Application No.: A.19-04-

Exhibit No.:

Witness: Monica V. Chihwaro

PREPARED DIRECT TESTIMONY OF MONICA V. CHIHWARO ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

Public Version

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

April 15, 2019



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PREPARED DIRECT TESTIMONY OF MONICA V. CHIHWARO ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

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I. PURPOSE AND OVERVIEW

This testimony presents San Diego Gas & Electric Company's ("SDG&E") accounting procedure used to record the greenhouse gas ("GHG") Compliance Instrument Costs that are described in the testimony of SDG&E witness Ana Garza-Beutz.

II. ACCOUNTING FOR DIRECT GHG EMISSIONS

As described in the prepared direct testimony of Ana Garza-Beutz, SDG&E values its purchased GHG compliance instruments on a monthly basis using the Weighted Average Cost ("WAC") of Compliance Instruments by compliance period, in accordance with Decision ("D.") 14-10-033, as corrected by D.15-01-024. The SDG&E Utility Accounting Department recorded GHG costs in the Energy Resource Recovery Account ("ERRA") balancing account based on data detailing actual GHG emissions and WAC calculations provided by Ms. Garza-Beutz. More specifically, the Utility Accounting Department took the total monthly emissions and multiplied that amount by the WAC for each month. The product comprised the direct GHG costs and was booked as an expense. SDG&E recognized the expense of the costs of GHG compliance instruments for ERRA balancing account purposes as it emits GHG and incurs a liability to the California Air and Resources Board ("CARB"). Each month, as monthly emissions were reported, the Utility Accounting Department recorded the costs for the current month. If reported emission amounts from previous months were revised, then the Utility Accounting Department updated the current month's expense to reflect the true-up of costs associated with the revised emission amounts from prior months.

Recorded GHG Direct Compliance costs expensed in the ERRA balancing account for the year ended December 31, 2018 were million, which includes amounts expensed to true-up 2013 through 2017 emissions costs. See Attachment A, attached hereto, for summary of these transactions.

This concludes my prepared direct testimony.

III. QUALIFICATIONS

My name is Monica V. Chihwaro. My business address is 8315 Century Park Court, San Diego, CA 92123. I am employed by SDG&E as a Financial Accounting Manager in their Utility Accounting Department. My responsibilities include reviewing journal entries recorded to prepare financial statements, which include GHG-related accounts.

I joined SDG&E in July 1996, and since that time, I have held various positions within Sempra Energy companies, including Corporate Development Manager, Audit Services

Manager, and Financial Reporting Manager at Sempra Energy. I rejoined SDG&E in November 2013.

I received a Bachelor of Science degree in Business Administration with an emphasis in Accounting from San Diego State University. I am also a Certified Public Accountant licensed in the state of California.

ATTACHMENT A

Summary of GHG Charges					
Year Recorded	Compliance Year	(ual-based Actual GHG Direct pliance Costs ⁽¹⁾	(orded in ERRA- GHG Direct mpliance Costs
Project-to-date total as of 2016	2013 - 2016	\$	156,945,418	\$	154,434,597
2017	2015 - 2016				2)
2017	2017				3)
Total 2017					
2018	2013 - 2017				(4)
2018	2018				(5)
Total 2018					
Total Program-to-date		\$	219,565,230	\$	219,565,230

⁽¹⁾ Amounts represent total direct GHG cost for the period January through December 2013 - 2017, and 2018 according to Ms. Ana Garza-Beutz' testimony, Section IV. Actual GHG Compliance Costs, C. GHG Costs.

⁽²⁾ Expense recorded in 2017 to true-up 2015 and 2016 GHG direct compliance costs.

⁽³⁾ Expense recorded in 2017 for estimated-actuals provided as of 1/3/2018 for reporting period 1/1/2017 through 12/31/2017.

⁽⁴⁾ Expense recorded in 2018 to true-up 2013 - 2017 GHG direct compliance costs for estimated-actuals provided as of 1/3/2019.

⁽⁵⁾ Expense recorded in 2018 for estimated-actuals provided as of 1/3/2019 for reporting period 1/1/2018 through 12/31/2018.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

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

- 1. I am the Manager- Energy Supply & Dispatch in the Electric and Fuel Procurement department for San Diego Gas & Electric Company ("SDG&E"). I have been delegated authority to sign this declaration by Kendall K. Helm, Vice President of Energy Supply. I have reviewed Ana Garza-Beutz's and Monica Chihwaro's Prepared Direct Testimonies ("Ana Garza-Beutz Testimony and Monica Chihwaro Testimony") in support of SDG&E's April 15, 2019 "Application … for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts and GHG Related-Forecasts" ("Application"). I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.
- I hereby provide this Declaration in accordance with Decisions ("D.") D.16-08-024,
 D.17-05-035 and D.17-09-023 to demonstrate that the confidential information ("Protected
 Information") provided in Ms. Garza-Beutz's Testimony and Ms. Chihwaro's Testimony is within the scope of data protected as confidential under applicable law.
- 3. In accordance with the legal citations and narrative justification described in Attachment A, the Protected Information should be protected from public disclosure.

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

Executed this 15th day of April, 2019, at San Diego.

Ryan A. Miller Manager – Energy Supply & Dispatch

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ATTACHMENT A

SDG&E Request for Confidentiality on the following information contained in Ana Garza-Beutz's and Monica Chihwaro's Testimonies in support of SDG&E's Application

Location of	Legal Citations	Narrative Justification
Protected		
Information		
1. SDG&E WAC prices and WAC calculations (The 2018 WAC price appears in Ana Garza-Beutz's Testimony; the 2013-2018 WAC calculations are utilized in tab "D-2" of Attachment G and the 2018 Monthly WAC prices and calculations appear in Attachment A of Ana Garza-Beutz's Testimony)	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024 The Matrix makes the following confidential: "Weighted Average Cost (WAC) of compliance instruments, and the calculation of WAC" Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
2. Historical/Reco rded UOG Emissions	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023,	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.

	Public Utilities Code	
	Section 454.5(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
		and-Trade regulations prohibits disclosure of any auction-
	General Order ("GO") 66-D	related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
		SDOCE to penantes by the Camorina Air Resources Board.
(m) 2010	17 CCR § 95914(c) (the	In addition, Attachments A, C & D of D.15-01-024 and
(The 2018 Historical UOG	"ARB Confidentiality	Appendices A & B of D.15-10-032 require Auction-related
Emissions appear	Regulations")	information, forecasts of emissions intensity, forecasts of
in Ana Garza-		greenhouse gas (GHG) costs, GHG transactions, compliance
Beutz's	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.
Testimony and	Associated Costs in	Gro information to be kept confidential.
the 2013-2018	Template D-2 of D.14-10-	Additionally, the Protected Information also includes trade
Recorded UOG	033 and revised in D.15-01-	secret information because SDG&E's bidding/consignment
Emissions in Attachment G of	024	strategies contain "commercial value," which gives SDG&E "an
this Application.)	Template D-2 designates	opportunity to obtain a business advantage over competitors
	forecasted and recorded	who do not know or use it."
	UOG emissions as	Disclosure of this information would place SDG&E at an unfair
	confidential	business disadvantage relative to other Cap-and-Trade market
	Gov't Code §§6254(k),	participants and result in higher
	6254.7 (d), Evidence	Cap-and-Trade compliance costs for SDG&E and its end-use
	Code 1060, Civil	ratepayers.
	Code §3426 et seq.	
<i>3.</i>	D.08-04-023	The Protected Information is entitled to confidential treatment
Historical/Reco		under applicable law, including, but not limited to, the legal
rded California	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric
Tolling	D.17-05-035, D.17-09-023,	procurement information, but is market-sensitive information.
Agreement Emissions	Public Utilities Code	
Emissions	Section 454.5(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
	General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction-
	General Graef (GG) 60 B	related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
	17 CCR § 95914(c) (the	55 365 to penalties of the Camorina All Resources Boald.
	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
		information, forecasts of emissions intensity, forecasts of
(The 2018	Annual GHG Emissions and	greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other
Historical Tolling Agreement	Associated Costs in	GHG information to be kept confidential.
Emissions appear	Template D-2 of D.14-10-	
in Ana Garza-	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
Beutz's	024	secret information because SDG&E's bidding/consignment
Testimony and	Template D-2 designates	strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors
the 2013-2018 Recorded	forecasted and recorded	who do not know or use it."
California	Tolling Agreements	
Tolling	emissions as confidential	Disclosure of this information would place SDG&E at an unfair
Agreement		business disadvantage relative to other Cap-and-Trade market
Emissions appear	Gov't Code §§6254(k),	participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use
in Attachment G	6254.7 (d), Evidence	ratepayers.
	Code 1060, Civil	

	of this	Code §3426 et seq.	
	Application.)		
(TE Spo MV Em An Tes 201 Spo Em Att	Historical/Rec orded Specified Imported MWh and calculated Emissions he 2018 Historical ecified Imported Wh and calculated hissions appear in a Garza-Beutz's stimony and the 13-2018 Recorded ecified Imported hissions appear in tachment G of this plication.)	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Energy Imports (Specified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
5.	Historical/Rec orded Unspecified Imported MWh and calculated Emissions	Code §3426 et seq. D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.

(The 2018 Historical Unspecified Imported MWh and calculated Emissions appear in Ana Garza- Beutz's Testimony and the 2013-2018 Recorded Unspecified Imported Emissions appear in Attachment G of this Application.) 6. Historical RPS Adjustment eligible MWh and calculated Emissions (The Historical RPS Adjustment eligible MWh and calculated Emissions (The Historical RPS Adjustment eligible MWh and calculated Emissions for 2018 appear in Ana Garza- (The Historical RPS Adjustment eligible MWh and calculated Emissions for 2018 appear in Ana Garza- (The Historical RPS Adjustment eligible MWh and calculated Emissions (The Historical RPS Adjustment eligible MWh and calculated Emissions (The Historical RPS Adjustment eligible MWh and calculated Emissions (The Historical RPS Adjustment eligible MWh and calculated Emissions for 2018 appear in Ana Garza- (The Historical RPS Adjustment eligible MWh and calculated Emissions for 2018 appear in Ana Garza- Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Mown as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §\$6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq. D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10- 033 and revised in D.15-01- 024 Template D-2 designates forecasted and recorded Emissions for 2018 appear in Ana Garza- Template D-2 designates forecasted and recorded Emissions for 2018 appear in Ana Garza- Template D-2 designates forecasted and recorded Emissions for 2018 appear in Ana Garza- The Protected Information also includes trade secret information also includes trade secret information his ensuit vo totain a bus			Template D-2 of D.14-10-	
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Gov*t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq. 6. Historical RPS Adjustment eligible MWh and calculated Emissions D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") General GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Emissions Template D-2 designates forecasted and recorded Emissions for 2018 appear in Ana Garza- Gov*t Code §\$6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §\$6254.7 (d), Evidence Code 1060, Civil Code §\$426 et seq. The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but somrket-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of ensurance information to be kept confidential. Additionally, the Protected Information also includes trade secret information to be kept confidential. Template D-2 designates forecasted and recorded Emissions for 2018 appear in Ana Garza-				
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Template D-2 of D.14-10-033 and revised in D.15-01-024 **Template D-2 of D.14-10-033 and revised in D.15-01-024 **Emissions for 2018 appear in Ana Garza- **Template D-2 designates forecasted and recorded Ana Garza- **Template D-2 designates forecasted Ana Garza- **Template D		(m)	Associated Costs in	
eligible MWh and calculated Emissions for 2018 appear in Ana Garza- 1033 and revised in D.15-01- 1024 Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."		,		· · · · · · · · · · · · · · · · · · ·
calculated Emissions for 2018 appear in Ana Garza- Calculated Emissions for 2018 appear in Carrae Template D-2 designates forecasted and recorded Energy Imports (Unapperified) Secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."			•	Additionally, the Protected Information also includes trade
Emissions for 2018 appear in Ana Garza- Template D-2 designates forecasted and recorded forecasted and recorded Engage Imports (Unappetition). Strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."		·		
2018 appear in Ana Garza- forecasted and recorded Energy Imports (Unappetition) Template D-2 designates opportunity to obtain a business advantage over competitors who do not know or use it."				strategies contain "commercial value," which gives SDG&E "an
Ana Garza- Torecasted and recorded who do not know or use it."				
		• •		who do not know or use it."
		Beutz's		Disclosure of this information and data CDC 9 E of the C
Testimony and emissions, which includes any applicable RPS emissions, which includes business disadvantage relative to other Cap-and-Trade market		Testimony and	1	
the 2013-2018 any applicable KLS				
Recorded RPS Adjustificities as confidential. Con and Trade compliance costs for SDG&E and its and use				
Adjustment Kilowicuge of the WWII ratenavers		•	•	
Emissions appear makes discovery of the				
in Attachment G emissions possible, thus the			•	
of this MWh are also confidential.			MWh are also confidential.	
Application.)		Аррисапоп.)		
Gov't Code §§6254(k),			Gov't Code §§6254(k),	
6254.7 (d), Evidence			6254.7 (d), Evidence	
Code 1060, Civil			Code 1060, Civil	
Code §3426 et seq.			Code §3426 et seq.	

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<i>7</i> .	Total Direct	D.08-04-023	The Protected Information is entitled to confidential treatment
	Compliance		under applicable law, including, but not limited to, the legal
	Obligation	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	O	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
		Public Utilities Code	procurement information, but is market-sensitive information.
	(The 2018 Total	Section 454.5(g)	
	Direct	Section 434.3(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
	Compliance		and-Trade regulations prohibits disclosure of any auction-
	Obligation	General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
	appears in Ana		SDG&E to penalties by the California Air Resources Board.
	Garza-Beutz's	17 CCR § 95914(c) (the	
	Testimony, the	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	2013-2018	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
	Recorded Total		information, forecasts of emissions intensity, forecasts of
	Direct		greenhouse gas (GHG) costs, GHG transactions, compliance
	Compliance	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	Obligation appear	Associated Costs in	GHG information to be kept confidential.
	in Attachment G	Template D-2 of D.14-10-	
	of this	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	Application, the	024	secret information because SDG&E's bidding/consignment
	2018 recorded	T. I. D.O.I.	strategies contain "commercial value," which gives SDG&E "an
	ERRA Direct	Template D-2 designates	opportunity to obtain a business advantage over competitors
	GHG Costs in	forecasted and recorded	who do not know or use it."
	Monica	Direct GHG Emissions	
	Chihwaro's	Subtotal as confidential.	Disclosure of this information would place SDG&E at an unfair
	Testimony and		business disadvantage relative to other Cap-and-Trade market
	the 2013-2018	Gov't Code §§6254(k),	participants and result in higher
	Accrual and	6254.7 (d), Evidence	Cap-and-Trade compliance costs for SDG&E and its end-use
	Recorded Direct	Code 1060, Civil	ratepayers.
	GHG Costs.)	Code §3426 et seq.	
8.	Indirect	D.08-04-023	The Protected Information is entitled to confidential treatment
	Purchases in	2.00 0.020	under applicable law, including, but not limited to, the legal
	MWh and	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	calculated	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
	Emissions	Public Utilities Code	procurement information, but is market-sensitive information.
	Emissions		
		Section 454.5(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
			and-Trade regulations prohibits disclosure of any auction-
		General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
			SDG&E to penalties by the California Air Resources Board.
		17 CCR § 95914(c) (the	
	(The 2018	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	forecasted	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
	Indirect		information, forecasts of emissions intensity, forecasts of
	Purchases in	Annual CHC Entire 1	greenhouse gas (GHG) costs, GHG transactions, compliance
	MWh and	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	calculated	Associated Costs in	GHG information to be kept confidential.
	Emissions appear	Template D-2 of D.14-10-	Additionally the Dustreet SToConnection 1 1 1 1 1 1
	in Ana Garza-	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	Beutz's	024	secret information because SDG&E's bidding/consignment
	Testimony and the 2013-2018	Template D-2 designates	strategies contain "commercial value," which gives SDG&E "an
	tne 2013-2018 Recorded	forecasted and recorded	opportunity to obtain a business advantage over competitors who do not know or use it."
	kecoraea calculated	Torecasied and recorded	who do not know of use it.
	Indirect		
Ь	maneci		

	F	In the st CHC E	Disabassas of this information as 11 along CDC 0.7
	Emissions appear in Attachment G of this Application.)	Indirect GHG Emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus, the MWh are also confidential.	Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
		Gov't Code §§6254(k), 6254.7 (d), Evidence	
		Code 1060, Civil Code §3426 et seq.	
9.	Direct GHG Costs (The 2018 Direct GHG Costs appear in Ana	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations")	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of
	appear in Ana Garza-Beutz's Testimony and the 2013-2018 Recorded Direct GHG Costs appear in Attachment G of this Application.)	Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Direct GHG Costs as confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
10.	Estimated Indirect GHG Costs	Code §3426 et seq. D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related

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(The 2018 estimated Indirect GHG Costs appear in Ana Garza-Beutz's Testimony and the 2013-2018 Recorded estimated Indirect GHG Costs appear in Attachment G of this Application.)	17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Indirect GHG Costs as confidential.	information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
	Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	Tatepuyers.
11. GHG Quarterly Auction Revenue	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-
(The 2018 GHG Quarterly Auction Revenue appear in Ana	General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") 1a. of Attachment A of D.14-10-033 and revised in D.15-01-024 1a. makes the following confidential: "AB 32 GHG auction participation."	and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an experturity to obtain a business educators over competitors.
Garza-Beutz's Testimony.)	Although Annual Auction Revenues are public, Quarterly Auction Revenues must be confidential since public auction settlement prices and Quarterly Auction Revenues would reveal SDG&E's quarterly auction participation as a consigner Gov't Code §§6254(k),	opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.

	6254.7 (d), Evidence	
	Code 1060, Civil	
	Code §3426 et seq.	
12. Emissions Intensities	D.08-04-023	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal
Intensities	D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-
	General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction- related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
(The 2018-2020 forecasted Emissions Intensities appears in Attachment G of this Application.)	17 CCR § 95914(c) (the "ARB Confidentiality Regulations") The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024 The Matrix makes the following confidential: "Forecast of GHG Emissions Intensity" Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
	Code §3426 et seq.	