, DC 20374

Alpine County
Attn. County Clerk
99 Water Street, P.O. Box 158
Markleeville, CA 96120

Borrego Springs Chamber of
Commerce Attn. City Clerk
786 Palm Canyon Dr
PO Box 420
Borrego Springs CA 92004-0420

City of Carlsbad
Attn. City Attorney
1200 Carlsbad Village Drive
Carlsbad, CA 92008-19589

City of Carlsbad
Attn. Office of the County Clerk
1200 Carlsbad Village Drive
Carlsbad, CA 92008-19589

City of Chula Vista
Attn: Office of the City Clerk
276 Fourth Avenue
Chula Vista, California 91910-2631

City of Chula Vista
Attn. City Attorney
276 Fourth Ave
Chula Vista, Ca 91910-2631

City of Coronado
Attn. Office of the City Clerk
1825 Strand Way
Coronado, CA 92118

City of Coronado
Attn. City Attorney
1825 Strand Way
Coronado, CA 92118

City of Dana Point
Attn. City Attorney
33282 Golden Lantern
Dana Point, CA 92629

City of Dana Point
Attn. City Clerk
33282 Golden Lantern
Dana Point, CA 92629

City of Del Mar
Attn. City Attorney
1050 Camino Del Mar
Del Mar, CA 92014

City of Del Mar
Attn. City Clerk
1050 Camino Del Mar
Del Mar, CA 92014

City of El Cajon
Attn. City Clerk
200 Civic Way
El Cajon, CA 92020

City of El Cajon
Attn. City Attorney
200 Civic Way
El Cajon, CA 92020

City of Encinitas
Attn. City Attorney
505 S. Vulcan Ave.
Encinitas, CA 92024

City of Encinitas
Attn. City Clerk
505 S. Vulcan Ave.
Encinitas, CA 92024

City of Escondido
Attn. City Clerk
201 N. Broadway
Escondido, CA 92025

City of Escondido
Attn. City Attorney
201 N. Broadway
Escondido, CA 92025

City of Fallbrook
Chamber of Commerce
Attn. City Clerk
111 S. Main Avenue
Fallbrook, CA 92028

City of Fallbrook
Chamber of Commerce
Attn. City Attorney
111 S. Main Avenue
Fallbrook, CA 92028

City of Imperial Beach
Attn. City Clerk
825 Imperial Beach Blvd
Imperial Beach, CA 92032

City of Imperial Beach
Attn. City Attorney
825 Imperial Beach Blvd
Imperial Beach, CA 92032

Julian Chamber of Commerce
P.O. Box 1866
2129 Main Street
Julian, CA

City of Laguna Beach
Attn. City Clerk
505 Forest Ave
Laguna Beach, CA 92651

City of Laguna Beach
Attn. City Attorney
505 Forest Ave
Laguna Beach, CA 92651

City of Laguna Niguel
Attn. City Attorney
30111 Crown Valley Parkway
Laguna Niguel, California 92677

City of Laguna Niguel
Attn. City Clerk
30111 Crown Valley Parkway
Laguna Niguel, California 92677

City of Lakeside
Attn. City Clerk
9924 Vine Street
Lakeside CA 92040

City of La Mesa
Attn. City Attorney
8130 Allison Avenue
La Mesa, CA 91941

City of La Mesa
Attn. City Clerk
8130 Allison Avenue
La Mesa, CA 91941

City of Lemon Grove
Attn. City Clerk
3232 Main St.
Lemon Grove, CA 92045

City of Lemon Grove
Attn. City Attorney
3232 Main St.
Lemon Grove, CA 92045

City of Mission Viejo
Attn: City Clerk
200 Civic Center
Mission Viejo, CA 92691

City of Mission Viejo
Attn: City Attorney
200 Civic Center
Mission Viejo, CA 92691

City of National City
Attn. City Clerk
1243 National City Blvd
National City, CA 92050

City of National City
Attn. City Attorney
1243 National City Blvd
National City, CA 92050

City of Oceanside
Attn. City Clerk
300 N. Coast Highway
Oceanside, CA 92054-2885

City of Oceanside
Attn. City Attorney
300 N. Coast Highway
Oceanside, CA 92054-2885

County of Orange
Attn. County Counsel
P.O. Box 1379
Santa Ana, CA 92702

County of Orange
Attn. County Clerk
12 Civic Center Plaza, Room 101
Santa Ana, CA 92701

City of Poway
Attn. City Clerk
P.O. Box 789
Poway, CA 92064

City of Poway
Attn. City Attorney
P.O. Box 789
Poway, CA 92064

City of Ramona
Attn. City Clerk
960 Main Street
Ramona, CA 92065

City of Ramona
Attn. City Attorney
960 Main Street
Ramona, CA 92065

City of San Diego
Attn. Mayor
202 C Street, 11th Floor
San Diego, CA 92101

City of San Clemente
Attn. City Clerk
100 Avenida Presidio
San Clemente, CA 92672

City of San Clemente
Attn. City Attorney
100 Avenida Presidio
San Clemente, CA 92672

County of San Diego
Attn. County Counsel
1600 Pacific Hwy
San Diego, CA 92101

County of San Diego
Attn. County Clerk
P.O. Box 121750
San Diego, CA 92101

City of San Diego
Attn. City Attorney
1200 Third Ave.
Suite 1620
San Diego, CA 92101

City of San Diego
Attn. City Clerk
202 C Street, 2nd Floor
San Diego, CA 92101

City of San Marcos
Attn. City Attorney
1 Civic Center Dr.
San Marcos, CA 92069

City of San Marcos
Attn. City Clerk
1 Civic Center Dr.
San Marcos, CA 92069

City of Santee
Attn. City Clerk
10601 Magnolia Avenue
Santee, CA 92071

City of Santee
Attn. City Attorney
10601 Magnolia Avenue
Santee, CA 92071

City of Solana Beach
Attn. City Attorney
635 S. Highway 101
Solana Beach, CA 92075

Spring Valley Chamber of
Commerce
Attn. City Clerk
3322 Sweetwater Springs Blvd,
Ste. 202
Spring Valley, CA 91977-3142

Valley Center Chamber of
Commerce
Attn. City Clerk
P.O. Box 8
Valley Center, CA 92082

City of Vista
Attn. City Attorney
200 Civic Center Drive, Bldg. K
Vista, CA 92084

City of Vista
Attn. City Clerk
200 Civic Center Drive
Vista, CA 92084

City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656

APPENDIX G

SAN DIEGO UNIFIED PORT DISTRICT ENERGY MANAGEMENT PLAN

(91)

ENERGY MANAGEMENT PLAN CONTRACT

THIS ENERGY MANAGEMENT PLAN CONTRACT (this "Contract") is made as of August 14, 2017 (the "Execution Date") between San Diego Gas & Electric Company, a California corporation (hereinafter referred to as "SDG&E"), and the San Diego Unified Port District, (hereinafter referred to as the "District"). SDG&E and the District may be referred to individually as "Party" and collectively as "Parties."

RECITALS

WHEREAS, the State of California promotes the efficient use of low-cost, low-emissions energy sources in the operations of its ports and harbors, including the District;

WHEREAS, there is an opportunity in the District operations, to reduce emissions of greenhouse gases and criteria pollutants;

WHEREAS, the State of California encourages the development of new businesses and the retention of existing businesses within port and harbor district boundaries such as the District;

WHEREAS, the State of California, as reflected in California Assembly Bill 628 (as codified in California Public Resources Code §25990) ("AB628"), has encouraged investor-owned utilities such as SDG&E to engage in joint projects with port and harbor districts such as the District to provide and administer energy-related service alternatives and programs that may promote economic development and retention in those districts;

WHEREAS, the District and SDG&E jointly desire to implement an energy management plan in accordance with AB628 that includes energy efficiency, clean energy, shorepower rate and other related elements as further described in this Contract to promote economic development and retention in the District;

WHEREAS, the District desires, in cooperation with SDG&E, to implement, and to encourage tenants of the District to implement, energy efficiency measures;

WHEREAS, the District's meter location providing electric shorepower service to cruise ships would receive a transparent discount that will result in an electric bill that is equivalent to being assessed a rate for demand and energy usage based on SDG&E's effective class-average rate per kilowatt-hour applicable to the Medium/Large Commercial & Industrial ("M/L C&I") customer class;

WHEREAS, in addition to the elements of the energy management plan specified in this Contract, SDG&E and the District are jointly working on other energy projects including a clean transportation plan for charging infrastructure to support electrification of vehicles in the District (SB350), and are considering other projects such as a mobile energy storage solution for shorepower demand charge management and grid resilience; and

WHEREAS, SDG&E plans to file an application with the CPUC pursuant to AB628 seeking CPUC review and approval of the Contract and related matters ("Application").

DUPLICATE ORIGINAL

NOW, THEREFORE, in consideration of the mutual promises and covenants contained herein, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby agree, as follows:

I. Definitions.

- A. "AB628" shall mean California Assembly Bill 628 (as codified in California Public Resources Code §25990).
- B. "Application" shall have the meaning set forth above.
- C. "Confidential Customer Information" means information regarding any SDG&E customer, including an SDG&E customer's name, address, telephone number, account number and all billing and usage information that is marked confidential by SDG&E. If the District is uncertain whether any information should be considered Confidential Customer Information, the District may contact SDG&E prior to disclosing the information.
- D. "Contract" shall have the meaning set forth above.
- E. "Contractor" means an entity contracting directly or indirectly with the District, or any subcontractor thereof subcontracting with such entity, to furnish services or materials as part of or directly related to the District's energy initiatives, the Climate Action Plan and any related programs, and the EMP.
- F. "Cruise Ship Meter" shall have the meaning set forth in Section VII.
- G. "District" shall mean the San Diego Unified Port District.
- H. "Energy Management Plan" or "EMP" shall mean the document attached hereto as Exhibit A.
- I. "Enhanced Partnership Program" or "EPP" shall have the meaning set forth in Section III.
- J. "Execution Date" shall mean August 14, 2017.
- K. "Final CPUC Approval" shall have the meaning set forth in Section IX.
- L. "Notice of Breach" shall have the meaning set forth in Section X.
- M. "Party" shall have the meaning set forth above.
- N. "Parties" shall have the meaning set forth above.
- O. "SDG&E" shall mean San Diego Gas & Electric Company, a California corporation.
- P. "Shorepower Rate" shall have the meaning set forth in Section VII.

II. Energy Management Plan. Pursuant to AB628, upon Final CPUC Approval, the Parties shall implement the EMP, a copy of which is attached hereto as Exhibit A. The Parties shall cooperate with each other in good faith and use reasonable efforts to implement the EMP.

III. Enhanced Partnership Program. Upon Final CPUC Approval, the Parties shall establish and maintain an Enhanced Partnership Program (“EPP”). The objective of the EPP will be to lead the effort to successfully implement the EMP. The resources in the EPP will coordinate, plan, implement, manage, track, and report the progress and impact of the EMP. The EPP will establish a formal structure to receive feedback from stakeholders and interested parties on the implementation of the EMP. The EPP will consist of one or more SDG&E and District employees. Specific activities and details about the EPP are further described in the EPP section of the EMP.

IV. Energy Efficiency. Upon Final CPUC Approval, the Parties shall use the completed assessments of energy efficiency opportunities to support the Port’s Climate Action Plan and inform the development of specific goals and actions that reduce air emissions, promote economic development, and reduce energy consumption. This will include assessments that identified current and emerging processes and technologies to reduce energy consumption and improve energy efficiency for the Port and its tenants. SDG&E will use this information to solicit a comprehensive solution to achieve these goals using a competitive request for offer process. Specific aspects of this plan are described in the Energy Efficiency section of the EMP.

V. Clean Transportation. Upon Final CPUC Approval, the Parties shall collaboratively study and analyze one or more projects that will reduce vehicular emissions of greenhouse gases and criteria pollutants in District operations. Specific aspects of this plan are described in the Clean Transportation section of the EMP.

VI. Clean Generation. Upon Final CPUC Approval, the Parties shall collaboratively study and analyze the viability of innovative clean generation program options. Detailed descriptions of the Clean Generation plans are included in the Clean Generation section of the EMP.

VII. Shorepower Rate. Beginning on the first day of the month following Final CPUC Approval, SDG&E shall apply the Shorepower Rate to the District meter location(s) providing electric service to cruise ships (“Cruise Ship Meter”). The Shorepower Rate shall be implemented as follows:

A. SDG&E will bill the District each month for Electric service at the Cruise Ship Meter at an applicable M/L C&I rate schedule.

B. SDG&E will provide the District each month a transparent discount, initially through a monthly refund check, that results in an effective electric bill that is equivalent to the Cruise Ship Meter being assessed a rate, before assessment of applicable taxes and fees, that is equivalent to SDG&E’s then-effective class-average rate per kilowatt-hour applicable to the M/L C&I customer class. The discount is initially provided through a monthly refund check, rather than an on-bill line-item discount, because of technical and budgetary constraints in the SDG&E billing system. SDG&E will pursue implementing

the discount through a line-item on the District's bill, with timing of the line-item discount dependent on system demands and limitations.

C. The total dollar amount of the discount will be tracked by SDG&E for recovery from all SDG&E electric customers through Public Purpose Program charges. If the District purchases energy through a third party rather than SDG&E, the discount will not apply to the commodity portion of the District's bill.

D. The Shorepower Rate shall be in effect for a period of five (5) years from the date the Shorepower Rate is first applied.

VIII. Data. SDG&E shall respond to reasonable data requests from the District or from its designated Contractor for, and provide, in a reasonably timely manner tidelands-wide energy savings data for use in GHG inventories and EMP tracking and monitoring for jurisdictional and for regional planning purposes; provided that SDG&E may require, as a condition to providing data to any designated Contractor, that such designated Contractor execute a non-disclosure agreement in respect of such data in form and substance satisfactory to SDG&E; provided further that SDG&E shall have sole and absolute discretion in the means and format by which Confidential Customer Information is disclosed to the District or its designated Contractor. To the extent reasonably requested by the District, SDG&E shall provide relevant information and data to track and monitor the implementation of the components of the EMP. Any responses to data requests under this Section VIII are subject to, and must comply with, the terms and conditions of SDG&E's privacy policy, and the CPUC rules governing disclosure of Confidential Customer Information, as such policy and rules may be modified from time to time.

IX. CPUC Approval.

A. The effectiveness of this Contract is conditioned upon receiving Final CPUC Approval on or before July 31, 2019. "Final CPUC Approval" shall mean a final and non-appealable order of the CPUC, without conditions or modifications unacceptable to the Parties, or either of them, which approves the Application and this Contract in its entirety.

B. The Parties agree to cooperate and use reasonable efforts to obtain the Final CPUC Approval as soon as is practicable. SDG&E will file the Application with the CPUC no later than October 1, 2017. District agrees that it shall intervene in the proceeding related to the Application and provide necessary support of the Application including, but not limited to, timely sponsoring testimony supporting this Contract and all the elements hereof, providing timely responses to data requests, participating in settlement discussions, and submitting briefs and comments in support of the Application. District shall also provide evidentiary support regarding the positive economic impact of cruise ship visits to the District and the impact of energy rates on such visits. District shall take reasonable efforts to file testimony with the CPUC in support of the Application within ten (10) days after SDG&E files the Application with the CPUC. If the District does not file testimony with the CPUC in support of the Application within thirty (30) days after SDG&E files the Application with the CPUC, SDG&E shall have the option, at its sole discretion, to withdraw the Application from the CPUC.

C. Should the CPUC issue a ruling or order requiring conditions or modifications be made that would materially alter this Contract, or issue a decision approving the Application and this Contract with conditions or modifications that materially alter the Application or this Contract, the Parties shall have fourteen (14) calendar days from the date of such ruling, order or decision to provide the other Party written notice of the issuing Party's acceptance or rejection of the conditions or modifications required by the CPUC. The acceptance or rejection of such conditions or modifications shall be in each Party's sole discretion. If a Party fails to provide written notification of its acceptance or rejection to the other Party within such fourteen (14) day period, that Party's silence shall be deemed to constitute acceptance of the conditions or modifications and agreement by such Party that this condition has been satisfied.

X. Termination. This Contract may be terminated by order or decision of the CPUC, by the agreement of the Parties, or by either Party as follows:

A. Either Party shall have the right to terminate this Contract if such Party, in its sole discretion, determines, pursuant to Section IX.C, to reject conditions or modifications required by the CPUC as a condition of approving the Application or this Contract.

B. The District shall have the right to terminate this Contract in the event SDG&E materially breaches any obligation under this Contract and such breach is not cured by District within thirty (30) calendar days (unless the breach is incapable of being cured within 30 days, in such case the cure period shall be reasonably extended so long as SDG&E initiates good faith efforts to cure within 30 calendar days and thereafter diligently continues those efforts), after SDG&E receives written notice ("Notice of Breach") of the same from District.

C. SDG&E shall have the right to terminate this Contract in the event District materially breaches any obligation under this Contract and such breach is not cured by District within thirty (30) calendar days in the case of a breach (unless a is incapable of being cured within 30 calendar days, in such case the cure period shall be reasonably extended so long as District initiates good faith efforts to cure within 30 calendar days and thereafter diligently continues those efforts), after District receives written Notice of Breach of the same from SDG&E.

XI. Miscellaneous.

A. Governing Law. The Parties agree that this Contract is governed by the laws of the State of California, and by SDG&E's applicable rates and rules on file with the CPUC, which rates and rules are made a part hereof by reference, and by all valid and applicable laws, orders, directives, rules and regulations of duly-constituted governmental authorities having jurisdiction. This Contract shall be subject at all times to such changes or modifications in these rates and rules as the CPUC may make from time to time in the exercise of its jurisdiction.

B. Amendments. This Contract shall be considered for all purposes as prepared through the joint efforts of the Parties and shall not be construed against one Party or the other as a

result of the preparation, substitution, submission or other event of negotiation, drafting or execution hereof. Except to the extent provided for herein, no amendment or modification to this Contract shall be enforceable unless reduced to writing and executed by both Parties. This Contract shall not impart any rights enforceable by any third party.

C. Waiver of Rights. The respective rights and remedies of each Party to this Contract are cumulative, and no exercise or enforcement by either Party of any right or remedy hereunder shall preclude the exercise or enforcement by such Party of any other right or remedy hereunder, or which such Party is entitled by law to enforce. Each Party may waive any obligation of, or restriction upon, the other Party under this Contract only in writing. No failure, refusal, neglect, delay, waiver, forbearance, or omission of either Party to exercise any right or remedy under this Contract or to insist upon full compliance by the other with its obligations hereunder shall constitute a waiver of any provision of this Contract nor shall it impair the exercise of any such right or remedy or of any other right or remedy to which it is entitled.

D. No Restriction. For the avoidance of doubt, nothing in this Contract shall be construed or implied so as to restrict the District from jointly developing an energy management plan concurrently with any other entity, including but not limited to any other electrical corporation (as defined in subdivision (a) of Section 218 of the California Public Utilities Code), gas corporation (as defined in Section 222 of the California Public Utilities Code), community choice aggregator, or public utility (as defined in subdivision (a) of Section 216 of the California Public Utilities Code) or to restrict the District from generating or procuring energy through mechanisms independent of SDG&E including, but not limited to, the formation of a community choice aggregation program on its own or in conjunction with any other entity. Nothing in this Contract shall restrict the District from pursuing or obtaining funding for energy-related initiatives with any other entity.

E. LIMITATION OF LIABILITY. IN NO EVENT SHALL A PARTY BE LIABLE TO THE OTHER FOR ANY SPECIAL, PUNITIVE, EXEMPLARY, INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES (INCLUDING, WITHOUT LIMITATION, LOSS OF GOODWILL, LOSS OF PROFITS OR REVENUES, LOSS OF USE, AND BUSINESS INTERRUPTION) THAT ARE CLAIMED TO BE INCURRED BY THE OTHER PARTY WHETHER SUCH CLAIM ARISES UNDER CONTRACT, TORT (INCLUDING STRICT LIABILITY), INDEMNITY OR OTHER THEORY OR LAW, EVEN IF THE OTHER PARTY HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

F. Headings. Titles and headings of the Sections and Subsections of this Contract are for the convenience of reference only and do not form a part of this Contract and shall in no way affect the interpretation thereof.

G. Severability. The illegality or invalidity of any provisions of this Contract shall not impair, affect or invalidate the other provisions of this Contract and the Parties shall negotiate in good faith to modify this Contract to give effect to the original intention of the Parties.

H. Assignment. District may assign this Contract only if (a) SDG&E consents in writing, which consent SDG&E shall not unreasonably deny, withhold or delay, (b) CPUC approval is received, if necessary, and (c) the party to whom the Contract is assigned agrees in writing to perform the obligations of District hereunder. Assignment of the Contract shall not release District from any of the obligations under this Contract unless otherwise provided herein or within the instrument of assignment and consent.


I. Entire Agreement. This Contract, including any incorporated electrical tariff schedules and rules, and each and every attachment, exhibit, amendment, schedule and any written supplements hereto, if any, between the Parties constitutes the entire agreement and understanding between the Parties concerning the subject matter hereof and supersedes any prior understanding or written or oral agreement relative to said matter.

J. Counterparts. This Contract may be executed in any number of identical counterparts, each of which shall be deemed to be an original, and all of which together shall be deemed to be one and the same instrument when each Party has signed one such counterpart.


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IN WITNESS WHEREOF, the Parties hereto have caused this Contract to be executed, for and on behalf of each, by their duly authorized agents, officers or representatives, as of the Execution Date.


**SAN DIEGO GAS & ELECTRIC
COMPANY**

By: 
Name: Scott B. Crider
Title: Vice President – Customer Services

**SAN DIEGO UNIFIED PORT
DISTRICT**

By: 
Name: Randa Coniglio
Title: President and Chief Executive
Officer

Approved as to legal form:

By: 
Name: James W. Baker
Title: Assistant General Counsel

Approved as to legal form:


By: 
Name: John Carter
Title: Deputy GC

EXHIBIT A

Copy of Energy Management Plan

Port of San Diego Energy Management Plan

FINAL



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Port of San Diego Energy Management Plan

I. LEGISLATIVE BACKGROUND

Assembly Bill (AB) 628, signed into law by Governor Brown on October 11, 2013, authorizes the San Diego Unified Port District (District), in conjunction with San Diego Gas & Electric Company (SDG&E), to prepare an Energy Management Plan (EMP) to reduce air emissions and promote economic development in the District.¹ In doing so, the State of California declared the following:

- That it seeks to “promote efficient use of low-cost, low-emissions energy sources in the operations of ports and harbors;”
- That ports offer a unique opportunity to “reduce vehicular emissions of greenhouse gases (GHG) and criteria pollutants;”
- That it “encourages the development of new businesses and retention of existing business within port boundaries;”
- That “businesses located within port and harbor districts may benefit through greater stability in the cost of energy services;” and
- That investor-owned utilities, such as SDG&E, are in the “optimal position” to work with ports to provide energy-related service alternatives and programs.²

This Energy Management Plan developed under AB 628 not only promotes low emission energy sources and added energy efficiencies but also develops a cruise vessel shore power

¹ AB 628, Energy Management Plans for Ports and Harbor Districts (October 11, 2013), codified in Public Resources Code, Chapter 13 § 25990.

² AB 628, Section 1(a)-(f).

rate that will ensure stability of grid-based power rates for the cruise industry located in San Diego and support CARB driven efforts to reduce cruise ship emissions.

AB 628 also aligns with the State’s broader objective of combating climate change through GHG reductions and energy regulations. Governor Schwarzenegger, through Executive Order (EO) S-3-05 and Assembly Bill (AB) 32, required the State to reduce its GHG emissions by 80% below 1990 levels by 2050.³ Governor Brown further required, through EO B-30-15 and codified through Senate Bill (SB) 32, the State to reduce its GHG emissions by 40% below 1990 levels by 2030.⁴ The State went even further with SB 350, which required that energy efficiency (EE) be cumulatively doubled by 2030 and that 50% of electricity generated and sold must come from renewable energy resources by 2030.⁵ Governor Brown, through EO B-16-2012, also set a goal of having 1.5 million zero emission vehicles on the road by 2025.⁶ The regulations promulgated by the California Air Resources Board (CARB) to implement these GHG EOs are creating a difficult scenario for California Ports and the Cruise Industry under existing rate structures. AB 628 may be one way to minimize that conflict.

II. PORT BACKGROUND

The Port of San Diego is a unique port with unique energy management needs. For decades, the District has strategically pursued specialty cargoes such as automobiles, refrigerated fruit, bulk and break bulk cargoes. The District’s maritime facilities include two cargo terminals and the largest on-dock cold storage facility on the West Coast. Class I railroad BNSF and three major highways serve the maritime cargo terminals. In addition to maritime

³ EO 2-30-05 (June 1, 2005), accessible at: <https://www.gov.ca.gov/news.php?id=1861>.

⁴ EO B-30-15 (April 29, 2015), accessible at: <https://www.gov.ca.gov/news.php?id=18938>.

⁵ SB 350, Clean Energy and Pollution Reduction Act of 2015 (October 7, 2015).

⁶ EO B-16-2012, accessible at: <https://www.gov.ca.gov/news.php?id=17472>.

cargo, the District’s cruise ship terminal serves cruise vessels at three berths located at two piers, B Street Pier and Broadway Pier. In addition, the District maintains over twenty public parks, is responsible for public safety on tidelands and at the airport through the Harbor Police Department, and leases land to hundreds of tenant businesses around San Diego Bay.

Current operations, and environmental and sustainability initiatives adopted by the District present an opportunity to align best practices with the State’s stated goals through an EMP as outlined in AB 628. The District, a self-supporting public-benefit corporation established by the State Legislature in 1962 to manage San Diego Bay and surrounding waterfront land, seeks to “protect the Tidelands Trust resources by providing economic vitality and community benefit through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship and public safety.”⁷

The District has taken its mission of environmental stewardship seriously, having been one of the first ports in the nation to voluntarily adopt – unanimously – a Climate Action Plan (CAP) on December 10, 2013.⁸ The District’s CAP seeks to reduce GHG emissions by 10% under 2006 levels by 2020 and 25% under 2006 levels by 2035. The District intends to update future GHG reduction goals to align with SB 32, which established an interim GHG reduction of 40% by 2030. The following areas are included in the CAP as opportunities to reduce GHG:

- Transportation and land use planning;
- Energy conservation and efficiency;

⁷ Port of San Diego mission statement, accessible at: <https://www.portofsandiego.org/about-us.html>.

⁸ Port of San Diego Climate Action Plan (2013), accessible at: <https://www.portofsandiego.org/document/environment/climate-mitigation-and-adaptation-plan/documents-1/5515-port-of-san-diego-climate-action-plan/file.html>.

- Water conservation and recycling;
- Alternative energy generation;
- Waste reduction and recycling; and
- Miscellaneous (supporting other programs and outreach to reduce GHG emissions).⁹

III. ENERGY MANAGEMENT PLAN OVERVIEW

This EMP was developed cooperatively by the District and SDG&E in accordance with the direction and requirements of AB 628. The EMP leverages elements of the District’s CAP measures to provide a focused energy roadmap for the District to reduce its GHG emissions, provide societal benefits (i.e., cleaner air and improved public health), create jobs through new energy projects, facilitate the retention of current businesses, and create a more attractive climate for new businesses. This EMP provides the District the flexibility to align with new state regulations, leverage new technologies, and phase in advanced technologies offered by SDG&E. Further, the District envisions this EMP to be the first of multiple EMPs developed with the assistance of SDG&E over the course of the next 15 years. This initial EMP focuses on the District’s industrial and maritime uses (with a few exceptions in order to capture some large upcoming land developments).

In support of the EMP, the District and SDG&E intend to collaborate on projects and programs that focus on the following areas:

- Energy Efficiency;
- Advanced Technologies;
- Clean Generation;

⁹ *Id.*

- Clean Transportation; and
- Electric Rates, designed to aid in economic development.

SDG&E and the District arrived at these areas of focus after evaluating the objectives of AB 628 and the District’s CAP. Each of these areas is discussed in greater detail below and the outlines of specific collaborative District-SDG&E programs, designed to support the above areas of focus, are provided in Appendix A. Further, this EMP includes the information required by AB 628, which is provided in Appendix B.

A. Energy Efficiency

Implementation of energy efficiency measures will help achieve AB 628’s objective of assessing “current and emerging processes and technologies to reduce energy consumption and improve energy efficiency.”¹⁰ Further, the District’s CAP cites energy conservation and efficiency as one of the measures it intends to utilize to reduce its GHG emissions. Specifically, it seeks a reduction of 21,591 metric tons of carbon dioxide equivalent (MT CO₂) – or 20% under 2006 levels by 2020 through the implementation of energy efficiency measures.¹¹ In emphasizing the importance of energy efficiency, the CAP states:

The built environment is a significant indirect contributor to GHG emissions as a result of the electricity and natural gas demand in buildings. Increasing the energy efficiency of both new and existing buildings will result in significant GHG reductions. The Port can implement energy strategies for buildings and exterior spaces, which can provide the opportunity to save money on utility costs, improve air quality, and provide other community benefits.¹²

¹⁰ Public Resources Code, Chapter 13 §25990(b)(2)(C).

¹¹ *Id* at 24.

¹² *Id*.

While the District and its tenants have been active participants with SDG&E in EE portfolio programs in the past, including through a robust Local Government Partnership (LGP), there are significant opportunities for additional savings. Specialized audits of District tenant facilities have revealed additional opportunities for energy savings to include:

- Industrial Process Load;
- Temporary Services;
- To-Code Measures;
- Advanced Controls and Energy Dashboards; and
- Emerging Technologies.

In addition, the audit results have identified energy savings opportunities which fall into the following three categories:

- Measures that fit into existing SDG&E EE portfolio programs;
- Specialized measures that are not eligible for existing SDG&E EE portfolio programs; and
- Measures not financially viable through existing programs and which could benefit from enhanced incentives.

Given the CAP's emphasis on EE, and the findings of the specialized audits, the District and SDG&E have designed a specialized EE measures proposal (the "EE Proposal") to capture some of these incremental savings opportunities. The EE Proposal will further numerous policy objectives beyond those set forth in AB 628. It will help enable the District to meet its EE CAP goal, reduce electricity demand, thereby lowering GHG emissions in furtherance of the GHG Executive Orders, and will help the State achieve its lofty SB 350 goal of doubling EE by 2030.

SDG&E intends to apply to its regulator, the California Public Utilities Commission (“Commission”), for authorization for funding and regulatory approval of the EE project in a forthcoming application. Further detail on the EE proposal can be found in Appendix A.

B. Advanced Technologies and Clean Generation

Implementation of advanced technologies and clean generation projects will help achieve AB 628’s objective of promoting the efficient use of “low-cost, low-emissions” energy sources in port operations, as well as assessing “the role that distributed generation” could play to aid economic development.¹³ In addition, alternative energy generation is another measure cited in the District’s CAP to reduce GHG emissions. Specifically, the District seeks a reduction of 22,203 MT CO₂e/year or 20% under 2006 levels by 2020 through alternative energy generation.¹⁴ The District’s CAP emphasizes the importance of this measure, stating:

Shifting from traditional, GHG-emitting power sources (fossil fuels) to clean, renewable energy can contribute significantly to meeting the Port’s GHG reduction targets. The Port can help meet energy demands through on-site, distributed renewable energy generation. Policies, programs and technologies that support this type of energy generation will also make Port tenants and users more resilient to price variations and interruptions in power supply, while promoting the economic benefits of new, local industries.¹⁵

i. Advanced Technologies

To that end, this EMP focuses on advanced technologies, including the opportunity for the District to work collaboratively with SDG&E on at least two advanced technologies proposals - a mobile battery storage project and the installation of microgrid infrastructure on the District lands. On May 1, 2017, SDG&E filed its 2018-2020 investment plan for the Electric Program

¹³ AB 628, Section 1(a); Public Resources Code, Chapter 13 §25990(b)(2)(B).

¹⁴ *Id.* at 28.

¹⁵ *Id.*

Investment Charge (EPIC) program which included a request for authority to spend on the mobile battery storage project. In addition, under the directives of AB 2868, SDG&E will consider a microgrid infrastructure proposal proposed by the District, which, if accepted, SDG&E will then apply to the Commission for regulatory approval. These proposals are described in greater detail in Appendix A.

ii. Clean Generation

This EMP also focuses on clean generation, including a comprehensive clean generation proposal. SDG&E proposes to leverage its EcoShare program to assist the District in the deployment of distributed solar that could potentially benefit the District, its tenants and/or “communities of concern” around the District most affected by criteria air pollutants. In addition, SDG&E intends to encourage the District and its tenants to participate in its EcoChoice program, which allows customers to subscribe to receive new and local renewable energy for up to 100% of energy usage. Further, several District tenants are also actively pursuing on-site solar generation (as well as the District, itself). As such, in addition to facilitating the deployment of these customer-sited technologies, the EMP seeks to support the required planning and upgrades that may be necessary to support high penetration of renewables.

Beyond the objectives of AB 628 described above, these advanced technologies and clean generation proposals are in line with policies proposed in a number of State regulations and proceedings, including:

- The GHG EOs;
- SB 350;

- The Integrated Distribution Energy Resources proceeding¹⁶;
- The Distribution Resource Plan proceeding¹⁷;
- The Integrated Resource Plan proceeding¹⁸; and
- The California Energy Commission’s (CEC) EPIC program, which “supports advanced technology through research, loans and policy,”¹⁹ and which issued a grant funding opportunity called “The EPIC Challenge: Accelerating the Deployment of Advanced Energy Communities.”²⁰

More specifically, with respect to a potential microgrid infrastructure proposal, the State has explored the potentially significant value of microgrids in two policy papers: “Microgrids: a Regulatory Perspective”²¹ and the CEC’s “Microgrid Assessment and Recommendations to Guide Future Investment,” which states that “[m]icrogrids offer resiliency over a geographic area during grid outage events, provide cost saving opportunities, and can deliver additional societal benefits; such as reduced carbon footprint and higher penetration levels of renewable resources than would otherwise be possible.”²²

C. Clean Transportation

Focusing on clean transportation is in line with AB 628’s objective to “reduce vehicular emissions of greenhouse gases and criteria pollutants” in port operations, including a

¹⁶ Integrated Distributed Energy Resources proceeding, R.14-10-003.

¹⁷ Distribution Resource Plan proceeding, R.14-08-013.

¹⁸ Integrated Resource Plan proceeding, R.16-02-007.

¹⁹ California Energy Commission, “Energy Commission Supports Advanced Energy Technology Through Research, Loans, and Policy” (January 13, 2016).

²⁰ California Energy Commission, GFO-15-312, “The EPIC Challenge: Accelerating the Deployment of Advanced Energy Communities” (November 24, 2015).

²¹ California Public Utilities Commission Policy and Planning Division, “Microgrids: A Regulatory Perspective” (April 4, 2014).

²² California Energy Commission, “Microgrid Assessment and Recommendation(s) to Guide Future Investment,” p.3 (July 2015).

description of “measures to be taken to reduce air emissions for vehicle use within district boundaries, including vehicles used for movement of commercial products.”²³ Further, the District’s CAP determined that the largest potential for GHG reduction comes from the transportation and land use sector. Specifically, it seeks a reduction of 62,210 MT CO₂e/year by 2020.²⁴ In acknowledging this fact, the CAP stated:

The Port is home to many diverse land uses and modes of transportation that directly and indirectly contribute to GHG emissions. Recreational boating, on-road vehicles (cars and trucks) and off-road equipment (such as cargo handling equipment and ships) account for 35% of the Port’s 2006 baseline GHG emissions. Lodging, restaurants, marina attractions, trains and other heavy-duty vehicles also contribute to GHG emissions. Combining land use and transportation strategies can also lead to a broad set of co-benefits, and improve the daily experience of Port employees and visitors.²⁵

In furtherance of these objectives, this EMP refers to SDG&E’s transportation electrification application pursuant to SB 350 before the Commission, which proposes a clean transportation project at the District, described in detail in Appendix A.²⁶ This project will help the District with the CAP transportation sector goals by working with the District and District tenants. The 2020 reductions anticipated from the proposed SDG&E Medium Duty/Heavy Duty (MD/HD) Port Electrification project includes avoiding 38,000 gallons of gasoline equivalent with incremental electricity use of 344 MWhrs, netting 253 MT of CO₂ reductions.²⁷ Additionally, the District and

²³ AB 628, Section 1(b); Public Resources Code, Chapter 13 §25990(b)(2)(5).

²⁴ Port of San Diego, Climate Action Plan, p. 20.

²⁵ *Id.*

²⁶ A.17-01-020, Application of San Diego Gas & Electric Company (U 902-E) for Authority to Implement Priority Review and Standard Review Proposals to Accelerate Widespread Transportation Electrification, accessible (January 20, 2017), accessible at:

https://www.sdge.com/sites/default/files/regulatory/SDGE%20Application%20For%20Approval%20of%20SB%20350%20Transportation%20Electrification%20Proposals_0.pdf.

²⁷ Assumes 19.6 lbs CO₂ / GGE (US EIA estimate) and 541 lbs CO₂e / MWh (Port’s consultant 2020 estimate).

SDG&E envision further collaboration in the future to expand on clean transportation opportunities aimed at achieving the CAP goals in the transportation and land use sector.

Beyond the objectives of AB 628 described above, the clean transportation project put forth in SDG&E's SB 350 application furthers the State's energy goals in several ways. It helps to achieve the state's GHG reduction goals set forth in the EOs and SB 350. Further, it reduces mobile emissions, in line with the National Program for GHG and Fuel Economy Standards, developed jointly by the Environmental Protection Agency and the National Highway Traffic Safety Administration,²⁸ as well as the Tier 3 Vehicle Emission and Fuel Standards Program.²⁹ It also furthers the State's transportation electrification goals, put forth in Governor Brown's EO B-16-12, setting the goal of having 1.5 million zero emission vehicles on the road by 2025, and detailed in the 2013 interagency report entitled "A Roadmap toward 1.5 zero emission vehicles on California's roadways by 2025."³⁰ Lastly, SB 350 supports the Executive Order B-32-15³¹, which directed the development of the Sustainable Freight Action Plan³². The action plan has a goal to deploy over 100,000 zero- or near-zero emissions freight vehicles by 2030.

D. Shore Power Electric Rate

AB 628 states that "[e]nergy utility customers located within the state's port and harbor districts may benefit from the addition of new businesses and the retention of existing

²⁸ Environmental Protection Agency and National Highway Traffic Safety Administration, Fed. Reg. 77, "2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards" (October 15, 2012).

²⁹ Environmental Protection Agency, Fed. Reg. 79, "Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards" (April 28, 2014).

³⁰ EO B-16-12, accessible at: <https://www.gov.ca.gov/news.php?id=17463>; Governor's interagency Working Group on Zero-emission Vehicles, "2013 ZEV Action Plan: A roadmap toward 1.5 million zero-emission vehicles on California roadways by 2025 (February 2013), accessible at: https://www.gov.ca.gov/docs/2016_ZEV_Action_Plan.pdf.

³¹ EO B-32-15. Accessible: <https://www.gov.ca.gov/news.php?id=19046>

³² California Sustainable Freight Action Plan. Accessible: <http://www.casustainablefreight.org>

businesses through increased energy cost certainty.” The law further states that “[b]usinesses located within the state’s port and harbor districts may benefit through greater stability and certainty in the cost of energy services.” The District’s dynamic business portfolio has an important economic impact on the region. Focusing on the maritime cruise business specifically, according to data provided by the Business Research & Economic Advisor’s (“BREA”) 2005 Economic Impact Analysis of the San Diego Cruise Sector, a homeported San Diego cruise call generates approximately \$1.23 million in direct economic benefit.³³ In 2004, the San Diego cruise ship sector was responsible for \$271 million in final sales among San Diego businesses which generated 2,243 full and part-time jobs in San Diego County, paying a total of \$83.5 million in wages and salaries.³⁴ Therefore, it is in the best interest of the District, tenants in the maritime and tourism sectors, and the San Diego region as a whole to pursue a sustainable cruise ship shore power electric rate.

The cruise business and operation are unique within the District’s portfolio, and as such, have unique energy needs. Every time a cruise vessel “plugs in” to the grid-based shore power system, it is the effective equivalent of a small city or large hotel coming online at once. Similarly, disconnecting from the system results in an immediate, significant load reduction. Cruise vessels are generally deployed in fleets; vessel owners make deployment decisions on the basis of multiple vessels serving a group of ports. Vessel redeployments can be viewed as multiple vessels entering or leaving service; alternatively, single vessel redeployments are

³³ See BREA 2005 Economic Analysis of the San Diego Cruise Ship Sector, pp. 30, 34, 37-38. Does not reflect indirect benefits also attributable to homeport calls.

³⁴ *Id.* at 2.

exceedingly rare. These market forces, operational costs and vessel fleet dynamics therefore result in outsized impacts on vessel call volumes at a single port facility.

This pursuit is particularly important now as a result of unique regulatory circumstances. The CARB At-Berth Regulation requiring the use of shore power was enacted in order to reduce GHG emissions from certain classes of ocean going vessels by powering down onboard engines to reduce criteria air pollutants. In accordance with SDG&E's GRC Phase 2 proceeding, SDG&E included in its 2016 GRC Phase 2 Application amendments to the applicability of SDG&E's standard small commercial rate³⁵ which the District is currently utilizing for the shore power system at the Cruise Ship Terminal. These amendments would result in the District's cruise facilities no longer being eligible for a small commercial rate. The District would need to be transferred to a qualifying rate, i.e. the appropriate medium/large commercial and industrial (C&I) rate, Schedule AL-TOU.

Based on the characteristics of the cruise business, and available elasticity data for similar transportation services, even small rate adjustments could cause a sizable shift in business at the District's cruise facility. Large rate changes could result in a demand reduction sufficient to effectively eliminate cruise as a viable business in San Diego. It is estimated that transitioning the Cruise Ship Terminal from SDG&E's Schedule TOU-A to Schedule AL-TOU would cause the annual bill amounts to increase by over 400%-600%³⁶. This substantial rate change may result in a significantly negative impact to the regional cruise ship industry, tourism, and economic development and retention in the District.

³⁵ Generally applicable for customers less than 20 kW.

³⁶ Based on existing load factor.

In order to protect a longstanding, foundational element in the District’s charter, and to promote future economic development and retention at the District, SDG&E is offering a rate proposal for the District’s shore power account that will prevent rate shock and enable it to continue operating as an economic engine for the region, while still complying with state mandates for sustainable freight and shore power usage imposed by CARB. This proposal, described in detail in Appendix A, and for which SDG&E intends to apply to the Commission for regulatory approval, is in line with the mission of AB 628, which seeks to promote the economic viability of ports through energy offerings and is a critical component to the overall plan.

E. Enhanced Partnership Program

In addition to the substantive proposals described above, this EMP includes an Enhanced Partnership Program (EPP) proposal to help ensure that there is an adequate level of oversight to effectively implement the plans described herein. This ongoing oversight is particularly important because SDG&E and the District envision this EMP to be a “living document;” the first of likely multiple EMPs over the course of the next fifteen years.

While the EPP does not in and of itself effectuate the environmental and economic policy objectives of the EMP, it will be integral to ensuring that those important objectives are achieved through effective and efficient implementation of the individual proposals. The details of the EPP proposal can be found in Appendix A.

IV. CONCLUSION

In conclusion, this EMP is an innovative and multi-faceted project that is designed to further many of the State’s energy and environmental goals, in particular, those set forth in AB 628.

More specifically, the EMP is designed to benefit the District and its tenants, enabling it to continue the important role that it plays in the region, both economically and environmentally. The District and SDG&E look forward to working together to implementing these measures.

APPENDIX A - Port and SDG&E Program Description Outlines

Energy Efficiency Proposal

I. Proposal Overview

SDG&E is requesting Commission approval of a comprehensive EE effort at District and tenant facilities. SDG&E has completed a number of specialized audits at some of the largest tenant facilities to determine energy savings opportunities. Although SDG&E will make a proposal based on the data already collected from these audits, the proposed plan will also include further audit capability and remain flexible enough to capture future energy savings opportunities.

Many projects will be conducted within the existing SDG&E EE programs, but this plan also proposes to include some innovative methods and equipment to capture additional energy savings, such as replacing sandblasting nozzles, retrofitting variable speed drives on rotary screw air compressors and stand-alone ventilation fans, or utilizing high-efficiency temporary air compressors, or specifying induction type portable welding machines to replace existing types.

SDG&E proposes to secure 19.9 million kWh in energy efficiency savings by 2020.

These savings will be achieved through projects and measures that qualify for SDG&E standard EE programs and those that will be performed solely under this plan. It is estimated that 70% of the energy savings will use incentives paid through standard SDG&E EE programs.

This Request for Offers (RFO) will seek out an experienced vendor to leverage existing SDG&E EE program methodologies, such as the Business Energy Solutions

program, which provides direct installation of low cost measures to small businesses, as well as implementing EE measures incremental to existing SDG&E EE programs. In addition, the RFO will require the vendor to provide evaluation, measurement and verification (EM&V) services to verify the savings achieved from these measures. This RFO process will be modeled after SDG&E's existing All-Source RFOs, but customized for the needs of the EMP.

As stated above, SDG&E has completed several specialized audits. These audits have identified a number of energy saving opportunities that have not yet been implemented. These include:

- Industrial Process Load;
- Temporary Services;
- To-Code Measures;
- Advanced Controls and Energy Dashboards; and
- Emerging Technologies.

Also considered were the following potential emerging technologies:

- Sandblasting Technology Demonstration Projects
- Smart Temporary Power Panel Demonstration Projects

Given the geographic size and composition of businesses within the District's jurisdiction, there are many different types of utility customers with a high degree of variation in energy use. This situation presents some interesting challenges when developing an energy efficiency plan for the District. The following sub-section

provides further detail regarding implementation of the District Energy Efficiency plan and how it will address these unique challenges.

Customer Types

SDG&E's customers at the District can generally be classified into one of four categories for purposes of this plan:

- **District facilities** – These facilities would be classified as one of the commercial sectors;
- **Industrial** – This is a segment with large potential, but many projects will require custom treatment and some of that will require providing incentives particular to this plan;
- **Large Commercial** – The primary large commercial customers at the District are hotels and the San Diego Convention Center. These facilities have been fairly active participants in SDG&E's EE programs to-date; however, further opportunities exist and will be pursued; and
- **Small Commercial** – District tenants are rounded out by the many small businesses in and around the District. SDG&E has offered many of these tenant's participation in EE via the Business Energy Solutions program. This plan will continue and expand this offer to new and prior participants.

Energy Efficiency Measures /Equipment and Incentives

- **Standard Measure Treatment** - The EMP may be starting at a time that provides the District, and its tenants, additional opportunity. Per AB 802,

SDG&E will be able to offer customers incentives based upon not only energy savings above building code, but also savings based on the energy consumption of the existing equipment. Practically, this new methodology means that SDG&E will be able to offer higher incentives for EE projects. Such incentives will improve the economics of these projects and, given these improved benefits to customers, SDG&E expects greater replacement of inefficient equipment. This higher incentive level will apply to both deemed and custom measures. Funds for these incentives will be paid through SDG&E's existing EE portfolio and corresponding savings will be claimed by the portfolio.

- **Temporary or other “Special” Measures** – The audits recently performed by SDG&E identified meaningful energy savings opportunities related to equipment that would not qualify for incentives under SDG&E's standard EE programs. These measures are often considered “temporary” or are owned by entities not located on District tidelands. However, under this plan, SDG&E proposes that incentives be offered for upgrading these measures. As an example, temporary equipment (welders, ventilators, and air compressors) are owned by and used by contractors in the local shipyards. Due to the fact that these contractors do not pay the site electric bills, they are ineligible for current incentive programs. Incentives are required to encourage contractors as well as customers to use energy efficient equipment.

Delivery Method

SDG&E will use two methods to deliver energy efficiency efforts to the District and its tenants.

- **Dedicated AB 628 Port Initiatives** – SDG&E will deliver services designed specifically for the District and its tenants based on the factors described above. These services will be delivered by one or more third-party contractors.

SDG&E will select an experienced vendor by using a RFO process, which will define customers, measures, required savings to be delivered, and a timeframe. The contractor will propose delivery methodologies and pricing. The contractor will work with the District and its tenants to implement both standard measures and those District-specific measures above and beyond what SDG&E currently offers. It is possible that some projects may be of such a size and scope that discretionary actions by the Board of Port Commissioners will be required. In addition, the vendor will provide EM&V services to verify savings from measures.

- **Standard Programs** – In some cases, SDG&E's existing programs and third-party contractors are well positioned to deliver EE services. These programs may be used by customers whose business situation does not align with the RFO's contractor(s).

Program Management

As with other aspects of proposals in furtherance of the District's EMP, the energy efficiency efforts, both Standard Programs and Dedicated Services, will be managed and coordinated by the EPP. EPP management will ensure that District, tenant, and ratepayer interests are balanced and addressed and that EE activities are kept on-track to deliver the energy savings required to meet the District's overall CAP goals. It is possible that some projects may be of such a size and scope that discretionary actions by the Board of Port Commissioners will be required. The EPP will ensure that these types of projects obtain the necessary regulatory and discretionary approvals.

II. Alignment with AB 628

The Energy Efficiency proposal directly addresses a number of goals established by AB 628. These goals include:

- Assessment of energy consumption and EE opportunities; and
- Recommendations for enhanced use of energy efficiency.³⁷

Additionally, energy efficiency will contribute to other goals set forth in AB 628 such as GHG reduction and small businesses engagement, as well as broader State GHG and EE goals set forth in EO S-3-05 (as codified in AB 32), EO B-30-15 (as codified in SB 32), and SB 350.

Further, the energy efficiency plan addresses or supports many required elements of AB 628. Specifically, the EE plan includes:

³⁷ Public Resources Code, Chapter 13 §25990(b)(2)(C).

- Assessment of current energy consumption;
- Assessment of energy efficiency;
- Assessment of current and emerging processes and technologies to reduce energy consumption; and
- Recommendations for enhanced use of energy efficiency.

III. Greenhouse Gas Reduction or Cost Savings

Depending upon the source of the utilized energy, energy efficiency will reduce GHG emissions both at the District and off-site. Each energy efficiency project will immediately produce operating cost savings. District, tenant, or ratepayer costs and savings will depend upon the cost-effectiveness of each project.

IV. Beneficiaries of the Proposal

The primary beneficiaries of the energy efficiency plan will be District tenants, who comprise the vast majority of the District's load. The facilities operated by the District will also benefit in the form of direct energy cost reductions.

The proposed energy efficiency plan will rely on implementation from the contractor community. EE projects require a mix of skills, including skills that can be learned without higher-education degrees. Thus, surrounding disadvantaged communities may benefit from job opportunities created by the projects under this plan.

Both surrounding disadvantaged communities and California residents in general will benefit from reduced GHGs and other emission reductions resulting from the reduced need to produce electricity.

V. Roles and Responsibilities

The District and its tenants will have close interaction with SDG&E to implement the proposal. As envisioned, SDG&E will work closely with the District to design, manage, track, and modify the plan on an ongoing basis. SDG&E will also coordinate data gathered to assist the District with the evaluation of the EMP measures against CAP progress goals.

At the project implementation level, both the District and its tenants will work with SDG&E and its contractor(s) to further identify EE opportunities, define projects, schedule project implementation, and verify energy savings.

VI. Proposal Timeframe

Energy efficiency, by its very nature, is an ongoing activity. Current energy savings opportunities are defined by current usage, process, and technologies. As these change over time, the EE opportunities change and the EE plan under this proposal will be updated. Thus, the initial timeframe for the EE plan will be through 2020, though these goals will be updated in future iterations of the EMP.

EE goals for each time period will be influenced by the timeline of related District activities, goals set by SB 350 and ongoing regulatory activities and budgets established under this proposal.

VII. Proposal Funding

Much of the EE activity can be performed within the standard SDG&E EE programs and thus approximately 70% of the funding is part of the Commission's EE proceeding. District-specific EE activities and incentives for non-standard measures

will need to be funded as part of the AB 628 effort and costs recovered via this process. The requested funding amount will be provided in SDG&E's application before the Commission.

Clean Transportation Proposal (SB 350)

I. Proposal Overview

As part of its SB 350 filing before the Commission, SDG&E proposed six “priority review projects,” including a clean transportation proposal at the District.

Specifically, SDG&E intends to conduct 30 – 40 installations that include a combination of components such as electric vehicle supply equipment (EVSE), load research meters and data loggers to obtain operational data and facilitate growth of Medium Duty/Heavy Duty (MD/HD) Electric Vehicles (EV), and electric forklifts) in an effort to reduce GHG emissions.

In addition, SDG&E will collect data which may include consumption, charging and operational data from load research meters and data loggers respectively for one year. Obtaining a baseline data set will facilitate analysis of how to optimize Vehicle Grid Integration (VGI) for the MD/HD and forklift EV market. At the conclusion of SDG&E’s data analysis process, SDG&E will collect one year of baseline data and intends to create a report to the Commission that may be shared with interested stakeholders, as allowed by privacy rules. Load research meters will collect consumption and charging data to evaluate energy consumption relative to time and demand. Data loggers will provide operational data such as operation-specific and EV-specific charging and operating patterns. This information will aid in determining how to optimize VGI as well as electric fuel economy in order to determine optimal battery and EVSE sizes. Optimized VGI is important for the MD/HD and forklift EV

market because it will allow for better grid utilization, mitigate impacts to system and circuit peak and mitigate the need for additional power generation facilities. There may be more opportunities in future phases of the EMP to explore EV charging management plans that identify timing, scheduling, and servicing needs to mitigate increased costs and facilitate operational needs. Where permissible, due to privacy rules, SDG&E will share data with the District to track, monitor, report and implement the EMP and contributions to the District's CAP.

In addition to SB 350, SDG&E stands ready to support the transportation fuel needs and choices of the District and District tenants. SDG&E is in a position to help enable and support the conversion from conventional fuels such as diesel to cleaner fuels, including natural gas and electricity. This may vary based upon the vehicle type and vehicle operation needs. For some District tenant customers, this may include facilitating the conversion from diesel to natural gas. For other vehicles, this may include accelerating the adoption of electric vehicles, forklifts and other equipment consistent with the direction in SB 350. These choices will often be customer driven in support of operational needs, CAP goals, and the goals of California.

II. **Alignment with AB 628**

SDG&E's SB 350 clean transportation project aligns with the Legislature's finding that "there is an opportunity in port and harbor district operations, including the

movement of commercial goods, to reduce vehicular emissions of greenhouse gases and criteria pollutants.”³⁸

Further, this project satisfies §25990(b)(5), which requires an EMP to contain “a description of measures to be taken to reduce air emissions for vehicle use within district boundaries, including vehicles used for movement of commercial products.”

III. Roles and Responsibilities

SDG&E requested Commission authorization to install, operate, maintain, and own EV charging infrastructure including, but not limited to, EVSE, circuits, load research meters and data loggers to support widespread transportation electrification within the District for 30-40 installations.

The District and its tenants will be key stakeholders.

IV. Proposal Timeframe

SDG&E will begin installation of the equipment associated with this project after Commission approval of its SB 350 application.³⁹

³⁸ AB 628, Section 1(b).

³⁹ Application of San Diego Gas & Electric Company (U 902-E) for Authority to Implement Priority Review and Standard Review Proposals to Accelerate Widespread Transportation Electrification, accessible (January 20, 2017), accessible at:

https://www.sdge.com/sites/default/files/regulatory/SDGE%20Application%20For%20Approval%20of%20SB%20350%20Transportation%20Electrification%20Proposals_0.pdf.

Advanced Technologies Proposal #1 – Mobile Battery

I. Proposal Overview

SDG&E is proposing a multi-phased integration of a battery storage solution to meet a portion of the projected needs of the cruise ship terminal. It is contemplated that the storage asset would be mobile so that it can be transported and deployed at more than one location depending upon need and the available capacity of the storage unit. The “stackable” value-stream property – that is, the potential capability to provide multiple, concurrent benefits – of advanced battery storage technology is the fundamental premise underlying this proposed solution. In fact, there are significant opportunities to use this mobile storage solution at large-scale community events where typically generators are used on-site (therefore reducing criteria air pollutants). This mobile storage proposal may also tie-in to the District’s existing solar photovoltaic installation at the B Street Terminal to benefit from the excess production that occurs during off-peak/non-cruise ship days thus bundling advanced technologies together.

This proposal contemplates the deployment of this plan in a phased manner:

- Phase 1 (Years 1-5): Pilot a storage project of up to 1 MW (4 MWh) utilizing available grant funding⁴⁰;

⁴⁰ We will revise with an accurate reflection of size of storage and cost.

- Phase 2 (Years 6-10) and Phase 3 (Years 11-15): Optimize and expand pilot keeping in mind:
 - 1) District’s ability to increase cruise ship traffic (thus increasing the shore power circuit’s load factor);
 - 2) Grid needs; and
 - 3) The technology landscape and future trends.

The plan requires conducting a 15-year economic analysis of the “mobile storage” concept based on the following inputs and assumptions:

- Shore power rate;
- Projected declining price-curve of storage;
- Known cruise ship schedule (12-18 months in advance); and
- Current load factor (~2%).

The following outputs will be calculated with a goal of maintaining a reasonable and competitive composite energy rate for the cruise ship terminal:

- Storage lease and/or other pricing models for the cruise ship terminal; and
- Value of other implementable benefit streams – e.g., grid use, leasing to other customers during periods when demand is not required by cruise ship terminal.

I. Alignment with AB 628

The purpose of this proposal is to demonstrate the potential of “stackable benefits” of energy storage, as well as test the ability to validate the effectiveness of energy storage as a tool to manage shore power load (and therefore costs) so that the Port

can maintain, attract and increase cruise ship traffic over the next 15 years. This objective aligns with the broad economic and energy goals of AB 628.

Further, an advanced technology proposal satisfies Section 25990(a), which states “A district may prepare one or more energy management plans...*that produces, generates, or supplies electricity to the public and that serves the district in order to reduce air emissions, promote economic development, and encourage the development of new businesses and retain existing businesses in that district.*”

This advanced technology proposal satisfies this required element because it seeks to produce/generate/supply electricity, reduce air emissions and promote economic development and business retention/attraction.

II. Greenhouse Gas Reduction or Cost Savings

This proposal offers the potential to reduce GHG emissions by decreasing the use of generation sources contributing to those emissions. The potential for GHG reductions will be analyzed during the demonstration project.

III. Beneficiaries of the Proposal

The District (cruise ship terminal), San Diego region (increased economic activity resulting from tourism due to increased cruise ship activity) and the San Diego Tourism Authority may all benefit from the proposal. As well as creating a mobile storage solution that could be used at large-scale community events thereby reducing criteria air pollutants from generators on nearby communities.

IV. Roles and Responsibilities

SDG&E will develop advanced technology options and the District will provide ingress, egress and space for the mobile battery.

V. Proposal Timeframe

The implementation timeframe is expected to be 2-5 years for the pilot phase, and 6-15 years for the expansion and optimization phases.

VI. Proposal Funding

SDG&E intends to fund the initial pilot phase through available grant opportunities. SDG&E will seek Electric Program Investment Charge (EPIC) Cycle 3 funds and additional state and/or federal grants to pay for the demonstration project. Funding plans for the later phases of the proposal will be developed during the pilot phase.

Advanced Technologies Proposal #2 – Infrastructure Update

I. Proposal Overview

- There are several redevelopment projects contemplated to be carried out in the District’s Port Master Plan Update. These plans will result in significant electric load growth in the area, requiring substantial distribution grid upgrades. As a result, SDG&E is contemplating the deployment of advanced technologies to meet these grid needs as alternatives to traditional grid infrastructure. As a first step in this direction, SDG&E will consider the results of a planned load-study of three District locations (Seaport Village, Harbor Island and Tenth Avenue Marine Terminal) to evaluate upgrades to the distribution grid utilizing storage, solar and other emerging advanced technologies. Additional studies of this nature will also be conducted in collaboration with the District and its tenants to ultimately design a smart and efficient distribution grid to systematically meet growing needs. SDG&E will conduct detailed economic and technology viability studies in support of these efforts.
- In addition, SDG&E will develop a program pursuant to AB 2868⁴¹ for which the District would likely qualify (see section 4.2 of California Public Utilities Commission Order Instituting Rulemaking (OIR) 15-03-011 for more information on the implementation process). AB 2868 provides the initial framework for the Commission to direct regulated electric utilities to develop and “file applications for

⁴¹ Public Utilities Code §2832.2 *et. seq.*

programs and investments to accelerate widespread deployment of distributed energy storage systems to achieve ratepayer benefits, reduce dependence on petroleum, meet air quality standards, and reduce emissions of greenhouse gases. Programs and investments proposed by the state’s three largest electrical corporations shall seek to minimize overall costs and maximize overall benefits.”⁴² SDG&E anticipates that the Commission will issue guidance on how such programs should be structured and submitted by the end of 2017. As §2832.2(d)(2) indicates that “[t]he commission shall prioritize those programs and investments that provide distributed energy storage systems to public sector and low-income customers,” SDG&E anticipates that the District, as a public-sector customer, would qualify for participation in such a program. SDG&E believes that this is the appropriate funding mechanism for the energy storage component of a future District microgrid project and has a clearer path for approval, such as priority for public sector projects, than AB 628 which does not directly authorize ratepayer cost recovery of District reliability enhancements. It should be noted that the District may independently pursue microgrids outside of the IOUs as a cost savings measure, where resiliency and islanding may be necessary and to further advance the District as a Strategic Port. If the District does so, those projects may be included in future EMPs.

⁴² Public Utilities Code §2832.2(b)

II. Alignment with AB 628

In keeping with SDG&E's commitment to excellent customer service, development and promotion of cost-effective advanced distributed energy technologies, as well as the "greening of communities" that it serves, SDG&E is proposing a multi-phased integration of advanced technologies to effectively meet the following additional goals:

- a. Achieve a sustained competitive energy cost in order to increase San Diego economic activity in accordance with the Port Master Plan Update, to increase activities such as cargo ship frequency, and enhanced industrial, commercial and retail activity along the San Diego Bay;
- b. Utilize new and advanced energy technologies to meet emissions/clean energy goals set forth in the District's Climate Action Plan (CAP);
- c. Ensure grid needs are met simultaneously with those of the District, thus minimizing cross-subsidies; and
- d. Implement advanced technologies prudently keeping in mind the nascence and declining price curve of many of these technologies.

Further, an advanced technology proposal satisfies Section 25990(a), which states "A district may prepare one or more energy management plans...*that produces, generates, or supplies electricity to the public and that serves the district in order to*

reduce air emissions, promote economic development, and encourage the development of new businesses and retain existing businesses in that district.”⁴³

This advanced technology proposal satisfies this required element because it seeks to produce/generate/supply electricity, reduce air emissions, and promote economic development and business retention/attraction.

In addition, the legislative declarations reference “low-cost, low-emission energy sources.”⁴⁴

III. Greenhouse Gas Reduction or Cost Savings

Some advanced technologies inherently result in GHG reductions through the increased utilization of renewable energy sources and the corresponding reductions in the use of fossil-fueled generation; however, the combination of such technologies in the ultimate solution will dictate the extent of such reductions.

Cost savings are a potential outcome for both the ratepayer and the District and its tenants; however, those savings can only be quantified based on the ultimate solution adopted.

⁴³ Public Resources Code, Chapter 13 §25990(a).

⁴⁴ AB 628, Section 1(a).

IV. Beneficiaries of the Proposal

The District, District tenants, adjacent communities and jurisdictions and ratepayers all benefit from increased industrial, commercial and retail activity promoted by the proposal. Additionally, the District, District tenants and adjacent communities will benefit from potential GHG reductions, and decreased air pollution, that may result from the proposal.

V. Roles and Responsibilities

This proposal requires a long-term estimate of proposed activities resulting in load-growth, that the District and District tenants will be required to provide in order for SDG&E to estimate impacts to the distribution grid. Collaboration with the District will be required to align energy needs with anticipated redevelopment activity and the Port Master Plan Update.

VI. Implementation Timeframe

The expected implementation timeframe for this proposal is 3-5 years.

VII. Proposal Funding

SDG&E will seek to develop a program pursuant to AB 2868, for which the District would likely qualify. Under this approach, costs would be recovered through distribution rates from all ratepayers. However additional value streams such as using the microgrid for energy arbitrage and backup power could support energy cost certainty for the District and its tenants and reduce the cost to ratepayers.

Clean Generation Proposal

I. Proposal Overview

SDG&E is proposing a multi-solution approach to support and develop clean generation at the District:

- 1) EcoChoiceSM;
 - 2) Integration of planned behind-the-meter solar by the District and its tenants;
 - 3) Solar as part of Advanced Technologies proposal #2 – Infrastructure Upgrade;
- and
- 4) Leverage EcoShareSM to develop creative solutions benefiting multiple stakeholders.

1) EcoChoice

EcoChoice is a green tariff that offers the District and its tenants an opportunity to increase the renewable content of energy provided by SDG&E above SDG&E's current Renewable Portfolio Standard. Through this offer the District and its tenants can reduce GHGs and promote the growth of renewable energy with no upfront costs or long term commitments. Customers can elect for 50% to 100% of electricity usage to be served through the program and may pay a small premium each month based on the size of the renewable energy subscription. Renewable energy credits associated with the participant's energy consumption are retired on the customer's behalf and can be counted toward CAP or other GHG goals. This offer supports the District's CAP goals and objectives as well as District tenant Sustainability Plans and

Green Program goals. EcoChoice will soon be comprised of 100% solar energy from facilities located in Southern California, but other renewable generation technologies like wind energy may be added to EcoChoice in the future.

2) Integration of planned behind-the-meter solar by the District and its tenants
SDG&E supports solar as a clean and green power generation technology, and SDG&E will work with the District and its tenants to integrate and support existing and planned customer-owned solar installations. SDG&E recognizes that the District is engaged in efforts to identify on-site generation opportunities to offset increased loads associated with advanced technologies (i.e., EV charging infrastructure, etc.). SDG&E will make full efforts to assist customers with selection of optimal rate plans in order to maximize solar benefits.

3) Solar as part of Advanced Technologies proposal #2 – Microgrid

There are several redevelopment projects envisioned in the District's Port Master Plan Update. These bold and aggressive plans will result in significant electric load growth in the area, requiring substantial distribution grid upgrades. To meet these grid needs, SDG&E is contemplating the deployment of advanced technologies, specifically at the Tenth Avenue Marine Terminal location. SDG&E is open to discussions with the District and its tenants to integrate multiple solar options into this proposal to most efficiently deploy clean technologies.

4) EcoShare

SDG&E's EcoShare program may be leveraged to deploy distributed solar to benefit the District, its tenants and "communities of concern" around the District that are most affected by emissions.

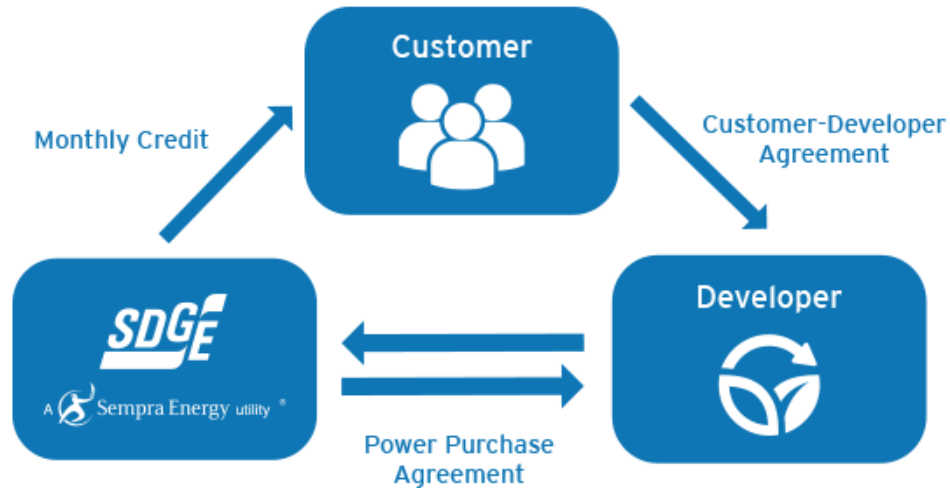
EcoShare Program Overview

EcoShare offers a way for the District and its tenants to purchase renewable energy directly from new solar facilities within SDG&E's service territory operated by third-party developers. All environmental attributes of the purchased solar energy remain with participating customers.

Under the EcoShare program, the District and participating customers could enter into private contracts with the selected developer(s) where the electricity price and agreement terms are defined. Billing for EcoShare participants works as follows:

1. Customers continue to receive normal SDG&E bills each month with a new credit reflecting the amount of solar energy purchased from the developer.⁴⁵
2. Customers receive an additional bill from the developer to pay for the renewable energy purchased from the solar facility.

⁴⁵ EcoShare credits are defined in Schedule ECR (http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_ECR.pdf)



The final cost of the solar energy is at the discretion of the selected developer and could potentially result in cost neutrality or a cost reduction for participating customers. Eligible solar projects must bid into a competitive solicitation and be selected by SDG&E according to solicitation requirements.

EcoShare Project Design

While several creative proposals could be designed leveraging the EcoShare program, an example could include the deployment of solar installations (options could include traditional ground-mounted systems or modern multi-functional solar canopies) sited in open spaces, parking lots or any other cost-effective suitable land. Additionally, the District could also opt to contribute land under its jurisdiction for the purpose of lowering the overall cost of the EcoShare project. Such details would be at the discretion of the District and the solar developer. Leveraging the EcoShare program, the solar energy generated by these solar facilities can be structured to directly benefit several stakeholders including the District, its tenants and potentially

even residents of the disadvantaged communities adjacent to the District. SDG&E will make every effort to support the District in developing creative solutions to meet CAP and energy-related goals through the EcoShare program.

II. Alignment with AB 628

This proposal will help to reduce air emissions, one of the objectives of AB 628.

This proposal satisfies Section 25990(b)(2)(B) - an assessment of the role that distributed generation, combined with accurately priced utility services, could play in providing greater rate stability and energy cost certainty to aid in economic development, and proposed actions with respect to that role. In addition, this proposal helps to address the CAP'S Alternative Energy Generation objective to meet energy demands through renewable energy generation. The CAP has currently targeted a GHG reduction goal of 20% through alternative generation. While SDG&E's Renewable Portfolio Standard will have a significant positive impact on GHG emissions, additional measures will be required in order to meet goals. In addition, this proposal is in line with the State's climate change policy, including the GHG EOs and SB 350.

III. Greenhouse Gas Reduction or Cost Savings

As specified in the CAP, shifting from traditional, GHG-emitting power sources (fossil fuels) to clean, renewable energy can contribute significantly to meeting the District's GHG reduction targets. The District can help meet energy demands through on-site, distributed renewable energy generation.

IV. Beneficiaries of the Proposal

Depending upon the ultimate contract with the solar developer, the beneficiaries of clean generation could be any or all of the following:

- The District,
- District tenants,
- Residents in communities adjacent to the District tidelands, and
- Other customer stakeholders.

V. Roles and Responsibilities

SDG&E is willing to assist the District with identifying suitable locations for the solar installations and aligning potential opportunities identified in the District's Port Master Plan Update.

VI. Implementation Timeframe

The implementation timeframe for this proposal could vary subject to final project design, but will largely be deployed before 2020. Specifically, EcoShare is available today, however EcoShare projects cannot begin construction until a PPA is in place with SDG&E. SDG&E currently holds two EcoShare solicitations per year, and the typical timeframe from the beginning of the solicitation to contract execution is approximately 6-7 months. Realistically, this means there is likely a 1.5-2-year delay between identifying land and a developer and having an operational project.

VII. Proposal Funding

No incremental funding is anticipated to implement this proposal, as it leverages the existing SDG&E EcoShare program.

Shore Power Rate

I. Proposal Overview

An AB 628 shore power rate will be filed with the Commission as part of its EMP related application. If approved, the electric rate will be applicable only to the District's cruise ship terminal and will be indexed to SDG&E's class-average electric rate for the Medium/Large C&I customer class. Adoption of the shore power rate is a critical component of the AB 628 proposal as it addresses and mitigates a significant impact associated with the GHG emission reductions and preserves cruise ship business of the District and benefits the entire San Diego Region.

Under the plan, the District's monthly electric service bill from SDG&E will show charges under the District's otherwise applicable tariff rate schedule (Schedule AL-TOU) and a discount or separate credit (showing both dollar amount and percentage) will be included. The discount, or credit, will be recalculated each billing period to cause the net electric rate paid by the District to equal SDG&E's currently-effective Medium/Large C&I class-average rate. Taxes and fees applicable to the discounted electric charges will be shown on the bill or by means of the separate credit.

For reference purposes, SDG&E's current Medium/Large C&I class-average rate is 19.85 cents per kWh, effective March 1, 2017 (Ref. Advice Letter 3034-E, Attachment A). For billing purposes, the applicable AB 628 Shore Power Rate would

be prorated based on number of billing period days effective for each class-average rate.

The dollar and percentage discounts shown on the bill, or provided separately, would be calculated as in the following example:

Line #	Description	Units	Notes:
1	Electricity Delivery	139,850 kWh	Monthly usage stated on bill
2	Total Electric Charges	\$ 155,000.00	Otherwise applicable bill amount (i.e. before discount and before Taxes & Fees)
3	Med/Large C&I Class-Average Rate	\$ 0.19850 per kWh	From Implementation Advice Letters, Attachment A
4	Total Electric Charges - Discounted	\$ 27,760.23	Line 1 multiplied by Line 3; This amount would be shown on bill or with separate credit
5	Line-Item Discount	\$ 127,239.78	Line 4 minus Line 2; This would be shown on the bill or provided as a separate credit, and tracked for recovery
6	Percentage Discount	82.1%	Line 5 divided by Line 2; This would be shown on the bill or as separate credit

VIII. Alignment with AB 628

This proposal addresses the following legislative requirements:

- Rate design proposals to support AB 628, Section 1(d): “Energy utility customers located within the state’s port and harbor districts may benefit from the addition of new businesses and the retention of existing businesses through increased energy cost certainty.”
- Rate design proposals to support AB 628 Section 1(e): “Businesses located within the state’s port and harbor districts may benefit through greater stability and certainty in the cost of energy services.”
- Rate design proposals to support Section 25990 (b)(2)(B): “An assessment of the role that distributed generation, combined with accurately priced utility services, could play in providing greater rate stability and energy cost certainty to aid in economic development, and proposed actions with respect to that role.”

IX. Greenhouse Gas Reduction or Cost Savings

The proposed rate options provided in this program will support reduction in air emissions through economic support of the CARB shore power requirements established by Section 93118.3 Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port.

X. Beneficiaries of the Proposal

The District and visiting cruise ships would benefit from reduced electric charges for shore power services. The rate proposal would also provide billing simplicity and more predictability for shore power service. The improved economics for shore power will also translate to increased economic benefits to the region. Each home port call represents a \$2 million economic impact to the region. The loss of cruise ship business would have a significant economic impact on the regional economy.

XI. Roles and Responsibilities

SDG&E and the District would both need to actively participate in the proceeding at the Commission through supporting testimony. The District would be responsible for long-term improvements in the overall energy use profile. Significant improvements in the District's annual load factor will facilitate a smooth transition, with minimal increases to the monthly bill amount, after the AB 628 Shore Power Rate terminates.

XII. Implementation Timeframe

The AB 628 Shore Power Rate would be in effect for a period of five (5) years. The timeframe for implementation will be based upon approval of the shore power rate

proposal by the Commission. SDG&E has requested that the District's Cruise Ship Terminal be allowed to stay on the small commercial rate as an interim measure until final adjudication of the application.

XIII. Proposal Funding

Cost recovery will be necessary. Costs of providing the rate discount would be recovered from all SDG&E customers by means of an adjustment to the Public Purpose Programs (PPP) charges. The discount amount to be recovered would be quantified annually by summing the monthly credit amounts.

Enhanced Partnership Program

I. Proposal Overview

SDG&E is proposing the creation of an Enhanced Partnership Program (EPP) for the District's Energy Management Plan outlined by AB 628. SDG&E and the District agree that flexibility is integral to the EMP and envision filing multiple EMPs over the course of the next 15 years to provide opportunities to align with new state/local goals, laws, regulations and directives, leverage new technology solutions and strategic planning for an Advanced Energy Community proposal to be implemented in phases. To realistically implement the District's EMPs and achieve the GHG reduction and economic development objectives of AB 628, dedicated oversight is needed.

Currently the District has a Local Government Partnership (LGP) agreement with SDG&E that is specific to EE, the LGP contract term is January 1, 2016 – December 31, 2020. Through this partnership the District receives funding to support CAP EE activities, which support both the District and District tenants. The five-year budget total is \$3,464,200, providing the District with a budget of \$692,840 annually which supports administration, marketing education and outreach, and direct implementation tasks to support EE activities.

The EPP will seek incremental funding for the District to provide the resources needed for the five-year term for the first EMP. This funding will support the important work the District is undertaking in support of the CAP goals and

objectives, that is not covered by the LGP EE agreement. This first EMP requests the needed resources to support clean transportation, advanced technologies and clean generation in support of the Districts CAP goals and objective.

SDG&E and the District will work jointly to finalize the detailed components for the EPP, by determining the appropriate EMP roles and responsibilities and framework for the program. Additionally, a five year budget will be proposed for SDG&E EPP labor, EPP set-up and operations, consulting and other smaller budget categories needed to support the EPP.

The EPP will provide an on-going governance framework for EMP activities such as planning, implementation, budget and milestone tracking, status updates and reporting. Some additional key activities to be handled by the EPP are communication and change management planning, stakeholder outreach and coordination, Steering Team coordination (including Community Groups) and grant writing.

EPP Goals:

1. Provide on-going governance framework for EMP activities such as implementation, tracking and reporting;
2. Future EMP planning, application filing and Implementation;
3. Provide a mechanism for inclusion of a broad stakeholder group; and
4. Provide resources to allow the District to work on a broader range of important activities supporting the EMP, beyond the District's existing EE LGP Agreement with SDG&E which has a narrowly defined EE scope.

II. Alignment with AB 628

The overarching goal of the EPP is to provide the framework and resources to support the various EMP project teams and stakeholders, to deliver successful projects that achieve goals and objectives outlined in the EMP in support of the District's CAP. Further, the EPP helps satisfy the elements of AB 628 by providing the oversight necessary to implement the individual proposals.

III. Greenhouse Gas Reduction or Cost Savings

The EPP proposal provides the needed resources and support to achieve GHG reductions and cost savings outlined in the EMP proposals.

IV. Beneficiaries of the Proposal

The EPP proposal will benefit the District, stakeholders, and the surrounding communities by supporting the individual EMP proposals to reduce GHG emissions and to retain and attract new business in the District tidelands.

V. Roles and Responsibilities

SDG&E and the District will work jointly to finalize the EPP proposal. One key area that will be mutually decided is to determine the roles and responsibilities, and the level of interaction the EPP will require from the District staff. The EPP intends to lessen the burden for the District staff by adding the needed framework and resources, and allow more flexibility to support a broader range of work that needs to be done in support of EMP proposals and the District's CAP goals and objectives.

VI. Implementation Timeframe

SDG&E and the District would like to formally create the EPP upon approval of this application filing. The EPP will be established and maintained through the term of this EMP, and for potential future EMP's.

VII. Proposal Funding

The EPP proposal will be funded through the PPP charge, and cost recovery will be necessary. The requested funding amount will be provided in SDG&E's application before the Commission.

APPENDIX B – Assembly Bill 628 Required Elements

AB 628 Required Elements

An assessment of current energy consumption within the district by energy source and type of users. Examples may include commercial, industrial, governmental, ships, individual transport, and product transport.

An electric or natural gas forecast, developed in coordination with the serving electrical corporation, gas corporation, communication choice aggregator established on or before July 1, 2013, or local publicly owned electric or gas utility that reflects anticipated load growth within the district.

Based on intermittent data representing aggregate San Diego Unified Port District (District)-wide electricity consumption over the period 2006 to 2016, a forecasted electricity consumption analysis was performed through 2025. Aggregate electricity and natural gas data obtained for years 2006, 2013, and 2016 were utilized as inputs into the forecast. To determine the forecasted electricity consumption, a linear extrapolation of past years was conducted for 2020 and 2025. As shown in Table 1, a forecasted consumption based on trend data for these three years indicates that electricity consumption is expected to increase through 2025, and natural gas is expected to decline over the same period. The growth in electricity consumption represents a 12% increase from 2006 levels. The reduction in future natural gas consumption represents a 37% reduction from 2006 levels.

Table 1. Forecasted Electricity and Natural Gas Consumption

Year	Electricity (kWh)	Natural Gas (Therms)
<i>Past Consumption</i>		
2006	321,365,741	30,549,842
2013	340,852,059	24,345,113
2016	339,089,994	25,486,155
<i>Forecasted Consumption</i>		
2020	350,033,007	22,012,751
2025	359,791,253	19,144,180

The District is currently developing an update to the Port Master Plan which will guide development through 2050. The forecast will be refined as future projects and growth throughout the District are better defined. Other considerations for future electricity and natural gas demand and consumption will include increased requirements for shore power located at the District’s marine and cruise terminals, as well as infrastructure for electric vehicle charging for a range of vehicle types from light duty to heavy duty classes. The Districts expects that even with future growth, greenhouse gas reductions can be achieved through energy conservation, increased renewable energy sources, and alternative fuels.

An assessment of the role that distributed generation, combined with accurately priced utility services, could play in providing greater rate stability and energy cost certainty to aid in economic development, and proposed actions with respect to that role. This assessment shall be developed jointly with the serving electrical corporation, gas corporation, community choice aggregator established on or before July 1, 2013, or local publicly owned electric or gas utility.

Distributed generation projects in the EMP have the potential to increase rate stability and decrease energy costs for the District's tenets and maritime operations. As described earlier in the EMP, the energy efficiency proposal, clean transportation proposal, and advanced technologies proposals (mobile battery and load studies) have the potential to generate both economic and environmental benefits for District tenets. These efforts to reduce energy consumption and to prepare the District's transportation infrastructure for electric vehicles will support the District's current direct economic impacts, which were estimated at 43,600 jobs and more than \$5.4 billion in economic output in 2015.⁴⁶

The EMP also provides a mechanism for the District to explore opportunities to gradually reduce the District's cost of service on the cruise terminal account and for other District facilities. Cruise lines schedule their cruises 12-24 months in advance, so rate stability and energy cost certainty are important for long-term schedule planning and to encourage them to

⁴⁶ Economic & Planning Systems, Inc. Economic Impacts of the San Diego Unified Port District in 2015. Final Report 12/20/16. P.7.

invest in shore power capabilities (aboard vessels). As described in the EMP, there is currently no substitute for utility services in providing electricity to cruise vessels when at berth, and so the five year shore power rate and accompanying Discount would give the District and SDG&E time to work together to identify a longer-term solution (or solutions) that serves to reduce the District's overall cost of service. The advanced technology proposal #1 (mobile battery) is one effort to develop a solution, and the EMP includes Phase 1 of this effort. The District is also exploring opportunities to increase solar energy generation and develop a microgrid. As described elsewhere in the EMP, cruise service is a critical component of the District's economic activities, with an estimated regional economic impact of \$82 million in overall regional economic impact, \$46 million in spending with local businesses by the cruise lines, and over 700 direct and 2,000 indirect jobs in 2015.⁴⁷

⁴⁷ Business Research & Economic Advisors, Economic Impact Analysis of the San Diego Cruise Sector 2015, June 2016, available online at <https://www.portofsandiego.org/commercial-fisheries/documents/about-port-of-san-diego-documents/strategic-plan/8037-economic-impact-analysis-2015/file.html>.

“An assessment, in consultation with business and industry, that identifies current and emerging processes and technologies to reduce energy consumption and improve energy efficiency.”⁴⁸

Rocky Mountain Institute (RMI) was brought under contract by SDG&E to facilitate SDG&E and the District in developing an innovative energy management plan. The first step was framing opportunities; the second step was designing a collaborative launch; and the third step was an all-day RMI facilitated working session with SDG&E and the District resulting in the production of a summary report of workshop results.

SDG&E’s team consulted with engineering industry experts to determine the best resources to provide specialized audits to address the unique needs of some of the largest District tenants. SDG&E researched and vetted firms with expertise in refrigeration, shipyards and compressed air systems in support of District tenant needs. SDG&E will further its audit activities by continuing to assess current processes and technologies to identify additional opportunities to reduce energy consumption and improve energy efficiency.

SDG&E has already completed targeted audits for some of the District’s largest tenants on equipment and processes identified by tenants as major energy users with the greatest potential for savings.

⁴⁸ *Id.* at §25990(b)(2)(C).

- Combined consumption of all those evaluated customers exceeded 100,000 MWh (based on a 2013 baseline).
- A total of about 50 measures in heating, ventilation, and air conditioning (HVAC), lighting and industrial processes were identified.
- Audited customers were from various Commercial and Industrial segments, including lodging, warehousing, manufacturing, and cold storage.
- These targeted audits identified more than 12,000 MWh and 15,000 therms of savings in the Commercial and Industrial segments.
- SDG&E estimates that of these identified savings approximately 85% of the kWh savings have a 50% or better chance of being implemented based on payback period, availability of incentive funding, and probability of project approval.
- The targeted audits also identified some new measures that may require further study. As a result, SDG&E will propose emerging technology (ET) projects for the direct benefit of District tenants. These may be District-specific or they may leverage other ET efforts.

“An assessment, in consultation with business and industry, that identifies domestic and international shipping requirements and operations related to energy use and consumption.”⁴⁹

I. San Diego Unified Port District Cruise Terminal Requirements and Operations

Overview

The District includes two maritime cruise terminals and two public cargo terminals that support commercially competitive maritime operations. Of those four terminals, only the cruise operations’ utilization of shore power for cruise ships fall under the EMP shore power rate proposal.

The District’s cruise terminals have three berths on two piers, “B Street Pier” and “Broadway Pier”. These three berths accommodate two categories of cruises that call at the cruise terminal, “homeport calls” and “visitation calls.” The shore power regulatory requirements, as further described below, apply equally to both types of cruise ship calls, but the homeport and visitation calls have slightly different markets with varying price sensitivity.

When combined, these homeport and visitation cruise calls have a large regional economic impact. For example, in 2015 the San Diego Cruise Terminal hosted 77 cruise calls, generating over \$82 million in overall regional economic impact, \$46

⁴⁹ *Id.* at §25990(b)(2)(D).

million in spending with local businesses by the cruise lines, and over 700 direct and 2,000 indirect jobs.⁵⁰

Homeport Cruise Calls

- Homeport calls are when a cruise ship docks at the District's cruise terminal, disembarks all current cruise passengers and then boards a completely new set of embarking passengers. This embarking/disembarking process includes baggage handling, stores loading and customs operations.
- The District's cruise terminals are two of five terminals in Southern California that can accommodate homeport calls. The other terminals are located in Long Beach and Los Angeles.
- Homeport calls are scheduled and marketed two-to-three years in advance. Due to the fact that passengers make travel arrangements far ahead of time to arrive in San Diego prior to a cruise, the cruise lines cannot easily cancel already-advertised homeport cruises without frustrating customers and damaging their brand.
- During the 2016/2017 cruise season, Holland America Lines and Disney Cruise Lines were the main homeport cruise lines at the District, and their vessels utilized shore power.

⁵⁰ Business Research & Economic Advisors, Economic Impact Analysis of the San Diego Cruise Sector 2015, June 2016, available online at <https://www.portofsandiego.org/commercial-fisheries/documents/about-port-of-san-diego-documents/strategic-plan/8037-economic-impact-analysis-2015/file.html>.

- In addition, these homeport calls generated an estimated regional economic impact of \$1.9 million per homeport call.

Visitation Cruise Calls

- Visitation calls are when a cruise ship docks at the terminal for a day so that its passengers can take excursions to regional attractions. For San Diego, these attractions include beaches, retail, museums, the San Diego Zoo, restaurants, and amusement parks.
- There are two additional facilities in Southern California that can accommodate visitation through tendering, with passengers brought ashore on small tendering boats rather than disembarking from a dock. The California Air Resources Board (CARB) At-Berth Regulations do not require vessels calling at the tendering-only facilities located in Santa Barbara and Catalina Island to use shore power, so visitation calls diverting from San Diego can avoid the electricity costs altogether. For this reason, visitation cruises are considered to be a separate market that could be lost quickly if shore power rates increase significantly.
- These calls are scheduled about eighteen to twenty-four months in advance in order to develop the schedule for a cruise, but they are more easily re-routed than homeport calls (which must be cancelled).
- In the 2016/2017 cruise season, Princess Cruises was the largest visitation cruise line for the Port of San Diego and utilized shore power. The other

visitation lines called at the port four-or-less times per calendar year, so they were not required to use shore power.⁵¹

- Visitation calls generate an estimated regional economic impact at of about \$600,000 per call.

II. Domestic and international shipping requirements and operations related to cruise industry energy use and consumption

The domestic and international requirements and operations related to cruise industry energy consumption, and the ongoing success of this critical regional industry, include:

Requirement #1: The District must provide vessel operators with access to shore power so they can comply with CARB At-Berth regulations⁵²:

- In December 2007, CARB approved the "Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port" Regulation, commonly referred to as the At-Berth Regulation. In general, this regulation requires that by 2020, at least 80% of the container ships, passenger ships, and refrigerated-cargo ships calling at seven Californian ports use shore power when in port.⁵³

⁵¹ Section 93118.3.(b)3(E)2 of the At-Berth Regulations (title 17, chapter 1, subchapter 7.5, California Code of Regulations (CCR) Section 93118.3) exempts “[a] fleet composed solely of passenger vessels that visits the same California port fewer than 5 times total in a calendar year” from the shore power requirements.

⁵² For a full description of the At-Berth Regulations, see the California Air Resources Board website at <https://www.arb.ca.gov/ports/shorepower/shorepower.htm>.

⁵³ For the full text of the regulation, see <https://www.arb.ca.gov/ports/shorepower/finalregulation.pdf>. At this time, there is a limited exemption for “[a] fleet composed solely of passenger vessels that visits the same California port fewer than 5 times total in a calendar year.”

- In order to help the cruise lines comply with this regulation, the District installed shore power capabilities at its cruise terminals in 2010.

Requirement #2: The shore power electricity rate should reflect the unique

features of the cruise business:

- Shore power has a load factor (the ratio of average demand to peak demand) that is far lower than most businesses. New standard utility rates with high fixed and demand charges that may be appropriate for other businesses can result in effective shore power electricity costs of a \$1.00/kWh or more.
- The cruise season in San Diego is from October through April, so shore power is rarely used during the peak hours when demand on the utility grid is highest; that is, summer evenings. Compared to other businesses, shore power imposes relatively little cost on the utility system.
- Shore power use is greatest during peak solar hours (8:00am to 5:00pm), making shore powering cruise vessels a good opportunity to use California’s abundant solar-generated electricity.⁵⁴
- Because ships are by nature mobile, cruise ship use of the District’s cruise terminals is highly elastic. Even a modest increase in per-visit costs can lead to a significant decrease in cruise ship business – business which provides substantial economic benefits to the region. This is true for both homeport and visitation

⁵⁴ Penn, Ivan. California invested heavily in solar power. Now there's so much that other states are sometimes paid to take it. Los Angeles Times. June 22, 2017. P. online: <http://www.latimes.com/projects/la-fi-electricity-solar/>.

calls, and in the case of visitation calls, there are many regional alternatives that do not require shore power.

- A shift to new standard utility rates will cause a more-than-modest increase in per-visit costs, and can lead to significant regional economic damage.

Requirement #3: The port must provide reliable and competitively priced port services:

- The cruise market is price sensitive, with competition between cruise companies and other tourist attractions, therefore maintaining the cruise industry in San Diego requires that the District be price competitive so that cruise lines calling in San Diego can offer their customers attractive rates.
- Vessels are currently charged an energy-only (per kWh) “pass through” rate that is straightforward to calculate and administer. A shift to new standard utility rates with fixed and demand charges would require the District to accurately estimate visits months in advance, and to allocate a lump sum of hundreds of thousands of dollars, or even millions of dollars, among an uncertain number of visits. This would impose a significant risk of under and over-collection on the District.
- The District estimates that the transition from the SDG&E Small Commercial Rate with no demand charges to the Commercial and Industrial rate with demand charges would increase the terminals’ total energy bills by 400% to 600%. Based on these initial calculations, as this electricity cost is transferred to the cruise

lines, it would increase their overall port charges by about 200% per call for shore powered vessels.

- A cost increase of this magnitude risks substantial losses to the District's cruise business.

Requirement #4: Cruise operators must have access to fuel that complies with the North America Emission Control Area (ECA) requirements:

- On March 26, 2010, the International Maritime Organization (IMO) officially designated waters off North American coasts as an area in which stringent international emission standards for sulfur will apply to ships.
- Cruise vessels operating within the ECA must use low-sulfur fuels or deploy exhaust gas cleaning technology.
- The District ensures that cruise vessels visiting the port are able to bunker (fuel) using compliant low-sulfur fuels.

III. Domestic and international shipping requirements and operations related to freight shipping industry energy use and consumption

The District's two public cargo terminals are Tenth Avenue Marine Terminal and National City Marine Terminal. These terminals work with vessels carrying refrigerated containers, automobiles, fertilizer, soda ash, petroleum, steel, windmill components, and miscellaneous project cargo. Tenth Avenue and National City marine terminals handled nearly 1.8 million tons of cargo in FY 2015, which moved on more than 400 vessels and barges calling at the District's two maritime freight terminals.

These two terminals also have a large economic impact on the region, with an estimated \$2.0 billion in total economic value in FY 2015 from the terminals' marine cargo and vessel activity and supporting nearly 15,000 jobs in the State of California.⁵⁵

The Port's Climate Action Plan (CAP) addresses activities at both these terminals, and the District is working with its tenants and customers to implement energy efficiency solutions. However, operations at the Tenth Avenue Marine Terminal and National City Marine Terminal are not included in the cruise shore power rate.

⁵⁵ Martin Associates, The Local and Regional Economic Impact of the Port of San Diego Marine Terminals, August 2016, p. 6-7 available online at <https://www.portofsandiego.org/commercial-fisheries/documents/about-port-of-san-diego-documents/strategic-plan/8037-economic-impact-analysis-2015/file.html>.

“A set of measurable energy performance and management goals that reduce air emissions and promote economic development, and a prioritized list of infrastructure projects, public education initiatives, and other actions that the district will undertake to achieve those goals.”⁵⁶

The District and SDG&E refer to the District’s CAP, in which the following overarching GHG reduction goals are identified:

- 10% less than 2006 levels by 2020; and
- 25% less than 2006 levels by 2035.

In the CAP, the District provided the following sector-level GHG reduction goals:

- Transportation and Land Use: The District has identified the potential to reduce GHG by 62,210 metric tons of carbon dioxide (MT CO₂e/year) – or 57% under 2006 levels - by 2020.⁵⁷
- Energy Conservation and Efficiency: The District has identified the potential to reduce GHG by 21,591 MT CO₂/year – or 20% under 2006 levels - by 2020.⁵⁸
- Water Conservation and Recycling: The District has identified the potential to reduce GHG by 647 MT CO₂e/year – or 1% under 2006 levels – by 2020.⁵⁹

⁵⁶ *Id.* at §25990(b)(3).

⁵⁷ Port of San Diego, Climate Action Plan, p. 20.

⁵⁸ *Id.* at 24.

⁵⁹ *Id.* at 27.

- Alternative Energy Generation: The District has identified the potential to reduce GHG by 22,203 MT CO₂e/year – or 20% under 2006 levels – by 2020.⁶⁰
- Waste Reduction and Recycling: The District has identified the potential to reduce GHG by 3,143 MT CO₂e/year. – or 3% under 2006 levels – by 2020.⁶¹
- Miscellaneous (supporting other programs and outreach to reduce GHG emissions): The District has identified the potential to reduce GHG by 35 MT CO₂e/year – or 0.3% under 2006 levels – by 2020.⁶²

In support of the EMP, and in furtherance of the District’s CAP goals, SDG&E has worked with the District to identify specific projects for which SDG&E has, or will be applying to the Commission for approval. These projects, described in detail in Appendix A, consist of the following:

- A Specialized Energy Efficiency measures proposal designed to achieve incremental savings identified through specialized audits;
- Advanced Technologies proposals, including a mobile battery storage project and a load forecast study to determine microgrid infrastructure needs at the District;
- A comprehensive Clean Generation proposal, which includes several customizable solar options to help meet the District’s various GHG reduction and CAP goals;

⁶⁰ *Id.* at 28.

⁶¹ *Id.* at 31.

⁶² *Id.* at 32.

- A Clean Transportation proposal, set forth in SDG&E’s SB 350 application, as well as the potential for future projects to expand the electrification of the District’s transportation sector;
- A Shore Power Rate proposal for the District’s shore power account designed to mitigate the effects of prospective rate shock and enable the District’s Cruise Ship Terminal to continue to serve as a regional economic hub; and
- An Enhanced Partnership Program proposal to provide for adequate oversight and resources to ensure that each of the above proposals is implemented efficiently.

In addition to the projects described in Appendix A, the District currently has the following infrastructure projects under development:

- North Embarcadero Visionary Plan;
- Chula Vista Bayfront;
- Lane Field;
- Old Police Headquarters;
- Commercial Fisheries;
- Harbor Island Redevelopment;
- America’s Cup Harbor;
- San Diego Marriott Marquis and Marina; and
- Central Embarcadero.

Regarding public education initiatives, the District and SDG&E will work to a jointly develop a communications plan to educate relevant stakeholders about the areas of focus of the EMP, and the benefits of the programs outlined in Appendix A.

“A list of recommendations, developed jointly with the serving electrical corporation, gas corporation, community choice aggregator established on or before July 1, 2013, or local publicly owned electric or gas utility for the enhanced use of cost-effective energy efficiency and demand-side management in existing buildings and the inclusion of energy efficiency measures as part of the development of new buildings.”⁶³

- For standard EE program measures, SDG&E will be able to offer customers incentives that are based not only on energy savings above building code, but also on “to code” energy savings that are based on the existing equipment, as directed in Assembly Bill 802.
- SDG&E will continue to also identify non-standard or “specialized” measures that will cost-effectively reduce energy consumption for District tenants. These are measures that typically would not qualify for SDG&E’s standard EE program incentives. For example, measures related to equipment that is temporary and not permanently installed, or equipment that is used at the District, but owned by non-District tenants.
- Expected savings from the previously completed targeted audits come from both specialized and standard measures, and SDG&E estimates that of all expected savings approximately 15% of the kWh savings and 50% of the therm savings will be from

⁶³ *Id.* at §25990(b)(4).

specialized measures. Specialized audits found energy savings opportunities that exist in the following areas:

- Industrial Process Load;
 - Temporary Services;
 - To-Code Measures;
 - Advanced Controls and Energy Dashboards; and
 - Emerging Technologies.
- SDG&E proposes to leverage its existing demand response programs and to provide a comprehensive solution for the District and District tenants.

“A description of measures to be taken to reduce air emissions for vehicle use within district boundaries, including vehicles used for movement of commercial products. Proposed actions, developed jointly with the serving electrical corporation, gas corporation, community choice aggregator established on or before July 1, 2013, or local publicly owned electric utility, may include replacement of vehicles with lower emitting alternatives and development of infrastructure, in appropriate areas, to aid in the refueling of alternative fuel vehicles.”⁶⁴

The District and SDG&E refer to SDG&E’s SB 350 application before the Commission, which contains proposals in furtherance of this objective. Specifically, SDG&E intends to conduct 30 – 40 installations that include a combination of components such as electric vehicle supply equipment, load research meters and data loggers to obtain operational data and facilitate growth of Medium Duty/Heavy Duty and forklift electric vehicles in an effort to reduce GHG emissions. A detailed description of this project can be found in Appendix A. In addition to this project, SDG&E and the District anticipate additional opportunities to develop additional clean transportation projects in furtherance of the CAP GHG reduction goals.

⁶⁴ *Id.* at §25990(b)(5).

“A summary identifying governmental and nongovernmental impediments to implementation of the plan that includes recommendations on how these impediments may be overcome.”

Energy Efficiency:

The two primary governmental actors are the Commission and the State Legislature. Since the EMP and the energy efficiency elements contained therein are in response to direction from these entities, the District and SDG&E would not consider changes in direction from the Commission and State Legislature regulators as impediments but rather a change in prioritization or direction.

External forces, beyond the control of the EMP, would include the general economy and, more specifically, economic impacts on shipping and tourism. This category also includes addressable issues such as business decisions, financial returns, impact of operations and perceptions from potential participants. Each of these can be mitigated by thoughtful planning, which includes the EE RFO concept (further described in Appendix A) to attract best practices and industry expertise, dedicated implementation staff, and open communication between all stakeholders.

Advanced Technologies:

There is currently a lack of specific funding mechanisms for Advanced Technology projects. SDG&E has identified potential sources of funding such as EPIC and AB 2868 which may mitigate this issue.

One potential impediment is the unknown future cost and capabilities of advanced technologies. The District and SDG&E plan to overcome this potential issue by taking a measured approach and constantly evaluating the technology landscape to provide the most benefit at the lowest cost.

Clean Generation

One potential impediment to the EcoShare proposal would be any delays or other issues which arise out of project permitting or environmental reviews which may be necessary for implementation.

The success of EcoChoice and EcoShare are dependent on robust subscription. Depending upon the design of the ultimate contract with the solar developer, SDG&E will assist the District to overcome this potential barrier through encouragement to District tenants and customers located in “communities of concern” to participate in these programs.

Enhanced Partnership Program

If the AB 628 EMP proposals are approved but the EPP is not approved there would be no dedicated resources or funding to provide the framework and resources to plan, track and implement various EMP proposals. For this reason, SDG&E stresses the importance of the EPP and points to the support it has garnered from key stakeholders. If the Commission approves the EPP at a reduced budget level, it would similarly harm the ability for SDG&E and the District to effectively implement the EMP. SDG&E refers the Commission to the comprehensiveness of

the EMP, and proposals being pursued in furtherance of it, which extend beyond energy efficiency.

“A description of one-year, 3-year, 5-year, 10-year, and 15-year objectives for implementation of the plan. These objectives shall be in sufficient detail to allow the district to undertake a meaningful annual review of the plan’s progress.”

Energy Efficiency

Due to the changing nature of technology and EE regulation, the District and SDG&E intend to implement energy efficiency in a phased approach. Defined goals have only been established for the initial three years. Subsequent updates to the EMP will be made to address mid and long-term periods.

The initial energy savings goals are:

Year 1: 3,250,000 kWh

Year 1-3: 10,000,000 kWh

The year three goal of 10 million kWh is the established goal. The one-year goal has been provided for reference purposes only. Due to the planned RFO approach to EE implementation,+ annual goals within the three-year period will be proposed by bidders and finalized during contracting.

Advanced Technologies

The proposed microgrid, if required, is anticipated to provide sufficient renewable, reliable power to enable the District and its tenants' critical loads to "ride through" power outages, and provide safety, security, and economic benefits. The objective of increased reliability does not change over time, although the District's assessment of the value of that reliability may change.

Year 1 –Reliability requirements and microgrid concept complete

Year 3 – Increased reliability

Year 5 – Increased reliability

Year 10 – Increased reliability

Year 15 – Increased reliability

Clean Generation (subject to the District's ultimate contract with the solar developer)

Year 1 – Identify land appropriate for solar PV and procure the design/construction of solar projects;

Year 3 – Have at least one operational solar project;

Year 5 – Have multiple operational projects and/or enroll customers in clean generation projects;

Year 10 – Sustain clean generation production and/or enrollment in clean generation programs; and

Year 15 – Sustain clean generation production and/or enrollment in clean generation programs.

Enhanced Partnership Program

The EPP would align with the District’s CAP GHG established and future goals, reduction program, implementation timeline, and reporting milestones to inform the annual review and reporting needs of the EMP’s progress. The District’s implementation, tracking and monitoring schedule provides for annual updates each year, with a more comprehensive update every three years (see Figure 1 for current timeline). This reporting timeline may adapt overtime and the EPP will respond to such changes to ensure adequate and meaningful reporting on the EMP.

Annual Performance Evaluation (Progress Report) – Based on implementation of GHG reduction measures and performance indicators.

Comprehensive Evaluation – Based on a comprehensive GHG inventory to measure performance indicators and develop an update on overall progress towards GHG reduction targets.

Figure 1. Port of San Diego Climate Action Plan GHG Reduction Implementation Timeline

2017	2018	2019	2020	2021
Progress Report	3-Year Update: Port-wide GHG inventory update (for 2017 emissions). CAP Evaluation and Progress Report	Progress Report	Progress Report	3-Year Update: Port-wide GHG inventory update (for 2020 emissions). CAP Evaluation and Progress Report. Update CAP.

APPENDIX G

SAN DIEGO UNIFIED PORT DISTRICT ENERGY MANAGEMENT PLAN

APPENDIX H

LETTERS OF SUPPORT



COUNCIL PRESIDENT MYRTLE COLE

FOURTH DISTRICT
CITY OF SAN DIEGO

August 18, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Dear Ms. Davidson,

On behalf of San Diego's Fourth Council District, I am writing first and foremost, in support of the cooperative effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628. In addition, I would like to express support for the application to the California Public Utilities Commission (CPUC) to implement key elements of that Energy Management Plan.

AB 628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility in an effort to reduce harmful emissions and to promote economic development by attracting and retaining businesses that offer growth and employment for the local communities.

In accordance with AB 628, the Port and SDG&E have been working closely with one another to develop the proposed Energy Management Plan, and I believe this EMP will offer valuable benefits to the Port, its tenants and the region. Specifically, the plan will expand the existing partnership program between the Port and SDG&E, and through that partnership ensure responsible oversight, management and monitoring of implementation of the various aspects of the EMP. In addition, the plan will enable for the expansion of energy-efficiency programs and development of new energy-efficiency measures. The City of San Diego is committed to achieving the goals of the Climate Action plan, and these aspects of the EMP would be positive steps toward supporting some of those goals by increasing clean energy production and reducing greenhouse gas emissions.

The Port District, including San Diego Bay, is often regarded as one of our regions great assets and primary destinations for visitors and residents alike. The bay attracts millions of visitors each year, and it is home to hundreds of businesses, many within the tourism industry and many of an industrial nature. Overall, the proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals, and those are efforts I can fully support.

Sincerely,

A handwritten signature in blue ink that reads "Myrtle Cole".

Myrtle Cole
Council President, Fourth District
San Diego City Council



SCEDC

South County Economic
Development Council

Board of Directors

Aquatica

Bank of America

Border Fusion Group

Cook & Schmid

Colliers International

COX Communications

DEITAC/CDT

Higgs Fletcher & Mack

HomeFed

Falcon Strategies

MAAC

McMillin, LLC

Mission Federal Credit Union

Pacific Southwest Assoc. of Realtors

Point Loma Nazarene University

Rancho Vista Properties

Republic Services

San Diego Business Journal

San Diego County Water Authority

San Diego Padres

San Diego Regional Chamber of Commerce

San Diego Regional EDC

San Ysidro Health Center

SANDAG

Schwartz, Semerdjian, Cauley & Moot, LLP

Scripps Health

SDG&E

Southwestern College

Southwest Airlines

Southwest Strategies

The B Factor

Trilogy PR Group

Turner Construcion

US Bank

XEWT Channel 12/Televisa

Dignatary Council

City of Chula Vista

City of Coronado

City of Imperial Beach

City of National City

City of San Diego

County of San Diego

Port of San Diego

August 23, 2017

Lisa Davidson

San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of South County Economic Development Council (SCEDC), I am writing to express our support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

The Unified Port of San Diego (Port) is a member of SCEDC, and it is the Port's mission to protect the Tidelands Trust resources by providing economic vitality and community benefit through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship and public safety.

In 2013, Governor Jerry Brown signed into law AB628, which authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

SCEDC is in favor of the implementation of the EMP and is particularly interested in the following elements including:

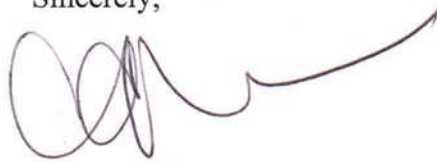
- A stable shore power electric rate for cruise ships that dock in San Diego. The proposed rate creates a stable and competitive rate for the cruise ship industry, which is critical to the regions tourism industry, including hotels, restaurants and attractions.

- An expanded partnership program, to track energy savings and engage stakeholders.
- Energy-efficiency measures to capture additional energy savings for the Port District and its tenants.

One of the crown jewels of our region is the Port District, which includes the San Diego Bay. The bay is visited by millions of people each year, and is home to hundreds of industrial and tourism-oriented businesses. The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

I urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me at 619-424-5143.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Cindy Gompper-Graves
President & CEO



Fresh Fruit Company

850 Water Street • San Diego, CA 92101-7833

Phone: (619) 615-1710 • Fax: (619) 236-0821 • Email: barry.jung@dole.com

Barrett A. Jung

Vice President

North American Terminals

Friday, July 28th, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of Dole Fresh Fruit, I am writing to express our strong support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

AB628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

Dole Fresh Fruit is in favor of the implementation of the EMP and is particularly interested in a number of the plan's elements including:

- clean and cost effective transportation cruise ships that dock in San Diego
- an expanded partnership program
- expanded energy-efficiency measures

The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

I enthusiastically urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me at (619) 615-1710.

Sincerely,


Barrett A. Jung
Vice President, North American Terminals

August 28, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of Cohn Restaurant Group, I am writing to express our support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

AB628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

Cohn Restaurant Group is in favor of the implementation of the EMP and is particularly interested in a number of the plan's elements including:

- a stable shore power electric rate for cruise ships that dock in San Diego
- an expanded partnership program

Cohn Restaurant Group operates over 20 restaurants in the San Diego area, including Island Prime/C-Level and Coasterra on San Diego Bay.

One of the treasures of our region is the Port District, which includes San Diego Bay. The bay is visited by millions of people each year, and is home to hundreds of industrial and tourism-oriented businesses. The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

We enthusiastically urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me at (619) 236-1299.

Sincerely,



Michael Feinman
Chief Financial Officer
Cohn Restaurant Group

August 23, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

As a Councilmember in the City of Coronado, I would like express my support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

In 2013, Governor Jerry Brown signed into law AB 628, which authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

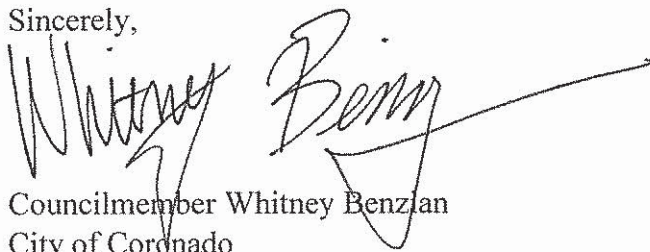
In accordance with AB 628, the Port and SDG&E have worked closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region. Some of these benefits, will in turn support the City of Coronado and region to improve air quality through valuable energy efficiency programs.

Through this letter, I wish to affirm my support of the implementation of the EMP and my particular interest in the following elements including:

- a stable shore power electric rate for cruise ships that dock in San Diego
- an expanded partnership program
- energy-efficiency measures

The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals. I strongly urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me at wbenzian@coronado.ca.us or 619.318.2031.

Sincerely,



Councilmember Whitney Benzian
City of Coronado



Greg Cox
SUPERVISOR, FIRST DISTRICT
San Diego County Board of Supervisors

August 23, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: Support for AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson:

As the San Diego County Supervisor for the First District that includes the entire San Diego Bay, I am writing to express my support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement key elements of the EMP.

As you know, AB 628 authorizes ports and harbor districts to develop and implement EMPs jointly with their local utility to reduce greenhouse gas (GHG) emissions and promote economic development. The EMP, as proposed, will offer many benefits to the Port, its tenants and the region.

A component of the plan that is of particular interest to me is the implementation of a shore power electric rate for cruise ships. An economic impact study covering the Port's cruise business for the 2015 calendar year found that the Port's cruise business contributed \$82 million in overall economic impact to the San Diego region, with about \$46.8 million spent on local businesses. Not only will this element of the EMP help keep the San Diego Cruise Ship Terminal stay economically competitive, it will reduce air pollution associated with our cruise ship activity to the benefit of surrounding communities,

I urge the Commission to approve the application. Should you have any questions, please feel free to contact my office at 619-531-5511.

Sincerely,


GREG COX
Supervisor, First District



August 24, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

RE: Letter of Support for the Port of San Diego/San Diego Gas and Electric Energy Management Plan

To Whom It May Concern:

I am writing to you in my capacity as the President and CEO of the Downtown San Diego Partnership to express our support of the Energy Management Plan (EMP) jointly passed by the San Diego Unified Port District (the Port) and the San Diego Gas & Electric Company (SDG&E). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

The Downtown San Diego Partnership is a longtime partner of the Port in attracting cruise business to San Diego and its cruise terminals. The cruise industry is a crucial engine for commerce and jobs in San Diego, with every home ported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall, the cruise activity from the Port of San Diego supported \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to San Diego and the entire region. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.

The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to voluntarily adopt a Climate Action Plan, and has continued to meet Green House Gas (GHG) reduction goals. As the Port of San Diego moves forward with its plans for the future, it is also bound by the California Air Resources Board (CARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in port. The CARB regulations require cruise lines to plug in to shore power, and the EMP allows for both SDG&E and the Port of San Diego to pass along competitive rates to the cruise

customers. Without the EMP, San Diego as a whole would lose out, as the cruise lines would be able to shift to markets with drastically cheaper shore power in Southern California.

The Port and SDG&E have worked together to craft this EMP that makes both financial and regulatory sense for both parties and the region. On behalf of the Downtown San Diego Partnership, I offer my full support for approval of the EMP between the Port and SDG&E, so that both may continue to operate in the best interest of their business and the communities that they serve. If you have any questions, or require any additional information, please feel free to contact my office.

Sincerely,

A handwritten signature in blue ink that reads "Kris Michell". The signature is fluid and cursive, with the first name "Kris" being more prominent than the last name "Michell".

Kris Michell
President & CEO
Downtown San Diego Partnership



REGIONALLY
FOCUSED.
GLOBALLY
COMPETITIVE.

August 11, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

RE: Support for Port of San Diego and San Diego Gas and Electric Energy Management Plan

Dear Ms. Davidson:

San Diego Regional EDC is pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as environmental benefits from having cruise vessels use shore power when at-berth.

EDC is a longtime partner with the Port of San Diego in attracting cruise business to San Diego and its cruise terminals. Beginning in 2008, we partnered with the Port of San Diego in an effort to bring Disney Cruise Line to San Diego. This effort resulted in four test cruises in 2012, and a determination that Disney will visit San Diego nineteen times in 2017-2018.

Cruises are a critical engine for commerce and jobs in San Diego, with every home ported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall, the cruise activity from the Port of San Diego supported \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to San Diego and the regional economy as a whole. The proposed shore power rate in the EMP would provide the rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.

The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to adopt a Climate Action Plan voluntarily, and has continued to meet Green House Gas (GHG) reduction goals. As the Port of San Diego moves forward with plans for the future, it is also bound by the California Air Resources Board (ARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in port. The EMP allows for both SDG&E and the Port of San Diego to pass along competitive rates to the cruise customers.

The Port of San Diego and SDG&E have worked together to craft an Energy Management Plan that makes financial and regulatory sense for both parties and for the region, and allows each to operate in the best interest of the communities they serve. In alignment with our mission to maximize the region's economic prosperity, San Diego Regional EDC will continue to offer its support for approval of this plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Cafferty', with a long horizontal flourish extending to the right.

Mark Cafferty
President & CEO

Cc Job Nelson, Port of San Diego



August 31, 2017

San Diego Gas & Electric
ATTN: Lisa Davidson
8335 Century Park Court
San Diego, CA 92123

RE: Support of AB 628 Energy Management Plan
Dear Ms. Davidson & the California Public Utilities Commission:

On behalf of the Industrial Environmental Association of California (IEA California), I am writing to express support for the proposed Energy Management Plan (EMP) between the Port of San Diego (the Port) and San Diego Gas & Electric (SDG&E), as authorized by AB 628.

The Industrial Environmental Association (IEA), established in 1983, represents 53 manufacturing related companies engaged in technology, pharmaceuticals, manufacturing, and ship repair. IEA member companies account for more than 55,000 employees in the southern California area alone. The IEA member companies significantly contribute to both the economic impact of San Diego and the implementation of environmental protection and compliance best practices. Recently, IEA committed significant resources and funding to expanding its reach in the Los Angeles area where it has already begun providing workshops and training to more than 100 companies/organizations in the Vernon area.

AB 628 authorizes ports and harbor districts to develop and implement an EMP jointly with their local utility to reduce air emissions, reduce energy use and promote economic development. Overall, IEA believes that the agreement between SDG&E and the Port (along with its tenants) will help address unique energy management needs and identify opportunities for more efficient energy use, achieve sustainability and contribute to Climate Action Plan objectives.

We urge the Commission to approve the application to be proposed by SDG&E.

Respectfully,

A handwritten signature in black ink that reads 'Jack Monger'. The signature is written in a cursive, flowing style.

Jack Monger
CEO



City of Imperial Beach, California

OFFICE OF THE MAYOR

825 Imperial Beach Blvd., Imperial Beach, CA 91932 Tel: (619) 423-8303 Fax: (619) 628-1395

August 15, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

As the Mayor of Imperial Beach, I am writing to express my support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

AB628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

The City of Imperial Beach is in favor of the implementation of the EMP and is particularly interested in the following elements including:

- a stable shore power electric rate for cruise ships that dock in San Diego, which will contribute to tourism and economic development throughout the region.
- an expanded partnership program, that I encourage be utilized to determine how much carbon is being sequestered as an outcome of the EMP.
- energy-efficiency measures, which will support Port Tenants to conserve their energy use and implement more sustainable practices.

Currently, the City of Imperial Beach is in the processes of evaluating our own greenhouse gas emission reduction strategies as part of our Climate Action planning underway. As a great portion of Imperial Beach is within Port tidelands, we wholeheartedly support the Port's efforts to introduce stronger emissions reduction strategies that will also contribute to the City's Climate mitigation overall.

Imperial Beach regards the Port District and San Diego Bay as a crown jewel of the region. The bay is visited by millions of people each year, and is home to hundreds of industrial and tourism-oriented businesses. The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

I urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact our City Manager, Andy Hall, at 619-423-8615 or ahall@imperialbeachca.gov.

Sincerely,

Serge Dedina
Mayor of Imperial Beach



OFFICE OF THE MAYOR
Mary Casillas Salas

August 18, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson:

The City of Chula Vista is pleased to provide this letter of support for the joint effort between the Port of San Diego and San Diego Gas & Electric (SDG&E) to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

AB628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses. In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

The City of Chula Vista is a recognized leader in sustainability and has a deep interest in supporting programs that reduce electricity consumption, support rate payers and assist local businesses within the community. We feel confident that the joint EMP will help boost these efforts in our region. The City has a strong partnership with SDG&E working on various initiatives that demonstrate the City's leadership among California municipalities in energy efficiency. Not only will the joint EMP benefit the ratepayers and local businesses, but it will also help the region and the state meet its statutory energy goals. The City of Chula Vista is in favor of the implementation of the EMP and is particularly interested in a number of the plan's elements including:

- Energy-efficiency elements that help reach the goals of our Climate Action Plan (CAP) and sustainability targets
- Expanded partnership programs that will help attract and retain local businesses
- Advanced innovative technologies that will further enable our regions Smart Cities efforts
- Provides support and access to affordable energy to businesses and residents in disadvantaged communities

We strongly support the joint EMP and urge the Commission to approve the application. If you have any questions, please contact our Chief Sustainability Officer, Dennis Gakunga at 619-476-5355

Sincerely,


MARY CASILLAS-SALAS
Mayor



KEVIN L. FAULCONER

MAYOR

August 24, 2017

Ms. Lisa Davidson
Director of Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

Dear Ms. Davidson:

On behalf of the City of San Diego, I am pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

The City of San Diego is a longtime partner with the Port of San Diego in attracting cruise business to San Diego and its cruise terminals. Cruise is a critical engine for commerce and jobs in San Diego, with every homeported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall, the cruise activity from the Port of San Diego supports \$82 million in economic output and roughly 652 jobs in 2015 alone. Rising shore power rates are detrimental to the City of San Diego and the San Diego region as a whole. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues while maintaining environmental benefits.

I appreciate your consideration of the EMP between the Port and SDG&E, which would allow both to continue to operate in the best interest of their business and the communities they serve.

Sincerely,

Kevin L. Faulconer
Mayor

KLF:pb





August 23, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of the citizens, I am writing to express my support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

The City of National City is a member of the Unified Port of San Diego (Port) and it is the Port's mission to protect the Tidelands Trust resources by providing economic vitality and community benefit through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship and public safety.

In 2013, Governor Jerry Brown signed into law AB 628, which authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

The City of National City is in favor of the implementation of the EMP and is particularly interested in the following elements including:

- a stable shore power electric rate for cruise ships that dock in San Diego
- an expanded partnership program.
- energy-efficiency measures, which I hope will support the National City Marine Terminal.

The San Diego Bay within the Port of San Diego, is one of the crown jewel of the San Diego region, visited by millions of people each year, and is home to hundreds of industrial and tourism-oriented businesses. The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

I strongly urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me at (619) 336-4236.

Sincerely,

Ron Morrison
Mayor

Mayor Ron Morrison
1243 National City Blvd., National City, CA 91950-4301
Office: (619) 336-4233 Cell: (619) 250-6091 Fax: (619) 336-4239
rmorrison@nationalcityca.gov www.nationalcityca.gov



P.O. Box 131068 – San Diego, CA 92170-1068
www.sandiegoshiprepair.com

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Marcel Becker
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Trident Maritime Systems

Monica Caniya
Administrative Assistant
(619) 300-3616
mpot@sandiegoshiprepair.com

August 29, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of the Port of San Diego Ship Repair Association (PSDSRA), I am writing to express our support for the proposed Energy Management Plan (EMP) between the Port of San Diego (Port) and San Diego Gas & Electric (SDG&E), as authorized by AB 628, and for the associated application to the California Public Utilities Commission (CPUC) to implement certain parts of this plan.

Established in 1982, the PSDSRA represents more than 100 San Diego-area companies engaged in ship repair, conversion, overhaul and modernization. Our member companies provide a full range of ship repair services including specialized and energy-intensive crafts such as welding, industrial painting, pipefitting, shipfitting, electrical work, and sandblasting. Our members add more than 14,000 jobs to the San Diego economy, both directly and through subcontractors and suppliers, and contribute hundreds of millions of dollars in revenue to the local economy each year.

AB628 authorizes ports and harbor districts to develop and implement an EMP jointly with their local utility to reduce air emissions and promote economic development. Many of our members are either San Diego Port tenants or subcontractors that complete their work on the Port district. Thus, our members influence a significant portion of the energy consumed at the Port district and would be key stakeholders in the implementation of any joint EMP between the Port and SDG&E.

The PSDSRA has reviewed the EMP proposed by the Port and SDG&E and believe that it will offer many benefits to our members, our industry, and the region. PSDSRA is in favor of the implementation of the EMP and is particularly interested in certain elements including:

- **Additional Energy Saving Opportunities.** Due to the unique nature of the industrial processes, certain energy saving opportunities have not been suitably addressed in existing utility programs. The EMP proposes to allow for specialized programs that allow for subcontractor participation and are better tailored to the ship repair industry, which will support further energy savings in the Port district.
- **New Technology and Improved Processes.** With the expected growth of ship repair requirements on the west coast, the EMP proposes to demonstrate emerging technologies and improved processes that can result in a more cost-competitive waterfront that operates with a reduced environmental footprint.

- Environmental Benefits for Adjacent Communities. PSDSRA places a special focus on support for the neighborhoods in and around the Barrio Logan community, where the major shipyards are based. The EMP proposals provide additional tools to reduce Greenhouse Gas emissions at the Port district and are consistent with PSDSRA's efforts to work with and contribute to the local Barrio Logan community.

In general, PSDSRA believes that the proposed EMP between the Port SDG&E, as authorized by AB 628, and the associated application to the CPUC can help the Port and its tenants better manage their energy needs, achieve sustainability and Climate Action Plan goals, and promote development of both industrial and tourism-oriented businesses.

I urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me at (858) 663-5792 or dpence@sandiegoshiprepair.com.

Respectfully,

A handwritten signature in black ink that reads "Derry T. Pence". The signature is written in a cursive style with a large initial "D" and a long, sweeping underline.

Derry T. Pence
President
Port of San Diego Ship Repair Association

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HARBORSIDE REFRIGERATED SERVICES
Sharon Bernie-Cloward, President
SAN DIEGO PORT TENANTS ASSOCIATION
Claudia Valenzuela, Secretary
SDG&E
Perry Wright, Treasurer
CONSIDINE & CONSIDINE



SAN DIEGO PORT TENANTS ASSOCIATION

August 22, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of the San Diego Port Tenants Association (SDPTA), I am writing to express our support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

AB628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

The SDPTA is in favor of the implementation of the EMP and is particularly interested in a number of the plan's elements including:

- a stable shore power electric rate for cruise ships that dock in San Diego
- an expanded partnership program
- energy-efficiency measures

Our Association represents the business leaseholds on the Port Tidelands (San Diego Bay) and we understand the importance of keeping our competitive edge as it relates to being an economic engine for the region while continuing our environmental stewardship.

One of the crown jewels of our region is the Port District, which includes San Diego Bay. The bay is visited by millions of people each year, and is home to hundreds of industrial and tourism-oriented businesses. The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

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Tom Fetter
William Hall
Douglas Manchester
Karen McElliott
Edward Plant
Lee Wilson

STAFF

Corchelle E. Worsham
MEMBERSHIP & EVENTS COORDINATOR
Chelsea Bernie
SPECIAL PROJECTS DIRECTOR

2390 SHELTER ISLAND DRIVE, SUITE 210 · SAN DIEGO, CALIFORNIA 92106 · (619) 226-6546 · FAX (619) 566-4056
EMAIL: Sharon@sdpta.com, Corchelle@sdpta.com, Chelsea@sdpta.com
Web: www.sdpta.com

Lisa Davidson
San Diego Gas & Electric
August 22, 2017
Page 2

We enthusiastically urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me, Sharon Cloward, at (619) 246-1916 or our SDPTA Chair Ken Franke (619) 760-4031.

Sincerely,

A handwritten signature in dark ink that reads "Sharon Cloward". The signature is written in a cursive, flowing style.

Sharon Cloward
President
San Diego Port Tenants Association



August 14, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

RE: Support for Port of San Diego and San Diego Gas and Electric Energy Management Plan

Dear Ms. Davidson,

The San Diego Tourism Authority (SDTA) is pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

The SDTA is a longtime partner with the Port of San Diego in attracting cruise business to San Diego. Beginning in 2008, SDTA partnered with the Port to help bring the Disney Cruise Line to San Diego. This effort resulted in Disney testing San Diego with four cruises in 2012, and will visit San Diego nineteen times in 2017-2018. Cruise is a critical engine for commerce and jobs in San Diego, with every home ported cruise brings \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall the cruise activity from the Port of San Diego supports \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to our region. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.

The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to adopt a Climate Action Plan voluntarily, and has continued to meet Green House Gas (GHG) reduction goals. As the Port of San Diego moves forward with their plan, it is also bound by the California Air Resources Board (ARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in port. The ARB regulations require cruise lines to plug in to shore power, and the EMP allows for both SDG&E and the Port of San Diego to pass along competitive rates to the cruise customers. Without the EMP, San Diego would lose out as the cruise lines would be able to shift to other Southern California markets with drastically cheaper shore power.

The Port of San Diego and SDG&E have worked together to craft this EMP that makes both financial and regulatory sense for both parties and the region. On behalf of the SDTA, I offer my full support for approval of the EMP between the Port and SDG&E, so that both may continue to operate in the best interest of their business and the communities they serve. If you have any questions, or require any additional information, please feel free to contact my office.

Best regards,


Joe Terzi
President & CEO

cc: Job Nelson, Port of San Diego



750 B Street
Suite 1500
San Diego/CA 92101

TEL 619.232.3101
FAX 619.696.9371

SANDIEGO.ORG



August 24, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

RE: Support for Port of San Diego and San Diego Gas and Electric Energy Management Plan

Dear Ms. Davidson,

Carnival Corporation is pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

As the parent company of Holland America Line and Princess Cruises, Carnival Corporation is a longtime partner with the Port of San Diego in at its two cruise terminals. Cruise is a critical engine for commerce and jobs in San Diego, with every home ported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall the cruise activity from the Port of San Diego supports \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to San Diego, its cruise partners, and the region as a whole. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.

The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to adopt a Climate Action Plan voluntarily, and has continued to meet Green House Gas (GHG) reduction goals. As the Port of San Diego moves forward with plans for the future, the Port of San Diego and the cruise lines are also bound by the California Air Resources Board (ARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in port. The ARB regulations require cruise lines to plug in to shore power, and the EMP allows for both SDG&E and the Port of San Diego to pass along competitive rates to the cruise customers.

The Port of San Diego and SDG&E have worked together to craft this EMP that makes both financial and regulatory sense for both parties and the region. On behalf of Carnival Corporation, I offer my full support for approval of the EMP between the Port and SDG&E, so that both may continue to operate in the best interest of their business and the communities that they serve. If you have any questions, or require any additional information, please feel free to contact my office.

Sincerely,

pp. *David Candib*

David Candib

Vice President, Development & Operations

Carnival Corporation & PLC

Global Port & Destination Development Group

T: 305-406-8688 | F: 305-406-5080

E: DCandib@carnival.com

3655 NW 87th Ave

Miami, FL 33178

cc: Job Nelson, Port of San Diego
Bill Sharp, Holland America



COUNCILMEMBER LORIE ZAPF

SECOND DISTRICT
CITY OF SAN DIEGO

August 17, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

RE: Support for Port of San Diego and San Diego Gas and Electric Energy Management Plan

Dear Ms. Davidson,

The City of San Diego is pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

The City of San Diego is a longtime partner with the Port of San Diego in attracting cruise business to San Diego and its cruise terminals. Cruise is a critical engine for commerce and jobs in San Diego, with every home ported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall the cruise activity from the Port of San Diego supports \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to the City of San Diego and the San Diego region as a whole. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.

The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to adopt a Climate Action Plan voluntarily, and has continued to meet Green House Gas (GHG) reduction goals. As the Port of San Diego moves forward with plans for the future, it is also bound by the California Air Resources Board (ARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in



port. The ARB regulations require cruise lines to plug in to shore power, and the EMP allows for both SDG&E and the Port of San Diego to pass along competitive rates to the cruise customers. Without the EMP, San Diego as a whole would lose out, as the cruise lines would be able to shift to markets with drastically cheaper shore power in Southern California.

The Port of San Diego and SDG&E have worked together to craft this EMP that makes both financial and regulatory sense for both parties and the region. On behalf of the City of San Diego, I offer my full support for approval of the EMP between the Port and SDG&E, so that both may continue to operate in the best interest of their business and the communities that they serve. If you have any questions, or require any additional information, please feel free to contact my office.

Sincerely,



Lorie Zapf
Councilmember
City of San Diego

cc: Job Nelson, Port of San Diego



CALIFORNIA TEAMSTERS LOCAL 911

PUBLIC, PROFESSIONAL & MEDICAL EMPLOYEES UNION, THE COUNTIES OF LOS ANGELES,
ORANGE, RIVERSIDE, SAN DIEGO, IMPERIAL, SAN LUIS OBISPO, SAN BERNARDINO, SANTA BARBARA AND VENTURA

9900 FLOWER STREET • BELLFLOWER • CALIFORNIA • 90706

(562) 595-4518 • Fax (562) 427-7298 • teamsters911.com

An Affiliate of the International Brotherhood of Teamsters

Raymond B. Whitmer
Secretary-Treasurer



August 22, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

Re: Support for Port of San Diego and San Diego Gas and Electric
Energy Management Plan

Dear Ms. Davidson:

The International Brotherhood of Teamsters, Local 911 (Teamsters) are pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

The Teamsters is a longtime partner with the Port of San Diego. Cruise is a critical engine for commerce and jobs in San Diego, with every home ported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall the cruise activity from the Port of San Diego supports \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to jobs in San Diego and the region as a whole. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.


The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to adopt a Climate Action Plan voluntarily, and has continued to meet Green House Gas (GHG) reduction goals. As the Port of San Diego moves forward with plans for the future, it is also bound by the California Air Resources Board (ARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in port. The ARB regulations require cruise lines to plug in to shore power, and the EMP allows for both

Page two
Ms. Lisa Davidson
August 22, 2017

SDG&E and the Port of San Diego to pass along competitive rates to the cruise customers. Without the EMP, San Diego as a whole would lose out, as the cruise lines would be able to shift to markets with drastically cheaper shore power in Southern California.

The Port of San Diego and SDG&E have worked together to craft this EMP that makes both financial and regulatory sense for both parties and the region. On behalf of the Teamsters, I offer my full support for approval of the EMP between the Port and SDG&E, so that both may continue to operate in the best interest of their business and the communities that they serve. If you have any questions, or require any additional information, please feel free to contact my office.

Sincerely,

A handwritten signature in cursive script that reads "Chester Mordasini".

Chester Mordasini, President
Teamsters, Local 911

c: Job Nelson, Port of San Diego
Joel Valenzuela, Port of San Diego
Josefina Balistreri, Port of San Diego



August 16, 2017

Lisa Davidson
San Diego Gas & Electric
8335 Century Park Court
San Diego, CA 92123

Subject: AB 628 Application to be filed by San Diego Gas & Electric

Dear Ms. Davidson,

On behalf of the Sheraton San Diego Hotel & Marina, I am writing to express our support for the joint effort between the Port of San Diego and San Diego Gas & Electric to establish an Energy Management Plan (EMP), as authorized by AB 628, and for the application to the California Public Utilities Commission (CPUC) to implement certain key elements of the EMP.

AB628 authorizes ports and harbor districts to develop and implement energy management plans jointly with their local utility to reduce air emissions and promote economic development by attracting and retaining businesses.

In accordance with AB 628, the Port and SDG&E have been working closely to develop an EMP. The proposed EMP will offer many benefits to the Port, its tenants and the region.

The Sheraton San Diego Hotel & Marina is in favor of the implementation of the EMP and is particularly interested in a number of the plan's elements including:

- A stable shore power electric rate for cruise ships that dock in San Diego
- An expanded partnership program
- Energy-efficiency measures

The EMP will benefit the entire region by helping to reduce emissions and clean our air. Cities around San Diego Bay, including many disadvantaged communities, will benefit from less air pollution associated with industrial and freight operations at the Port District.

One of the crown jewels of our region is the Port District, which includes the San Diego Bay. The bay is visited by millions of people each year, and is home to hundreds of industrial and tourism-oriented businesses. The proposed application will help the Port and its tenants better manage their energy needs, and achieve important sustainability and Climate Action Plan goals.

Sheraton®

SHERATON SAN DIEGO HOTEL &
MARINA
1380 Harbor Island Drive
San Diego, CA 92101
T 619 291 2900
F 619 692 2363
sheraton.com/sandiegomarina

I enthusiastically urge the Commission to approve the application as proposed. Should you have any questions, please feel free to contact me or our Director of Engineering, David Prost, at (619) 692-2284.

Sincerely,

Russ Mitchell
Director of Sales and Marketing
Sheraton San Diego Hotel & Marina



402 West Broadway, Suite 1000
San Diego, CA 92101-3585
p: 619.544.1300

www.sdchamber.org

August 17, 2017

Ms. Lisa Davidson
Director, Customer Programs
San Diego Gas & Electric
8335 Century Park Court
San Diego, California 92123

RE: Support for Port of San Diego and San Diego Gas & Electric Energy Management Plan

Dear Ms. Davidson:

The San Diego Regional Chamber of Commerce (Chamber) is pleased to support the Port of San Diego and San Diego Gas and Electric (SDG&E) in passing their joint Energy Management Plan (EMP). The EMP provides many benefits to the region, including a sustainable rate for shore power to cruise vessels calling in San Diego, as well as the environmental benefits from having cruise vessels use shore power when at-berth.

With nearly 2,500 members representing an estimated 300,000 employees, the Chamber is the largest nonprofit advocate for regional businesses and is dedicated to growing commerce in the San Diego region. The Chamber is a longtime partner of the Port of San Diego in attracting cruise business to San Diego and its cruise terminals. Cruise is a critical engine for commerce and jobs in San Diego, with every home ported cruise bringing \$2 million dollars to San Diego, and each visitation port call bringing \$600,000. Overall the cruise activity from the Port of San Diego supports \$82 million in economic output and roughly 652 jobs in 2015 alone. Anything that hampers the cruise industry, including rising shore power rates, is detrimental to San Diego and the region as a whole. The proposed shore power rate in the EMP would provide rate stability needed to maintain these jobs and revenues, while maintaining the environmental benefits attained through shore power.

The EMP also supports regional efforts to lead the way in environmental stewardship. The Port of San Diego was one of the first ports in the nation to adopt a Climate Action Plan voluntarily, and has continued to meet greenhouse gas (GHG) reduction goals. As the Port of San Diego moves forward with plans for the future, it is also bound by the California Air Resources Board (ARB) at-berth air emission regulations requiring cruise ships to plug into shore power when in port. The ARB regulations require cruise lines to plug in to shore power, and the EMP allows for both SDG&E and the Port of San Diego to pass along competitive rates to the cruise customers. Without the EMP, San Diego as a whole would lose out, as the cruise lines would be able to shift to markets with drastically cheaper shore power in Southern California.

The Port of San Diego and SDG&E have worked together to craft this EMP that makes both financial and regulatory sense for both parties and the region. On behalf of the Chamber, I offer my full support for approval of the EMP between the Port and SDG&E, so that both may continue to operate in the best interest of their business and the communities that they serve. If you have any questions, please don't hesitate to contact Sophie Barnhorst, Public Policy Advisor, at (619) 544-1314 or sbarnhorst@sdchamber.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "SKarafin". The signature is stylized and written in a cursive-like font.

Sean Karafin
Vice President, Policy & Economic Research
San Diego Regional Chamber of Commerce

cc: Job Nelson, Port of San Diego

APPENDIX I

ROCKY MOUNTAIN INSTITUTE WORKSHOP REPORT

Developing an Energy Management Plan

SUMMARY OF WORKSHOP RESULTS

November 10, 2016



Contents

1. Workshop Overview
2. Key Insights
3. Outcomes:
 - i. *EMP Issues to Address*
 - ii. *Organizational Considerations*
 - iii. *Developing Next Steps*

Appendix: Pre-Read Materials



1

Workshop Overview



RMI transforms global energy use to create a clean, prosperous, and secure future.

RMI is working to help SDG&E and the Port of San Diego begin developing an innovative energy management plan

- The co-creation of an energy management plan (EMP) by the Port of San Diego and SDG&E will be a first of its kind activity, in both California and the world.
- This EMP will have the potential to accelerate progress toward climate and energy goals for both the Port and SDG&E. A successful EMP will break down barriers to collaboration and create new opportunities for the Port and SDG&E to work together.
- However, to get there we will need to develop the right scope for this unprecedented plan. RMI is helping to facilitate the initiation of this work by:
 - Conducting a series of interviews with Port and SDG&E staff to identify important opportunities and barriers.
 - Facilitating conversation culminating with this workshop.
 - Sharing takeaways from the workshop with the EMP teams.



Workshop Scope

The all-day workshop was convened on November 1, 2016 at the SDG&E Energy Innovation Center in San Diego, CA.

Meeting Objectives

The workshop brought together key members of Port and SDG&E teams to work through critical issues related to developing an EMP. Specific objectives included:

- Identify and understand drivers and concerns regarding the EMP
- Build a shared understanding of the EMP's scope, objectives, and roles
- Review and develop solutions for high priority activity areas to pursue within the EMP
- Develop a robust set of next steps, including timeline and ownership of action items

Outcomes

The workshop enabled valuable collaboration between the Port and SDG&E teams. The group met many of its initial objectives, but also chose to dedicate time to new priorities that surfaced during the workshop. The workshop produced:

- A set of the key issues that need to be resolved, building on a discussion of drivers and concerns
- Shared learnings about each organization's business model and needs, a need which was identified during the workshop
- A better understanding of what the EMP is and how both parties can work together to develop it
- A clear set of next steps for developing the EMP, building on discussion of several priority areas

Workshop Participants

The workshop brought together strong teams from both the Port and SDG&E, representing a wide range of perspectives and areas of expertise, with RMI staff providing facilitation.

Port of San Diego

- Phil Gibbons, Energy and Sustainability Program Manager
- Aimee Heim, Maritime Policy Manager
- Jim McTarnaghan, Outside Council
- Job Nelson, Assistant Vice President of External Relations
- Rachel Stern, Senior Environmental Specialist
- Renee Yarmy, Energy and Sustainability Program Manager

San Diego Gas & Electric

- Brendan Blockowicz, New Products & Services Manager
- Lisa Davidson, Director of Customer Programs
- Cyndee Fang, Rate Strategy & Analysis Manager
- Will Fuller, Regulatory Case Manager
- Josh Gerber, Manager of Advanced Technology Integration
- Julia Mendoza, Product Manager
- Rama Moorthy, Product Manager
- Raghav Murali, Senior Policy Advisor
- Paul Pruschki, Energy Efficiency Technical Services Manager
- Emma Salustro, Senior Regulatory Counsel
- John Zwick, Senior Account Executive

Rocky Mountain Institute (Facilitation Team)

- Leia Guccione, Principal
- Galen Hon, Manager
- James Sherwood, Senior Associate

2

Key Insights



RMI transforms global energy use to create a clean, prosperous, and secure future.

Key Insights

From the workshop, RMI identified key insights regarding both the EMP process and opportunities to strengthen the working relationship between the Port and SDG&E.

- ❖ There is a **long list** of action items that need to be completed in order to finalize an initial EMP proposal. To effectively execute against this and build on momentum from this workshop, the combined Port and SDG&E teams can look to work collaboratively as **a unified team**.
- ❖ Coming out of the workshop, the group can focus on **executing against next steps** identified for each priority task (see §3 (iii)), but it may be necessary to **clarify working relationships**—specifically who from each organization is the lead for each task. RMI’s recommendation to the project team is to **share the task ownership** as much as possible—a core team from each organization can manage the overall EMP process, but distributing ownership may streamline the development of individual components of the plan.
- ❖ Beyond specific tasks that were identified, both the Port and SDG&E teams may benefit from **continuing to learn** more about each other’s business model and operational practices. The team should look to create opportunities to continue the dialogue that was had on this topic at the workshop, for instance reviewing in detail the Port’s ability to support specific commercial activities, and further explaining how SDG&E’s commercial rates are structured.

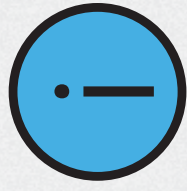
3

Outcomes



RMI transforms global energy use to create a clean, prosperous, and secure future.

3. Outcomes



EMP Issues to Address

The group identified several key areas that need to be considered and addressed in developing the EMP



Organizational Considerations



Developing Next Steps

Issues That Need to Be Addressed

<u>Issue</u>	<u>The Need</u>	<u>How to Address</u>
Mutual Understanding of Needs & Constraints	Better understand the organizations' shared drivers and needs, including increased understanding of foundational business principles and responsibilities	Discussed at workshop (See §3(ii), p.12) but will require continued effort
Realistic Scope	Clearly understand what is/isn't acceptable in the eyes of the CPUC and the Port's Board and articulate the team's rationale	Improve understanding of AB 628 (see p. 17)
Shorepower Rate	Port and SDG&E directly talk about rates—both how they are developed and what is required for a shore power rate to be sustainable	Discussed in next steps (see p. 18)
Cost & Benefit Metrics	Determine what calculations should be used to provide a refined evaluation of cost effectiveness by quantifying costs and benefits	Discussed in next steps (see p. 20)
Stakeholder Engagement & Outreach	Align on how to define stakeholder participation and develop a stakeholder engagement plan, including how to include certain stakeholders in the development and ownership of the EMP	Develop stakeholder outreach plan (see p. 22)
The Right Technical Solutions	Technology solutions that are flexible, so they can be adapted over time, but also need to be cutting-edge and economic, and integrate with long-term plans and goals	Revise advanced technology proposal (see p. 22)
New Ideas & Approaches to Reduce GHGs	Enable new and innovative projects and approaches that are different from existing programs that will help reduce GHGs	With other efforts, review existing programs to ensure additionality

3. Outcomes



EMP Issues to Address



Organizational Considerations

The group reviewed key considerations for both the Port and SDG&E to provide a better mutual understanding of each organization's needs and constraints



Developing Next Steps

Organizational Considerations: Port of San Diego

PUBLIC TRUST CONSTRAINTS*

The Port **must** support:

- Navigation
- Fisheries
- Recreation
- Commerce
- Environmental stewardship

Except with special permission from the state, the

Port **cannot**:

- Provide for housing development
- Support commercial activity that is not water serving
- Collect taxes
- Turnover land jurisdiction

Within these constraints the Port has some noteworthy **capabilities**, including the ability to:

- Regulate land use
- Enact leasing requirements
- Be more flexible than other municipalities, such as by:
 - Signing onto partnerships
 - Buying and annexing property

ADDITIONAL CONSIDERATIONS

Decision making at the Port includes:

- Port staff can pursue legislation, but will require Board approval if controversial
- The CA Coastal Commission must sign off on activities outside of the Port's master plan
- The Port's Board will likely need to approve both the EMP itself, as well as subsequent projects under the EMP
- Expenditures greater than \$175,000 require Board approval, under certain circumstances

The Port can **generate revenue** through:

- Rates for use of property
 - E.g., real estate leases
- Tariff rates for commercial activities
 - Dockage
 - Wharfage

Notably, the Port does not generate revenue from shorepower, which is a pass-through cost to cruise ships

*A brief overview of the Public Trust Doctrine is available at goo.gl/PaeG8j and a longer review is available at goo.gl/NvBohz

Organizational Considerations: SDG&E

SETTING RATES*

In setting rates, SDG&E is responsive to stakeholders including its customers, shareholders, and regulators (both state and federal).

Rates are set through a general rate case (GRC) proceeding with the CPUC every three years. The GRC is divided into two phases:

- **Phase 1**
 - This phase considers the total amount of money that SDG&E can collect from customers, based on costs including O&M, capital expenditures, and return on capital
- **Phase 2**
 - Once the total amount of money is set, this phase determines the share of the cost that each customer class is responsible for and then allocates those costs to rates for that customer class
 - This creates rates that are based on the “cost to serve” different customer classes

Stakeholders engage throughout the process, often by registering as intervenors in the GRC proceeding. They may represent a variety of interests, including community groups, environmental advocates, business groups, and ratepayer advocates.

Stakeholders can wield significant influence in the process, as they review utility filings and proposals and submit comments to the CPUC about whether they agree or disagree with the utility’s proposal, and can recommend alternatives. For example, ratepayer advocates may review a utility’s GRC Phase 2 filing to see whether certain customers are being treated unfairly and call this to the PUC’s attention if so.

* More information on setting rates in California is available at: goo.gl/14cKTs

3. Outcomes



EMP Issues to Address



Organizational Considerations

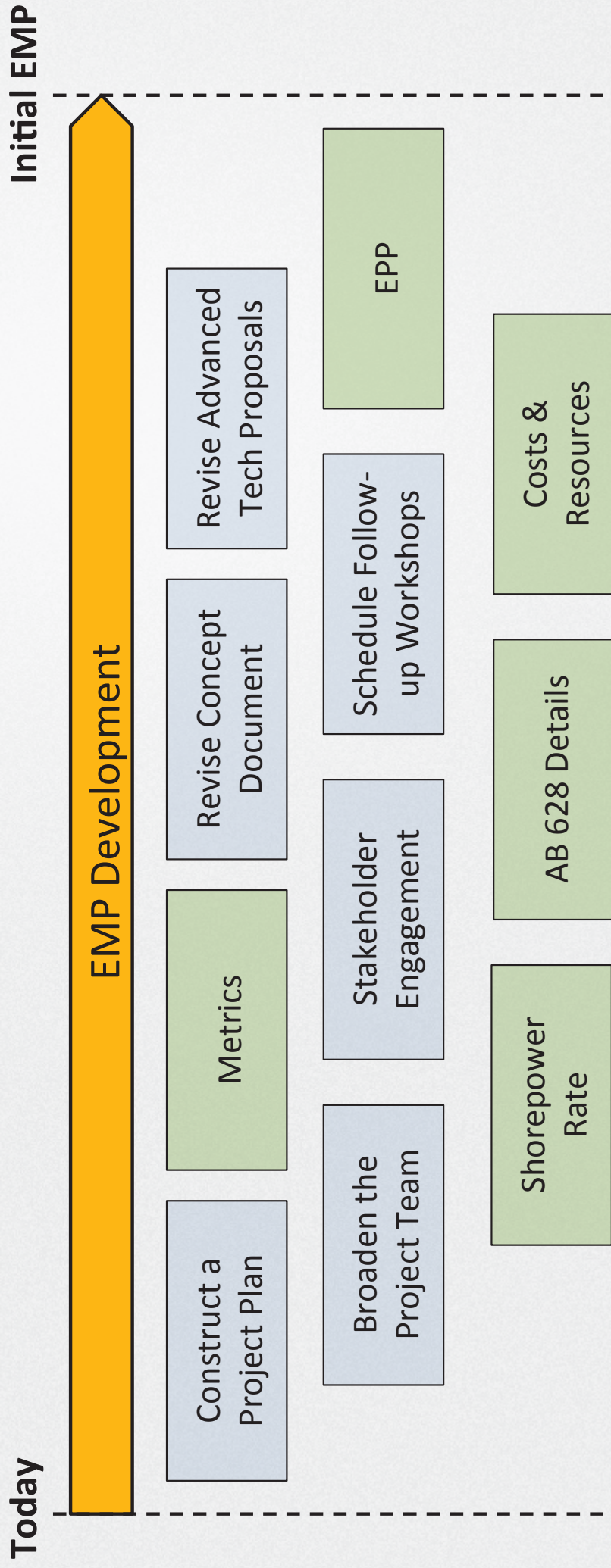


Developing Next Steps

Based on discussion of key issues and each organization's needs, the group focused on developing specific next steps to complete an initial EMP

Developing Next Steps

Based on discussion around organizational issues as well as major EMP issues to address, the group identified the set of next steps that need to be undertaken in order to complete an initial EMP.



These next steps were selected as areas for further discussion and development in person at the workshop—they are shown in detail on the slides that follow

Next Steps: AB 628 Details

ISSUE DESCRIPTION

Participants felt that it will be critical to better understand AB 628. In particular, this should serve to ensure that all elements of AB 628 are included in the EMP proposal. The group also felt that a common understanding of AB 628 and related terminology should be used to support alignment across the Port and SDG&E teams, as well as with communication to stakeholders.

NEXT STEPS

<u>What</u>	<u>Who*</u>	<u>When*</u>
Create a master list of AB 628 elements	SDG&E (Julia's team)	November 3
Perform a legal review of AB 628	Port (Jim) + SDG&E (Emma)	November 10
Review status of DNV-GL's analyses	Port + SDG&E	Now/soon
Review details of regulatory filing on clean transportation	Port	Next week
Integrate AB 628 elements into EMP proposal	Port + SDG&E	Ongoing

* Roles and dates shown as identified at workshop

Next Steps: Shorepower Rate

ISSUE DESCRIPTION

The group placed a high priority on developing an acceptable and sustainable shorepower solution. Doing so should include solidifying the near-term rate offering, but also better understanding the economics and business case for attracting cruise ships. The latter should include reviewing analysis of cruise ships' demand elasticity, load projections, and constraints to improving load factor, as well as analyzing cruise ship shorepower rates at other CA ports.

NEXT STEPS

<u>What</u>	<u>Who</u> *	<u>When</u> *
Determine physical constraints (What else can be connected?)	Port + SDG&E	TBD**
Complete shorepower rate proposal	SDG&E	TBD**
Share study of cruise ship price elasticity	Port	TBD**
Evaluate whether technology can help	TBD**	TBD**
Explore new ways to pass utility costs through to customer	Port + SDG&E	TBD**

* Roles and dates shown as identified at workshop

** Not clearly assigned at the workshop

Next Steps: EPP

ISSUE DESCRIPTION

While participants shared interest and saw value in the proposed Enhanced Partnership Program (EPP), the group shared a desire to more clearly understand the EPP's role—relative to the Port and SDG&E roles—and its responsibilities, needs, and funding requirements.

NEXT STEPS

<u>What</u>	<u>Who*</u>	<u>When*</u>
Create a detailed EPP concept plan	SDG&E	Mid-November
Define an EPP steering committee and labor analytics	Port + SDG&E	~2 weeks after concept plan
Define funding source for EPP and restrictions	SDG&E	~2 weeks after steering committee
Define ongoing evaluation of metrics	Port + SDG&E	TBD**

* Roles and dates shown as identified at workshop

** Not clearly assigned at the workshop

Next Steps: Metrics

ISSUE DESCRIPTION

Participants identified the need to evaluate and define metrics for the EMP (e.g., GHGs, cost, co-benefits), as well as a common understanding of success via those metrics. Using these metrics, participants felt it would be important to prioritize or rank projects and activities to determine what should be in (or out) of the EMP, considering things like their level of dependencies (low to high) and timeframe (short, medium, long).

NEXT STEPS

<u>What</u>	<u>Who</u>	<u>When</u>
Define Metrics <ul style="list-style-type: none"> - List potential metrics - Highlight priority metrics and the level of detail needed - Define each metric's methodology - Define "success" for each metric 	Port + SDG&E	December 1
Calculate Reductions	SDG&E (with Port support)	December 1
Rank Projects	Port + SDG&E	TBD

ADDITIONAL CONSIDERATIONS

The group also noted the need to establish a plan for ongoing monitoring, measurement, and verification to determine project success. This may be best suited as part of the EPP's duties.

** Roles and dates shown as identified at workshop*

Next Steps: Costs & Resources

ISSUE DESCRIPTION

The group shared a desire to become better informed about both the technology costs and funding opportunities for EMP activities. Specifically, participants identified a need to determine how much financial modeling is needed, to perform a cost/benefit analysis of the various proposals, and to evaluate the business case and funding options for each.

NEXT STEPS

<u>What</u>	<u>Who*</u>	<u>When*</u>
Understand financing options and limitations	Port + SDG&E	Now
Project design	Port + SDG&E	1 month
Develop costs and budgets based on financing options available	Port + SDG&E	1 month
Rank projects Based on costs and benefits	Port + SDG&E	TBD**

* Roles and dates shown as identified at workshop

** Not clearly assigned at the workshop

Next Steps: Additional Areas

These action items were recognized as important, but were not discussed in detail and will require further attention by the Port and SDG&E teams to solidify next steps.

Broaden the Project Team

The team needs to include and consult with both Port and SDG&E operations and engineering staff

Stakeholder Engagement

Develop plans for both engaging stakeholders to provide input on the EMP, and for outreach to stakeholders to gain buy-in on the EMP, particularly including port tenants and regulators

Revise Concept Document

The team can develop a plan for reviewing and revising the concept document in light of Port comments, discussion at the workshop, and continued progress in developing specific topic areas

Schedule Follow-up Workshops

As the team makes progress, schedule additional workshops or meetings to collaboratively problem solve, potentially focusing on specific topic areas

Revise Advanced Technology Proposals

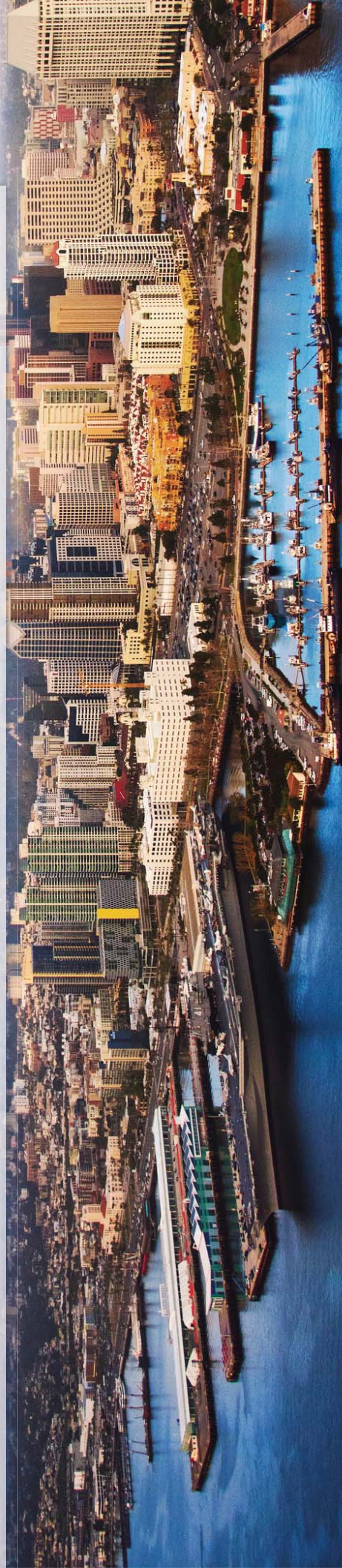
Build on the workshop conversation to reconsider advanced technology proposals to ensure that they are innovative and additive to efforts that are either already underway or can be achieved through other means

The group also flagged that there is a need to **review NDAs** between organizations before sharing data, and a desire to review the Port's **fixed charge allocation to cruise ships** through shorepower rates.

A

Appendix

Selected Pre-Read Materials



RMI transforms global energy use to create a clean, prosperous, and secure future.

Contents

1. Workshop Overview (*Omitted for brevity, available upon request*)
2. Background Context
3. Priority Areas for Discussion

Appendices:

1. Data Sharing Considerations
2. Case Studies in Priority Areas
3. Findings from Initial Interviews (*Omitted for brevity, available upon request*)

2

Background Context



RMI transforms global energy use to create a clean, prosperous, and secure future.

California's ambitious climate and energy goals are reshaping business as usual in the energy sector

The creation of an energy management plan is happening in the context of numerous other ongoing activities in California's energy sector.

Legislative and executive actions have set key climate and energy goals, including:

- 33% of utilities' energy procurement must be from renewables by 2020 [SB 2]
- Renewable electricity must make up 50% of retail sales by 2030 [SB 350]
- GHG emissions must be 40% below 1990 levels by 2030 [EO-B-30-15, AB-32]

Meanwhile, regulators at CARB and CPUC have taken action to meet these goals:

- A cap-and-trade program was enacted to control GHG emissions [CARB]
- At-berth regulation requires alternative power sources (shorepower) or control technologies to enable emissions reduction [CARB]
- California utilities are required to procure 1.3 GW of energy storage by 2020 to support grid optimization and renewables integration [CPUC]
- Utilities are required to submit distribution resource plans (DRPs) that integrate distributed energy resources (DERs) into distribution grid planning [CPUC]
- The Integrated Distributed Energy Resources (IDER) proceeding is actively considering how best to integrate demand-side resources into utility planning and procurement processes [CPUC]



These activities are leading electric utilities toward a new emphasis on engagement and collaboration directly with customers to meet the state's goals. AB 628 presents a unique opportunity for a utility to work directly with a major customer to create meaningful impact toward these goals.

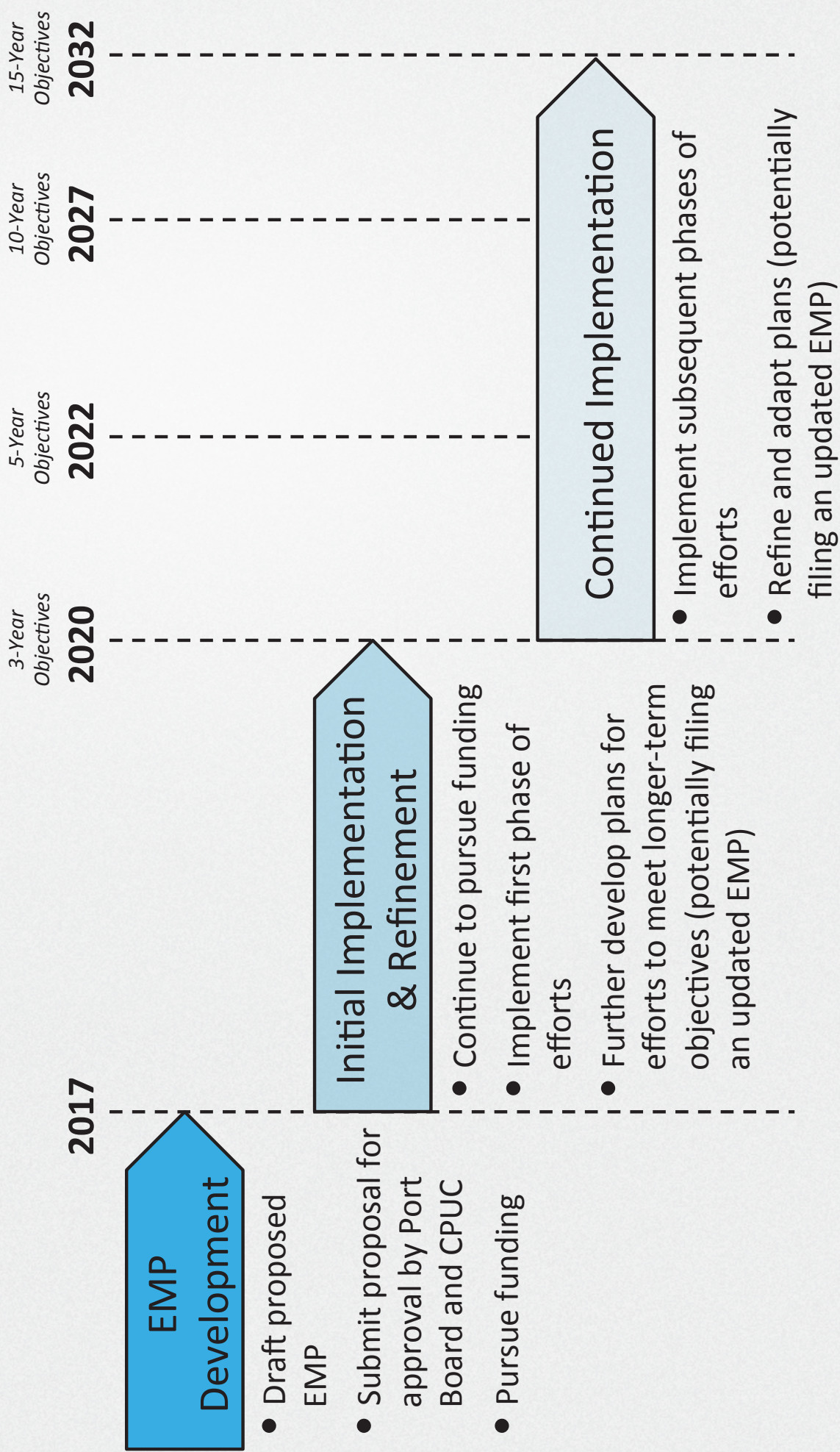
AB 628 created the opportunity for energy management plans (EMPs) for harbor and port districts

AB 628 enables creation of an energy management plan (EMP) in order to reduce air emissions, promote economic development, and encourage business creation and retention.

The legislation states that an EMP should be developed jointly between a port district and an electric utility. It requires that an EMP include:

- An assessment of current energy use and forecasted load growth
- An evaluation of energy management issues, specifically including:
 - Electricity rate design
 - The role of distributed generation, energy efficiency, and demand-side management
 - Consideration of domestic and international shipping requirements
 - Vehicle use within Port boundaries
- Measureable energy management goals and a prioritized list of actions to meet them
- An implementation timeline with 3-, 5-, 10-, and 15-year objectives
- A summary of barriers to implementation, with recommendations on overcoming them
- Proposed funding methods for all activities within the EMP

Implementation will be a long-term process, but EMP efforts can be considered in stages



Several key focus areas have emerged to consider within the first stage of EMP efforts

Energy Efficiency
Streamline and improve energy efficiency efforts to maximize the uptake of energy efficiency within the Port district

Shorepower Solutions
Develop rate and load factor solutions that help mitigate potential cost increases for shorepower-served vessels

Advanced Technology Integration
Integrate advanced technology with planned development projects in the Port district

Clean Transportation
Collaboratively remove barriers and enable development of electric vehicle infrastructure opportunities

Clean Generation
Develop solutions to increase the percentage of the Port's generation mix provided by clean resources

* Note: These focus areas are described in further detail in SDG&E's draft "Program Description Summaries" document

3

Priority Areas for Discussion



RMI transforms global energy use to create a clean, prosperous, and secure future.

Three topics have been identified as priority areas to address in the workshop

1

Shorepower Solutions

What solutions, including advanced technology, could be developed to help mitigate potential cost increases? How can rates be designed to smooth the transition?

2

Advanced Technology Integration

How can the Port and SDG&E work together to integrate advanced technology with development in the Port district?

3

Stakeholder Engagement

How will the team bring stakeholders along in the EMP process, particularly port tenants?

We will address these areas at the workshop by having a separate breakout group focused on each topic.*

Each breakout group will be tasked with developing solutions and a plan for addressing the topic in the EMP.

*Note: Broader topics, like data sharing and funding, can be discussed in the context of these specific issues

1 Priority Area: Shorepower Solutions

The Issue

- The Port's cruise ship terminal is transitioning from a historical small commercial rate (which pre-dated shorepower use) to a general service tariff (A-6 TOU), which includes a demand charge.
- The cruise ship terminal has unique load characteristics, with a high peak demand (11.3 MW) but a low load factor (1.9%).*
- As a result, the effective rate faced by cruise ships will be greater under the general service tariff.

Key Considerations

- The Port forecasts light growth in cruise ship calls over coming years, and CARB requirements for shorepower will increase from 50% of calls to 70% in 2017.
- Proposed solutions include temporary rate discounts, concept rates with stronger time-based price signals, incentivizing behavior change by the cruise ships, and advanced technologies (e.g., batteries) to manage load factor at the terminal.
- The CPUC strictly regulates preferential treatment of specific customers, constraining the level of rate discount that SDG&E can provide.

Questions for the Workshop

- What solutions could help mitigate potential cost increases due to shorepower?
- Could alternative rates be designed to influence cruise ship demand and reduce costs?
- Can behavior-related or technology-enabled options be used to improve system efficiency?
- What timeframes should be considered for developing near-term solutions versus longer-term, more-sustainable solutions?

* Statistics shown for 2015–16

2 Priority Area: Advanced Technology Integration

The Issue

- Both SDG&E and the Port are eager to explore opportunities to integrate advanced technologies for a variety of reasons, including increased resiliency, renewables integration, and societal benefits (such as reduced emissions and benefits to low-income communities).
- Several specific development projects in (or adjacent to) the Port district may be possible locations for an advanced technology project, including the Tenth Avenue Marine Terminal, Seaport Village, Harbor Island, and the Navy Broadway Complex.

Key Considerations

- Advanced technologies may include battery storage, on-site renewable generation, microgrids, and other distributed generation and energy management technology.
- Integrating advanced technology is in-line with many state energy goals, including SB 350, the CPUC's distributed resource proceedings, and the CEC's EPIC program's support for advanced energy communities.
- Developing an advanced technology project may require significant effort to work with additional stakeholders (e.g., tenants and developers), understand cost effectiveness, and pursue funding.

Questions for the Workshop

- How can the Port and SDG&E work together to integrate advanced technology with development in the Port district?
- What timeframe should be considered for developing advanced technology projects?
- Are there specific development projects that would be most impactful to focus on?

3 Priority Area: Stakeholder Engagement

The Issue

- Several stakeholder groups relevant to the collaboration between SDG&E and the Port may wield significant influence on the outcome of the EMP process, including port tenants, adjacent city governments, and community groups.
- These key stakeholders have not yet been engaged in the effort to create an EMP and to support its implementation.

Key Considerations

- In addition to being influential in garnering support for, or opposition to, an EMP proposal, some stakeholders may be important partners on certain elements of the EMP (e.g., specific tenants for energy efficiency programs).
- Both SDG&E and the Port have skilled teams experienced in working with these stakeholders.

Questions for the Workshop

- How will the team bring stakeholders along in the EMP process, particularly port tenants?
- Which stakeholders have goals aligned with those of the EMP, and could potentially publicly support its approval and implementation?
- What role should each of SDG&E's and the Port's teams play in outreach and engagement?

A1

Appendix 1

Data Sharing Considerations



RMI transforms global energy use to create a clean, prosperous, and secure future.

Data sharing by utilities is a major issue nationally, offering potential benefits but raising key concerns

The Data Sharing Opportunity

- A national conversation around customer data access and sharing by utilities has gained steam in recent years, as the rollout of advanced metering infrastructure (AMI) has exponentially increased the amount of data collected by utilities.
- This data offers new insight into energy usage patterns, which has the potential to benefit stakeholders across the electricity space—for instance, this data can be used to help customers make better decisions about their energy use, aid the development of more-effective energy efficiency programs, or better target advertising campaigns by third-party service providers.

Customer Privacy Concerns

- The collection of more-detailed energy use data has also raised concerns about customer privacy. Policymakers have therefore been forced to confront the challenge of facilitating access to customer data while safeguarding customer privacy and providing consumer protections in connection with unwanted uses of data.*
- At the national level, the U.S. Department of Energy has taken a leading role to develop solutions to this challenge, including creating the Green Button initiative to enable customer access to their own data, as well as creating a forum for policymakers to share their approaches.
- While new policies have opened the door to sharing certain types of aggregated data with third parties, safeguards are still required to protect the customer privacy given the availability of analytic tools that can reverse engineer aggregated data and identify individual customers.

* State and Local Energy Efficiency Action Network. 2012. *A Regulator's Privacy Guide to Third-Party Data Access for Energy Efficiency*.

In California, the CPUC has enacted several sets of rules that govern utility data sharing

Data Sharing Rules in California

- The CPUC has responded to the need for clarity around utility data sharing by putting in place several rules. These rules limit the extent to which SDG&E and other California utilities are allowed to share customer data with third parties and local governments (LGs).
- There are three primary sets of rules that control SDG&E's ability to share data with third parties:
 - **Privacy Protections for Energy Consumption Data** (*Public Utilities Code §8380*)
This regulation restricts SDG&E's ability to share data without customer consent. If a third party has customer consent, SDG&E can share anything the customer has authorized the utility to share.
 - **Smart Grid Privacy Decision** (*CPUC Decision 11-07-056*)
This decision specifies numerous privacy controls SDG&E must implement to safeguard customer privacy.
 - **Energy Data Access Decision** (*CPUC Decision 14-05-016*)
This decision provides additional rules that create opportunities for a few specific authorized third parties to obtain customer data without consent. These rules were intended by the CPUC to help make it easier for LGs to obtain aggregated customer energy usage data.

Available Options for Data Sharing

- These rules provide several clear options for SDG&E to share data with local governments like the Port— *these options are summarized on the next page.*
- These options are subject to specific constraints, which can create challenges in certain situations, for instance where specific customers must be left out of the dataset because they do not meet the strict aggregation standard of the rule and the local government is unable to obtain the customer's consent. In this situation it is incumbent on SDG&E to protect customers' privacy according to CPUC rules, and SDG&E is not allowed to share the affected customers' data.

SDG&E Local Government (LG) Options for Customer Energy Data Requests

Option 1 (preferred)

Option 2

Option 3

	Use Publicly Available Data Reports (sdge.com/energydata)	Aggregate to Publicly Available Standard Using Towncode (Community Separators)	Submit Energy Data Access (EDA) request using Privacy GreenLight
Description	Publicly available customer energy usage data reports are available online by quarter. These reports are separated by customer class level and zip code.	Customer energy data can be provided to LGs using town code boundaries instead of zip codes provided the dataset meets the same aggregation standards as the publicly available data.	The CPUC enacted formal rules which govern the way SDG&E is allowed to share energy usage data with LGs.
Aggregation Levels Used	Residential: >100 customers in dataset Commercial/Agricultural/Industrial: 15/15 Rule	Residential: 100 customers in dataset Commercial/Agricultural/Industrial: 15/15 Rule	Residential/Commercial/Agricultural: 15/20 Rule Industrial: 5/25 Rule
Anonymization Standards	None	None	All Customer Classes: 100/10 Random ID number & order Homogenous grouping (no mixing of sets) No solar customers in sample
Can other levels of aggregation be achieved?	Online, only zip code level is available. However, LGs may request similar data by town code using Privacy GreenLight (see option 2).	No, only available by customer class aggregated to towncode level.	Yes, provided aggregation rules can be met SDG&E may be able to provide other options.
What happens if aggregation levels cannot be met?	Online data is pre-aggregated. No further aggregation is required.	Customers from neighboring town codes must be added until levels can be met, or customer consent must be obtained.	Customers not meeting aggregation requirements are excluded from data set and LG is notified that data set is not complete. Alternatively, LG may obtain customer consent to receive entire data set.
Can data be shared publicly?	Yes	Yes	No. However, results of analysis on data sets can be shared.
Required Documentation	None	None	Terms of Service
Privacy GreenLight required?	No	Yes. http://sdge.com/energydata . There is no four-week waiting period to receive this data.	Yes, http://sdge.com/energydata with all EDA rules enabled.
Additional rules	None	None	Mandatory 4-week waiting period after request passes preliminary review in which CPUC is notified of intent to transfer. Typical transactions take six to eight weeks from initial request submission.
Pros	Data is available immediately without need to submit a request. Data can be shared, analyzed, and reported publicly without an NDA or Terms of Service.	Data are made available faster. Data can be shared, analyzed, and reported publically without an NDA or Terms of Service.	Aggregation levels are more granular; LG can request aggregation beyond zip or town code level and can request anonymized data.
Cons	Aggregated usage data by zip code & customer class only. Data sets are often incomplete due to aggregation rules.	Aggregated usage data by town code & customer class only. Data sets may be incomplete due to aggregation rules.	Long wait times to receive data. Unable to share data with public. Data sets may be incomplete due to aggregation rules.

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Appendix 2

Case Studies in Priority Areas



RMI transforms global energy use to create a clean, prosperous, and secure future.

The First Shorepower Project: Why Juneau, Alaska?

Stakeholders:

City of Juneau, Princess Cruises, Holland America Lines

Overview:

In 2001, Juneau, Alaska became the first large commercial shorepower installation. Why was this remote location on the cutting edge of technology? As the capital of Alaska, the City believed that it would grow substantially over coming decades and it invested heavily in infrastructure to provide power for the Juneau of the future – but the city didn't grow as expected.

Meanwhile one of the biggest industries in town, the cruise lines, were having a major image problem with eco-conscious visitors who didn't like seeing smoking ships against the pristine backdrops of Alaska. In response, the city began considering emission opacity limits and opened a dialogue with the cruise lines to explore solutions.

The City, with their excess of power, agreed to provide nearly free (at the time) electricity to its best customers to create a solution that persists to this day.

Did you know:

Most major ports in the world have studied shorepower costs, benefits, and applications. Explore the following reports for further ideas and inspiration:

[Rotterdam](#)

[British Columbia](#)

[San Francisco](#)

[Aalborg](#)

[Victoria, BC](#)

[MassPort \(Boston\)](#)

[Charleston](#)

[Tanjung, Indonesia](#)

[Shenzhen](#)

[Vancouver, BC](#)

[Nova Scotia](#)

[Nordhavn](#)

[San Diego \(2007\)](#)



Electrifying Rubber-Tired Gantry Cranes in Savannah:

Data-driven partnerships help deploy new technologies

Stakeholders:

Georgia Port Authority, Southern Company, Georgia Power, KoneCranes, Conductix-Wampfler

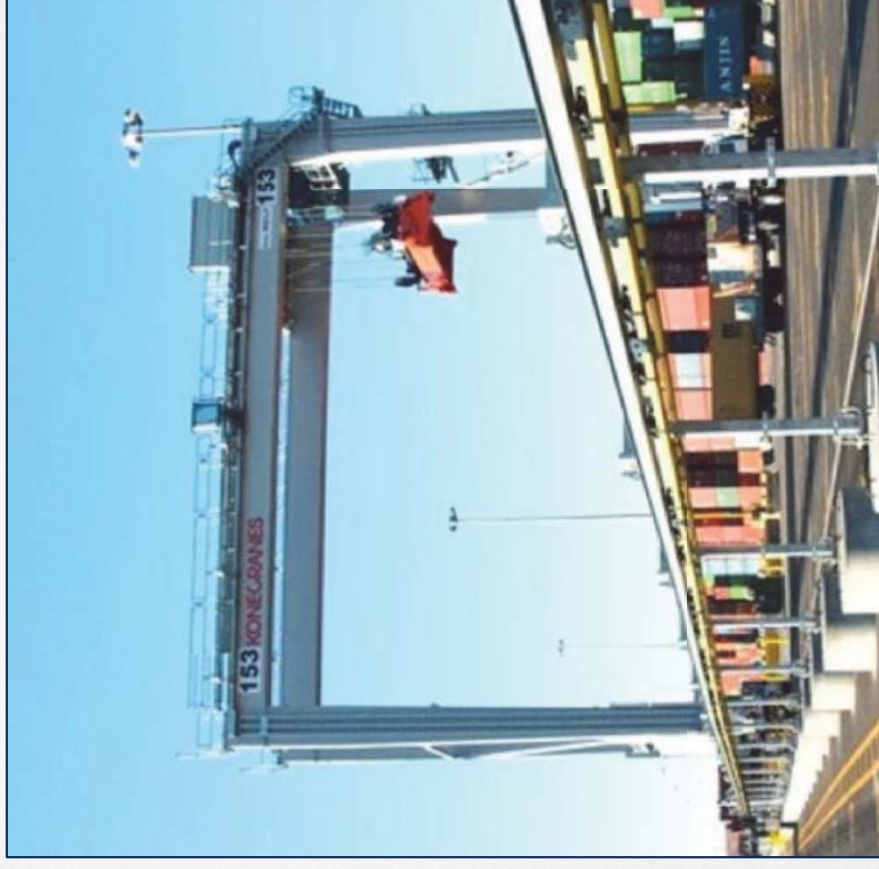
Overview:

The State of Georgia, known for luscious peaches and ominous banjo music, also hosts one of the largest container gateways in the Southeast. The Port of Savannah is remarkable in many respects but may be among the most data-driven port authorities in the US.

The Port of Savannah operates its own terminals and has maintained rich data on most of its operations, spanning many years. So when the administration challenged staff to find ways to save energy, it was clear where the biggest opportunities were. One of the best opportunities identified were with the more than 160 “rubber-tired gantry” cranes.

Even though the technology was new to the market, Georgia Port Authority (GPA) teamed with their local utility provider and manufacturers to evaluate the potential savings and energy requirements, establish a pilot study, and begin a plan to execute full deployment—a process that took only 2–3 years.

Based on the success of the partnerships and pilot studies, GPA adding only new eRTG’s as it expands or replaces old equipment.



More information: [Electrification at the Port of Savannah Increases Efficiency and Savings](#)

Stakeholder Engagement at US ports: Lessons from Savannah, Los Angeles, Long Beach, Seattle, Tacoma, and Oakland

Stakeholders:

Port Authorities, Communities, NGOs, port tenants and their customers, local and national government agencies

Objectives:

Ensure alignment on key initiatives around environmental and economic aspects of sustainable port development and unofficial “license to operate.”

Key lessons learned:*

- Establish relationships and dialogue with all key stakeholders before they are needed.
- Put an organizational “radar” in place to identify and internally communicate emerging concerns and issues.
- Prepare to balance investment in outreach to match level of challenge—but be careful not to overburden staff.
- Ensure that stakeholder engagement is transparent, accessible, and balanced.
- Balance response time to emerging public relations issues, particularly from government or community sources, with time to coordinate internal messaging.
- Establish outreach plans and structures that do not get disrupted with staff changes and other organizational changes—when you start a process, put mechanisms in place to ensure continuity and quality.



* Source: in-person interviews with International Association of Ports and Harbors (IAPH) delegation to the International Maritime Organization (IMO)

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