# **<u>UPDATED</u>** PREPARED DIRECT TESTIMONY OF

# ANA GARZA BEUTZSCOTT D. LEWIS

# **ON BEHALF OF**

# SAN DIEGO GAS & ELECTRIC COMPANY

# **\*\*REDACTED – PUBLIC VERSION\*\***

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

April-November 0615, 2020



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GLOSSARY

#### <u>UPDATED</u> PREPARED DIRECT TESTIMONY OF <u>ANA GARZA BEUTZSCOTT D. LEWIS</u> ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

# 5 **I.**

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### PURPOSE AND OVERVIEW

6 My updated prepared direct testimony presents San Diego Gas & Electric Company's ("SDG&E's") 2019-2020<sup>1</sup> costs for greenhouse gas ("GHG") compliance instruments used to 7 8 satisfy its compliance obligations under the California Air Resources Board's ("ARB") cap-and-9 trade program pursuant to Assembly Bill ("AB") 32. My testimony also includes SDG&Es' 2019-2020 revenues related to the sale of its -allowance allocation.<sup>2</sup> Appendix A of this 10 11 testimony includes SDG&E's Weighted Average Cost calculation ("WAC") as required in 12 Decision ("D.") 14 10 033, subsequently corrected in D.14 10 055, D.15 01 024 and D.19 04-13 016. The purpose of this updated prepared direct testimony is to present both SDG&E's 2019-14 <u>2020</u> costs and revenues as well as SDG&E's WAC calculation, in accordance with applicable 15 decisions. The following sections describe the cap-and-trade program and details SDG&E's 16 2019 actual revenues and final estimated costs as well as estimates for SDG&E's 2020 revenues 17 and costs. These costs and revenues are used in the calculations of SDG&E's gas and electric

<sup>&</sup>lt;sup>1</sup> The 2018 volumes and costs became final in September 2019 and were reported as part of SDG&E's Updated 2020 ERRA Forecast Filing (Application ("A.") 19-04-010); thus the 2018 volumes and costs were not reported in my the April 2020 testimony nor in this testimony-. The 2019 estimated emissions and costs became final in September 2020. reported in this testimony are subject to change due to emission verification for all of 202019. AdditionallyIn, tThis\_updated testimony. I does not includes 20210 emissions, costs and revenues since only January and February estimates are available at this time. In my the November 2020 update of this testimony, I will include estimated costs and revenues for January through September of 2020 and forecasts for October – December 2020, all of which are subject to change when actualized and/or verified.

<sup>&</sup>lt;sup>2</sup> The 2019 revenues are now final. 2020 revenues for January-October-September are final, however the 2020 revenue total is subject to the outcome of the November 2020 auction. emissions and costs are subject to change due to emission verification which will become final in August September 2020. 2019 revenues, however, are now final.

Weighted Average Cost ("WAC") and in customer rates, further adjusted to recorded numbers
 for the purposes of reconciliation as further explained in the testimony of SDG&E witnesses Ms.
 MillerChihwaro and Ms. Fuhrer.<sup>3</sup>

II. BACKGROUND

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#### **AB 32 Background**

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

12 In October 2011, ARB released its Final Regulation Order, which was approved by its

13 Board and by the Office of Administrative Law ("OAL") in December 2011.<sup>6</sup> The ARB

14 regulations create a GHG emissions allowance cap-and-trade system, with compliance obligations

15 in the electricity sector applicable to "first deliverers of electricity"<sup>7</sup> that emit more than 25,000

16 Metric Tons ("MT") of GHG. The regulation requires that first deliverers of electricity, including

17 investor-owned utilities ("IOUs") such as SDG&E, obtain all the compliance instruments required

<sup>&</sup>lt;sup>3</sup> SDG&E witness Mr. Covic provides a forecast of the 2021 GHG costs.

<sup>&</sup>lt;sup>4</sup> AB 32, Stats. 2005-2006, Ch. 488 (Cal. 2006).

<sup>&</sup>lt;sup>5</sup> State of California Air Resources Board, *California Cap-and-Trade Program, Resolution 11-32* (October 20, 2011) at 3-4 *available at*: <u>https://www.arb.ca.gov/regact/2010/capandtrade10/res11-32.pdf</u>.

<sup>&</sup>lt;sup>6</sup> The ARB Final Regulation Order from December 2011 is codified at 17 California Code of Regulations section ("§") 95800 *et seq.* and is also *available at:* http://www.arb.ca.gov/regact/2010/capandtrade10/capandtrade10.htm.

<sup>&</sup>lt;sup>7</sup> "First deliverers of electricity" is defined in § 95811(b) of ARB's Final Regulation Order as electricity generators inside California and electricity importers.

to meet their compliance obligations by November 1 of the year following the end of a compliance 1 2 period. Compliance instruments consist of allowances and offsets. An allowance is a limited, 3 tradable authorization to emit up to one MT of carbon dioxide equivalent ("CO2e") and an offset is a project that reduces GHG in sectors outside of those covered in the cap-and-trade program.<sup>8</sup> 4 5 Section 95892(b) of ARB's Final Regulation Order establishes that IOUs are required to sell all 6 their free allowances and acquire an amount equal to their direct compliance obligations. There 7 are also annual requirements to surrender at least 30% of expected annual obligations each year by 8 November 1 of the following year.

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#### B. GHG Actual Revenues

10 The revenues discussed in my testimony result from the sale of allowances allocated to 11 SDG&E by ARB for the benefit of its ratepayers. ARB requires that the allowances that are 12 allocated annually to the IOUs be made available for sale at the ARB auctions. Allowances given 13 to the IOUs must all be consigned by the last auction of that year. Except for the November 2012 14 auction, where ARB specified the amount that each IOU needed to auction, all other amounts 15 consigned at auctions are up to the discretion of each IOU, provided the entire annual volume is 16 consigned by the end of each year. Revenues are calculated by multiplying the volume sold by the 17 auction settlement price. The revenues presented in this testimony consist of allowances sold in 18 the 2019 auctions and the 2020 auctions that occurred in February, May and, August, auctions 19 with and an estimate for the 2020 and November auctions.

<sup>&</sup>lt;sup>3</sup> Refer to § 95801of ARB's Final Regulation Order for definitions.

C.

#### GHG Actuals and Estimated Emission Volumes

2 The 2019-2020 direct emissions will be the estimated actual verified/calculated GHG emissions for: (1) SDG&E's California utility-owned generation ("UOG"), (2) California 3 4 generators with whom SDG&E has contracts where SDG&E is responsible for GHG costs, (3) 5 estimated emissions associated with SDG&E imports of both specified electricity and unspecified 6 electricity, and potentially (4) Renewable Portfolio Standard adjustment ("RPS Adjustment"). The 7 RPS Adjustment, which is an optional provision of the Cap-and-Trade regulation that reduces a 8 compliance entity's direct compliance obligation, is calculated by multiplying the out-of-state 9 renewable megawatt-hours ("MWh") eligible for RPS adjustment by the ARB assigned 10 unspecified emission factor. The 202019 direct volumes may change because they are subject to: 11 (1) emission estimates and emission reporting verification, (2) changing emission factors, and (3) contractual requirements for reviewing tolling agreement emissions for potential reductions. If 12 13 there are such changes, they will be reflected in future testimony.

14 The 2019-2020 indirect emissions are estimated emissions based on net purchases from the California electricity market controlled by the California Independent System Operator 15 16 Corporation ("CAISO") measured in MWh and multiplied by the ARB assigned unspecified 17 emission factor. Indirect emissions are not overseen by ARB. Indirect emissions are comprised of 18 estimated GHG emissions for which SDG&E was exposed because of purchasing power from third 19 parties. The 2019 calculated indirect emissions are included within this updated testimony. The 20 202019 indirect emissions within this testimony are those calculated in SDG&E's 202019 ERRA 21 Forecast Application and will be updated in my-the Updated 20221 ERRA Forecast testimony in 22 November  $202\underline{10}$ .

#### **D.** GHG Cost Categories

2 The costs outlined in my testimony are broken down into two categories of GHG costs: 3 direct costs and indirect costs. SDG&E defines direct costs of a given compliance year as the net 4 cost of procuring compliance instruments that can be used to satisfy SDG&E's compliance year 5 obligation. SDG&E defines indirect costs of a given compliance year as the GHG compliance costs embedded in the price of electricity delivered in that year, which are passed on from sellers. 6 7 Section III below addresses the carbon price for 2019-2020. Section IV.A addresses direct 8 GHG emissions associated with SDG&E's UOG plants, procurement of electricity from tolling 9 agreements, electricity imports attributed to SDG&E, and potentially credits from SDG&E's 10 eligible RPS Adjustment. Section IV.B addresses the approximate 2019-2020 indirect GHG 11 emissions for which SDG&E paid as GHG costs embedded in electricity prices charged by third parties to SDG&E under contract for various supplies.<sup>9</sup> Section IV.C summarizes the GHG costs 12 13 based on the carbon prices in Section III and emissions in Sections IV.A and IV.B.

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III.

#### CARBON PRICE METHODOLOGY

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#### A. Price for Direct GHG Emissions

SDG&E has used and continues to use the WAC of Compliance Instruments by compliance
 period recorded monthly, as described in D.19 04 016 which modified Attachment C of D.14 10 033 (subsequently corrected by D.14 10 055 and D.15 01 024) to calculate its direct emissions
 pricing.

The 2019 <u>Direct GHG Emissions price</u><del>WAC price shown below</del> is based on the sum of
2019 monthly balancing account entries as found in the testimony of SDG&E witness Sheri Miller
Attachment A of this testimony and the <u>final</u> 2019 emission volumes as described in section IV.A.

<sup>&</sup>lt;sup>9</sup> Indirect GHG costs are estimated based on the assumptions described herein.

1	The 2020 monthly January – September 2020 Direct GHG Emissions price is based on the
2	monthly balancing account entries found in Sheri Miller's testimony and the January - September
3	2020 emission estimates as described in section IV.A. The WAC Direct GHG Emissions price
4	calculations in Attachment A were calculated utilizing the approach detailed in D.19-04-016.
5	Attachment A below includes the calculations recorded in SDG&E's balancing accounts through
6	<del>December 31, 2019.</del>
7	The Direct GHG Emissions price WAC price is listed in the tables below:
8	Jan-Dec 2019 Direct GHG Emissions Price (\$/MI)
9	Jan-Sep 2020 Direct GHG Emissions Price (\$/MT)
10	For October-December 2020 SDG&E will use the forecast price from Stefan Covic's
11	Testimony in SDG&E's 2020 ERRA Forecast Application of \$18.29.
12	Jan-Dec 2019 WAC (\$/MI)
13	B. Price for Indirect Emissions
14	The embedded GHG costs for indirect emissions are estimated by using the average
15	CAISO GHG Allowance Price Indices, as listed in the table below. <sup>10</sup> Indirect costs are estimated
16	since it is assumed that the GHG cost was passed on by all sources of power from market
17	purchases.
	2019 CAISO GHG Prices
18	Jan-Dec 2019 \$17.28
19	
	2020 CAISO GHG Prices
20	Jan-Sep 2020 \$17.10
	<sup>10</sup> Annual CAISO prices are a straight average of public daily GHG prices published on CAISO's OASIS website.
	AGBSDL-6

1 **IV.** 

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#### GHG COMPLIANCE <u>EMISSIONS AND</u> COSTS

#### A. Direct Greenhouse Gas Emissions

3 Under ARB's cap-and-trade program, the "first deliverer of electricity" within California must surrender one allowance or offset credit for each MT of GHG emissions. Accordingly, 4 5 SDG&E had direct compliance obligations for GHGs emitted from burning natural gas at its UOG 6 plants, namely, the Palomar Energy Center ("Palomar") and Miramar Energy Facility I and II (collectively, "Miramar").<sup>11</sup> SDG&E's UOG GHG emission volumes are derived from 7 information extracted from each covered plant's Continuous Emissions Monitoring Systems 8 9 ("CEMS") and that plant's annual fuel usage. The data is reported to ARB (under the mandatory GHG reporting rule) and undergoes a rigorous quality assurance/quality control ("QA/QC") 10process with supporting documentation from the CEMS systems. The data is then subject to third 11 party verification by an ARB-certified verifier. The 2019 UOG emissions will become became 12 final in August 2020. The 2019 final and January - September 2020 estimated UOG emissions are 13 14 as follows:

	Jan-Dec 2019 California UOG Plants	Verified Emissions
	Palomar Energy Center	(in MT)
h	Miramar Energy Facilities	
	Total	

<sup>&</sup>lt;sup>11</sup> ARB's Mandatory Reporting Regulation require use of emission factors from federal regulations – title 40, Code of Federal Regulation ("CFR") Part 98 promulgated by U.S. EPA and published in the Federal Register on October 30, 2009, July 12, 2010, September 22, 2010, October 28, 2010, November 30, 2010, December 17, 2010, and April 25, 2011. 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 Subpart C of the CFR Part 98 provides an emissions rate for CO<sub>2</sub> of 0.05302 MT/MMBtu. Table C-2 of Subpart C of the 40 CFR Part 98 gives a default emission factor for CH4 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 NO2 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.

Jan-Sep 2020 California UOG Plants	Emissions Estimate (in MT)
Palomar Energy Center	
Miramar Energy Facilities	
Total	

Jan-Dec 2019 California UOG Plants	Emissions Estimate (in MT)
Palomar Energy Center	
Miramar Energy Facilities	
Total	

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3 In addition, SDG&E has agreements with some California generators which stipulate that 4 if SDG&E is dispatching the plant, then SDG&E will provide compliance instruments to the generator for its GHG compliance obligations. The generators covered by these agreements 5 include, the Otay Mesa Energy Center ("OMEC")<sup>12</sup>, the Orange Grove Energy Center ("Orange 6 Grove"), the Escondido Energy Center ("EEC"), the Pio Pico Energy Center ("Pio Pico") and the 7 Carlsbad Energy Center ("Carlsbad"), which became operational in 2018.<sup>13</sup> The estimated 8 9 emissions for these plants can be calculated by multiplying the MMBtu burned with the emission 10 factor of 0.05307 MT/MMBtu associated with natural gas as the input fuel. These estimates are 11 subject to change, not only because the emissions estimates are based on fuel calculations instead 12 of emission meter read calculations, but also because the tolling agreement contracts state that 13 SDG&E will only cover the emissions generated resulting from SDG&E dispatches of efficiently run plants. The 2019 estimated SDG&E obligations to tolling agreement partners are shown 14 below. SDG&E will be analyzing the 2019 tolling data and could potentially adjust the 2019 15

<sup>&</sup>lt;sup>12</sup> In October 2019, the OMEC-PPA expired and was replaced by a new capacity-only agreement which shifts the burden of purchasing compliance instruments-back to Otay MesaMEC. As such Otay <u>MesaMEC no longer contributes to SDG&E's Cap-and-Trade Obligation portfolio, though it did</u> contribute during 2018-2019. See AL 3476-E.

<sup>&</sup>lt;sup>13</sup> Goal Line became eligible to exit the Cap-and-Trade program retroactive to January 1, 2018.

1 estimated emissions for non SDG&E dispatches, inefficiencies or based on verification. If there

#### 2 are such changes, they will be reflected in future testimony.

(in MT)

Jan-Sep 2020 California Tolling Generators	Emissions Estimate (in MD)
Orange Grove Energy Center	
Escondido Energy Center	
Pio Pico	
Carlsbad Energy Center	
Total	

Jan-Dec 2019 California Tolling Generators	Emissions Estimate (in MI)
Otay Mesa Energy Center	
Orange Grove Energy Center	
Escondido Energy Center	
Pio Pico	
Carlsbad Energy Center	
Total	

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An entity that delivers out-of-state electricity to a delivery point inside California is also
responsible for the GHG emissions associated with generation of that electricity. For known
imports, called "specified sources," the estimated GHG emissions related to the portion of outputs
of plants that are delivered to California are covered in the cap-and-trade program and as such the
importer of that electricity has a compliance obligation. SDG&E has a contract with Yuma
Cogeneration Associates ("YCA") in Arizona and owns the Desert Star Energy Center ("Desert
Star") combined cycle plant in Nevada. These out-of-state generators are specified sources. The

compliance obligation for the power imported from each of these sources is calculated by the
 product of the imported power times the transmission loss correction factor as listed in section
 95111 of ARB's mandatory reporting regulation, and the specified emissions factor assigned to
 those facilities by ARB.<sup>14</sup> As with SDG&E's other estimated obligations, specified imports are
 also subject to change, and those changes will be reflected in future testimony. The 2019
 estimated emissions for SDG&E's specified imports which became final in August 2020, and the
 January – September 2020 estimated emissions for SDG&E's specified imports are as follows:

Jan-Dec 2019 Specified Imports	Verified Specified Imports (in MWh)	Specified Emission Factor	Transmission Loss Factor	Verified Emissions (in MT)
Desert Star		0.411	1.00	
YCA		0.511	1.02	
Total				

Jan-Sep 2020 Specified Imports	Specified Import Estimates	Emission Factor Estimates	Transmission Loss Factor	Emissions Estimate (in MT)
Desert Star		0.411	1.00	
YCA		0.511	1.02	
Total				

Jan-Dec 2019 Specified Imports	Specified Import Estimates	Emission Factor Estimates	Transmission Loss Factor	Emissions Estimate (in MD)
Desert Star		0.423	1.00	
YCA		0.645	1.02	
Total				

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In addition to specified sources, importing of "unspecified sources" also generates a

12 compliance obligation. SDG&E procured both contracted imports and market imports from

13 unspecified sources in 2019 and 2020. The cap-and-trade compliance obligation for these

<sup>&</sup>lt;sup>14</sup> Specified Emission Factors are updated annually by ARB. See Confluence, Reporting Form Instructions, available at: http://www.ccdsupport.com/confluence/display/calhelp/Reporting+Form+Instructions.

unspecified imports is calculated by multiplying the number of MWh imported, adjusted upward 1 2 by two percent to account for transmission losses between the point of generation and the 3 California border, by the ARB default rate, as stated in its regulation (currently 0.428 MT/MWh).<sup>15</sup> 4 Finally, ARB recognizes that the building of new renewable generation outside California reduces 5 GHG. As such, the cap-and-trade regulations allow for an RPS Adjustment. The RPS Adjustment reduces an entity's GHG compliance burden and is calculated by assigning the default emission 6 rate (currently 0.428 MT/MWh) to the GHG-free renewable energy, as measured at the point of 7 generation. The adjustment does not account for the transmission losses from the point of 8 generation to California,<sup>16</sup> and the cap-and-trade regulations also allow that they be taken in 9 following years. SDG&E successfully claimed the undelivered portion of its potential 2014 RPS 10 11 Adjustment in 2015. SDG&E has been is unable was planning to claim undelivered portions of the 12 2015-20198 contractually purchased renewable energy applicable to the RPS Adjustment provision in recent GHG reports to ARB and- SDG&E will not be claiming the RPS Adjustment for 2019 or 13 2020However, the data for the 2015 2018 RPS Adjustment was unavailable, thus SDG&E 14

15 necessarily claimed zero RPS Adjustment for the RPS generated in years 2015 2018.<sup>17</sup> If, as

<sup>&</sup>lt;sup>15</sup> ARB's Mandatory Reporting Regulation, Section 95111(b)(1). See Section 95852(be)(1)(C) in ARB, Article 5: California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms at 1186, available at: https://ww2.arb.ca.gov/sites/default/files/classic//cc/capandtrade/ct\_reg\_unofficial.pdfhttps://ww3.arb.c a.gov/cc/reporting/ghg\_rep/regulation/mrr\_2018\_unofficial\_2019\_4-3.pdf?\_ga=2.248590913.797450650.1572910305\_557391757.1471971036.

 <sup>&</sup>lt;sup>16</sup> See Section 95852(b)(1) of ARB's Final Regulation Order for the calculation of the RPS Adjustment. ARB, Article 5: California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms, at 11<u>7</u>5, Section 95852(b)(1), available at https://ww2.arb.ca.gov/sites/default/files/classic//cc/capandtrade/ct\_reg\_unofficial.pdfhttps://ww3.arb.ca.gov/cc/capandtrade/ct\_reg\_unofficial.pdf.

<sup>&</sup>lt;sup>17</sup> SDG&E's ability to utilize the non-imported portion of its Glacier and Rim\_Rock 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 2015-2018 generation years. SDG&E

expected, the RPS Adjustment data for any prior year(s) becomes available in the future, SDG&E 1 2 will incorporate that benefit in an upcoming annual ARB Electric Power Entity ("EPE") report. 3 SDG&E is continuing to request delivered/undelivered volumes and expects to receive 2015 2018 RPS Adjustment data in 2020 in time to utilize that benefit in the upcoming 2019 EPE Report. 4 5 The estimated 2019 RPS Adjustment claims are shown below. Both the estimated 202019 unspecified imports and the RPS Adjustments claimed for 202019 are subject to change and those 6 7 changes will be reflected in future testimony. The 2019 estimated emissions for SDG&E's 8 unspecified imports and RPS adjustment claims, which became final in August 2020, and the 9 January – September 2020 estimated emissions for SDG&E's unspecified imports and RPS

10 <u>adjustment claims</u> are as follows:

continues to have discussions with Morgan Stanley and Open Access Technology International, Inc. ("OATI") about obtaining this data and <u>may expects to</u> receive it in the future at which point SDG&E can apply the prior RPS Adjustment volumes to the next compliance year's report.

Jan-Dec 2019 Unspecified Impo	rts & 2018 RPS	Adjustment	Unsp In	rified ecified iport MWb)	Emi	ecified ssion ctor	Transmis Loss Fac		Verified Emissions (in MT)
Unspecified Impo	rts					0.428		1.02	
RPS Adjustment						0.428		1.00	
Total									
Jan-Sep 2020 Unspecified Impo	rts & 2019 RPS	Adjustment	In Esti	ecified port mates MWb)	Emi	ecified ssion ctor	Transmis Loss Fac		Emissions Estimate (in MT)
Unspecified Impo	rts					0.428		1.02	
RPS Adjustment						0.428		1.00	
Total									
Jan-Dec 201 Unspecified 2018 RPS A	Imports &	Unspecii Import Esti (in MW	mates	Unspec Emis Fact	sion		mission Factor	E	nissions stimate in MI)
Unspecified	Imports				0.428		1.02		
RPS Adjust Total	ment				0.428		1.00		
	ove, SDG&F		<del>etual</del> v	verified	0.428	anuary	1.00	mber	<u>2020</u>
Total Based on the abo	ove, SDG&F ince obligati Jan-Dec	ons are:		verified	0.428	Ve Emi	1.00	mber	<u>2020</u>
Total Based on the abo	ove, SDG&F ance obligati Jan-Dec Direct Co California	ions are: 2019 2019 Ompliance Obli 2006 Plants	gations	verified	0.428	Ve Emi	1.00 - Septer rified ssions	mber	<u>2020</u>
Total Based on the abo	ove, SDG&F ince obligati Jan-Dec Direct Co California California	ons are: 2019 mpliance Obli 1 UOG Plants 1 Tolling Genera	gations	verified	0.428	Ve Emi	1.00 - Septer rified ssions	mber	<u>2020</u>
Total Based on the abo	ove, SDG&F ince obligati Jan-Dec Direct Co California Specified	ons are: 2019 2019 200G Plants 200G Plants 2001 Tolling General 2001 Imports	gations	verified	0.428	Ve Emi	1.00 - Septer rified ssions	mber	<u>2020</u>
Total Based on the abo	ove, SDG&F ince obligati Jan-Dec Direct Co California Specified	2019 2019 2019 2000 Plants 2000 Plants 200	gations	verified	0.428	Ve Emi	1.00 - Septer rified ssions	mber	<u>2020</u>

I

Jan-Sep 2020 Direct Compliance Obligations	Estimate	Jan-Dec 2019 Direct Compliance	Emissions Estimate
California UOG Plants		Obligations	(in MT)
California Tolling Generators		California UOG Plants	
Specified Imports		California Tolling Specified Imports	
Unspecified Imports		Unspecified Imports	
RPS Adjustment		RPS Adjustment	
Total		Total	

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#### B. **Indirect Greenhouse Gas Emissions**

SDG&E, along with all other purchasers of wholesale electricity, is subject to indirect GHG compliance costs that generators incur and pass on to their buyers. This additional cost of GHG compliance is embedded in the market price of electricity procured in the wholesale market from third parties, thereby increasing SDG&E's cost to purchase wholesale electricity, as well as from suppliers under contracts that include market-based prices. The cost of GHG affects both market purchases and contracts based on the price of energy (such as combined heat and power 8 9 ["CHP"] facilities); because the price of energy changes in tandem with the change in the GHG 10 allowance prices, sellers of electricity demand higher revenues to offset the costs related to their 11 cap-and-trade obligations. The 2019-2020 indirect GHG volumes are estimated, for both net 12 market purchases and CHP contracts, as the MWh of electricity production multiplied by the ARB 13 default rate for unspecified electricity of 0.428 MT/MWh. The estimated 2019 estimated 2019 and 14 forecasted 202019 MWh and emissions of SDG&E's indirect purchases are as follows:

	2019 Indirect Volumes in MWh and MT
	Total INDIRECTS (MWh)
	Unspecified Emissions Factor (MT/MWh) 0.428
1	Total INDIRECTS (MT)
	2019 Forecasted Indirect Volumes in MWh and MT
	Total INDIRECTS (MWh)
	Unspecified Emissions Factor (MT/MWh) 0.428
2	Total INDIRECTS (MI)
	2020 Forecasted Indirect Volumes in MWh and MT
	Total INDIRECTS (MWh)
	Unspecified Emissions Factor (MT/MWh) 0.428
2	Total INDIRECTS (MT)
3	
4	C. GHG Costs
•	
5	Using the prices from Section III above, the 2019 direct GHG costs and 2020 estimated
6	direct costs are as follows:
v	
	Verified Direct GHG
	2019 GHG Direct Costs Emissions Emissions Price Cost
	(in MT) (in \$/MT)
	Jan-Dec 2019
7	Total
7	
	Direct GHG
	2019 GHG Direct Costs     Verified     Emissions       Cost     Emissions     Cost
	(in MI) (in \$MD)
	Jan-Dec 2019
8	Total
9	
	Emissions Direct GHG Estimated
	2020 GHG Direct Costs Estimate (in MT) (in \$/MT) Direct Cost
	Jan-Sep 2020 (emissions estimate)
10	Oct - Dec 2020 (forecasted)
10	Total

#### AGBSDL-15

Combining indirect volumes and the CAISO GHG allowance price indices,<sup>18</sup> the 2019-

## 2 <u>2020</u> estimated GHG indirect costs are as follows:

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2019 Indirect Volumes & Cost		
Total INDIRECTS (MT)		
CAISO GHG Price (Jan-Dec 2019) (\$/MT) \$17.		\$17.28
Total Indirect Cost		

2019 Forecasted Indirect Volumes & Cost		
Total INDIRECTS (MT)		
CAISO GHG Price (Jan-Dec 2019) (\$/MT) \$1		\$17.28
Total Indirect Cost		

2020 Forecasted Indirect Volumes & Cost		
Total INDIRECTS (MT)		
CAISO GHG Price (Jan-Dec 2020) (\$/MT)		\$17.10
Total Indirect Cost		

Thus, the 2019 and 2020 Direct and Indirect estimate blended costs is are \$30.19 \$723.072

7 million and \$49.81 million (rounded) respectively.

### V. ACTUAL AND ESTIMATED GHG REVENUES

SDG&E received 6,<u>186,937</u> 288,321 MT of vintage 2019 allowances to sell at 2019

10 auctions and 6,143,947 MT of vintage 2020 allowances to sell at 2020 auctions. SDG&E's annual

- 11 allocated allowances are required to be consigned at that year's quarterly auctions; however,
- 12 SDG&E has full discretion on how to distribute its allowances across the four quarterly auctions.
- 13 The tables below show the volumes sold at each 2019 auction and at the first three 2020 auctions.
- 14 with an estimate for the last 2020 auction along with associated revenues.

<sup>&</sup>lt;sup>18</sup> Per D.14-10-033 at 25, indirect costs are calculated using a proxy price equal to the <u>annual average of the CAISO GHG Allowance Price Index for the current yearaverage of the published CAISO GHG index daily prices in OASIS.</u>

	2019	GHG Revenues	
Auction	Settlement Price (\$/MT)	Sold Volume (MT)	Revenue
Feb-19	\$15.73		
May-19	\$17.45		
Aug-19	\$17.16		
Nov-19	\$17.00		
Total	\$16.83	6,186,937	\$104,156,909

2020 GHG Revenues Jan - Sep 2020			
Auction	Settlement Price (\$/MT)	Sold Volume (MT)	Revenue
Feb-20	\$17.87		
May-20	\$16.68		
Aug-20	\$16.68		
Nov-20	\$0.00		
Total	\$17.08		

2020 Estimated GHG Revenues Oct - Dec 2020			
Auction	ICE Price (\$/MT)	Consign Volume (MT)	Revenue
2020			
Balance	\$18.29		
Total	\$18.29		

	2020 Estim	ated GHG Reve	nues
Total		6,143,947	\$106,782,171

	2019	GHG Revenues	
Auction	Settlement Price (\$/MT)	Sold Volume (MT)	Revenue
Feb-19	\$15.73		
May-19	\$17.45		
Aug-19	\$17.16		
Nov-19	\$17.00		
Total	\$16.83		

This concludes my <u>updated</u> prepared direct testimony.

1	VI.	QUALIFICATIONS

2	My name is Scott D. Lewis. My business address is 8315 Century Park Court, San Diego,
3	CA 92123. I am employed by San Diego Gas & Electric as the Electric & Fuels Trading Manager
4	in the Energy Supply and Dispatch Department. My responsibilities include managing the
5	execution of SDG&E's GHG portfolio and also the day ahead and forward procurement of
6	electricity and natural gas that serves SDG&E's electric portfolio. I assumed my current position
7	<u>in August 2014.</u>
8	I have been employed by SDG&E in numerous positions including Senior Electric Fuels
9	Trader, Electricity Trader, Electricity Pre-scheduler, and Electric Real Time Operations. I have
10	been responsible for natural gas scheduling and trading, electricity scheduling and trading,
11	outage management and demand forecasting.
12	I hold a Bachelor's degree in Business Administration with an emphasis in Finance from
13	California State University, Chico. Ana Garza Beutz. My business address is 8315 Century Park
14	Court, San Diego, CA 92123. I am employed by SDG&E as a Principal Energy Administrator in
15	the Electric & Fuel Procurement Department. My responsibilities include managing SDG&E's
16	GHG portfolio, which includes development of GHG procurement and hedging strategies.
17	I joined SDG&E in November 2003 and have held various positions with increasing
18	levels of responsibility within the Electric & Fuels Procurement Department. Prior to joining
19	SDG&E, I worked as a Risk Analyst with Sempra Energy.
20	I received a Bachelor of Science degree in Mathematics from the California Polytechnic
21	State University San Luis Obispo and a Master of Arts in Mathematics from the University of
22	California Santa Barbara.
23	I have previously testified before the California Public Utilities Commission.

AGBSDL-18

# GLOSSARY

Acronym	Definition	
AB	Assembly Bill	
ARB	California Air Resources Board	
CAISO	California Independent System Operator	
САМ	Cost Allocation Mechanism	
CARB	California Air Resources Board	
CEMS	Continuous Emissions Monitoring System	
CO2e	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	

**APPENDIX A** 

DECLARATION OF ELSA VALAY-PAZ REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-024, et al.

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

#### DECLARATION OF ELSA VALAY-PAZ REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-24, *et al.*

I, Elsa Valay-Paz, do declare as follows:

1. I am the Director of Origination, 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 Miguel Romero, Vice President of Energy Supply. I have reviewed Scott Lewis's Prepared Direct Testimony ("Testimony") and Attachment G, the GHG Revenue and Reconciliation Application Form, in support of SDG&E's "November Update to Application", related to its Application for approval of its 2021 Electric Procurement Revenue Requirement Forecasts and GHG Related-Forecasts ("Application"), filed November 6, 2020. 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.

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 Mr. Lewis's Testimony and Attachment G are within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachment A, 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 6<sup>th</sup> day of November, 2020, at San Diego.

DocuSigned by: Chilalauthan

Elsa Valay-Paz Director of Origination, Energy Supply & Dispatch

# ATTACHMENT A

# SDG&E Request for Confidentiality on the following information contained in Scott Lewis's Testimony and Attachment G in support of SDG&E's Application

Location of	Legal Citations	Narrative Justification
Protected	_	
Information		
1. SDG&E Direct GHG Emissions Price and Direct GHG Emissions calculations (The 2019 and Jan – Sep 2020 Direct GHG Emissions price appears in Scott Lewis's Testimony. The Jan 2013 - Sep 2020 Direct GHG Emissions calculations are utilized in tab "D- 2" of Attachment G.	<ul> <li>D.08-04-023</li> <li>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code</li> <li>Section 454.5(g)</li> <li>General Order ("GO") 66-D</li> <li>17 CCR § 95914(c) (the "ARB Confidentiality Regulations")</li> <li>The GHG Confidential Information Matrix in Attachment A of D.14-10- 033 and revised in D.15-01- 024</li> <li>The Matrix makes the following confidential: "Weighted Average Cost (WAC) of compliance instruments, and the calculation of WAC"</li> <li>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</li> </ul>	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. 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&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & 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. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&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&E and its end-use ratepayers.
2. Historical/Reco rded UOG Emissions	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	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.

			Among other things, 17 CCR Section 95914(c)(1) of the Cap-
		General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction-
			related information. Violation of Section 95914 may subject
		17 CCR § 95914(c) (the	SDG&E to penalties by the California Air Resources Board.
	(The 2019 and	"ARB Confidentiality	
	Jan – Sep 2020	Regulations")	In addition, Attachments A, C & D of D.15-01-024 and
	Historical UOG	Regulations )	Appendices A & B of D.15-10-032 require Auction-related
	Emissions appear		information, forecasts of emissions intensity, forecasts of
	in Scott Lewis's	Annual GHG Emissions and	greenhouse gas (GHG) costs, GHG transactions, compliance
	Testimony.	Associated Costs in	instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.
	The 2013-2019	Template D-2 of D.14-10-	GHO information to be kept confidential.
	and Jan - Sep	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	2020 Recorded	024	secret information because SDG&E's bidding/consignment
	UOG Emissions	Template D-2 designates	strategies contain "commercial value," which gives SDG&E "an
	appear in Attachment G of	forecasted and recorded	opportunity to obtain a business advantage over competitors
	this Application.)	UOG emissions as	who do not know or use it."
		confidential	
			Disclosure of this information would place SDG&E at an unfair
		Gov't Code §§6254(k),	business disadvantage relative to other Cap-and-Trade market participants and result in higher
		6254.7 (d), Evidence	Cap-and-Trade compliance costs for SDG&E and its end-use
		Code 1060, Civil	ratepayers.
2		Code §3426 et seq.	The Protected Information is entitled to confidential treatment
3.	Historia 1/Daaa	D.08-04-023	under applicable law, including, but not limited to, the legal
	Historical/Reco	D 14 10 022 D 16 09 024	authority cited herein. The information does not expressly fall
	rded California	D.14-10-033, D.16-08-024,	within any category of the IOU Matrix applicable to electric
	Tolling	D.17-05-035, D.17-09-023, Public Utilities Code	procurement information, but is market-sensitive information.
	Agreement Emissions	Section 454.5(g)	
	Emissions	Section 434.3(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
		General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction-
			related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
		17 CCR § 95914(c) (the	SDORE to penalues by the Camornia An Resources Board.
		"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
1		Regulations")	Appendices A & B of D.15-10-032 require Auction-related
		<u> </u>	information, forecasts of emissions intensity, forecasts of
1	(The 2019 and	Armed CHC Entering	greenhouse gas (GHG) costs, GHG transactions, compliance
1	Jan – Sep 2020	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	Tolling	Associated Costs in	GHG information to be kept confidential.
1	Agreement	Template D-2 of D.14-10- 033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	Emissions appear in Scott Lewis's	033 and revised in D.13-01- 024	secret information because SDG&E's bidding/consignment
	th Scott Lewis's Testimony.		strategies contain "commercial value," which gives SDG&E "an
1	The 2013-2019	Template D-2 designates	opportunity to obtain a business advantage over competitors
	and Jan - Sep	forecasted and recorded	who do not know or use it."
	2020 Tolling	Tolling Agreements	
	Agreement	emissions as confidential	Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market
	Emissions appear		participants and result in higher
	in Attachment G	Gov't Code §§6254(k),	Cap-and-Trade compliance costs for SDG&E and its end-use
1	of this Application.)	6254.7 (d), Evidence	ratepayers.
	<i>.</i>	Code 1060, Civil	
		Code §3426 et seq.	

4. Historical/Reco rded Specified Imported MWh and calculated Emissions (The 2019 and Jan – Sep 2020 Specified Imported MWh and calculated Emissions appear in Scott Lewis's Testimony. The 2013-2019 and Jan - Sep 2020 Recorded Specified Imported Emissions appear in Attachment G of this Application.)	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10- 033 and revised in D.15-01- 024 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.	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. 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&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & 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. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&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&E and its end-use ratepayers.
	Code 1060, Civil	
5. Historical/Reco	Code §3426 et seq. D.08-04-023	The Protected Information is entitled to confidential treatment
5. Historical/Reco rded Unspecified Imported MWh and calculated Emissions	D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D	under applicable law, including, but not limited 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. 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
(The 2019 and Jan – Sep 2020 Unspecified Imported MWh	17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-	<ul> <li>SDG&amp;E to penalties by the California Air Resources Board.</li> <li>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.</li> <li>Additionally, the Protected Information also includes trade secret information because SDG&amp;E's bidding/consignment</li> </ul>

	and calculated	033 and revised in D.15-01-	strategies contain "commercial value," which gives SDG&E "an
	Emissions appear	024	opportunity to obtain a business advantage over competitors
	in Scott Lewis's	Templete D 2 designates	who do not know or use it."
	Testimony.	Template D-2 designates forecasted and recorded	
	The 2013-2019		Disclosure of this information would place SDG&E at an unfair
	and Jan - Sep	Energy Imports (Unspecified)	business disadvantage relative to other Cap-and-Trade market
	2020 Unspecified	emissions as confidential.	participants and result in higher
	Imported Emissions appear	Knowledge of the MWh	Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
	in Attachment G	makes discovery of the	Tatepayers.
	of this	emissions possible, thus the	
	Application.)	MWh are also confidential.	
	(ipplication.)		
		Gov't Code §§6254(k),	
		6254.7 (d), Evidence	
		Code 1060, Civil	
		Code §3426 et seq.	
<i>6</i> .	Historical RPS	D.08-04-023	The Protected Information is entitled to confidential treatment
	Adjustment		under applicable law, including, but not limited to, the legal
	eligible MWh	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	and calculated	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
	Emissions	Public Utilities Code	procurement information, but is market-sensitive information.
		Section 454.5(g)	
			Among other things, 17 CCR Section 95914(c)(1) of the Cap-
		General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction-
			related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
		17 CCR § 95914(c) (the	SDO&E to penanties by the Camornia All Resources Board.
		"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
		Regulations")	Appendices A & B of D.15-10-032 require Auction-related
		Regulations )	information, forecasts of emissions intensity, forecasts of
			greenhouse gas (GHG) costs, GHG transactions, compliance
		Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	(The RPS	Associated Costs in	GHG information to be kept confidential.
	Adjustment	Template D-2 of D.14-10-	
	eligible MWh and	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	calculated	024	secret information because SDG&E's bidding/consignment
	Emissions for	Tamalata D 2 dasianatas	strategies contain "commercial value," which gives SDG&E "an
	2019 and Jan –	Template D-2 designates	opportunity to obtain a business advantage over competitors
	Sep 2020 appear	forecasted and recorded	who do not know or use it."
	in Scott Lewis's	Energy Imports (Unspecified)	Disclosure of this information would place SDG&E at an unfair
	Testimony.	emissions, which includes	business disadvantage relative to other Cap-and-Trade market
	The 2013-2019	any applicable RPS	participants and result in higher
	and Jan - Sep	Adjustments as confidential.	Cap-and-Trade compliance costs for SDG&E and its end-use
	2020 RPS	Knowledge of the MWh	ratepayers.
	Adjustment	makes discovery of the	
	Emissions appear in Attachment G	emissions possible, thus the	
	of this	MWh are also confidential.	
	Application.)		
		Gov't Code §§6254(k),	
		6254.7 (d), Evidence	
		Code 1060, Civil	
		Code §3426 et seq.	

7.	Total Direct	D.08-04-023	The Protected Information is entitled to confidential treatment
	Compliance		under applicable law, including, but not limited to, the legal
	Obligation	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	Obligation	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
			procurement information, but is market-sensitive information.
		Public Utilities Code	r · · · · · · · · · · · · · · · · · · ·
	(The 2019 and	Section $454.5(g)$	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
	Jan – Sep 2020		and-Trade regulations prohibits disclosure of any auction-
	Total Direct	General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
	Compliance		SDG&E to penalties by the California Air Resources Board.
	Obligation	17 CCR § 95914(c) (the	SDORE to penantes by the Camornia An Resources Board.
	appears in Scott		Le all'den Attalacente A. C. & D. (D. 15.01.024 en l
	Lewis's	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	Testimony.	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
	The 2013-2019		information, forecasts of emissions intensity, forecasts of
	and Jan - Sep		greenhouse gas (GHG) costs, GHG transactions, compliance
	2020 Total Direct	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	Compliance	Associated Costs in	GHG information to be kept confidential.
	Obligation appear	Template D-2 of D.14-10-	
	in Attachment G	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	of this	024	secret information because SDG&E's bidding/consignment
	Application.)		strategies contain "commercial value," which gives SDG&E "an
	Application.)	Template D-2 designates	opportunity to obtain a business advantage over competitors
		forecasted and recorded	who do not know or use it."
		Direct GHG Emissions	
		Subtotal as confidential.	Disclosure of this information would place SDG&E at an unfair
			business disadvantage relative to other Cap-and-Trade market
		Gov't Code §§6254(k),	participants and result in higher
			Cap-and-Trade compliance costs for SDG&E and its end-use
		6254.7 (d), Evidence	ratepayers.
		Code 1060, Civil	
		Code §3426 et seq.	
8.	Indirect	D.08-04-023	The Protected Information is entitled to confidential treatment
	Purchases in		under applicable law, including, but not limited to, the legal
	MWh and	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	calculated	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
	Emissions	Public Utilities Code	procurement information, but is market-sensitive information.
	Emissions		
		Section 454.5(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
			and-Trade regulations prohibits disclosure of any auction-
		General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
			SDG&E to penalties by the California Air Resources Board.
		17 CCR § 95914(c) (the	
	(The 2019 and	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	2020 forecasted	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
	Indirect Purchase	- 3 )	information, forecasts of emissions intensity, forecasts of
	MWhs and		greenhouse gas (GHG) costs, GHG transactions, compliance
	calculated	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	Emissions appear	Associated Costs in	GHG information to be kept confidential.
	in Scott Lewis's	Template D-2 of D.14-10-	1
	Testimony.	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	The 2013-2019	033 and revised in D.13-01- 024	secret information because SDG&E's bidding/consignment
	final and 2020	024	strategies contain "commercial value," which gives SDG&E "an
	forecasted	Template D-2 designates	opportunity to obtain a business advantage over competitors
	Indirect Emission	forecasted and recorded	who do not know or use it."
	calculations	rerecusies and recorded	
	appear in		
	uppour m	1	

	Attachment G of this Application.)	Indirect GHG Emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus, the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	Disclosure of this information would place SDG&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&E and its end-use ratepayers.
		Code §3426 et seq.	
9.	Direct GHG Costs (The 2019 and estimated 2020 Direct GHG Costs appear in Scott Lewis's Testimony. The 2013 – 2019 final and 2020 estimated Direct GHG Costs appear in Attachment G of this Application.)	<ul> <li>D.08-04-023</li> <li>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code</li> <li>Section 454.5(g)</li> <li>General Order ("GO") 66-D</li> <li>17 CCR § 95914(c) (the "ARB Confidentiality Regulations")</li> <li>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10- 033 and revised in D.15-01- 024</li> <li>Template D-2 designates forecasted and recorded Direct GHG Costs as confidential.</li> <li>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</li> <li>D.08-04-023</li> </ul>	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. 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&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & 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. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&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&E and its end-use ratepayers.
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<i>Lewis's</i> <i>Testimony.</i> <i>The 2013 - 2019</i> <i>actual GHG</i> <i>Quarterly</i> <i>Auction Revenues</i> <i>and estimated</i> Quarterly <i>Auction Revenues</i> <i>and estimated</i> <i>Auction Revenues</i> <i>Auction Revenues</i> <i>and estimated</i> <i>Auction Revenues</i> <i>and estimate Auction Revenues</i> <i>Auction Revenu</i>	Auction Revenues	0	who do not know or use it."
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Auction Revenues Gov't Code §§6254(k),	Auction Revenues	Gov t Code §§6254(K),	

appear in	6254.7 (d), Evidence	
Attachment G of	Code 1060, Civil	
this Application.)	Code §3426 et seq.	
12. Emissions Intensities	D.08-04-023	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal
Intensutes	D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	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. Among other things, 17 CCR Section 95914(c)(1) of the Cap-
	General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction- related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
(The 2013-2019 final and 2020- 2021 forecasted Emissions Intensities appears in Attachment G of this Application.)	17 CCR § 95914(c) (the "ARB Confidentiality Regulations") The GHG Confidential Information Matrix in Attachment A of D.14-10- 033 and revised in D.15-01- 024 The Matrix makes the following confidential:	In addition, Attachments A, C & D of D.15-01-024 and Appendices A & 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. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."
	"Forecast of GHG Emissions Intensity" Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.