

Application No.: A.24-05-010  
Exhibit No.: SDGE-9  
Witness: Jimmy Elias

**PREPARED REBUTTAL TESTIMONY OF**  
**JIMMY ELIAS**  
**ON BEHALF OF**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

**PUBLIC VERSION**

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



**September 9, 2024**

**TABLE OF CONTENTS**

I. INTRODUCTION .....1

II. SDG&E AGREES THAT THE PRM SHOULD BE UPDATED TO 17%.....2

III. SDG&E WILL UPDATE ITS METHODOLOGY FOR FORECASTING RA  
SALES AS PART OF THE OCTOBER UPDATE.....2

IV. CONCLUSION.....4

V. QUALIFICATIONS .....5

ATTACHMENT A – DECLARATION OF JIMMY ELIAS

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21

**PREPARED REBUTTAL TESTIMONY OF  
JIMMY ELIAS  
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

**I. INTRODUCTION**

The purpose of my rebuttal testimony is to address the August 19, 2024, Prepared Direct Testimony of Carlo Bencomo-Jasso on behalf of San Diego Community Power and Clean Energy Alliance (collectively the “Joint CCAs”) in San Diego Gas & Electric Company’s (“SDG&E”) Application for Approval of its 2025 Electric Procurement Revenue Requirement Forecasts, 2025 Electric Sales Forecast, and GHG Related Forecasts (“Application”).

Specifically, my rebuttal testimony addresses the following issues raised in Mr. Bencomo-Jasso’s testimony:

- The Joint CCAs’ recommendation that SDG&E should employ a different Resource Adequacy (“RA”) sales forecast to reflect an updated planning reserve margin (“PRM”).
- The Joint CCAs’ recommendation that SDG&E should classify the [REDACTED] of excess RA it withheld to cover uncertainties as Retained RA instead of Unsold RA and value this Retained RA amount at the RA market price benchmark (“MPB”).

SDG&E’s failure to address any particular intervenor testimony or individual issue in this rebuttal testimony does not imply agreement by SDG&E with any argument, position or proposal asserted by the intervenors.

1 **II. SDG&E AGREES THAT THE PRM SHOULD BE UPDATED TO 17%**

2 In their testimony, the Joint CCAs recommend that SDG&E utilize a 17% PRM instead  
3 of the █████ PRM used to estimate excess RA for 2025.<sup>1</sup> SDG&E notes the 17% PRM was not  
4 adopted until after the May filing, and therefore, SDG&E used █████ as a worst-case scenario.<sup>2</sup>  
5 SDG&E agrees that the PRM should be updated to reflect the approved PRM of 17% in  
6 D.24-06-004.<sup>3</sup> This will be reflected in the October Update.

7 **III. SDG&E WILL UPDATE ITS METHODOLOGY FOR FORECASTING RA**  
8 **SALES AS PART OF THE OCTOBER UPDATE**

9 The Joint CCAs take issue with SDG&E's proposed RA sales forecasting methodology,  
10 claiming that it understates volumes of sold RA and overstates volumes of unsold RA for the  
11 forecast year.<sup>4</sup> Specifically, the Joint CCAs suggest that the Commission require SDG&E to  
12 classify the █████ of excess RA it withheld to cover uncertainties as Retained RA instead of  
13 Unsold RA and value this Retained RA amount at the RA MPB.<sup>5</sup> The Joint CCAs maintain that  
14 this approach is consistent with the method Southern California Edison ("SCE") utilizes in its  
15 2025 ERRRA Forecast.<sup>6</sup> The Joint CCAs also point out that the Commission directed SDG&E to  
16 adopt the Joint CCAs' methodology for forecasting RA sales in last year's ERRRA Forecast  
17 proceeding (*i.e.*, the 2024 ERRRA forecast proceeding).<sup>7</sup>

---

1 <sup>1</sup> Bencomo-Jasso Testimony, pp. 27-29.

2 <sup>2</sup> SDG&E notes that the Commission's recently revised LOLE study from August 30, 2024  
recommends a 2026 PRM of 26.5% from January – May and 23.5% from June – December. *See,*  
*Appendix A to Loss of Load Expectation Study for 2026: Revised Slice of Day Tool Analysis* in  
R.23-10-011.

3 <sup>3</sup> SDG&E notes that the PRM is subject to change every year and it would be inappropriate to assume a  
17% PRM every year.

4 <sup>4</sup> Bencomo-Jasso Testimony, pp. 23-33.

5 <sup>5</sup> *Id.* at pp. 31.

6 <sup>6</sup> *Id.*

7 <sup>7</sup> *Id.* at 24.

1 SDG&E acknowledges that the Commission directed it to utilize the Joint CCAs'  
2 methodology for the 2024 ERRA forecast proceeding, but notes that the Commission also  
3 made clear that this directive was applicable only to the 2024 ERRA forecast proceeding  
4 (A.23-05-013) and was never intended to be the controlling or exclusive methodology going  
5 forward:

6 Therefore, we find that SDG&E should revise its 2024 RA sales forecast using the  
7 average of actual RA sales recorded in 2023 to date. Affected revenue  
8 requirement forecasts such as the PABA revenue requirement should also be  
9 revised accordingly. **This methodology for forecasting RA sales shall apply to**  
10 **SDG&E's 2024 ERRA forecast.**<sup>8</sup>  
11

12 It is important to note that the original proposed decision issued in last year's ERRA  
13 forecast proceeding did not expressly include this limitation. However, in its Comments to last  
14 year's proposed decision, SDG&E raised this concern and argued that the prescribed  
15 methodology for forecasting 2024 RA sales should be limited to only the 2024 ERRA forecast  
16 proceeding (*i.e.*, A.23-05-013) and should not preclude SDG&E from proposing or adopting  
17 alternative methods for forecasting RA sales volumes in future ERRA forecast filings.<sup>9</sup> In other  
18 words, the forecasting methodology should not be the precedent for future ERRA forecast  
19 filings.<sup>10</sup> The Commission agreed with SDG&E and added the limiting language quoted above  
20 in the final decision.<sup>11</sup> Indeed, this concern is especially true today given all of the recent and  
21 upcoming changes to its RA compliance requirements and processes that SDG&E must manage.

---

<sup>8</sup> D.23-12-021 (issued Dec. 15, 2023 in A.23-05-013) at p. 30 (emphasis added).

<sup>9</sup> A.23-05-013 *SDG&E's Opening Comments on Proposed Decision Approving 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecast, and Greenhouse Gas Related Forecasts*, pp. 4-5.

<sup>10</sup> *Id.*

<sup>11</sup> Compare A.23-05-013 Proposed Decision (filed on Nov. 27, 2023) at p. 30 with Final Decision D.23-12-021 at p. 30.

1 These include the Commission’s recent adoption of a “slice of day” framework for RA  
2 compliance in 2025; the natural attrition of SDG&E’s energy supply portfolio associated with  
3 load departure; and the market’s reaction to the slice of day requirement, which may impact  
4 future RA sales. Thus, any suggestion by the Joint CCAs that the Commission required SDG&E  
5 to adopt the Joint CCAs’ forecasting methodology in perpetuity is inaccurate, due to the  
6 significant differences between years 2024 and 2025.

7 In addition, D.19-10-001 defines “Retained RA” as the “amount of RA not offered for  
8 sale or forecasted to be offered for sale”<sup>12</sup> from PCIA-eligible resources. Similarly, SDG&E  
9 defines “RA Reserves,” as “capacity that is not required to meet its annual and/or monthly RA  
10 compliance requirements but it not offered for sale.”<sup>13</sup> SDG&E clarifies its methodology for  
11 forecasting RA sales: to the extent that it has RA Reserves (“*i.e.*, buffer”), this amount will be  
12 added to its RA capacity required to meet compliance obligations and included in Retained RA,  
13 with the remaining capacity offered for sale to the market. At the time of filing the application,  
14 SDG&E did not have its final CAM allocations, final Slice of Day requirements, or outages for  
15 2025, so the [REDACTED] withheld to “cover uncertainties”<sup>14</sup> was a conservative figure. As part of its  
16 October Update, SDG&E will consider recent RA sales, solicitations,<sup>15</sup> potential outages, and  
17 any other relevant data to update forecasted amounts of Retained RA, sold RA and unsold RA.  
18 This will be reflected in the October Update.

#### 19 **IV. CONCLUSION**

20 This concludes my prepared rebuttal testimony.  
21

---

<sup>12</sup> D.19-10-001, Attachment B, p. 1

<sup>13</sup> Advice Letter 3836-E, p. 2

<sup>14</sup> Direct Testimony of Jimmy Elias, p. 5.

<sup>15</sup> SDG&E’s 2025 RA Solicitation closed on August 30, 2024.

1 **V. QUALIFICATIONS**

2 My name is Jimmy Elias. My business address is 8315 Century Park Court, San Diego,  
3 CA 92123. I joined SDG&E in July 2015 and my current title is Senior Resource Planner in the  
4 Electric & Fuel Procurement Department. My responsibilities include running computer models  
5 that forecast energy needs for both physical and financial operational needs. I received a B.S. in  
6 Finance from San Diego State University in San Diego, CA.

7 I have previously testified before the California Public Utilities Commission.

**ATTACHMENT A**



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

**DECLARATION  
OF JIMMY ELIAS**

**A.24-05-010**

**Application of San Diego Gas & Electric Company (U 902-E)  
for Approval of Its 2025 Electric Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts**

I, Jimmy Elias, declare as follows:

1. I am a Senior Resource Planner for San Diego Gas & Electric Company (“SDG&E”). I sponsored my Prepared Rebuttal Testimony (“Testimony”) in support of SDG&E’s Application for Approval of its 2025 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as the Senior Resource Planner, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information (“Protected Information”) set forth in the referenced Testimony falls within the scope of data provided confidential treatment in the IOU Matrix (“Matrix”) attached to the Commission’s Decision (“D.”) 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and
- that the data cannot be aggregated, redacted, summarized, masked, or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section

454.5(g) of the Public Utilities Code.<sup>1</sup> As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

<b>Location of Protected Information</b>	<b>Matrix Reference</b>	<b>Reason for Confidentiality and Timing</b>
Prepared Rebuttal Testimony at pages JE-1, JE-2,	VI.A	Utility Bundled Net Open Position for Capacity; confidential for the front three years

4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. SDG&E will comply with the limitations on confidentiality specified in the Matrix for the Protected Information.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized, masked, or otherwise protected in a manner that would allow further disclosure of the data while still protecting confidential information.

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

Executed this 9<sup>th</sup> day of September 2024, at San Diego, California.

/s/ Jimmy Elias  
Jimmy Elias  
Senior Resource Planner  
San Diego Gas & Electric Company

---

<sup>1</sup> In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-D. Accordingly, SDG&E seeks confidential treatment of this data under those provisions, as applicable.