

Application No.: A.18-04-  
Exhibit No.: \_\_\_\_\_  
Witness: Ana Garza-Beutz

**PREPARED DIRECT TESTIMONY OF**  
**ANA GARZA-BEUTZ**  
**ON BEHALF OF**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

***\*\*redacted, public version\*\****

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

**April 13, 2018**



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GLOSSARY



1 **II. BACKGROUND**

2 **A. AB 32 Background**

3 The Global Warming Solutions Act of 2006, also referred to as AB 32, establishes a goal of  
4 reducing California’s GHG emissions to the 1990 level by 2020. The statute grants ARB broad  
5 authority to regulate GHG emissions to reach this target. ARB’s Scoping Plan includes a  
6 recommendation that California adopt a portfolio of emissions reduction measures, including a  
7 California GHG cap-and-trade program.<sup>4</sup>

8 In October 2011, ARB released its Final Regulation Order, which was approved by its  
9 Board and by the Office of Administrative Law (“OAL”) in December 2011.<sup>5</sup> The ARB  
10 regulations create a GHG emissions allowance cap-and-trade system, with compliance obligations  
11 in the electricity sector applicable to “first deliverers of electricity”<sup>6</sup> that emit more than 25,000  
12 Metric Tons (“MT”) of GHG. The regulation requires that first deliverers of electricity, including  
13 investor-owned utilities (“IOUs”) such as SDG&E, obtain all the compliance instruments required  
14 to meet their compliance obligations by November 1 of the year following the end of a compliance  
15 period. Compliance instruments consist of allowances and offsets. An allowance is a limited,  
16 tradable authorization to emit up to one MT of carbon dioxide equivalent (“CO<sub>2</sub>e”) and an offset is  
17 a project that reduces GHG in sectors outside of those covered in the cap-and-trade program.<sup>7</sup>  
18 Section 95892(b) of ARB’s Final Regulation Order establishes that IOUs are required to sell all  
19 their free allowances and acquire an amount equal to their direct compliance obligations. There

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<sup>4</sup> ARB Resolution 11-32 (October 20, 2011) at 3-4. Available at:  
<https://www.arb.ca.gov/regact/2010/capandtrade10/res11-32.pdf>.

<sup>5</sup> The ARB Final Regulation Order from December 2011 is codified at 17 CCR § 95800 *et seq.* and is also available at: <http://www.arb.ca.gov/regact/2010/capandtrade10/capandtrade10.htm>.

<sup>6</sup> “First deliverers of electricity” is defined in Section 95811(b) of ARB’s Final Regulation Order as electricity generators inside California and importers of electricity from outside of California.

<sup>7</sup> Refer to Section 95801 of ARB’s Final Regulation Order for definitions.

1 are also annual requirements to surrender at least 30% of expected annual obligations each year by  
2 November 1 of the following year.

3 **B. GHG Actual Revenue**

4 The revenues discussed in my testimony result from the sale of allowances allocated to  
5 SDG&E by ARB for the benefit of its ratepayers. ARB requires that the allowances that are  
6 allocated annually to the IOUs be made available for sale at the ARB auctions. Allowances given  
7 to the IOUs must all be consigned by the last auction of that year. Except for the November 2012  
8 auction, where ARB specified the amount that each IOU needed to auction, all other amounts  
9 consigned at auctions are up to the discretion of each IOU, provided the entire annual volume is  
10 consigned by the end of each year. Revenues are calculated by multiplying the volume sold by the  
11 auction settlement price. The revenues presented in this testimony consist of allowances sold in  
12 the 2017 February, May, August, and November auctions.

13 **C. GHG Actual Emissions Volumes**

14 The 2017 direct emissions will be the actual/calculated GHG emissions for: (1) SDG&E's  
15 California utility-owned generation ("UOG"), (2) California generators with whom SDG&E has  
16 contracts where SDG&E is responsible for GHG costs, (3) estimated emissions associated with  
17 SDG&E imports of both specified electricity and unspecified electricity, and (4) Renewable  
18 Portfolio Standard ("RPS") adjustment. The RPS adjustment is calculated by multiplying the out-  
19 of-state renewable megawatt-hours ("MWh") eligible for RPS adjustment by the ARB assigned  
20 unspecified emission factor. The 2017 direct volumes may change because they are subject to: (1)  
21 emission estimates and emission reporting verification, (2) changing emission factors, and (3)  
22 contractual requirements for reviewing tolling agreement emissions for potential reductions. If  
23 there are such changes, they will be reflected in future testimony.

1 The 2017 “actual” indirect emissions are estimated emissions based on net purchases from  
2 the California electricity market controlled by the California Independent System Operator  
3 Corporation (“CAISO”) measured in MWh and multiplied by the ARB assigned unspecified  
4 emission factor. Indirect emissions are not overseen by ARB. Indirect emissions are comprised of  
5 an estimated volume of GHG for which SDG&E was exposed because of purchasing power from  
6 third parties. The estimated numbers for 2017 are those calculated in SDG&E’s 2017 ERRR  
7 Forecast Application and will be updated in my Updated 2019 ERRR Forecast testimony in  
8 November 2018.

9 **D. GHG Actual Cost Categories**

10 The costs outlined in my testimony are broken down into two categories of GHG actual  
11 costs: direct costs and indirect costs. SDG&E defines direct costs of a given compliance year as  
12 the net cost of procuring compliance instruments that can be used to satisfy SDG&E’s compliance  
13 year obligation. SDG&E defines indirect costs of a given compliance year as the GHG  
14 compliance costs embedded in the price of electricity delivered in that year, which are passed on  
15 from sellers.

16 Section III below addresses the carbon price for 2017. Section IV.A addresses direct GHG  
17 emissions associated with SDG&E’s UOG plants, procurement of electricity from tolling  
18 agreements, electricity imports attributed to SDG&E, and credits from SDG&E’s eligible RPS  
19 Adjustment. Section IV.B addresses the approximate 2017 indirect GHG emissions for which  
20 SDG&E paid as GHG costs embedded in electricity prices charged by third parties to SDG&E  
21 under contract for various supplies.<sup>8</sup> Section IV.C summarizes the GHG costs based on the carbon  
22 prices in Section III and emissions in Sections IV.A and IV.B.

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<sup>8</sup> Indirect GHG costs are estimated based on the assumptions described herein.

1 **III. CARBON PRICE METHODOLOGY**

2 **A. Price for Direct GHG Emissions**

3 SDG&E uses the Weighted Average Cost (“WAC”) of Compliance Instruments by  
4 compliance period recorded monthly, as described in Attachment C of Decision (D.) 14-10-033,  
5 subsequently corrected by D.14-10-055 and D.15-01-024, to calculate its direct emissions pricing.

6 The WAC<sup>9</sup> prices are listed in the table below:

7

2017 WAC (\$/MT)	
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8 **B. Price for Indirect Emissions**

9 The embedded GHG costs for indirect emissions are estimated by using the average  
10 CAISO GHG Allowance Price Indices, as listed in the table below.<sup>10</sup> Indirect costs are estimated  
11 since it is assumed that the GHG cost was passed on by all sources of power from market  
12 purchases.

13

2017 CAISO GHG Prices	
Jan - Dec 2017	\$14.57

14 **IV. ACTUAL GHG COMPLIANCE COSTS**

15 **A. Direct Greenhouse Gas Emissions**

16 Under ARB’s cap-and-trade program, the “first deliverer of electricity” within California  
17 must surrender one allowance or offset credit for each MT of GHG emissions. Accordingly,  
18 SDG&E had direct compliance obligations for GHGs emitted from burning natural gas at its UOG  
19 plants, namely, the Palomar Energy Center (“Palomar”) and Miramar Energy Facility I and II

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<sup>9</sup> Monthly WAC prices are provided in Appendix A of this testimony. The WAC calculations for 2017 are based upon SDG&E’s most recent estimate for the respective monthly emissions and on previous years’ WAC.

<sup>10</sup> Annual CAISO prices are a straight average of public daily GHG prices published on CAISO’s OASIS website.

1 (collectively, “Miramar”).<sup>11</sup> SDG&E’s UOG GHG emission volumes are derived from  
 2 information extracted from each covered plant’s Continuous Emissions Monitoring Systems  
 3 (“CEMS”) and that plant’s annual fuel usage. The data is reported to ARB (under the mandatory  
 4 GHG reporting rule) and undergoes a rigorous quality assurance/quality control (“QA/QC”)  
 5 process with supporting documentation from the CEMS systems. The data is then subject to third  
 6 party verification by an ARB-certified verifier. The 2017 UOG data will become final in  
 7 September 2018. The 2017 estimated UOG actuals are as follows:

2017 Estimated California UOG Plants	Est. Actual (in MT)
Palomar Energy Center	
Miramar Energy Facilities	
Total	

8  
 9 In addition, SDG&E has agreements with some California generators, which stipulate  
 10 that if SDG&E is dispatching the plant, then SDG&E will provide compliance instruments to the  
 11 generator for its GHG compliance obligations. The generators covered by these agreements  
 12 include, the Otay Mesa Energy Center (“OMEC”), the Orange Grove Energy Center (“Orange  
 13 Grove”), Goal Line (which became a dispatchable plant in 2015), and the Escondido Energy  
 14 Center (“EEC”). The estimated actuals for these plants were calculated by multiplying the  
 15 MMBtu burned with the emission factor of 0.05307 MT/MMBtu associated with natural gas as  
 16 the input fuel. These estimates are subject to change, not only because the emissions estimates  
 17 are based on fuel calculations instead of emission meter read calculations, but also because the

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<sup>11</sup> ARB’s Mandatory Reporting Regulations requires use of emission factors from federal regulations - 40 Code of Federal Regulation (“CFR”) Section 98. For pipeline natural gas, there are three components – CO<sub>2</sub>, CH<sub>4</sub>, and NO<sub>2</sub>. Table C-1 of 40 CFR Section 98 provides an emissions rate for CO<sub>2</sub> of 0.05302 MT/MMBtu. Table C-2 of 40 CFR Section 98 gives a default emission factor for CH<sub>4</sub> of 0.000001 MT/MMBtu. Using a Global Warming Potential of 21, the resulting CO<sub>2</sub>e emission rate is 0.00002 MT/MMBtu. The default NO<sub>2</sub> emission rate is given as 0.0000001 MT/MMBtu, and its Global Warming Potential is 310, resulting in a CO<sub>2</sub>e emission rate of 0.00003 MT/MMBtu. Combining the 3 elements results in an overall emission rate of 0.05307 MT/MMBtu.



1 tolling agreement contracts state that SDG&E will only cover the emissions generated resulting  
 2 from SDG&E dispatches of efficiently run plants. The 2017 estimated SDG&E obligations to  
 3 tolling agreement partners are shown below. SDG&E will be analyzing the 2017 data and could  
 4 potentially adjust the 2017 emissions for actuals, non-SDG&E dispatches or for inefficiencies. If  
 5 there are such changes, they will be reflected in future testimony.

2017 Estimated California Tolling Generators	Est. Actual (in MT)
Otay Mesa Energy Center	
Orange Grove Energy Center	
Goal Line	
Escondido Energy Center	
Pio Pico	
Total	

6  
 7 An entity that delivers out-of-state electricity to a delivery point inside California is also  
 8 responsible for the GHG emissions associated with generation of that electricity. For known  
 9 imports, called “specified sources,” the estimated GHG emissions related to the portion of  
 10 outputs of plants that delivered to California are covered in the cap-and-trade program and as  
 11 such the importer of that electricity has a compliance obligation. SDG&E has a contract with  
 12 Yuma Cogeneration Associates (“YCA”) in Arizona and owns the Desert Star Energy Center  
 13 (“Desert Star”) combined cycle plant in Nevada. These out-of-state generators are specified  
 14 sources. The compliance obligation for the power imported from each of these sources is  
 15 calculated by the product of the imported power times the transmission loss correction factor as  
 16 listed in section 95111 of ARB’s mandatory reporting regulation, and the specified emissions  
 17 factor assigned to those facilities by ARB.<sup>12</sup> As with SDG&E’s other estimated obligations,

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<sup>12</sup> Specified Emission Factors are updated annually by ARB. They can be found at:  
<http://www.cdscsupport.com/confluence/display/calhelp/Reporting+Form+Instructions>.

1 specified imports are also subject to change, and those changes will be reflected in future  
2 testimony. The 2017 estimated actuals for SDG&E’s specified imports are as follows:

2017 Estimated Specified Imports	Est. Actual Specified (in MWh)	Emission Factor (in MT/MWh)	Transmission Loss Factor	Est. Actual (in MT)
Desert Star		0.401	1.00	
YCA		0.509	1.02	
Total				

3  
4 In addition to specified sources, importing of “unspecified sources” also generates a  
5 compliance obligation. SDG&E procured both contracted imports and market imports from  
6 unspecified sources in 2017. The cap-and-trade compliance obligation for these unspecified  
7 imports is calculated by multiplying the number of MWh imported, adjusted upward by two  
8 percent to account for transmission losses between the point of generation and the California  
9 border, by the ARB default rate, as stated in its regulation (currently 0.428 MT per MWh).<sup>13</sup>  
10 Finally, ARB recognizes that the building of new renewable generation outside California reduces  
11 GHG. As such, the cap-and-trade regulations allow for an RPS adjustment. The RPS adjustment  
12 reduces an entity’s GHG compliance burden and is calculated by assigning the default emission  
13 rate, 0.428 MT/MWh, to the GHG-free renewable energy, as measured at the point of generation.  
14 The adjustment does not account for the transmission losses from the point of generation to  
15 California.<sup>14</sup> The Cap-and-Trade Regulation also allows for RPS Adjustment to be taken in  
16 following years. SDG&E successfully claimed the undelivered portion of its potential 2014 RPS  
17 Adjustment renewable MWhs in 2015. SDG&E was planning to claim the 2015 and 2016  
18 undelivered contractually purchased renewable energy applicable to the RPS Adjustment Provision  
19 in its 2016 and 2017 GHG reports to ARB. However, the data for the 2015 and 2016 RPS

<sup>13</sup> ARB’s Cap-and-Trade Regulation, Section 95852(b)(1)(B).

<sup>14</sup> See Section 95852(b)(1) of ARB’s Final Regulation Order for the calculation of the RPS Adjustment.

1 Adjustment was not available, thus SDG&E claimed zero RPS Adjustment for Compliance Years  
 2 2016 and 2017.<sup>15</sup> If, as expected, the 2015 and/or 2016 RPS Adjustment data becomes available in  
 3 the future, SDG&E will incorporate that benefit in an upcoming annual ARB Electric Power Entity  
 4 (“EPE”) report. SDG&E expects to receive the 2017 RPS Adjustment data and utilize that benefit  
 5 in the 2018 EPE Report. The estimated 2017 RPS Adjustment claims are shown below. Both the  
 6 estimated 2017 unspecified imports and the RPS Adjustments claimed for 2017 are subject to  
 7 change and those changes will be reflected in future testimony. The 2017 estimated actuals for  
 8 SDG&E’s unspecified imports and RPS adjustment claims are as follows:

2017 Compliance Reporting: 2017 Unspecified Imports & 2016 RPS Adjustment	Est. Actual Unspecified (in MWh)	Emission Factor (in MT/MWh)	Transmission Loss Factor	Est. Actual (in MT)
Unspecified Imports		0.428	1.02	
RPS Adjustment		0.428	1.00	
<b>Total</b>				

9  
 10 Based on the above, SDG&E’s 2017 estimated actual direct compliance obligation are:

2017 Estimated Direct Compliance Obligations	Est. Actual (in MT)
California UOG Plants	
California Tolling Generators	
Specified Imports	
Unspecified Imports	
RPS Adjustment	
<b>Total</b>	

11  
 12 **B. Indirect Greenhouse Gas Emissions**

13 SDG&E, along with all other purchasers of wholesale electricity, is subject to indirect  
 14 GHG compliance costs that generators incur and pass on to their buyers. This additional cost of

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<sup>15</sup> SDG&E’s ability to utilize the non-imported portion of its Glacier and RimRock contracts for the RPS Adjustment is dependent on receipt of Glacier and Rim Rock import volumes from Morgan Stanley. SDG&E has, thus far, not received this information for the 2015 or 2016 generation years. SDG&E continues to have discussions with Morgan Stanley about this data and expects to receive it in the future at which point SDG&E can apply the prior RPS Adjustment volumes to the prompt compliance year’s report.

1 GHG compliance is embedded in the market price of electricity procured in the wholesale market  
 2 from third parties, thereby increasing SDG&E’s cost to purchase wholesale electricity, as well as  
 3 from suppliers under contracts that include market-based prices. The cost of GHG affects both  
 4 market purchases and contracts based on the price of energy (such as combined heat and power  
 5 (“CHP”) facilities); because the price of energy changes in tandem with the change in the GHG  
 6 allowance prices, sellers of electricity demand higher revenues to offset the costs related to their  
 7 cap-and-trade obligations. The 2017 indirect GHG volumes are estimated, for both net market  
 8 purchases and CHP contracts, as the MWh of electricity production multiplied by the ARB default  
 9 rate for unspecified electricity of 0.428 MT/MWh. The 2017 estimated MWh and emissions of  
 10 SDG&E’s indirect purchases are as follows:

2017 Estimated Indirect Volumes in MWh and MT	
Total INDIRECTS (MWh)	
Unspecified Emissions Factor (MT/MWh)	0.428
Total INDIRECTS (MT)	

12 **C. GHG Costs**

13 Using the prices from Section III above, the estimation of the 2017 direct GHG costs are as  
 14 follows:

2017 Estimated GHG Direct Costs	Volume (in MT)	WAC Price (in \$/MT)	Cost
Jan - Dec 2017			
Total			

16 Combining indirect volumes and the CAISO GHG allowance price indices,<sup>16</sup> the 2017  
 17 estimated GHG indirect costs are as follows:

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<sup>16</sup> Per D.14-10-033, indirect costs are calculated using a proxy price equal to the average of the published CAISO prices.

2017 Indirect Volumes & Cost	
Forecasted INDIRECTS (MT)	
CAISO GHG Price (Jan-Dec '17) (\$/MT)	\$14.57
Total 2017 Indirect Cost	

Thus, the estimation of the 2017 actual/forecast blended cost is \$50.64 million (rounded).

**V. ACTUAL AND ESTIMATED GHG REVENUES**

SDG&E received 6,460,042 MT of vintage 2017 allowances to sell at 2017 auctions.

SDG&E’s annual allocated allowances are required to be consigned at that year’s quarterly auctions; however, SDG&E has full discretion on how to distribute its allowance across the four quarterly auctions. The tables below show the volumes sold at each 2017 auction and the associated revenues.

2017 GHG Revenues			
Auction	Settlement Price (\$/MT)	Sold Volume (MT)	Revenue
Feb-17	\$13.57		
May-17	\$13.80		
Aug-17	\$14.75		
Nov-17	\$15.06		
<b>Total</b>	<b>\$14.32</b>	<b>6,460,042</b>	<b>\$92,539,677.19</b>

This concludes my direct testimony.

1 **VI. QUALIFICATIONS**

2 My name is Ana Garza-Beutz. My business address is 8315 Century Park Court, San  
3 Diego, CA 92123. I am employed by SDG&E as a Principal Energy Administrator in the  
4 Electric & Fuel Procurement Department. My responsibilities include managing SDG&E's  
5 GHG portfolio, which includes development of GHG procurement and hedging strategies.

6 I joined SDG&E in November 2003, and have held various positions with increasing  
7 levels of responsibility within the Electric & Fuels Procurement Department. Prior to joining  
8 SDG&E, I worked as a Risk Analyst with Sempra Energy.

9 I received a Bachelor of Science degree in Mathematics from the California Polytechnic  
10 State University San Luis Obispo and a Master of Arts in Mathematics from the University of  
11 California Santa Barbara.

12 I have previously testified before the Commission.

# APPENDIX A

## SDG&E's Monthly WAC Calculation

(Calculation date of January 3, 2018)

As of 01/03/2018

### CONFIDENTIAL GHG Data

#### ELECTRIC Portfolio: CP2 WAC Calculation

#### Monthly WAC Recordings

Month	Transaction Date	Transaction Type	Quantity Pur/(Sales) (MT)	Purchase (\$/MT)	Sales (\$/MT)	Total Cost (\$)	Total Sales (\$)	Inventory Balance (\$)	Total Qty in Inventory	WAC* (\$)		
Jan-15	1/1/2015	CP1 WAC Transfer										
Jan-15	11/14/2012	ARB Auction - Vintage 2015		\$10.00								
Jan-15	2/19/2013	ARB Auction - Vintage 2016		\$10.71								
Jan-15	5/16/2013	ARB Auction - Vintage 2016		\$10.71								
Jan-15	8/16/2013	ARB Auction - Vintage 2016		\$11.10								
Jan-15	11/19/2013	ARB Auction - Vintage 2016		\$11.10								
Jan-15	2/19/2014	ARB Auction - Vintage 2017		\$11.38								
Jan-15	5/16/2014	ARB Auction - Vintage 2017		\$11.34								
Jan-15	8/18/2014	ARB Auction - Vintage 2017		\$11.34								
Jan-15	11/24/2014	ARB Auction - Vintage 2017		\$11.86								
Feb-15												
Feb-15												
Feb-15												
Feb-15												
Feb-15												
Mar-15												
Mar-15												
Mar-15												
Mar-15												
Mar-15												
Apr-15												
Apr-15												
Apr-15												
Apr-15												
Apr-15												
May-15												
May-15												
May-15												
May-15												
May-15												
Jun-15												
Jun-15												
Jun-15												
Jun-15												
Jun-15												

Month	
End of Month WAC	
Monthly Emissions (MT)	
Balancing Account Entry for Month	
Month	
End of Month WAC	
Monthly Emissions (MT)	
Balancing Account Entry for Month	
Month	
End of Month WAC	
Monthly Emissions (MT)	
Balancing Account Entry for Month	
Month	
End of Month WAC	
Monthly Emissions (MT)	
Balancing Account Entry for Month	
Month	
End of Month WAC	
Monthly Emissions (MT)	
Balancing Account Entry for Month	

Jul-15	Month
Jul-15	End of Month WAC
Jul-15	Monthly Emissions (MT)
Jul-15	Balancing Account Entry for Month
Aug-15	Month
Aug-15	End of Month WAC
Aug-15	Monthly Emissions (MT)
Aug-15	Balancing Account Entry for Month
Sep-15	Month
Sep-15	End of Month WAC
Sep-15	Monthly Emissions (MT)
Sep-15	Balancing Account Entry for Month
Oct-15	Month
Oct-15	End of Month WAC
Oct-15	Monthly Emissions (MT)
Oct-15	Balancing Account Entry for Month
Nov-15	Month
Nov-15	End of Month WAC
Nov-15	Monthly Emissions (MT)
Nov-15	Balancing Account Entry for Month
Dec-15	Month
Dec-15	End of Month WAC
Dec-15	Monthly Emissions (MT)
Dec-15	Balancing Account Entry for Month
Jan-16	Month
Jan-16	End of Month WAC
Jan-16	Monthly Emissions (MT)
Jan-16	Balancing Account Entry for Month
Feb-16	Month
Feb-16	End of Month WAC
Feb-16	Monthly Emissions (MT)
Feb-16	Balancing Account Entry for Month
Mar-16	Month
Mar-16	End of Month WAC
Mar-16	Monthly Emissions (MT)
Mar-16	Balancing Account Entry for Month
Apr-16	Month
Apr-16	End of Month WAC
Apr-16	Monthly Emissions (MT)
Apr-16	Balancing Account Entry for Month
May-16	Month
May-16	End of Month WAC
May-16	Monthly Emissions (MT)
May-16	Balancing Account Entry for Month



Jun-16	Month
Jun-16	End of Month WAC
Jun-16	Monthly Emissions (MT)
Jun-16	Balancing Account Entry for Month
Jul-16	Month
Jul-16	End of Month WAC
Jul-16	Monthly Emissions (MT)
Jul-16	Balancing Account Entry for Month
Aug-16	Month
Aug-16	End of Month WAC
Aug-16	Monthly Emissions (MT)
Aug-16	Balancing Account Entry for Month
Sep-16	Month
Sep-16	End of Month WAC
Sep-16	Monthly Emissions (MT)
Sep-16	Balancing Account Entry for Month
Oct-16	Month
Oct-16	End of Month WAC
Oct-16	Monthly Emissions (MT)
Oct-16	Balancing Account Entry for Month
Nov-16	Month
Nov-16	End of Month WAC
Nov-16	Monthly Emissions (MT)
Nov-16	Balancing Account Entry for Month
Dec-16	Month
Dec-16	End of Month WAC
Dec-16	Monthly Emissions (MT)
Dec-16	Balancing Account Entry for Month
Jan-17	Month
Jan-17	End of Month WAC
Jan-17	Monthly Emissions (MT)
Jan-17	Balancing Account Entry for Month
Feb-17	Month
Feb-17	End of Month WAC
Feb-17	Monthly Emissions (MT)
Feb-17	Balancing Account Entry for Month
Mar-17	Month
Mar-17	End of Month WAC
Mar-17	Monthly Emissions (MT)
Mar-17	Balancing Account Entry for Month

Apr-17	Month
Apr-17	End of Month WAC
Apr-17	Monthly Emissions (MT)
Apr-17	Balancing Account Entry for Month
May-17	Month
May-17	End of Month WAC
May-17	Monthly Emissions (MT)
May-17	Balancing Account Entry for Month
May-17	
Jun-17	Month
Jun-17	End of Month WAC
Jun-17	Monthly Emissions (MT)
Jun-17	Balancing Account Entry for Month
Jun-17	
Jul-17	Month
Jul-17	End of Month WAC
Jul-17	Monthly Emissions (MT)
Jul-17	Balancing Account Entry for Month
Jul-17	
Aug-17	Month
Aug-17	End of Month WAC
Aug-17	Monthly Emissions (MT)
Aug-17	Balancing Account Entry for Month
Aug-17	
Sep-17	Month
Sep-17	End of Month WAC
Sep-17	Monthly Emissions (MT)
Sep-17	Balancing Account Entry for Month
Sep-17	
Oct-17	Month
Oct-17	End of Month WAC
Oct-17	Monthly Emissions (MT)
Oct-17	Balancing Account Entry for Month
Oct-17	
Nov-17	Month
Nov-17	End of Month WAC
Nov-17	Monthly Emissions (MT)
Nov-17	Balancing Account Entry for Month
Nov-17	
Dec-17	Month
Dec-17	End of Month WAC
Dec-17	Monthly Emissions (MT)
Dec-17	Balancing Account Entry for Month
Dec-17	
Dec-17	

# GLOSSARY

Acronym	Definition
AB	Assembly Bill
ARB	California Air Resources Board
CAISO	California Independent System Operator
CAM	Cost Allocation Mechanism
CARB	California Air Resources Board
CEMS	Continuous Emissions Monitoring System
CO <sub>2e</sub>	Carbon Dioxide Equivalent
CUYAMACA	Cuyamaca Peak Energy Plant
CYCG	Czamecki-Yester Consulting Group LLC
DESERT STAR	Desert Star Energy Center
EEC	Escondido Energy Center
EECC	Electric Energy Commodity Cost
ENVOY	ENVOY is dashboard-styled web interface for managing natural gas supplies
EPE	Electric Power Entity; The EPE Report contains all import/RPS Adjustment Data submitted to ARB
ERRA	Energy Resource Recovery Account
GHG	Greenhouse Gas
IOU	Investor Owned Utility
MIRAMAR	Miramar Energy Facility I & Miramar Energy Facility II
MIRAMAR I	Miramar Energy Facility I
MIRAMAR II	Miramar Energy Facility II
MT	Metric Ton
MWh	Megawatt hour
OAL	Office of Administrative Law
OMAR	Operational Meter Analysis and Reporting (CAISO Online Metering System)
OMEC	Otay Mesa Energy Center
ORANGE GROVE	Orange Grove Energy Center
PALOMAR	Palomar Energy Center
PPA	Power Purchase Agreement
QA/QC	Quality Assurance/Quality Control
QFs	Qualifying Facilities
RPS	Renewable Portfolio Standard
SDG&E	San Diego Gas & Electric Company
UOG	Utility Owned Generation
WAC	Weighted Average Cost
YCA	Yuma Cogeneration Associates

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

**DECLARATION OF RYAN A. MILLER  
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS  
PURSUANT TO D.16-08-24, *et al.***

I, Ryan A. Miller, do declare as follows:

1. I am the Manager- Energy Supply & Dispatch in the Electric and Fuel Procurement department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Emily C. Shults, Vice President of Energy Supply. I have reviewed Ana Garza-Beutz’s Prepared Direct Testimony (“Testimony”) in support of SDG&E’s April 13, 2018 “Application ... for Approval of its 2019 Electric Procurement Revenue Requirement Forecasts and GHG Related-Forecasts” (“Application”). I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decisions (“D.”) D.16-08-024, D.17-05-035 and D.17-09-023 to demonstrate that the confidential information (“Protected Information”) provided in Ms. Garza-Beutz’s Testimony is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachments A and B, the Protected Information should be protected from public disclosure.

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

Executed this 13<sup>th</sup> day of April, 2018, at San Diego.

A handwritten signature in black ink, appearing to read "Ryan A. Miller". The signature is fluid and cursive, with a long horizontal stroke at the end.

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Ryan A. Miller  
Manager – Energy Supply & Dispatch

# ATTACHMENT A

## SDG&E Request for Confidentiality on the following information contained in Ana Garza-Beutz’s Testimony in support of SDG&E’s Application

Location of Protected Information	Legal Citations	Narrative Justification
<p><b>1. SDG&amp;E WAC prices and WAC calculations</b></p> <p><i>(The 2017 WAC price appears in the Testimony; the 2013-2017 WAC calculations are utilized in tab “D-2” of Attachment G and the 2015-2017 Monthly WAC prices and calculations appear in Attachment A of the Testimony)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024</p> <p>The Matrix makes the following confidential: “Weighted Average Cost (WAC) of compliance instruments, and the calculation of WAC”</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>2. Historical/Recorded UOG Emissions</b></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023,</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p>

<p><i>(The 2017 Historical UOG Emissions appear in the Testimony and the 2013-2017 Recorded UOG Emissions in Attachment G of this Application.)</i></p>	<p>Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded UOG emissions as confidential</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p>3.</p> <p><i>Historical/Recorded California Tolling Agreement Emissions</i></p> <p><i>(The 2017 Historical Tolling Agreement Emissions appear in the Testimony and the 2013-2017 Recorded California Tolling Agreement Emissions appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Tolling Agreements emissions as confidential</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>

<p><b>4. Historical/Recorded Specified Imported MWh and calculated Emissions</b></p> <p><i>(The 2017 Historical Specified Imported MWh and calculated Emissions appear in the Testimony and the 2013-2017 Recorded Specified Imported Emissions appear in Attachment G of this Application.)</i></p>	<p>Code §3426 et seq. D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Energy Imports (Specified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>5. Historical/Recorded Unspecified Imported MWh and calculated Emissions</b></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p>



<p><i>(The 2017 Historical Unspecified Imported MWh and calculated Emissions appear in the Testimony and the 2013-2017 Recorded Unspecified Imported Emissions appear in Attachment G of this Application.)</i></p>	<p>033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E's bidding/consignment strategies contain "commercial value," which gives SDG&amp;E "an opportunity to obtain a business advantage over competitors who do not know or use it."</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>6. Historical RPS Adjustment eligible MWh and calculated Emissions</b></p> <p><i>(The Historical RPS Adjustment eligible MWh and calculated Emissions for 2017 appear in the Testimony and the 2013-2017 Recorded RPS Adjustment Emissions appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order ("GO") 66-D</p> <p>17 CCR § 95914(c) (the "ARB Confidentiality Regulations")</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions, which includes any applicable RPS Adjustments as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E's bidding/consignment strategies contain "commercial value," which gives SDG&amp;E "an opportunity to obtain a business advantage over competitors who do not know or use it."</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>

<p><b>7. Total Direct Compliance Obligation</b></p> <p><i>(The 2017 Total Direct Compliance Obligation appears in the Testimony and the 2013-2017 Recorded Total Direct Compliance Obligation appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Direct GHG Emissions Subtotal as confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>8. Indirect Purchases in MWh and calculated Emissions</b></p> <p><i>(The 2017 forecasted Indirect Purchases in MWh and calculated Emissions appear in the Testimony and the 2013-2017 Recorded calculated Indirect Emissions appear in Attachment G</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p>

<p><i>of this Application.)</i></p>	<p>Indirect GHG Emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus, the MWh are also confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>9. Direct GHG Costs</b></p> <p><i>(The 2017 Direct GHG Costs appear in the Testimony and the 2013-2017 Recorded Direct GHG Costs appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Direct GHG Costs as confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>10. Estimated Indirect GHG Costs</b></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related</p>

<p><i>(The 2017 estimated Indirect GHG Costs appear in the Testimony and the 2013-2017 Recorded estimated Indirect GHG Costs appear in Attachment G of this Application.)</i></p>	<p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Indirect GHG Costs as confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>
<p><b>11. GHG Quarterly Auction Revenue</b></p> <p><i>(The 2017 GHG Quarterly Auction Revenue appear in the Testimony.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>1a. of Attachment A of D.14-10-033 and revised in D.15-01-024</p> <p>1a. makes the following confidential: “AB 32 GHG auction participation.” Although Annual Auction Revenues are public, Quarterly Auction Revenues must be confidential since public auction settlement prices and Quarterly Auction Revenues would reveal SDG&amp;E’s quarterly auction participation as a consigner</p> <p>Gov’t Code §§6254(k),</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>

	6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	
<p><b>12. Emissions Intensities</b></p> <p><i>(The 2017-2019 forecasted Emissions Intensities appears in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024</p> <p>The Matrix makes the following confidential: “Forecast of GHG Emissions Intensity”</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&amp;E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C &amp; D of D.15-01-024 and Appendices A &amp; B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&amp;E’s bidding/consignment strategies contain “commercial value,” which gives SDG&amp;E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&amp;E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&amp;E and its end-use ratepayers.</p>