

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2021
Electric Procurement Revenue Requirement
Forecasts and GHG-Related Forecasts

Application 20-04-_____

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF ITS 2021 ELECTRIC PROCUREMENT REVENUE
REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS**

****REDACTED – PUBLIC VERSION****

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April 15, 2020

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I. INTRODUCTION

In compliance with California Public Utilities Commission (“Commission”) Decisions (“D.”) 02-10-062, D.02-12-074, D.04-01-050, D.13-09-003, D.14-10-033, D.19-06-026 and D.20-03-019 as well as the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) hereby submits this Application (“Application”) for Approval of its 2021 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Portfolio Allocation Balancing Account (“PABA”) revenue requirement; (3) the Competition Transition Charge (“CTC”) revenue requirement tracked in the Transition Cost Balancing Account (“TCBA”);¹ (4) the Local Generation (“LG”) revenue requirement tracked in the Local Generating Balancing Account (“LGBA”);² (5) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement tracked in SDG&E’s Nuclear Decommissioning Adjustment Mechanism (“NDAM”) account; (6) the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement; and (7) the GHG allowance revenues and return

¹ The purpose of the TCBA is to accrue all the CTC revenues and recover all CTC-eligible generation-related costs.

² The purpose of the LGBA is to record revenues and costs of generation and other energy sources where the Commission has determined that the resource is subject to the Cost Allocation Mechanism (“CAM”).

allocations. SDG&E also requests authorization to return the overcollected 2018 balance recorded to the LGBA. Lastly, SDG&E requests approval for its proposed 2021 (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables (“GTSR”) Program. SDG&E respectfully requests that the Commission approve the forecasts and proposals in this Application for recovery in rates beginning January 1, 2021.

As discussed in greater detail below and in the testimony accompanying this Application, SDG&E hereby requests approval of a total 2021 forecasted revenue requirement of \$920.317 million.³ This total forecast is comprised of 2021 forecasts of the following:

- (1) the ERRA revenue requirement: \$604.409 million (includes 2021 forecast GHG costs of \$12.793 million);
- (2) the PABA revenue requirement: \$373.828 million;⁴
- (3) the CTC revenue requirement: \$16.673 million;
- (3) the LG revenue requirement: \$137.895 million (excludes LGBA overcollection of \$(91.084) million);
- (4) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement: \$1.073 million;
- (5) the TMNBC revenue requirement as set forth in the Testimony of Khoang T. Ngo and confidentiality declaration attached thereto; and

³ This forecasted revenue requirement includes Franchise Fees and Uncollectibles (“FF&U”). SDG&E is also requesting approval of its 2021 TMNBC revenue requirement, which is set forth in the Testimony of Khoang T. Ngo and confidentiality declaration attached thereto. SDG&E omitted the 2021 TMNBC revenue requirement figures from the text of this Application due to confidentiality concerns.

⁴ The 2020 forecasted PABA over/undercollection balance will be included in the November Update.

(6) the following GHG allowance revenue return allocations:⁵

(a) \$122.477 million for residential California Climate Credit (“CCC”).⁶

Those GHG allowance revenue return allocations are based on the following 2021 forecasts of GHG revenues and expenses, for which SDG&E also requests approval:

(1) the GHG allowance revenues: \$121.114 million;

(2) the GHG allowance revenue set aside for clean energy/energy efficiency programs of \$1,030 million; and

(3) the GHG administration, customer education and outreach plan costs of \$0.059 million.

The 2021 revenue requirement forecasts for ERRA, PABA, CTC, LG, SONGS Unit 1 Offsite Spent Fuel Storage Costs, the GHG allowance revenue return, and the sum of the 2018 LGBA activity result in a total revenue requirement decrease of \$574.866⁷ million compared to the amounts currently effective in rates.⁸ These components are shown in detail in Table 1, below.

⁵ The Emissions Intensive and Trade Exposed (“EITE”) and Small Business Volumetric Return has ended as of 2020 (D.12-12-033, Appendix 2).

⁶ The residential California Climate Credit is the semi-annual line item credit that goes to residential customers. It was previously referred to as the “climate dividend.” Pursuant to D.14-01-012, the Energy Division issued a letter on January 27, 2014 notifying the electric utilities that “California Climate Credit” will be used as the name for all on-bill credits of GHG allowance revenues.

⁷ This amount excludes the 2021 TMNBC revenue requirement due to confidentiality concerns.

⁸ On January 16, 2020, the Commission approved SDG&E’s “Application of San Diego Gas & Electric Company for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts” (Application [“A.”] 19-04-010) (“2020 Application”), as updated on November 7, 2019 in “San Diego Gas & Electric Company’s November Update to Application.” See D.20-01-005. SDG&E implemented its approved forecasts in rates in Advice Letter (“AL”) 3500-E. The rate impacts resulting from the revenue requirements requested in this application are calculated using current effective rates as of April 1, 2020 (Advice Letter 3514-E) and current authorized sales, which includes the 2019 test year. D.18-11-035 authorized SDG&E to update its sales forecast for 2019. SDG&E has filed A.19-03-002 (2019 GRC Phase 2) to update its authorized sales to include the 2020-2022 forecast years, which is currently pending before the Commission.

TABLE 1
ERRA, PABA, CTC, LG, SONGS and GHG Revenue Requirements
(Includes FF&U) (\$000)

Line	Description	Currently Effective Revenue Requirement	2021 Revenue Requirement	Change from Current
1	ERRA	\$801,215	\$604,409	\$(196,807)
2	PABA	\$363,421	\$373,828	\$10,406
3	CTC	\$18,725	\$16,673	\$(2,052)
4	LG	\$132,914	\$137,895	\$4,981
5	SONGS Unit 1 Spent Fuel	\$1,073	\$1,073	\$0
6	PABA Balance	\$254,054	\$0	\$(254,054)
7	LGBA Overcollection	\$14,420	\$(91,084)	\$(105,504)
8	Subtotal	\$1,585,822	\$1,042,794	\$(543,028)
GHG Allowance Revenues Eligible for Return to Customers				
9	GHG EITE	\$(427)	\$0	\$427
10	GHG Small Business	\$(2,902)	\$0	\$2,902
11	GHG CCC	\$(87,310)	\$(122,477)	\$(35,166)
12	Subtotal	\$(90,639)	\$(122,477)	\$(31,838)
13	Total⁹	\$1,495,183	\$920,317	\$(574,866)

In total, these changes would decrease the current system average rate by 2.734 cents per kilowatt hour, or 11.39%. A typical non-California Alternative Rates for Energy (“CARE”) residential customer in the inland climate zone using 400 kilowatt-hours could see a monthly summer bill decrease of 8.7%, or \$10.17 (from \$117.41 to \$107.24). A typical non-CARE residential customer in the inland climate zone using 400 kilowatt-hours could see a monthly winter bill decrease of 9.4%, or \$10.10 (from \$107.60 to \$97.50).^{10 11} As indicated in footnote 6 above, the rates that SDG&E will

⁹ Sums may not equal due to rounding. Sums do not include the TMNBC revenue requirement.

¹⁰ Customers’ actual bill impacts will vary with usage per month, by season and by climate zone.

¹¹ These changes reflect the TMNBC revenue requirement.

implement on January 1, 2021 in connection with the revenue requirements for which SDG&E seeks approval in this application could change if the Commission approves SDG&E's request to update its authorized sales. The key drivers underlying the changes in the 2021 forecasted revenue requirements (as compared to the 2020 revenue requirements) are lower load and market prices, accompanied with contract changes and the exclusion of the PABA undercollection balance. Section VIII below summarizes the relief SDG&E requests from the Commission in this Application.

SDG&E's 2021 ERRRA Application presents forecasts and proposals utilizing input and assumptions based on several anticipated events that have uncertainties as to timing, duration and magnitude. Notably, the 2021 forecast reflects significant load departure as Community Choice Aggregations ("CCAs") are expected to depart SDG&E's bundled service throughout the year. Since approximately half of SDG&E's customers are currently expected to depart bundled service by the end of 2021, the forecast is subject to numerous, unprecedented uncertainties. For example, the forecast could be impacted by: (1) the specific timing and magnitude of CCA load departures; (2) the Commission's direction on portfolio optimization and resource allocation to departing load, and other issues being addressed in the PCIA OIR (R.17-06-026); (3) the disconnect between SDG&E's General Rate Case authorized sales forecast¹² (which presently does not reflect CCA load departure in 2021) and SDG&E's revenue forecast (which does reflect departed load); and (4) potentially other presently unknown factors or factors that cannot be planned for in April 2020 with certainty or precision. Of

¹² In D.17-08-030, the Commission approved SDG&E's request for an extension of time to file its 2019 GRC Phase 2 application and to bifurcate the submittal of SDG&E's proposed 2019 electric sales forecast from all other aspects of its 2019 GRC Phase 2 application. Accordingly, SDG&E filed on March 1, 2018 its Application for Approval of its 2019 Electric Sales Forecast (A.18-03-003) to update its authorized sales. D.18-11-035 in that proceeding authorized SDG&E to update its sales forecast. This change was implemented in SDG&E's Consolidated AL 3326-E, effective January 1, 2019 and remains effective in 2020.

particular note, the short- and long-term impacts of COVID-19 on SDG&E's electricity customers, suppliers and current or anticipated CCAs are unknown.

For these and likely other unknown, unique circumstances, SDG&E may need to update its Record Year 2021 ERRR Application or seek leave for other relief as may be necessary to ensure that any material developments impacting SDG&E's forecast can be addressed in a timely manner. Additionally, SDG&E anticipates a Commission decision in its 2019 General Rate Case Phase 2 proceeding (A.19-03-002) in which, among other things, SDG&E's sales forecast for 2021 may be updated. At present, a decision in that proceeding is expected by year-end, but could ultimately be delayed into 2021. Accordingly, timely coordination of the 2021 ERRR Application with these developments and other Commission proceedings will be key. SDG&E will, of course, update the Commission and parties regarding the implications of these matters in its November 2020 Update in this proceeding; however, it is possible that there may need to be additional updates or adjustments during the course of this proceeding as various uncertainties are resolved or rendered less uncertain. Regardless of this fluid, multi-factored situation, SDG&E nonetheless is planning for and requesting a Final Decision in this proceeding in December 2020.

II. SUMMARY OF APPLICATION

SDG&E's 2021 forecasts and proposals in this Application contain several categories of electric procurement activities, each of which is described below and discussed in testimony. Prior to 2016, SDG&E had filed an annual application seeking approval of its forecasted revenue requirements for ERRR, CTC and LG and a separate application regarding GHG-related forecasts. In accordance with D.14-10-033, in which the Commission directed the utilities to incorporate GHG-related forecasts and proposals into their annual ERRR forecast applications, SDG&E began including its GHG-related forecasts in its 2016 Application and has continued that approach ever since. Likewise, as in prior

Applications, SDG&E is again proposing to incorporate its 2021 forecast of its SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – formerly an element of its General Rate Cases (“GRC”) – in this Application. In accordance with D.19-10-001, SDG&E has included its PABA revenue requirement in this Application. In addition, SDG&E seeks to recover its 2021 LGBA forecasted revenue requirement (excluding its overcollected 2018 LGBA recorded activity), as further described in Section II.D below. SDG&E has also included 2021 proposed rate components for the Green Tariff Shared Renewables Program, as further described in Section II.G below.

A. ERRA

In D.02-10-062, the Commission established the ERRA balancing account – the power procurement balancing account required by Public Utilities (“P.U.”) Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities (“IOUs”) with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator-related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers.¹³

The ERRA regulatory process consists of (1) an annual forecast proceeding to adopt a forecast of the utility’s electric procurement cost revenue requirement and electricity sales for the upcoming year; and (2) an annual compliance proceeding to review the utility’s compliance in the preceding year regarding energy resource contract administration, least cost dispatch, fuel procurement, and the ERRA balancing account. There is also an update process for new information (*e.g.*, fuel and

¹³ See D.02-10-062 at 60-61.

purchased power forecasts, GHG verified volumes and associated costs, and additional GHG estimates for current year) which takes place in November of each year (“November Update”).

P.U. Code Section 454.5(d)(3) also specified that the balance of the ERRA was not to exceed 5% of the IOUs’ actual recorded generation revenues for the prior calendar year, excluding revenues collected for the Department of Water Resources (“DWR”).¹⁴ Accordingly, in D.02-10-062, the Commission established a trigger mechanism designed to avoid the 5% threshold point, pursuant to which IOUs must file an expedited application for approval to adjust rates in 60 days from the date when their ERRA balance reaches an undercollection or overcollection of 4% and is projected to exceed the 5% trigger.¹⁵ As currently implemented, the trigger process exists independently of, but in conjunction with, the forecast process used for this Application. Thus, SDG&E does not currently include the prior year-end ERRA balance in its forecast applications as it is addressed via an ERRA trigger application or year-end consolidated advice letter filing.

B. PABA

Pursuant to D.18-10-019 and Advice Letter 3318-E,¹⁶ the PABA was established to record the “above-market” costs and revenues associated with all generation resources that are eligible for cost recovery through the PCIA rates, including SDG&E’s Utility-Owned Generation (“UOG”). The PABA is comprised of a series of subaccounts referred to as “vintage subaccounts.” Costs recorded in each vintage subaccount include, but are not limited to, fuel, GHG costs, third party power purchase contracts, and UOG’s revenue requirement. The above-market costs of all generation resources that

¹⁴ *See id.* at 58, n.30; *see also* D.11-05-005.

¹⁵ In D.07-05-008 at 6, the Commission modified D.02-10-062 by adding a new rule to the trigger procedures, pursuant to which SDG&E is permitted to file an advice letter seeking to maintain rates when it expects an undercollection or overcollection above the 4% trigger will self-correct within 120 days.

¹⁶ SDG&E AL 3318-E, filed on December 10, 2018, and approved on May 30, 2019.

are eligible for cost recovery through the PCIA rates, including SDG&E's UOG, are recorded in the PABA. D.19-10-001 authorized any over/under collection in the PABA vintage subaccounts in a given year to be rolled into the next year's ERRRA Forecast filing.

C. CTC

The TCBA is designed to accrue all ongoing CTC revenues and recover all ongoing CTC-eligible generation-related costs.¹⁷ In accordance with D.02-12-074 and D.02-11-022, payments to Qualifying Facilities ("QFs") that are above the market benchmark proxy price (*i.e.*, above-market QF power costs) are charged to the TCBA. Eligible above market CTC expenses reflect the difference between the market benchmark proxy price and the costs associated with QF contracts.

D. LG

The LGBA is designed to record the costs and revenues of Local Generation where the Commission has determined that the generation resource is subject to the CAM.¹⁸ Such generation may take the form of power purchase agreements, company-owned generation units associated with new generation resources, or any other resources approved by the Commission for CAM treatment. The costs recorded in the LGBA are recovered via the Local Generation Charge ("LGC") rate component.

In this Application, SDG&E is requesting recovery for costs related to peaker generators that have been previously approved for CAM treatment, including Carlsbad, Pio Pico, and Escondido. These plants are described in testimony, along with the CAM-eligible combined heat & power plants.

¹⁷ Assembly Bill ("AB") 1890 established the expenses that are eligible for CTC recovery.

¹⁸ The Commission adopted its CAM policy in D.06-07-029, which it later modified in D.11-05-005. The basic purpose of the CAM is to allow the advantages and costs of new generation to be shared by all benefiting customers in an IOU's service territory.

SDG&E is also requesting recovery for costs related to four energy storage facilities in SDG&E's service territory that have been approved for CAM treatment.

SDG&E is also seeking the return of LGBA activity in the amount of \$(91.08) million. This represents the overcollected LGBA activity during 2018. Per A.19-05-007, which is pending approval, SDG&E proposed to return the overcollected 2018 recorded activity in this 2021 ERRR Forecast Application. This approach is consistent with the recovery of 2017 LGBA activity in the 2020 ERRR Forecast, which was approved in D.20-01-005.¹⁹

E. PCIA

The PCIA is another rate component of this Application. In D.06-07-030, as modified by D.07-01-030, the Commission resolved various issues relating to the cost responsibility surcharge applicable to Direct Access ("DA") and Municipal Departing Load customers within the service territories of the IOUs. The PCIA component of the cost responsibility surcharge is intended to preserve bundled customer indifference to customers that migrate from bundled load by ensuring that departing load customers pay their share of the cost responsibility associated with the above-market-costs of the utilities' total procurement portfolio. Under the methodology adopted by the Commission in D.08-09-012, the Commission refined the indifference amount methodology by introducing the requirement to vintage departing load customers, based on their departure date, when assigning responsibility for the total portfolio of resources.

In D.18-10-019, the Commission adopted an annual true-up mechanism as well as a cap that limits the change of the PCIA rate from one year to the next. Starting in forecast year 2020, the cap

¹⁹ D.20-01-005 at OP 4.

level of the PCIA rate was set at 0.5 cents/kWh more than the prior year's PCIA, differentiated by system average vintage rate.

AL 3436-E established the PCIA under-collection balancing account (CAPBA).²⁰ CAPBA establishes an interest-bearing balance account that will be used in the event that the PCIA cap is reached, in order to track any obligation that accrues for departing load customers by vintage subaccounts. The forecasted reserve shortfall from these departed load customers is estimated at \$0 million in 2021.

The PCIA rates will be based on applicable costs from SDG&E's total portfolio of resources, including its forecasted ERRA, PABA and CTC revenue requirements, as well as its authorized 2020 Non-Fuel Generation Balancing Account ("NGBA") revenue requirement and authorized 2020 DWR costs allocated to SDG&E. Although SDG&E proposes to update the currently effective PCIA rates in this Application, it will not be able to provide final PCIA rates until the 2021 NGBA and DWR revenue requirements (and certain market price information) become available, which is anticipated to be in the second half of 2020. Once the necessary information becomes available, SDG&E will update its proposed PCIA rates in the November Update to this Application.

F. SONGS Unit 1 Offsite Spent Fuel Storage Costs

As noted above, SDG&E tracks the authorized spent fuel storage costs revenue requirement in its NDAM account. SDG&E is seeking authorization to recover these costs through the ERRA forecast application process, and it is thus seeking authorization of the forecast 2021 revenue requirement for SONGS Unit 1 Offsite Spent Fuel Costs in this Application, as it did in its 2017, 2018, 2019 and 2020 Applications.

²⁰ SDG&E AL 3436-E was filed on September 30, 2019 approved on October 31, 2019.

G. TMNBC

AL 3343-E established the Tree Mortality Non-Bypassable Charge Balancing Account (“TMNBCBA”) to record the tree mortality related procurement costs incurred as directed by Resolution E-4770 and Resolution E-4805.²¹ As noted in D.18-12-003, Ordering Paragraph (“OP”) 9, the TMNBCBA cost will be recovered through the PPP charge. Details regarding the TMNBC revenue requirement are discussed in the testimony of Mr. Covic and Ms. Ngo.

H. GHG Costs and Allowance Revenues

Pursuant to the California Global Warming Solutions Act of 2006, AB 32, the California Air Resources Board (“ARB”) designed a statewide GHG cap-and-trade program in which certain utilities are required to participate. The cap-and-trade program creates a cap on major sources of GHG emissions – including power plants, fuel suppliers and industrial facilities – to achieve GHG reduction goals.

Utilities incur costs both by purchasing allowances for their own compliance obligation under the cap-and-trade program and, indirectly, through GHG costs embedded in the wholesale price of electricity. These GHG costs are incorporated into the generation component of electricity rates through the ERRR process in the same manner as other procurement-related costs, and they result in a carbon price signal intended to incent an overall reduction in GHG emission. The state allocates GHG allowances to ratepayers with the utilities acting as an intermediary to hold and then sell the allowances for ratepayer benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that result from GHG compliance.

²¹ AL 3343-E was approved on July 19, 2019 with an effective date of July 2, 2019.

In D.14-10-033, the Commission adopted methodologies for calculating forecasts of GHG allowance revenue and GHG costs, as well as recorded GHG allowance revenue and GHG costs. In so doing, the Commission required that utilities use Attachments C and D to D.14-10-033, as corrected by D.14-10-055, D.15-01-024 and D.19-04-016, to provide the required information in its GHG Forecast Revenue and Reconciliation Applications as a separate chapter or as part of its ERRA forecast applications.²² The decision further adopted Confidentiality Protocols for cap-and-trade related data and required the utilities to use a proxy price in their forecasts. Accordingly, this Application includes completed Weighted Average WAC calculation forms (Attachment C of the Decisions listed above) in Attachment A of Ana Garza-Beutz’s testimony and SDG&E’s GHG Revenue and Reconciliation Application Form (Attachment D of the Decisions listed above) as Attachment G to this Application. SDG&E will further update this information in its forthcoming November Update.

I. Proposed Rate Components for the Green Tariff and Enhanced Community Renewables Program

In 2013, California enacted the Green Tariff Shared Renewables Program, established in Senate Bill (“SB”) 43.²³ That legislation intended to promote renewable energy by expanding access to renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation (*e.g.*, residential customers who could not install onsite solar panels). In D.15-01-051 – implementing SB 43 – the Commission required the three large California IOUs to establish the Green Tariff Shared Renewables Program. This program has two features administered by the utilities: (1) a Green Tariff component, which allows customers to purchase energy with a greater share of

²² As directed in D.14-10-033, SDG&E is including its Weighted Average Cost (“WAC”) and GHG Revenue and Reconciliation Application Form in its ERRA Forecast Applications for review. If requested by the Commission, SDG&E may provide these forms under other proceedings as informational only.

²³ SB 43, Stats. 2013-2014, Ch. 413 (Cal. 2013).

renewables; and (2) an Enhanced Community Renewables component, which allows customers to purchase renewable energy from community-based projects. In its decision, the Commission directed the utilities to procure renewable energy resources, subject to certain limitations. The Commission also made numerous determinations regarding rate design. SDG&E customers who elect into the Green Tariff Renewables program will pay a subset of SDG&E's renewable energy procurement costs (which costs are in turn a subset of the total ERRA costs), and SDG&E has thus developed 2021 forecasts of procurement expenses under this program, as well as 2021 rate proposals for the various rate components of the Green Tariff Shared Renewables Program.

III. SUMMARY OF PREPARED TESTIMONY

In support of this Application, including the requests outlined above, SDG&E provides the testimony of six witnesses. The testimony is summarized below:

A. Stacy Fuhrer

Ms. Fuhrer's testimony presents the rate and bill impacts associated with the cost recovery of SDG&E's 2021 forecast of its (1) ERRA revenue requirement; (2) PABA revenue requirement; (3) CTC revenue requirement; (4) LG revenue requirement; (5) SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement; (6) TMNBC revenue requirement; (7) GHG allowance revenue return; and (8) the sum of the activity in the LGBA. Ms. Fuhrer also proposes the 2021 PCIA component of the cost responsibility surcharge applicable to departing load customers. Further, Ms. Fuhrer presents the methodology for the GHG allowance revenue returns, which involves identifying and supporting the 2021 forecast GHG allowance revenue return allocation amounts (including the California Climate Credit) in Templates D-1 and D-4 of Attachment G to this Application. Lastly, Ms. Fuhrer proposes the 2021 rate components associated with the Green Tariff Shared Renewables program.

B. Stefan Covic

Mr. Covic's testimony describes the resources that SDG&E expects to use in 2021 to meet its forecast bundled customer load. Mr. Covic then forecasts the procurement costs that SDG&E expects to record to the ERRA, TCBA, PABA and LGBA, as well as procurement costs related to the Green Tariff Shared Renewables program in 2021. In addition, Mr. Covic provides a forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. Covic also presents SDG&E's forecast of 2021 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which (as noted below) Ms. Ngo uses in her 2021 forecast of the ERRA revenue requirement. Additionally, Mr. Covic provides a 2021 forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2021. Mr. Covic also provides the 2021 TMNBC forecast. Lastly, Mr. Covic's testimony describes SDG&E's meet-and-confer activities and information exchange with CCAs as required by D.19-06-026 and D.20-03-019.

C. Khoang Ngo

Ms. Ngo's testimony describes the purpose of the ERRA, PABA, TCBA, LGBA and CAPBA. Using cost information provided by Mr. Covic, Ms. Ngo then presents SDG&E's 2021 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; (3) the LG revenue requirement; and (4) the PABA revenue requirement. Ms. Ngo also presents the sum of 2018 activity recorded to the LGBA that SDG&E seeks to return in this Application. Additionally, Ms. Ngo compares the 2019 year-end recorded balances with the 2019 year-end actual balances in the GHG balancing accounts used for GHG expenses (GHG Customer Outreach and Education Memorandum Account and GHG Administrative Costs Memorandum Account) and GHG allowance revenues (GHG Revenue Balancing Account). Ms. Ngo's testimony also discusses the activity in the

Green Tariff Shared Renewables balancing account. Ms. Ngo also presents SDG&E's 2021 forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement. Lastly, Ms. Ngo discusses the history of the TMNBCBA and how the related revenue requirement provided in Mr. Covic's testimony is recorded and collected from ratepayers via the PPP charge.

D. Ana Garza-Beutz

Ms. Garza-Beutz's testimony presents SDG&E's 2019 costs for GHG compliance instruments used to satisfy obligations under the ARB's cap-and-trade program. Additionally, Ms. Garza-Beutz provides the 2019 revenues. Ms. Garza-Beutz's testimony also describes the cap-and-trade program and details the methodology behind SDG&E's calculation of its unadjusted 2019 actual revenues and estimated costs including the WAC form in Attachment A to her testimony. These costs and revenues are further adjusted to recorded for the purposes of reconciliation as further explained in the testimony of Ms. Chihwaro and Ms. Fuhrer.

E. Monica Chihwaro

Ms. Chihwaro's testimony presents the accounting procedures that are used to record the GHG costs described in Ms. Garza-Beutz's testimony.

F. April Bernhardt

Ms. Bernhardt's testimony describes the overall approach that SDG&E proposes to employ to support ongoing customer awareness about the purpose and value of the GHG allowance revenues that will be credited to the bills of residential customers. In addition, the testimony forecasts the costs of ongoing customer education and outreach as well as the ongoing administrative and billing costs associated with the return of allowance revenue to customers.

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

In accordance with Rule 2.1 (a) – (c) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.

1. Rule 2.1 (a) - Legal Name

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E’s principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E’s attorney in this matter is Roger A. Cerda.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications, including any data requests, regarding this Application should be addressed to:

Shewit Woldegiorgis
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP32F
San Diego, California 92123
Telephone: (619) 696-2229
Facsimile: (858) 654-1788
Email: swoldegiorgis@sdge.com

with copies to:

Roger A. Cerda
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, CA 92123
Telephone: (858) 654-1781
Facsimile: (619) 699-5027
Email: rcerda@sdge.com

3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting because SDG&E proposes to recover the forecasted revenue requirements described in this Application from its ratepayers, and the costs will thus influence SDG&E's rates.

b. Need for Hearings

SDG&E does not believe that approval of this Application will require hearings. SDG&E has provided ample supporting testimony, analysis and documentation that provide the Commission with a sufficient record upon which to grant the relief requested.

c. Issues to be Considered

The issues to be considered are described in this Application and the accompanying testimony and exhibits. SDG&E does not believe there are any issues related to safety considerations that need to be considered in this Application.

d. Proposed Schedule

SDG&E proposes the following schedule:

<u>ACTION</u>	<u>DATE</u>
Application filed	April 15, 2020
Approx. End of Response Period (including Applicant Reply)	May 26, 2020
Prehearing Conference	June 12, 2020
ORA and Intervener Testimony	July 17, 2020
Rebuttal Testimony	August 7, 2020
Evidentiary Hearings (if needed)	August 24-28, 2020
Concurrent Opening Briefs	September 18, 2020
Concurrent Reply Briefs	October 9, 2020
SDG&E November Update	November 6, 2020

<u>ACTION</u>	<u>DATE</u>
ORA/Intervenor Comments on November Update	November 13, 2020
SDG&E Reply Comments on November Update	November 20, 2020
Commission Final Decision	December 18, 2020

B. Rule 2.2 – Articles of Incorporation

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014 in connection with SDG&E Application 14-09-008 and is incorporated herein by reference.

C. Rule 3.2 – Authority to Change Rates

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.²⁴

1. Rule 3.2 (a) (1) – Balance Sheet

SDG&E’s financial statement, balance sheet and income statement for the nine-month period ending September 30, 2019 are included with this Application as Attachment A.

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

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

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

A statement of proposed rate changes is attached as Attachment C.

²⁴ Note Rule 3.2(a) (9) is not applicable to SDG&E.

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

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

Applicant's original cost of utility plant, together with the related reserves for depreciation and amortization nine-month period ending September 30, 2019 is shown on the Statement of Original Cost and Depreciation Reserves included in Attachment D.

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

A summary of SDG&E's earnings (for the total utility operations for the company) for nine-month period ending September 30, 2019 is included as Attachment E to this Application.

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

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

Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

7. Rule 3.2 (a) (8) – Proxy Statement

A copy of the most recent proxy statement sent to all shareholders of SDG&E’s parent company, Sempra Energy, dated March 19, 2020, was mailed to the Commission on April 13, 2020, and is incorporated herein by reference.

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

The rate increases reflected in this Application pass through to customers only increased costs to SDG&E for the services or commodities furnished by it. However, as noted in Table 1 above, the overall impact of the various rate changes is a rate decrease.

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

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

10. Rule 3.2 (c) – Newspaper Publication

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

11. Rule 3.2 (d) – Bill Insert Notice

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

V. MEET-AND-CONFER ACTIVITIES

D.19-06-026 adopted a meet-and-confer requirement whereby: (a) A meeting between load-serving LSEs that anticipate load migration shall occur reasonably in advance of the filing deadline for initial year ahead forecasts; and (b) In each LSE’s initial year ahead forecast filing, each LSE shall describe the dates of meetings with other LSEs to discuss load migration, any agreements, and any continued areas of disagreement.²⁵

Additionally, in OP 1 of D.20-03-019 Considering Working Group Proposals on Departing Load Forecast and Presentation of Power Charge Indifference Adjustment Rate on Bills and Tariffs (filed February 25, 2020), the Commission ordered SDG&E to report in each regulatory filing its meet-and-confer activities and information exchange with Community Choice Aggregators in SDG&E’s service territory, if the regulatory filing involves a departing load forecast.²⁶

²⁵ *Decision Adopting Local Capacity Obligations for 2020-2022, Adopting Flexible Capacity Obligations for 2020, and Refining the Resource Adequacy Program* at OP 14 (filed in Rulemaking (R.) 17-09-020).

²⁶ Filed in R.17-06-026.

SDG&E held a meet-and-confer meeting regarding load forecasting on March 23, 2020. SDG&E invited numerous entities to participate in the March 23rd meet-and-confer meeting.²⁷ Attendees to the meeting included representatives for Calpine, San Diego Community Power, and Clean Energy Alliance. The items addressed at the meet-and-confer meeting included: (1) an overview of SDG&E's load forecast process for departing load; (2) an overview of the meet-and-confer requirement; (3) an overview of regulatory proceedings and schedules; (4) an overview of load data to support regulatory filings; and (5) a discussion of future load forecast cycles. The parties continue to exchange information regarding load forecasting through a collaborative effort. The parties have reached agreement on the process by which the non-IOU LSEs are to provide forecast data to SDG&E as well as the templates to be used to submit their data. There have not been any specific areas of disagreement at this point. Information provided by the non-IOU LSEs to SDG&E include monthly energy sales, peak demand and customer forecast data.

VI. CONFIDENTIAL INFORMATION

SDG&E is submitting the confidential testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E's declarations of confidential treatment attached to the confidential testimonies and submitted in conformance with D.06-06-066, D.08-04-023 and other applicable orders and statutory provisions. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E's electric procurement resources and strategies) that SDG&E witnesses must identify to support SDG&E's revenue requirements forecasts for 2021. Additionally, SDG&E is contemporaneously filing a motion for leave to file confidential information in Attachment G to this Application under seal.

²⁷ SDG&E sent an invite to recipients on the R.17-09-020 and R.19-11-009 distribution lists.

VII. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will electronically serve this Application, testimony and related exhibits on parties to the service list for its 2020 Erra Forecast Application (A.19-04-010). Electronic copies will also be served on Chief ALJ Anne Simon and ALJ Gerald F. Kelly. Pursuant to the Commission's *COVID-19 Temporary Filing and Service Protocol for Formal Proceedings*, paper copies of e-filed documents will not be mailed to the Administrative Law Judges or to parties on the service lists.

VIII. CONCLUSION AND SUMMARY OF RELIEF REQUESTED

WHEREFORE, San Diego Gas & Electric Company requests that the Commission:

(1) grant authority to decrease rates by approving as reasonable SDG&E's 2021 forecast of its Erra revenue requirement pertaining to SDG&E's load, the resources available to meet SDG&E's load, and various input assumptions regarding fuel costs, GHG costs, and costs for SDG&E's various electric resources;

(2) grant authority to increase rates by approving as reasonable SDG&E's 2021 forecast of its PABA revenue requirement;

(3) grant authority to decrease rates by approving as reasonable SDG&E's 2021 forecast of its CTC revenue requirement;

(4) grant authority to increase rates by approving as reasonable SDG&E's 2021 forecast of its LG revenue requirement;

(5) grant authority to hold rates constant by approving as reasonable SDG&E's 2021 forecast of its SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement;

(6) grant authority to decrease rates by approving as reasonable SDG&E's 2021 forecast of its TMNBC revenue requirement;

- (7) approve SDG&E's 2021 forecast of its GHG allowance revenues;
- (8) approve SDG&E's 2021 forecast for its GHG administration, customer education and outreach activities;
- (9) adopt SDG&E's 2021 forecast of its GHG allowance revenue return allocations for the residential California Climate Credit;
- (10) grant authority to return the overcollected 2018 LGBA recorded activity;
- (11) adopt SDG&E's proposed vintage PCIA rates, as will be provided in SDG&E's forthcoming November Update to this Application;
- (12) adopt SDG&E's proposed 2021 rate components for the Green Tariff Shared Renewables Program; and
- (13) grant such additional relief as the Commission believes is just and reasonable.

SDG&E is ready to proceed with its showing in this Application.

Respectfully submitted,

/s/ Roger A. Cerda
Roger A. Cerda
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, CA 92123
Telephone: (858) 654-1781
Facsimile: (619) 699-5027
Email: rcerda@sdge.com

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Miguel Romero
Miguel Romero
San Diego Gas & Electric Company
Vice President – Energy Supply

DATED at San Diego, California, this 15th day of April 2020

OFFICER VERIFICATION

OFFICER VERIFICATION

Miguel Romero declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF ITS 2021 ELECTRIC PROCUREMENT REVENUE REQUIREMENT FORECASTS AND GHG-RELATED FORECASTS** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on April 15, 2020 at San Diego, California.

By: /s/ Miguel Romero
Miguel Romero
San Diego Gas & Electric Company
Vice President – Energy Supply

ATTACHMENT A

**BALANCE SHEET AND INCOME STATEMENT AND
FINANCIAL STATEMENT**

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
Sep 2019

1. UTILITY PLANT		2019
101	UTILITY PLANT IN SERVICE	19,224,609,780
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	112,194,000
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,425,748,375
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(5,939,647,002)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(702,661,244)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(1,937,872)
118	OTHER UTILITY PLANT	1,437,992,275
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(305,469,546)
120	NUCLEAR FUEL - NET	-
TOTAL NET UTILITY PLANT		\$ 15,254,579,488

2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	6,030,597
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(326,049)
158	NON-CURRENT PORTION OF ALLOWANCES	194,407,912
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,048,982,466
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	245,122,898
TOTAL OTHER PROPERTY AND INVESTMENTS		\$ 1,494,217,824

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
Sep 2019

3. CURRENT AND ACCRUED ASSETS

		2019
131	CASH	23,964,097
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	-
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	374,208,721
143	OTHER ACCOUNTS RECEIVABLE	105,974,436
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,745,403)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	24,866,801
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,339,959
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	129,498,482
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	209,887,563
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(194,407,912)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	498,125
165	PREPAYMENTS	165,094,239
171	INTEREST AND DIVIDENDS RECEIVABLE	2,426,643
173	ACCRUED UTILITY REVENUES	75,906,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	3,800,000
175	DERIVATIVE INSTRUMENT ASSETS	270,676,926
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(245,122,898)
	TOTAL CURRENT AND ACCRUED ASSETS	944,866,279

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	36,725,456
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,119,981,492
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	778,617
184	CLEARING ACCOUNTS	298,108
185	TEMPORARY FACILITIES	558,556
186	MISCELLANEOUS DEFERRED DEBITS	466,636,449
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	5,097,340
190	ACCUMULATED DEFERRED INCOME TAXES	185,575,157
	TOTAL DEFERRED DEBITS	2,815,651,175

	20,509,314,766
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SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
Sep 2019

5. PROPRIETARY CAPITAL		2019
201	COMMON STOCK ISSUED	291,458,395
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	591,282,978
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	802,165,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	5,269,518,112
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(10,404,929)
TOTAL PROPRIETARY CAPITAL		6,919,414,284
6. LONG-TERM DEBT		
221	BONDS	5,140,552,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	-
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(12,383,622)
TOTAL LONG-TERM DEBT		5,128,168,378
7. OTHER NONCURRENT LIABILITIES		
227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	1,353,609,613
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	25,490,187
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	218,107,233
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	72,511,869
230	ASSET RETIREMENT OBLIGATIONS	867,617,192
TOTAL OTHER NONCURRENT LIABILITIES		2,537,336,094

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
Sep 2019

8. CURRENT AND ACCRUED LIABILITES		2019
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	482,399,443
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	50,796,848
235	CUSTOMER DEPOSITS	81,791,383
236	TAXES ACCRUED	65,868,258
237	INTEREST ACCRUED	64,076,274
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	6,116,333
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	170,158,441
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	41,359,790
244	DERIVATIVE INSTRUMENT LIABILITIES	104,549,698
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(72,511,869)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
	TOTAL CURRENT AND ACCRUED LIABILITIES	994,604,599
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	73,031,776
253	OTHER DEFERRED CREDITS	494,968,304
254	OTHER REGULATORY LIABILITIES	2,477,476,002
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	14,672,958
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	1,707,552,610
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	162,089,761
	TOTAL DEFERRED CREDITS	4,929,791,411
	TOTAL LIABILITIES AND OTHER CREDITS	20,509,314,766

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
September 30, 2019

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

(b) Brief Description of Mortgage:

Full information as to this item is given in Application Nos. 93-09-069, 96-05-066, 00-01-016, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, 15-08-011, and 18-02-012 to which references are hereby made.

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

	Nominal Date of Issue	Par Value		Interest Paid (update required in Q4' 20xx) as of Q4' 2018
		Authorized and Issued	Outstanding	
First Mortgage Bonds:				
5.875% Series VV, due 2034	06-17-04	43,615,000	43,615,000	2,562,288
5.875% Series WW, due 2034	06-17-04	40,000,000	40,000,000	2,349,914
5.875% Series XX, due 2034	06-17-04	35,000,000	35,000,000	2,056,175
5.875% Series YY, due 2034	06-17-04	24,000,000	24,000,000	1,409,949
5.875% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	1,976,866
4.00% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	3,000,000
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
1.65% Series EEE, due 2018	09-21-06	161,240,000	0	2,217,050
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	350,000,000	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
1.9140% Series PPP, due 2022	03-12-15	250,000,000	31,372,648	2,905,194
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	12,500,000
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	15,000,000
4.15% Series SSS, due 2048	05-17-18	400,000,000	400,000,000	8,207,778
4.10% Series TTT, due 2049	05-31-19	400,000,000	400,000,000	-
Total First Mortgage Bonds:			5,082,637,648	199,072,714
Unsecured Bonds:				
5.30% CV96A, due 2021	08-02-96	0	0	0
5.50% CV96B, due 2021	11-21-96	0	0	0
4.90% CV97A, due 2023	10-31-97	0	0	0
Total Unsecured Bonds				0
Total Bonds:				199,072,714

TOTAL LONG-TERM DEBT			5,082,637,648	
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SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Sep 2019

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$ 3,976,506,814
401	OPERATING EXPENSES	2,366,227,918	
402	MAINTENANCE EXPENSES	132,200,737	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	537,369,051	
408.1	TAXES OTHER THAN INCOME TAXES	117,300,446	
409.1	INCOME TAXES	130,164,627	
410.1	PROVISION FOR DEFERRED INCOME TAXES	81,543,301	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(104,475,577)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(950,160)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		3,259,380,343
	NET OPERATING INCOME		717,126,471

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(6,332,578)	
418	NONOPERATING RENTAL INCOME	25,821	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	22,028,172	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	42,952,692	
421	MISCELLANEOUS NONOPERATING INCOME	452,345	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	59,126,452	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	19,600,639	
	TOTAL OTHER INCOME DEDUCTIONS	\$ 19,788,175	
408.2	TAXES OTHER THAN INCOME TAXES	431,049	
409.2	INCOME TAXES	744,424	
410.2	PROVISION FOR DEFERRED INCOME TAXES	30,815,752	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(26,602,780)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	\$ 5,388,445	
	TOTAL OTHER INCOME AND DEDUCTIONS		\$ 33,949,832
	INCOME BEFORE INTEREST CHARGES		751,076,303
	EXTRAORDINARY ITEMS AFTER TAXES		-
	NET INTEREST CHARGES*		167,028,368
	NET INCOME		\$ 584,047,935

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$15,180,293)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Sep 2019

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 4,683,700,304
NET INCOME (FROM PRECEDING PAGE)	584,047,935
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	-
OTHER RETAINED EARNINGS ADJUSTMENTS	1,769,873
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 5,269,518,112</u>

Confidential Pursuant to Applicable Provisions of D.06-06-066 and D.14-10-033

Yellow-Highlighted Portions In Attachment G Are Confidential

ATTACHMENT B

STATEMENT OF PRESENT RATES



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Sheet 1

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

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Advice Ltr. No. 3514-E

Decision No. D.20-01-021

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Mar 26, 2020

Effective Apr 1, 2020

Resolution No. _____



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Advice Ltr. No. 3514-E

Decision No. D.20-01-021

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Mar 26, 2020
Effective Apr 1, 2020
Resolution No. _____



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Advice Ltr. No. 3421-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Aug 15, 2019

Effective Sep 16, 2019

Resolution No. _____



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Issued by

Submitted

Jan 30, 2020

Advice Ltr. No. 3475-E-A

Dan Skopec

Effective

Feb 29, 2020

Vice President
Regulatory Affairs

Decision No. SB 1338

Resolution No. _____

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Advice Ltr. No. 3385-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Jun 14, 2019

Effective Dec 21, 2019

Resolution No. _____



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Advice Ltr. No. 3385-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Jun 14, 2019

Effective Dec 21, 2019

Resolution No. _____



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Advice Ltr. No. 3378-E

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Submitted Jun 21, 2019

Effective Jul 22, 2019

Resolution No. _____



San Diego Gas & Electric Company
San Diego, California

Original Cal. P.U.C. Sheet No. 31176-E

Canceling _____ Cal. P.U.C. Sheet No. _____

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16C15

Advice Ltr. No. 3292-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Nov 1, 2018

Effective _____

Resolution No. _____

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101-00753/2	03-05	Urgent Notice Payment Request Security Deposit to Re-Establish Credit.	18084-E
101-00753/3	04-11	Urgent Notice Payment Request for Past Due Security Deposit	22326-E
101-00753/4	04-11	Urgent Notice Payment Request for Past Due Bill	22327-E
101-00753/5	02-04	Urgent Notice Payment Request for Returned Payment	16948-E
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill.	16949-E
101-00753/7	02-04	Urgent - Sign Up Notice for Service	16950-E
101-00753/8	02-04	Reminder Notice – Payment Request for Past Due Bill	16951-E
101-00753/9	02-04	Closing Bill Transfer Notification	16952-E
101-00753/10	03-14	Payment Agreement Confirmation	24580-E
101-00753/11	02-04	ESP Reminder Notice – Payment Request for Past Due Bill	16954-E
101-00754	03-14	Final Notice Before Disconnection (mailed), Notice of Past Due Closing	24581-E
101-01071	04-11	Bill, and Notice of Past Due Closing Bill Final Notice	22330-E
101-01072	08-14	Notice of Disconnect (delivered).....	25420-E
101-01073	05-14	Notice of Shut-off (Mailed).....	24851-E
101-02171	05-10	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units)	21885-E
101-02172	03-14	Notice of Disconnect (MDTs).....	24582-E
101-2452G	02-04	Notice to Tenants - Request for Termination of Gas and Electric Service Customer Payment Notification.....	16959-E

OPERATIONS NOTICES

101-2371	11-95	No Access Notice.....	8826-E
101-3052B	3-69	Temporary "After Hour" Turn On Notice	2512-E
101-15152B	3-69	Door Knob Meter Reading Card.....	2515-E
107-04212	4-99	Notice of Temporary Electric Service Interruption (English & Spanish)	12055-E
115-00363/2	9-00	Sorry We Missed You.....	13905-E
115-002363	9-00	Electric Meter Test.....	13906-E
115-7152A		Access Problem Notice.....	3694-E
124-70A		No Service Tag	2514-E

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ATTACHMENT C

STATEMENT OF PROPOSED RATES

ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

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

If the CPUC approves SDG&E's application, a typical non-CARE residential customer living in the inland climate zone and using 400 kilowatt-hours per month could see a monthly winter bill decrease of 9.4%, or \$10.10, from a typical current monthly bill of \$107.60 to \$97.50.

The first table below provides illustrative bill changes for bundled customers, while the second table presents illustrative bill changes for DA customers. For DA customers who do not pay commodity, the Utility Distribution Company (UDC) rate changes on a class average basis are presented below. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC BUNDLED RATE DECREASE (TOTAL RATES INCLUDE UDC¹ AND COMMODITY²)

Customer Class	Class Average Rates Effective 4/1/2020 (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Decrease Per application (¢/kWh)	Total Rate Decrease (¢/kWh)	Percentage Rate Decrease (%)
Residential	27.130	23.802	(3.328)	-12.27%
Small	25.084	22.973	(2.111)	-8.42%
Commercial				
Medium and Large C&I⁴	22.123	19.560	(2.563)	-11.59%
Agricultural	16.980	15.237	(1.743)	-10.27%
Lighting	22.132	20.307	(1.825)	-8.25%
System Total	23.993	21.259	(2.734)	-11.39%

¹ UDC rates include Department of Water Resources (DWR) Bond Charge.

² Commodity rates include DWR Power Charge credit.

³ Rates effective 4/1/2020 per Advice Letter (AL) 3514-E.

⁴ C&I stands for Commercial and Industrial.

**SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC UDC¹
RATE DECREASE**

Customer Class	Class Average Rates Effective 04/01/2020² (¢/kWh)	Class Average Rates Reflecting Proposed Revenue Decrease Per application (¢/kWh)	Total Rate Decrease (¢/kWh)	Percentage Rate Decrease (%)
Residential Small	17.310	15.996	(1.314)	-7.59%
Commercial Medium and Large C&I³	16.194	15.785	(0.409)	-2.53%
Agricultural	11.856	11.319	(0.537)	-4.53%
Lighting	9.918	9.609	(0.309)	-3.12%
System Total	15.688	15.185	(0.503)	-3.21%
	14.208	13.430	(0.778)	-5.48%

¹ UDC rates include DWR Bond Charge.

² Rates effective 4/1/2020 per AL 3514-E.

³ C&I stands for Commercial and Industrial.

ATTACHMENT D

COST OF PROPERTY AND DEPRECIATION RESERVE

SAN DIEGO GAS & ELECTRIC COMPANY

**COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF SEPTEMBER 30, 2019**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	177,869,526.25	139,557,374.18
	TOTAL INTANGIBLE PLANT	<u>178,092,367.61</u>	<u>139,760,274.48</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	89,291,185.99	45,825,809.12
312	Boiler Plant Equipment	161,941,815.44	84,267,019.44
314	Turbogenerator Units	130,865,534.94	56,101,956.77
315	Accessory Electric Equipment	86,232,569.41	44,051,610.65
316	Miscellaneous Power Plant Equipment	53,609,985.24	16,855,305.18
	Steam Production Contra Accounts	<u>(1,621,911.83)</u>	<u>(532,709.11)</u>
	TOTAL STEAM PRODUCTION	<u>534,845,697.48</u>	<u>246,615,510.34</u>
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	23,664,945.54	10,015,777.68
342	Fuel Holders, Producers & Accessories	21,651,593.69	8,979,836.64
343	Prime Movers	95,333,635.07	47,135,072.94
344	Generators	361,209,977.55	170,734,339.92
345	Accessory Electric Equipment	32,510,919.85	16,501,404.74
346	Miscellaneous Power Plant Equipment	<u>31,043,889.97</u>	<u>17,093,074.87</u>
	TOTAL OTHER PRODUCTION	<u>565,641,758.54</u>	<u>270,461,934.75</u>
	TOTAL ELECTRIC PRODUCTION	<u>1,100,487,456.02</u>	<u>517,077,445.09</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	78,615,129.53	0.00
350.2	Land Rights	162,163,841.31	25,726,449.82
352	Structures and Improvements	631,499,448.23	89,577,951.30
353	Station Equipment	1,858,731,718.95	400,853,091.76
354	Towers and Fixtures	905,233,328.78	199,848,889.12
355	Poles and Fixtures	681,859,690.08	139,016,186.14
356	Overhead Conductors and Devices	693,412,730.38	253,853,261.95
357	Underground Conduit	464,061,495.94	77,582,879.68
358	Underground Conductors and Devices	504,067,255.18	76,473,758.96
359	Roads and Trails	329,383,764.24	42,255,406.34
	TOTAL TRANSMISSION	6,309,028,402.62	1,305,187,875.07
360.1	Land	16,490,990.26	0.00
360.2	Land Rights	90,631,085.70	46,023,250.94
361	Structures and Improvements	10,124,170.17	1,806,160.98
362	Station Equipment	603,313,981.54	225,155,715.60
363	Storage Battery Equipment	127,582,116.43	38,773,581.81
364	Poles, Towers and Fixtures	828,202,559.08	299,377,010.85
365	Overhead Conductors and Devices	815,329,278.75	239,192,593.26
366	Underground Conduit	1,378,356,141.26	537,307,215.42
367	Underground Conductors and Devices	1,693,305,277.42	975,557,176.26
368.1	Line Transformers	677,346,214.08	207,416,847.06
368.2	Protective Devices and Capacitors	34,160,978.17	13,484,315.12
369.1	Services Overhead	194,725,203.34	115,408,665.46
369.2	Services Underground	376,570,358.53	262,397,040.04
370.1	Meters	201,634,412.73	112,439,522.90
370.2	Meter Installations	63,357,087.87	29,732,404.14
371	Installations on Customers' Premises	9,683,675.03	10,675,584.82
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	32,395,124.54	21,204,653.94
	TOTAL DISTRIBUTION PLANT	7,153,208,654.90	3,135,951,738.60
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	45,611,645.37	27,080,505.22
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	20,613.28
393	Stores Equipment	46,521.59	2,200.57
394.1	Portable Tools	34,940,434.08	10,383,537.65
394.2	Shop Equipment	278,147.42	216,037.98
395	Laboratory Equipment	5,333,953.73	1,139,631.29
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	330,068,016.99	133,646,628.71
398	Miscellaneous Equipment	63,125,572.45	5,194,774.46
	TOTAL GENERAL PLANT	486,835,108.77	177,851,315.04
101	TOTAL ELECTRIC PLANT	15,227,651,989.92	5,275,828,648.28

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,168,803.11	1,279,559.62
	TOTAL STORAGE PLANT	2,168,803.11	1,279,559.62
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,515,541.91	1,546,983.75
366	Structures and Improvements	19,418,588.35	11,132,075.79
367	Mains	246,982,195.08	89,678,707.61
368	Compressor Station Equipment	92,435,675.59	73,028,985.08
369	Measuring and Regulating Equipment	28,569,467.31	17,933,350.74
371	Other Equipment	2,023,759.81	175,484.24
	TOTAL TRANSMISSION PLANT	397,594,371.80	193,495,587.21
374.1	Land	1,514,828.76	0.00
374.2	Land Rights	8,499,822.79	7,334,135.37
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,299,079,387.66	421,277,189.71
378	Measuring & Regulating Station Equipment	19,064,072.53	9,184,326.56
380	Distribution Services	350,418,461.00	298,210,023.40
381	Meters and Regulators	166,943,830.62	72,023,667.24
382	Meter and Regulator Installations	108,353,491.55	48,067,601.89
385	Ind. Measuring & Regulating Station Equipm	1,516,810.70	1,284,516.17
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,402,034.82	6,043,249.96
	TOTAL DISTRIBUTION PLANT	1,966,836,187.34	863,485,963.40

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	0.00	0.13
394.1	Portable Tools	11,787,116.36	4,148,051.64
394.2	Shop Equipment	71,501.71	34,711.30
395	Laboratory Equipment	0.00	(7,344.15)
396	Power Operated Equipment	16,162.40	15,000.96
397	Communication Equipment	2,377,501.95	891,637.64
398	Miscellaneous Equipment	465,784.09	136,122.14
	TOTAL GENERAL PLANT	14,718,066.51	5,243,682.66
101	TOTAL GAS PLANT	2,381,403,532.96	1,063,590,897.09
COMMON PLANT			
303	Miscellaneous Intangible Plant	605,400,145.25	399,574,108.96
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,792.37	0.00
389.2	Land Rights	27,776.34	27,776.34
390	Structures and Improvements	452,432,490.47	171,289,396.83
391.1	Office Furniture and Equipment - Other	39,632,888.99	15,105,311.98
391.2	Office Furniture and Equipment - Computer E	67,008,201.80	20,845,643.73
392.1	Transportation Equipment - Autos	725,072.38	290,330.80
392.2	Transportation Equipment - Trailers	107,977.72	6,410.43
392.3	Transportation Equipment - Aviation	11,580,557.15	2,005,358.86
393	Stores Equipment	333,835.97	34,455.53
394.1	Portable Tools	1,520,858.30	533,099.62
394.2	Shop Equipment	142,759.33	93,067.84
394.3	Garage Equipment	1,854,148.83	425,738.86
395	Laboratory Equipment	1,731,116.64	845,515.42
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	243,356,068.77	90,642,839.16
398	Miscellaneous Equipment	5,136,413.68	560,251.74
	Topside	0.00	0.00
118.1	TOTAL COMMON PLANT	1,438,485,103.99	702,086,327.00
	TOTAL ELECTRIC PLANT	15,227,651,989.92	5,275,828,648.28
	TOTAL GAS PLANT	2,381,403,532.96	1,063,590,897.09
	TOTAL COMMON PLANT	1,438,485,103.99	702,086,327.00
101 & 118.1	TOTAL	19,047,540,626.87	7,041,505,872.37
101	PLANT IN SERV-SONGS FULLY RECOVER	0.00	0.00
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	(2,079,446.23)	(1,250,794.05)
	Gas	(335,000.00)	(335,000.00)
	Common	(3,145,591.33)	(431,924.57)
		(5,560,037.56)	(2,017,718.62)

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CONTRA-ELECTRIC		
	Electric	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,540,513.52)	(1,540,513.52)
		<u>(1,540,513.52)</u>	<u>(1,540,513.52)</u>
101	Accrual for Retirements		
	Electric	(5,572,533.00)	(5,572,533.00)
	Gas	(665,630.20)	(665,630.20)
		<u>(6,238,163.20)</u>	<u>(6,238,163.20)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(6,238,163.20)</u>	<u>(6,238,163.20)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	112,194,000.02	22,100,147.52
	Gas	0.00	0.00
		<u>112,194,000.02</u>	<u>22,100,147.52</u>
	TOTAL PLANT LEASED TO OTHERS	<u>112,194,000.02</u>	<u>22,100,147.52</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,102,768,560.08	
	Gas	113,732,843.32	
	Common	209,246,970.77	
		<u>1,425,748,374.17</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,425,748,374.17</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	1,048,073,756
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	1,048,073,756.49
101.1	ELECTRIC CAPITAL LEASES	1,307,422,019.46	48,649,574.96
118.1	COMMON CAPITAL LEASE	24,888,703.59	12,612,648.56
		1,332,310,723.05	61,262,223.52
143	FAS 143 ASSETS - Legal Obligation	17,125,479.67	(1,044,126,606.55)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	109,841,313.16	43,907,575.06
143	FAS 143 ASSETS - Legal Obligation	0.00	(1,736,325,370.07)
	TOTAL FAS 143	126,966,792.83	(2,736,544,401.56)
	UTILITY PLANT TOTAL	22,031,421,802.66	5,426,601,203.00

ATTACHMENT E
SUMMARY OF EARNINGS

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
Sep 2019
(\$ IN MILLIONS)

Line No.	Item	Amount
1	Operating Revenue	\$ 3,977
2	Operating Expenses	<u>3,259</u>
3	Net Operating Income	<u>\$ 717</u>
4	Weighted Average Rate Base	\$ 10,331
5	Rate of Return*	7.96%
	*Authorized Cost of Capital	

ATTACHMENT F

GOVERNMENTAL ENTITIES RECEIVING NOTICE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656

ATTACHMENT G

**GHG REVENUE AND RECONCILIATION FORM
(ATTACHMENT D OF DECISIONS D.14-10-033
AND D.15-01-024)**

GHG Revenue and Reconciliation Application Form

Notes:

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

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

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

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

Line Description	2013		2014		2015		2016		2017		2018		2019		2020		2021	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ²	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A	12.09	N/A	13.13	N/A	13.23	N/A	15.63	N/A	16.35		8.29			17.9
2 Allocated Allowances (MT)	6 919 341	6 919 341	6 549 142	6 549 142	6 426 430	6 426 430	6 406 805	6 406 805	6 460 042	6 460 042	6 288 321	6 288 321	6 186 936	6 186 937	6 143 946	6 143 946		6 766 147
3 Revenues																		
4 Prior Balance	N/A	N/A	(\$102 074 500)	(\$82 503 131)	(\$19 755 324)	(\$ 8 393 131)	\$31 586 221	\$31 892 368	\$3 775 309	\$4 334 942	(\$4 295 169)	(\$6 529 128)	(\$686 192)	\$3 734 063	\$1 310 790	\$325 486		(\$985 304)
5 Allowance Revenue	(\$103 302 000)	(\$82 453 505)	(\$94 570 000)	(\$76 756 698)	(\$77 695 500)	(\$79 929 224)	(\$84 121 350)	(\$81 558 628)	(\$85 466 355)	(\$92 539 677)	(\$98 286 457)	(\$93 727 555)	(\$101 156 404)	(\$104 156 909)	(\$112 372 776)	(\$112 372 776)		(\$121 114 031)
6 Interest	\$0	(\$49 626)	(\$28 773)	(\$47 002)	(\$76 463)	\$24 263	\$24 796	\$151 893	\$96 857	\$65 917	\$91 282	\$143 250	\$251 035	\$236 629	\$136 079	\$136 079		(\$10 210)
7 Franchise Fees and Uncollectibles	\$0	\$0	(\$1 771 359)	(\$1 706 341)	(\$1 190 048)	(\$1 581 513)	(\$1 026 495)	(\$661 789)	(\$1 013 589)	(\$991 175)	(\$1 066 881)	(\$1 135 547)	(\$1 061 344)	(\$1 056 581)	(\$1 188 148)	(\$1 188 148)		(\$1 456 340)
8 Subtotal Revenues	(\$103 302 000)	(\$82 503 131)	(\$198 444 632)	(\$161 013 172)	(\$98 717 335)	(\$99 879 665)	(\$53 536 828)	(\$50 176 155)	(\$82 607 777)	(\$89 129 994)	(\$103 557 225)	(\$101 248 980)	(\$102 652 905)	(\$101 242 797)	(\$112 114 055)	(\$113 099 359)		(\$123 565 884)
9 Expenses																		
10 Outreach and Administrative Expenses ³	\$1 227 500	\$0	\$187 500	\$801 369	\$334 835	\$334 989	\$80 036	\$80 994	(\$2 063)	(\$369)	\$48 463	\$52 210	(\$135 316)	(\$134 042)	\$29 021	\$29 021		\$59 000
11 Franchise Fees and Uncollectibles	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		\$0
12 Interest	\$0	\$0	\$0	(\$119)	\$0	(\$154)	\$0	(\$958)	\$0	(\$1 694)	\$0	(\$3 747)	\$0	(\$1 274)	\$0	\$0		\$0
13 Subtotal Expenses	\$1 227 500	\$0	\$187 500	\$801 250	\$334 835	\$334 835	\$80 036	\$80 036	(\$2 063)	(\$2 063)	\$48 463	\$48 463	(\$135 316)	(\$135 316)	\$29 021	\$29 021		\$59 000
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ⁴	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1 281 995	\$0	\$10 300 000	\$10 300 000	\$13 649 840	\$13 649 840	\$14 375 823	\$14 375 823		\$1 030 000
15 Net GHG Revenues (Line 8 Line 13 Line 14)	(\$102 074 500)	(\$82 503 131)	(\$198 257 132)	(\$160 211 922)	(\$98 382 500)	(\$99 544 830)	(\$53 456 792)	(\$50 096 119)	(\$81 327 845)	(\$89 132 057)	(\$93 208 762)	(\$90 900 517)	(\$89 138 381)	(\$87 728 273)	(\$97 709 211)	(\$98 694 515)		(\$122 476 884)
16 GHG Revenues to be Distributed in Future Years	\$0	\$0	\$51 037 250	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		\$0
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 Line 16)	(\$102 074 500)	(\$82 503 131)	(\$147 219 882)	(\$160 211 922)	(\$98 382 500)	(\$99 544 830)	(\$53 456 792)	(\$50 096 119)	(\$81 327 845)	(\$89 132 057)	(\$93 208 762)	(\$90 900 517)	(\$89 138 381)	(\$87 728 273)	(\$97 709 211)	(\$98 694 515)		(\$122 476 884)
18 GHG Revenue Returned to Eligible Customers																		
19 EITE Customer Return ^{5,6,7}	\$0	\$0	\$1 583 553	\$0	\$1 384 559	\$0	\$4 238 010	\$2 599 416	\$760 200	\$668 775	\$669 179	\$468 650	\$468 650	\$426 781	\$426 782	\$426 782		\$0
20 Sma I Business Volumetric Return	\$0	\$0	\$10 982 219	\$11 533 823	\$6 954 469	\$13 247 750	\$3 648 498	\$4 062 057	\$2 701 990	\$3 100 138	\$3 638 944	\$4 330 020	\$2 798 095	\$2 968 472	\$2 901 607	\$2 901 607		\$0
21 Residential Volumetric Return	\$0	\$0	\$45 925 031	\$35 582 852	\$31 314 08	\$39 050 655	\$0	\$1 767 675	\$0	(\$3 550)	\$0	(\$3 002)	\$0	(\$23)	\$0	\$0		\$0
22 Subtotal EITE Volumetric Returns	\$0	\$0	\$58 480 803	\$47 116 675	\$39 653 61	\$52 298 405	\$7 886 508	\$8 429 148	\$3 462 190	\$3 765 363	\$4 308 123	\$4 795 668	\$3 266 745	\$3 395 230	\$3 328 389	\$3 328 389		\$0
23 Number of Households Eligible for the California Climate Credit	-	-	1 224 253	1 306 520	1 224 251	1 313 989	1 306 630	1 319 006	1 314 398	1 3 0 804	1 325 052	1 340 879	1 370 670	1 351 509	1 352 478	1 352 478		1 352 026
24 Per-Household Semi-Annual Climate Credit ⁸ (0.5 x (Line 17 Line 23))	\$0.00	\$0.00	\$36.24	\$36.24	\$23.99	\$23.99	\$17.44	\$17.44	\$29.62	\$29.62	\$33.55	\$33.50	\$31.32	\$31.32	\$34.89	\$34.89		\$45.29
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	\$0	\$0	\$88 739 079	\$94 702 116	\$58 729 139	\$79 138 793	\$45 570 284	\$46 001 913	\$77 865 656	\$78 837 566	\$88 900 639	\$89 838 912	\$85 871 636	\$84 658 530	\$94 380 823	\$94 380 823		\$122 476 884
26 Revenue Balance (Line 15 Line 22 Line 25)	N/A	(\$82 503 131)	N/A	(\$18 393 131)	N/A	\$31 892 368	N/A	\$4 334 942	N/A	(\$6 529 128)	N/A	\$3 734 063	N/A	\$325 486	N/A	(\$985 304)		N/A

¹ Includes 50% of 2013 allowance revenues and expenses.

² Recorded data is equal to forecast and will be updated with the November Update Filing.

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

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

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

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

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

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

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016		2017		2018		2019		2020		2021	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ⁶	Forecast	Recorded		
1	Direct GHG Emissions (MTCO2e)																		
2	Utility Owned Generation (UOG)																		
3	Tolling Agreements																		
4	Energy Imports (Specified)																		
5	Energy Imports (Unspecified)																		
6	RPS Adjustment																		
6.5	2013 Under-Reported True-Up (Section 95858 of C&T Regulation)																		
7	Qualifying Facility (QF) Contracts																		
8	Contract with Financial Settlement																		
8	Subtotal																		
9	Indirect GHG Emissions (MTCO2e)																		
10	CAISO Market Purchases																		
11	Contract Purchases																		
12	Subtotal																		
13	Total Emissions (MTCO2e)	5 596 398	5 678 547	5 473 713	5 590 681	4 811 519	5 013 119	4 203 567	4 545 471	4 243 313	4 521 153	3 879 511	4 247 722	3 778 406	2 041 337	3 905 980	3 905 980	3 239 000	
	Direct GHG Costs ²																		
14	Proxy GHG Price (\$/MT)	\$17.35	\$13.57	\$14.44	\$12.04	\$12.09	\$12.79	\$13.13	\$12.84	\$13.23	\$14.57	\$15.63	\$15.31	\$16.35	\$17.28	\$18.29	\$18.29	\$17.90	
15	GHG Costs (\$)																		
16	Direct GHG Costs ²																		
16.5	Direct GHG Costs True-Up ³																		
17	Direct GHG Costs - Financial Settlement																		
18	Indirect GHG Costs																		
19	Previous Year's Forecast Reconciliation ⁴	N/A	N/A	\$0	\$0	(\$25 881 702)	(\$35 475 620)	(\$7 355 343)	(\$16 295 922)	(\$7 874 871)	(\$21 964 804)	(\$8 449 696)	(\$8 449 696)	\$3 474 478	\$3 474 478	(\$31 587 146)	(\$31 587 146)	\$0	
20	Total Costs (\$)	\$89 750 005	\$61 221 829	\$61 715 000	\$64 361 474	\$32 289 561	\$24 934 218	\$47 848 837	\$39 973 966	\$48 264 166	\$39 814 470	\$52 187 054	\$55 661 532	\$65 251 423	\$33 664 277	\$39 853 228	\$39 853 228	\$57 978 100	
21	Forecast Variance⁵ (\$)	N/A	(\$28 528 177)	N/A	\$2 646 474	N/A	(\$7 355 343)	N/A	(\$7 874 871)	N/A	(\$8 449 696)	N/A	\$3 474 478	N/A	(\$31 587 146)	N/A	\$0	N/A	

¹In October of 2018 SDG&E recognized a downward adjustment of the under-reported emissions from 2013 and recorded this adjustment in its updated 2017 emissions. The downward adjustment follows section 95858 of the Cap-and-Trade regulation which provides a formula for calculating compliance obligations for under-reporting in a previous compliance period. The result of that formula was a compliance obligation reduction of 75 877 MT.

²Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes. Direct costs for 2017 forward include true-ups.

³SDG&E adopted an approach (as per D.19-04-016) that splits Direct GHG costs from prior period true-ups of Direct Costs. This row captures the true-up costs that necessarily need to be added to the Direct Costs prior to recording.

The 2019 Recorded True-up includes an off-cycle \$155 105 true-up to finalize SDG&E's 2018 emission volumes.

⁴The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition due to updates to recorded 2013 and 2014 amounts this figure has been updated.

⁵Also reflects adjustment for sh ft in regulatory accounting from cash to accrual

⁶Recorded data is equal to forecast and will be updated with the November Update Filing.

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016		2017		2018		2019		2020		2021	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded
1 Utility Outreach																		
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Other (Consultant) ^{2,5,6}	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-	-	-	-	18,811	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-	-	-	18,811	-	-	-	-	-
5 Utility Administrative																		
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	5,600	-	-	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	30,912	-	-	-	-	-	-	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	35,000	51,342	35,000	25,512	35,000	26,809	47,500	23,425	47,500	3,291	59,000	59,000	59,000	-
10 Other ⁴	-	N/A	12,500	12,500	12,500	-	12,500	-	12,500	2,361	-	-	-	-	-	-	-	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	56,424	47,500	34,770	47,500	23,425	47,500	3,291	59,000	59,000	59,000	-
12 Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	88,683	47,500	56,424	47,500	34,770	47,500	23,425	47,500	22,103	59,000	59,000	59,000	-
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000	-	140,000	-	140,000	-	140,000	-	-	-	-	-	-	-
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	88,683	187,500	56,424	187,500	34,770	187,500	23,425	47,500	22,103	59,000	59,000	59,000	-

¹ Recorded data is equal to forecast and will be updated with the November Update Filing.

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

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

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

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

⁶ Bill inserts and emails costs of \$18,811 booked to GHGCOEMA in October/November/December 2019 will be transferred to GHGACMA in 2020.

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Status (Open/Closed) (B)	Bundled Customers				Unbundled Customers				Total	
		Forecast MWh Sales (MWh) (C)	Forecast GHG Revenue Req (\$) ¹ (D)	Rate Impact (\$/kWh) ² (E)	Forecast GHG Revenue (\$) (F)	Forecast MWh Sales (MWh) (G)	Forecast GHG Revenue Req (\$) ¹ (H)	Rate Impact (\$/kWh) ² (I)	Forecast GHG Revenue (\$) (J)	Forecast GHG Revenue (\$) (K=F+J)	
Residential		6,062,419	\$ 27,657,026	0.00456	\$ 121,758,253	42,544	N/A	N/A	\$ 718,632	\$ 122,476,885	
DR	Open										
DR-LI	Open										
TOU-DR1	Open										
TOU-DR2	Open										
TOU-DR	Open										
DM	Closed										
D5	Closed										
DT	Closed										
DT-RV	Open										
DR-TOU	Closed										
DR-SES	Open										
EV-TOU	Open										
EV-TOU2	Open										
EV-TOU-5	Open										
Small Commercial		2,223,499	\$ 8,569,925	0.00385	\$ -	38,947	N/A	N/A	\$ -	\$ -	
TOU-A3	Open										
TOU-A2	Open										
TOU-A	Open										
A-TC	Open										
TOU-M	Open										
UM	Open										
Med/Large C&I³		5,915,422	\$ 27,141,095	0.00459	\$ -	3,525,242	N/A	N/A	\$ -	\$ -	
AL-TOU	Open										
AL-TOU2	Open										
DG-R	Open										
A6-TOU	Open										
OL-TOU	Open										
VGI	Open										
Public GIR	Open										
Agricultural		298,011	\$ 968,118	0.00325	\$ -	24,649	N/A	N/A	\$ -	\$ -	
TOU-PA3	Open										
TOU-PA2	Open										
TOU-PA	Open										
PA-T-1	Open										
Streetlighting		79,522	\$ 238,086	0.00299	\$ -	465	N/A	N/A	\$ -	\$ -	
LS-1	Open										
LS-2	Open										
LS-3	Closed										
OL-1	Open										
OL-2	Open										
DWL	Open										
System Total		14,578,874	\$ 64,574,250	0.00443	\$ 121,758,253	\$ 3,631,847	N/A	N/A	\$ 718,632	\$ 122,476,885	

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

²Rate impacts are based on customer class.

³The VGI and Public GIR rates are based on the Medium and Large Commercial and Industrial rate.

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

Line	Information	2013	2014	2015	2016	2017	2018	2019 (forecast)	2020 (forecast)	2021 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,409,838	\$56,269,888	\$61,779,274	\$64,111,229	\$30,189,799	\$71,440,374	\$37,722,530
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$81,558,628)	(\$92,539,677)	(\$93,727,555)	(\$104,156,909)	(\$112,372,776)	(\$121,114,031)
3	Emissions Intensity (MTCO ₂ e/MWh) *	0.322	0.284	0.269	0.242	0.243	0.241			

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

