

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2018 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 17-04-016
(Filed April 14, 2017)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E)
NOVEMBER UPDATE TO APPLICATION**

PUBLIC VERSION

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November 9, 2017

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I. INTRODUCTION

On April 14, 2017, San Diego Gas & Electric Company (“SDG&E”) submitted its Application for Approval of its 2018 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). In November of each year, SDG&E updates certain information in the testimony supporting its forecast application using data that was not available at the time it submitted its application (“November Update”). Consistent with that practice, and per the August 1, 2017 Scoping Memo and Ruling of Assigned Commissioner, SDG&E hereby submits its November Update, which consists of updated information sponsored by several SDG&E witnesses.¹

II. BACKGROUND

In the Application, SDG&E requested approval of its 2018 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Competition Transition Charge (“CTC”) revenue requirement; (3) the

¹ SDG&E filed a “Motion ... for Extension of the Deadline to File to File its November Update and the Deadlines for Comments and Reply Comments” on November 7, 2017, seeking a one-day extension to file the November Update and a one day extension of the deadlines for Comments and Reply Comments on the November Update. Via email dated November 8, 2017, the Administrative Law Judge indicated that he would grant the Motion. Hence, this November Update is being submitted one day later than the date set forth in the Scoping Memo and Ruling of Assigned Commissioner.

Local Generation (“LG”) revenue requirement; (4) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement; and (5) the GHG allowance revenues and return allocations. SDG&E also requested approval to recover undercollected balances recorded to the Local Generating Balancing Account (“LGBA”). Lastly, SDG&E requested approval for its proposed 2018 (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables Program. SDG&E’s Application was supported by the testimony of six witnesses. SDG&E requested approval of its Application for recovery in rates beginning January 1, 2018.

In November of each year, SDG&E updates the testimony it submitted earlier in the year with its April application. The November Update has traditionally served to update testimony regarding the Competition Transition Charge (“CTC”) Market Price Benchmark (“MPB”). This information is provided to SDG&E by the Commission’s Energy Division, which compiles and provides updated input assumptions to the investor-owned utilities (“IOU”) so that the MPB can be calculated. These assumptions typically do not become available until early November, as they include forward price curves for all of the trading days in October.

Other updates to the ERRA testimony are warranted since approximately six months have passed since the filing of the Application, and various input assumptions have changed, including with respect to gas, electric and GHG forward price curves; the bundled load forecast; and Power Purchase Agreement contract terms and projected operations. These updates result in changes to forecasted ERRA, CTC and LG expenses and GHG quantities and expenses.

SDG&E has also made several additional updates based on Commission decisions or other relevant information that has become available since the submission of the Application.

Pursuant to Administrative Law Judge Kelly’s October 24, 2017 “Email ruling in A.17-04-016 Requiring Additional Information in the November Update,” SDG&E is including an updated calculation of the amount attributable to Senate Bill 92 (Stats. 2017, Ch. 26). This calculation shows the allocation to the Multifamily Affordable Housing Solar Roofs Program for the period covered by these proceedings, as well as a before-and-after comparison of the effect on the Climate Credit. The calculation appears in the updated testimony of Jennifer Montanez (p. JRM-23) and the before-and-after comparison appears in the updated testimony of Cynthia Fang (p. CF-10).

In accordance with Ordering Paragraph 11 of D.14-10-033, in which the Commission directed utilities to provide a fourth quarter update to its GHG forecast revenue and reconciliation request no later than November 15 of each year, SDG&E is providing its 2017 GHG Allowance Revenue and Expenses Reconciliation. This process consists of updating the 2017 recorded data to include actual revenues and estimated expenses from January through September 2017 and forecasted revenues and expenses from October through December 2017. Templates D-1 to D-5 of Attachment G to the Application have been updated accordingly, as SDG&E indicated it would do when it filed the Application (Application at 14). *See* Attachment G hereto.

As required by Commission decisions in A.13-08-002, annual GHG forecast applications (now incorporated into the ERRA forecast filing) include reconciliation of prior years. These prior years are unaffected by changes to the MBP, but volumetric changes to SDG&E’s 2015 and 2016 GHG emissions, as well as changes to current year emissions, purchases and sales, have led to modifications to 2015-2017 GHG data, as further explained in the testimony of Ana Garza-Beutz. Final verification of annual emissions takes place September of the following year. The

2016 emission volumes became final on September 1, 2017 and both the 2016 volumes and costs have thus changed since the Application was submitted.

III. SUMMARY OF UPDATES TO THE APPLICATION

In the Application, SDG&E sought approval of its total 2018 forecasted revenue requirement of \$1,397.512 million, which was comprised of several forecasts of specific items.² In this November Update, SDG&E has proposed certain changes to those forecasts, as reflected in Table 1 below:

TABLE 1 – 2018 Revenue Requirement Forecasts³

Forecast	April 14, 2017 Application	November Update
ERRA revenue requirement (includes 2018 forecast GHG costs)	\$1,297.545 million	\$1,371.168 million
CTC revenue requirement	\$16.329 million	\$24.291 million
LG revenue requirement	\$169.424 million	\$159.338 million
SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement	\$1.086 million	\$1.088 million
GHG allowance revenue return allocations	\$(0.715) million for EITE customers	\$(0.669) million for EITE customers
	\$(3.905) million for small businesses	\$(3.639) million for small businesses
	\$(82.750) million for residential California Climate Credit	\$(88.901) million for residential California Climate Credit
LGBA undercollection	\$497,000	\$497,000
Total 2018 forecasted revenue requirement	\$1,398.227 million	\$1,463.174 million

² See Application at 2.

³ Includes Franchise Fees and Uncollectibles.

SDG&E also sought approval of certain forecasts used to calculate GHG allowance revenue return allocations. In this November Update, SDG&E has proposed certain changes to those forecasts, as reflected in Table 2 below:

TABLE 2 – 2018 GHG Revenue and Expense Forecasts

Forecast	April 14, 2017 Application	November Update
GHG allowance revenues	\$89.488 million	\$98.286 million
GHG allowance revenue set aside for clean energy/energy efficiency programs	\$1.342 million	\$10.300 million
GHG administration, customer outreach and outreach plan costs	\$190,000	\$190,000

In the Application, SDG&E also compared the 2018 revenue requirement forecasts against the amounts that were currently effective in rates at that time and concluded that there was a combined total increase of \$47.918 million. This combined total increase represented a 0.77% increase, or 0.171 cents per kilowatt hours.⁴ Based on those numbers, SDG&E projected that a typical non-CARE residential customer in the inland climate zone using 500 kilowatt hours could see a monthly summer bill increase of 0.9%, or \$1.16.

Based on this November Update, SDG&E projects a combined total increase of \$113.534 million (an increase of 0.573 cents per kilowatt-hour, or 2.52% to the current system average rate).⁵ Based on those numbers, SDG&E projects that a typical non-CARE residential customer in the inland climate zone using 500 kilowatt hours could see a monthly summer bill increase of 2.4%, or \$3.11.

⁴ Rates effective March 1, 2017, per AL 3034-E and 3034-E-A.

⁵ Rates effective November 1, 2017 per AL 3110-E.

IV. SUPPORTING TESTIMONY

This November Update includes the testimony of six SDG&E witnesses. Each witness has prepared a markup (attached hereto) of their original, April 14, 2017 testimony, in which updates are reflected in a redline format. Those witnesses (and summaries of the updates they performed) are as follows:

A. Ms. Jennifer Montanez

Ms. Montanez updates SDG&E's 2018 energy requirements forecast and supply resource forecast based on updated gas and electric forward price curves, an updated load forecast, and updated Power Purchase Agreement contract terms and projected operations. Ms. Montanez also updates SDG&E's forecast of procurement expenses based on the resulting changes to supply resource generation in the forecast model given these updated inputs. Lastly, Ms. Montanez updates SDG&E's 2018 forecast of GHG costs based on an updated GHG price and the resulting changes to supply resource generation in the forecast model given these updated inputs.

B. Ms. Sheri Miller

Based on updated forecasts provided by Ms. Montanez, Ms. Miller updates SDG&E's 2018 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; and (3) the LG revenue requirement. Ms. Miller also provides SDG&E's 2017 GHG Allowance Revenue and Expenses Reconciliation. This process consists of updating the 2017 recorded data to include actual revenues and expenses from January through September 2017, as well as updated forecasted revenues and expenses from October through December 2017. Finally, Ms. Miller updates the LGBA undercollection.

C. Ms. Cynthia Fang

Based on the updated revenue requirements provided by Ms. Miller, Ms. Fang updates the rate impacts associated with the ERRA, CTC, LG, SONGS and GHG revenue requirements. Based on 2018 Energy Division input factors that recently became available, Ms. Fang updates the CTC and the PCIA rates. Ms. Fang also updates the 2018 allowance revenue return based on updated information provided by Ms. Montanez. Ms. Fang also updates the 2018 rate components associated with the Green Tariff (“GT”) and Enhanced Community Renewables (“ECR”) programs.

D. Mr. Rick Janke

Mr. Janke’s testimony contains no substantive updates.

E. Ms. Ana Garza-Beutz

Ms. Garza-Beutz testimony updates revenues and costs for GHG compliance instruments to satisfy SDG&E’s 2015-2017 compliance obligations under the cap-and-trade program. These updates are based on D.14-10-33 where utilities are given direction to report GHG information for “any years for which it is recording or reconciling costs and revenues” in addition to the forecast year.

F. Ms. Monica Vazquez Chihwaro

Ms. Vazquez Chihwaro updates the recorded GHG Direct Compliance costs expensed in the ERRA balancing account to reflect the actual GHG emissions and Weighted Average Cost of Compliance (“WAC”) by compliance period, in accordance with D.14-10-033 and D.15-01-024. Based on the WAC calculations provided by Ms. Garza-Beutz, Ms. Vazquez Chihwaro updated the GHG emissions expense to satisfy SDG&E’s 2016-2017 compliance obligations under the cap-and-trade program.

V. CONFIDENTIALITY

Along with its Prepared Testimony, SDG&E submitted declarations attesting to the confidentiality of data presented therein. SDG&E requested that the confidential information in its Prepared Testimony be kept confidential pursuant to Public Utilities Code §§ 583, 454.5(g), Decision 06-06-066 and/or General Order 66-C, as identified in SDG&E's confidentiality matrix. This November Update contains confidential information that is identified in SDG&E's confidentiality matrix and covered by declarations, which are being submitted herewith. SDG&E requests that the same confidential treatment requested with the original filing apply to the information marked confidential in this November Update.

VI. CONCLUSION

SDG&E respectfully requests that the Commission approve the forecasts and proposals in its Application (Application at 24-25), subject to the updates contained in this November Update.

Respectfully submitted,

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November 9, 2017

**UPDATED ATTACHMENT G TO APPLICATION
GHG REVENUE AND RECONCILIATION FORM**

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Appendix D of the Proposed Decision mailed 9/12/14 in A.13-08-002 et al. Appendix D provides specific information on reporting methodology and confidentiality treatment of data.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

For Template D-4, each utility must provide the data in spreadsheet format, but may modify the template as appropriate to present the requested information by rate schedule.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	2013		2014		2015		2016		2017		2018	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded	Forecast	Recorded	Forecast	Recorded ²	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A	12.09	N/A	13.13	N/A	13.23	N/A	15.63	N/A
2 Allocated Allowances (MT)	6,919,341	6,919,341	6,549,142	6,549,142	6,426,430	6,426,430	6,406,805	6,406,805	6,460,042	6,460,042	6,288,321	-
3 Revenues												
4 Prior Balance	N/A	N/A	(\$102,074,500)	(\$82,503,131)	(\$19,755,324)	(\$18,393,131)	\$31,586,221	\$31,892,368	\$3,775,309	\$4,334,942	(\$4,295,169)	\$0
5 Allowance Revenue	(\$103,302,000)	(\$82,453,505)	(\$94,570,000)	(\$76,756,698)	(\$77,695,500)	(\$79,929,224)	(\$84,121,350)	(\$81,558,628)	(\$85,466,355)	(\$89,584,150)	(\$98,286,457)	\$0
6 Interest	\$0	(\$49,626)	(\$28,773)	(\$47,002)	(\$76,463)	\$24,203	\$24,796	\$151,893	\$96,857	\$65,962	\$91,282	\$0
7 Franchise Fees and Uncollectibles	\$0	\$0	(\$1,771,359)	(\$1,706,341)	(\$1,190,048)	(\$1,581,513)	(\$1,026,495)	(\$661,789)	(\$1,013,589)	(\$966,839)	(\$1,066,881)	\$0
8 Subtotal Revenues	(\$103,302,000)	(\$82,503,131)	(\$198,444,632)	(\$161,013,172)	(\$98,717,335)	(\$99,879,665)	(\$53,536,828)	(\$50,176,155)	(\$82,607,777)	(\$86,150,086)	(\$103,557,225)	\$0
9 Expenses												
10 Outreach and Administrative Expenses ³	\$1,227,500	\$0	\$187,500	\$801,369	\$334,835	\$334,989	\$80,036	\$80,994	(\$2,063)	(\$357)	\$48,463	\$0
11 Franchise Fees and Uncollectibles	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12 Interest	\$0	\$0	\$0	(\$119)	\$0	(\$154)	\$0	(\$958)	\$0	(\$1,706)	\$0	\$0
13 Subtotal Expenses	\$1,227,500	\$0	\$187,500	\$801,250	\$334,835	\$334,835	\$80,036	\$80,036	(\$2,063)	(\$2,063)	\$48,463	\$0
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ⁴	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,281,995	\$1,281,995	\$10,300,000	\$0
15 Net GHG Revenues (Line 8 + Line 13 + Line 14)	(\$102,074,500)	(\$82,503,131)	(\$198,257,132)	(\$160,211,922)	(\$98,382,500)	(\$99,544,830)	(\$53,456,792)	(\$50,096,119)	(\$81,327,845)	(\$84,870,154)	(\$93,208,762)	\$0
16 GHG Revenues to be Distributed in Future Years	\$0	\$0	\$51,037,250		\$0		\$0		\$0		\$0	\$0
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(\$102,074,500)	(\$82,503,131)	(\$147,219,882)	(\$160,211,922)	(\$98,382,500)	(\$99,544,830)	(\$53,456,792)	(\$50,096,119)	(\$81,327,845)	(\$84,870,154)	(\$93,208,762)	\$0
18 GHG Revenue Returned to Eligible Customers												
19 EITE Customer Return ^{5,6,7}	\$0	\$0	\$1,583,553	\$0	\$1,384,559	\$0	\$4,238,010	\$2,599,416	\$760,200	\$669,179	\$669,179	\$0
20 Small Business Volumetric Return	\$0	\$0	\$10,982,219	\$11,533,823	\$6,954,493	\$13,247,750	\$3,648,498	\$4,062,057	\$2,701,990	\$3,023,286	\$3,638,944	\$0
21 Residential Volumetric Return	\$0	\$0	\$45,915,031	\$35,582,852	\$31,314,308	\$39,050,655	\$0	\$1,767,675	\$0	(\$3,154)	\$0	\$0
22 Subtotal EITE + Volumetric Returns	\$0	\$0	\$58,480,803	\$47,116,675	\$39,653,361	\$52,298,405	\$7,886,508	\$8,429,148	\$3,462,190	\$3,689,311	\$4,308,123	\$0
23 Number of Households Eligible for the California Climate Credit	-	-	1,224,253	1,306,520	1,224,251	1,313,989	1,306,630	1,319,006	1,314,398	1,297,856	1,325,052	-
24 Per-Household Semi-Annual Climate Credit ⁸ (-0.5 x (Line 17 + 22) ÷ Line 23)	\$0.00	\$0.00	\$36.24	\$36.24	\$23.99	\$23.99	\$17.44	\$17.44	\$29.62	\$29.62	\$33.55	\$0.00
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	\$0	\$0	\$88,739,079	\$94,702,116	\$58,729,139	\$79,138,793	\$45,570,284	46,001,913	\$77,865,656	\$76,885,674	\$88,900,639	\$0
26 Revenue Balance (Line 15 + Line 22 + Line 25)	N/A	(\$82,503,131)	N/A	(\$18,393,131)	N/A	\$31,892,368	N/A	\$4,334,942	N/A	(\$4,295,169)	N/A	\$0

¹ Includes 50% of 2013 allowance revenues and expenses.

² Recorded data reflect actual data for January to September 2017 (through the third quarter) and updated forecasted data for October to December 2017 (fourth quarter).

³ Forecasted Outreach & Administrative Expenses are the forecasted expenses (from Template D-3) adjusted for any forecasted prior year's under/over-collection in the GHGCOEMA and GHGACMA.

⁴ The 2017 recorded column includes the Multifamily Program set aside consistent with the March 18, 2016 Administrative Law Judge ruling in the Development of a Successor to Net Energy Metering proceeding (Rulemaking 14-07-002). The 2018 forecasted column represents the October 24, 2017 ALJ email ruling directing SDG&E to file an updated calculation of the amount attributable to Senate Bill 92.

⁵ SDG&E's forecasted 2016 EITE Customer Return represents Prior Year EITE Customer Return of \$2,968,113 to be distributed in 2016, as well as the 2016 forecasted EITE Customer Return of \$1,269,897.

⁶ In accordance with the methodology approved in D. 15-01-024, the EITE Customer Return forecast for 2017 includes: a) 2016 EITE return, b) the 8-1-16 FF&U factor applied to the 2016 EITE return, and c) the 9-1-13 FF&U for EITE returns from 2013 to 2016.

⁷ In accordance with D.15-01-024, the 2018 EITE Customer Return forecast includes the 2016 revenue returned to EITE customers and will be updated with the November update.

⁸ Due to timing in receiving approval of D.15-03-019, the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household. The October residential CCC was based on the authorized 2015 residential CCC of \$23.99 per household.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016		2017		2018	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)												
2	Utility Owned Generation (UOG)												
3	Tolling Agreements												
4	Energy Imports (Specified)												
5	Energy imports (Unspecified)												
6	RPS Adjustment												
7	Qualifying Facility (QF) Contracts Contract with Financial Settlement												
8	Subtotal												
9	Indirect GHG Emissions (MTCO2e)												
10	CAISO Market Purchases												
11	Contract Purchases												
12	Subtotal												
13	Total Emissions (MTCO2e)	5,596,398	5,678,547	5,473,713	5,590,681	4,811,519	5,013,119	4,203,567	4,545,471	4,243,313	4,135,257	3,769,408	-
14	Proxy GHG Price (\$/MT)	\$17.35	\$13.57	\$14.44	\$12.04	\$12.09	\$12.79	\$13.13	\$12.84	\$13.23	\$14.36	\$15.63	\$0.00
15	GHG Costs (\$)												
16	Direct GHG Costs ¹												
17	Direct GHG Costs - Financial Settlement												
18	Indirect GHG Costs												
19	Previous Year's Forecast Reconciliation ²	N/A	N/A	\$0	\$0	(\$25,881,702)	(\$35,475,620)	(\$7,355,343)	(\$16,295,922)	(\$7,874,871)	(\$7,874,871)	(\$2,745,542)	(\$2,745,542)
20	Total Costs (\$)	\$89,750,005	\$61,221,829	\$61,715,000	\$64,361,474	\$32,289,561	\$24,934,218	\$47,848,837	\$39,973,966	\$48,264,166	\$45,518,624	\$56,170,297	(\$2,745,542)
21	Forecast Variance³ (\$)	N/A	(\$28,528,177)	N/A	\$2,646,474	N/A	(\$7,355,343)	N/A	(\$7,874,871)	N/A	(\$2,745,542)	N/A	(\$58,915,839)

CONFIDENTIAL INFORMATION

¹Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes

²The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition, due to updates to recorded 2013 and 2014 amounts, this figure has been updated.

³Also reflects adjustment for shift in regulatory accounting from cash to accrual

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016		2017		2018	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded
1 Utility Outreach												
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-	-	-
3 Other (Consultant) ^{2,5}	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-	-	-
5 Utility Administrative												
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	30,912	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	5,617	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	35,000	51,342	35,000	25,512	35,000	44,153	47,500	-
10 Other ⁴	-	N/A	12,500	12,500	12,500	-	12,500	-	12,500	-	-	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	56,424	47,500	49,770	47,500	-
12 Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	88,683	47,500	56,424	47,500	49,770	47,500	-
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000	-	140,000	-	140,000	-	140,000	-
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	88,683	187,500	56,424	187,500	49,770	187,500	-

¹ Recorded data reflect actual data for January to September 2017 (through the third quarter) and updated forecasted data for October to December 2017 (fourth quarter).

² 2013 forecasted expenses were revised from D.13-12-041 to shift the \$52.5k for Targetbase costs from admin to outreach pursuant to Resolution E-4611.

³ 2014 forecasted expenses were revised from D.13-12-041 to shift the \$35k for marketing from outreach to administration pursuant to Resolution E-4611.

⁴ Direct labor costs associated with: (1) Subsequent pricing and credit updates to the billing system; (2) customer eligibility review and verification process; (3) Manual set-up and maintenance required for the identified EITE customers; and (4) Monitoring of check cutting activities related to Net Energy Metering customers.

⁵ Bill inserts and emails costs of \$19,540 booked to GHGCOEMA in April/May/December 2014 were transferred to GHGACMA in October 2015.

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Status (Open/Closed) (B)	Bundled Customers				Unbundled Customers				Total
		Forecast MWh Sales (MWh) (C)	Forecast GHG Revenue Req (\$) ¹ (D)	Rate Impact (\$/kWh) ² (E)	Forecast GHG Revenue (\$) (F)	Forecast MWh Sales (MWh) (G)	Forecast GHG Revenue Req (\$) ¹ (H)	Rate Impact (\$/kWh) ² (I)	Forecast GHG Revenue (\$) (J)	Forecast GHG Revenue (\$) (K-F+J)
Residential		7,372,950	\$ 27,244,154	0.00370	\$ 88,778,397	111,342	N/A	N/A	\$ 122,242	\$ 88,900,639
DR	Open									
DR-LI	Open									
TOU-DR-E1	Open									
TOU-DR-E2	Open									
TOU-DR-E3	Open									
TOU-DR	Open									
DM	Open									
DS	Closed									
DT	Closed									
DT-RV	Open									
DR-TOU	Open									
DR-SES	Open									
EV-TOU	Open									
EV-TOU-2	Open									
Small Commercial		2,017,510	\$ 6,760,134	0.00335	\$ 3,481,537	27,186	N/A	N/A	\$-	\$ 3,481,537
A	Closed									
TOU-A	Open									
ATC	Open									
A-TOU	Open									
UM	Open									
Med/Large C&I³		6,872,291	\$ 24,461,780	0.00356	\$ 397,830	3,530,409	N/A	N/A	\$ 368,151	\$ 765,981
AD	Closed									
AD-TOU	Closed									
AL-TOU	Open									
AY-TOU	Closed									
DGR	Open									
A6-TOU	Open									
OL-TOU	Open									
VGI	Open									
Agricultural		301,799	\$ 912,349	0.00302	\$ 60,605	31,440	N/A	N/A	\$-	\$ 60,605
PA	Closed									
TOU-PA	Open									
PA-T-1	Open									
Streetlighting		103,651	\$ 252,944	0.00244	\$-	-	N/A	N/A	\$-	\$-
LS-1	Open									
LS-2	Open									
LS-3	Open									
OL-1	Open									
OL-2	Open									
DWL	Open									
System Total		16,668,202	\$ 59,631,361	0.00358	\$ 92,718,368	\$ 3,700,377	N/A	N/A	\$ 490,393	\$ 93,208,762

¹In accordance with Section 2.5. of the Amended Joint Investor - Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap and-trade costs incurred will be captured as part of the larger ERRR true-up process. SDG&E will true-up total ERRR balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRR Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column D does not include a GHG cost reconciliation.

²Rate impacts are based on customer class.

³The VGI rate is based on the Medium and Large Commercial and Industrial rate.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Information	2013	2014	2015	2016	2017 (forecast)	2018 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,409,838	\$56,269,888	\$53,393,495	\$58,915,839
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$81,558,628)	(\$89,584,150)	(\$98,286,457)
3	Emissions Intensity (MTCO/MWh) *	0.322	0.284	0.269	0.242		

* SDG&E Emissions Intensities are calculated based on renewable energy consumed and RECs associated with consumption in that year. It is not adjusted for RPS Compliance banking or modifications to RPS Adjustments in that year.

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