Proceeding No.: A.20-12-007
Exhibit No.: SDGE-04
Witness: Stacy Fuhrer

PREPARED SUPPLEMENTAL TESTIMONY OF

STACY FUHRER

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

January 20, 2021

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PREPARED SUPPLEMENTAL TESTIMONY OF
STACY FUHRER
ON BEHALF OF SDG&E

I. INTRODUCTION

The purpose of my supplemental testimony is to present San Diego Gas & Electric Company's ("SDG&E") rate recovery proposals for its Expedited Application Under the Energy Resource Recovery Account ("ERRA") Trigger Mechanism, which includes the undercollection as currently recorded in its ERRA balancing account. In addition, this supplemental testimony presents revised commodity and Power Charge Indifference Adjustment ("PCIA") rates that will bring the projected ERRA balance to zero. SDG&E's proposal to amortize its ERRA undercollection over a 10-month period beginning March 1, 2021 and ending December 31, 2021, and moving the undercollection to the 2020 Portfolio Allocation Balancing Account ("PABA") vintage would create rate stability while maintaining customer indifference, as discussed further below in section III. My supplemental testimony is organized as follows:

- **Section II**: - I discuss the background of PCIA, as well as its applicability to SDG&E's ERRA balance.
- **Section III**: - I discuss SDG&E's 10-month amortization cost recovery proposal of its ERRA undercollected balance and its transfer to the 2020 PABA vintage and present rate impacts for bundled[1] commodity rates and PCIA rates.
- **Section IV**: - I provide a summary of my supplemental testimony and the relief requested.

[1] Bundled customers are customers who receive bundled electric service from SDG&E, meaning they receive electric generation and utility distribution company ("UDC") services from SDG&E. In 2020 most of SDG&E's customers are bundled customers but SDG&E expects significant load departure in 2021.

This supplemental testimony was necessitated by the fact that on January 14, 2021, the Commission adopted a Final Decision in SDG&E's ERRA Forecast Application (A.20-04-014) which directed SDG&E to implement bundled generation rates based upon SDG&E's 2021 energy requirements sales forecast used to derive the ERRA revenue requirement and the System Average Percent Change ("SAPC") methodology.[2] The primary changes to my testimony serve to incorporate the impact of D.21-07-017 into this ERRA Trigger Application, including:

- Updating SDG&E's proposed revenue allocation methodology to use the SAPC methodology, rather than authorized generation revenue allocation factors.
- Updating SDG&E's requested undercollected ERRA Trigger balance from its initial $119 million *forecasted* year-end balance to its *actual* $124 million balance as of December 31, 2020 to ensure the current and most accurate balance is recovered.

II. BACKGROUND

A. PCIA Rates

In D.06-07-030, modified by D.07-01-030, the California Public Utilities Commission ("Commission") established authority for the PCIA component of the Cost Responsibility Surcharge ("CRS") to preserve bundled customer indifference by ensuring Departing Load customers pay their share of the cost responsibility associated with the above-market costs based on an administrative benchmark, also known as the "indifference amount" of the utilities' total procurement resource portfolio.[3]

In D.08-09-012, the Commission continued to refine the indifference amount methodology to better protect bundled customer indifference by introducing the requirement to "vintage" Departing Load customers, based on their departure date, when determining the customers' cost

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[2] Decision ("D.") 21-01-017 approved January 14, 2021.

[3] In D.07-01-025, the Commission adopted the PCIA methodology for Community Choice Aggregation ("CCA") customers.

responsibility for the "total portfolio" of resources.[4] Assigning customers to a vintage ensured that Departing Load customers pay their share of above-market costs associated with the specific vintage portfolio of resources that were acquired to serve them prior to their departure from bundled load service in order to better protect bundled customer indifference. After departure from bundled service, the Departing Load customers are not required to pay for above-market costs associated with utility procurement commitments after that load departs.

In D.11-12-018, the Commission adopted further refinement to the indifference amount methodology recognizing that regulatory and industry changes had impacted energy procurement practices. Changes to the Market Price Benchmark ("MPB") methodology, used to determine the "above-market" value of electricity, now included the addition of a renewables portfolio standards adder ("RPS adder") to better reflect the market value of renewable resources and a revised resource adequacy capacity adder ("CAP adder"), which resulted in vintage MPBs.[5] The vintage portfolio of resources calculation was revised to better reflect time-of-use load variations and also removed load-related costs incurred by the California Independent System Operator ("CAISO") that are then charged to the utilities.

In accordance with D.16-09-044, the Joint Utilities and CCAs[6] developed a uniform workpaper template through the PCIA Working Group to "facilitate comparison and analysis of the PCIA across utilities."[7] Pursuant to OP 1 of D.17-08-026 and consistent with SDG&E's 2020 ERRA Forecast, SDG&E has reflected the uniform workpaper template as attached in Appendix 7

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[4] D.08-09-012, Ordering Paragraph ("OP") 10.

[5] D.11-12-018, OP 2.

[6] Southern California Edison ("SCE"), Pacific Gas & Electric Company ("PG&E"), SDG&E companies (collectively, the Joint Utilities), CCAs, certain Electric Service Providers and other representatives of Direct Access interests, and consumer, labor and environmental groups participated to the PCIA working group.

[7] D.17-08-026, p. 2.

of D.06-07-030 as part of this filing. The Commission further ordered in D.18-10-019 that PG&E, SCE and SDG&E develop a uniform common template for the calculation of each of their PCIA rates reflecting the changes ordered in the Decision.[8] SDG&E submitted its common template to the Commission's Energy Division and concurrently served the updated common template to the service list for its ERRA proceeding.

In D.18-10-019, the Commission issued a decision modifying the PCIA methodology revising inputs to the MPB that is used to calculate the PCIA. The revised methodology affects PCIA rates that were effective as of January 1, 2019. In addition to the revised MPB inputs, the decision also adopted an annual true-up mechanism, as recommended by a number of parties, as well as a cap that will limit the change of the PCIA rate from one year to the next. Starting in forecast year 2020, the cap level of the PCIA rate is set at 0.5 cents/kilowatt-hour ("kWh") more than the prior year's PCIA, differentiated by system average vintage rate. In Advice Letter ("AL") 3318-E, the PABA was established to record the "above-market" costs and revenues associated with all PCIA eligible resources by vintage subaccounts. This balancing account became effective on January 1, 2019.

In D.19-10-001, the Commission issued a decision further modifying the PCIA methodology revising the inputs to the billing determinants (sales) that is used to calculate the PCIA rates. The revised methodology affects PCIA rates that are effective February 1, 2020.[9] This revision ordered SDG&E to use vintage billing determinants of those responsible for the vintage portfolio to determine PCIA rates, instead of the previously used system billing determinants. In addition, the decision authorized any over/under-collection in the PABA vintage subaccounts in a

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[8] D.18-10-019, OP 3.

[9] Ordinarily, rates would have been effective January 1, 2020. However, SDG&E's 2020 ERRA Forecast Filing was not approved until January 16, 2020 via D.20-01-005 and implemented per AL 3500-E on February 1, 2020.

given year to be rolled into the next year's ERRA Forecast filing. The decision adopted the methodology for SDG&E to true-up the values in PABA for the imputed RPS and Resource Adequacy ("RA") costs using the updated benchmarks provided by the Energy Division on November 1st. The true-up amounts for both RPS and RA will be booked as adjustments to PABA annually through the ERRA Forecast filing.

AL 3436-E established the PCIA under-collection balancing account ("CAPBA").[10] 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.[11]

B. Indifference Methodology

Under Commission rules,[12] Departing Load customers are responsible for their fair share of above-market costs, or an indifference amount, incurred by the utility on behalf of those customers when electric generation costs exceed the current market price, or MPB. To maintain bundled customer indifference to the departure of SDG&E's customers to non-utility service, SDG&E calculates the indifference amount to determine the cost responsibility for direct access ("DA"), CCA and other Departing Load as follows:

Indifference Amount = CTC + PCIA

The above-market costs for both the Ongoing Competition Transition Charge ("CTC") and PCIA are determined using the MPB, a calculated proxy for the market value of electricity. This methodology is consistent with Commission directives, specifically D.11-12-018 and Commission Resolution E-4475.

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[10] SDG&E AL 3436-E was filed on September 30, 2019 and approved on October 31, 2019.

[11] Pursuant to D.18-10-019, OP 9 to R.17-06-026, the CAPBA balance is the portion of PABA revenues that is above the capped system average rate of $0.005 kWh per vintage.

[12] California Public Utilities Code Section 365.2.

C. Treatment of SONGS-related Costs

On July 26, 2018, the Commission approved D.18-07-037 adopting the majority of the 2018 Revised Settlement Agreement (“Agreement”), which stated, in part, that SDG&E would cease collecting in rates the revenue requirement authorized to be recovered related to the San Onofre Nuclear Generation Station ("SONGS”) regulatory asset. SDG&E’s PCIA rates therefore no longer include SONGS-related Regulatory Asset costs.[13] The only remaining SONGS-related costs included in PCIA rates are non-fuel-related costs authorized in SDG&E’s 2019 General Rate Case (“GRC”).[14]

D. PCIA Rate Caps

Pursuant to D.18-10-019, SDG&E must now evaluate whether the $0.005/kWh PCIA cap has been reached based on the system average PCIA rate by customer vintage, using a comparison between the prior year’s DA/CCA PCIA rates and those proposed in the current proceeding.[15] If the system average PCIA rate by customer vintage is forecasted to increase by more than $0.005/kWh, then all PCIA rates for that customer vintage would be capped. The revenue shortfall resulting from the rate cap is tracked in the customer vintage subaccount within CAPBA. The forecasted revenue shortfall from these Departing Load customers is then divided by the authorized bundled sales to calculate the increase in bundled customers’ commodity rates to cover the shortfall.[16]

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[13] In the Order Instituting Investigation on the Commission’s Own Motion in the Rates, Operations, Practices, Services and Facilities of SCE and SDG&E Associated with the SONGS Units 2 and 3 (Investigation (“I.”) 12-10-013), a Joint Motion for Adoption of Settlement Agreement was approved by the Commission in D.18-07-037.

[14] D.19-09-051.

[15] SDG&E’s CAPBA Preliminary Statement pursuant to AL 3436-E and approved October 30, 2019.

[16] SDG&E’s bundled sales were approved in D.18-11-035 and implemented January 1, 2019 per AL 3326-E.

III. 10-MONTH AMORTIZATION PROPOSAL

A. Cost Recovery Proposal and Rate Impact for Bundled Customers

Throughout 2021 SDG&E is expecting significant load departure, especially in the Medium/Large Commercial & Industrial ("M/L C&I") class. In SDG&E's 2021 ERRA Forecast Application decision issued on January 14, 2021, the Commission approved a 2021 bundled sales forecast which takes into consideration the aforementioned significant load departure.[17] However, at this time SDG&E is still in the process of developing the final billing determinants necessary to create bundled commodity rates pursuant to D.21-01-017 and the 2021 bundled sales have not been implemented into rates yet. As such, SDG&E presents illustrative class average rates using SDG&E's current effective 2019 bundled sales forecast.[18]

Due to SDG&E's recently approved 2021 bundled sales forecast, and the fact that the M/L C&I class' bundled sales are declining almost 3 times more than any other customer class, SDG&E proposes to increase bundled commodity rates in order to collect the 2020 ERRA undercollection from its bundled customers using the SAPC methodology recently approved in SDG&E's 2021 ERRA Forecast Decision, D.21-01-017.[19] This is a deviation from the existing rate allocation applied to the ERRA balancing account today based on SDG&E's approved generation revenue allocation factors.[20] SDG&E requests authorization to use the SAPC methodology to allocate the 2020 ERRA undercollection to bundled commodity rates because the approved generation revenue allocation factors from SDG&E's 2016 GRC Phase 2 decision (D.17-08-030) do not take into consideration the significant load departure in SDG&E's M/L C&I class in 2021. Table 1 presents the illustrative generation revenue allocation factors which would result from using the SAPC

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[17] D.21-01-017 approved January 14, 2021.

[18] Approved in D.18-11-035, per AL 3326-E, approved May 3, 2019 and effective January 1, 2019.

[19] OP 8 of D.21-01-017.

[20] Approved in D.17-08-030, in Phase 2 of SDG&E's 2016 GRC.

methodology under SDG&E's recently approved 2021 bundled sales forecast[21] against SDG&E's approved generation revenue allocation factors pursuant to D.17-08-030.

Table 1 – Illustrative Generation Revenue Allocation Comparison[22]

Customer Classes	Approved D.17-08-030 Generation Revenue Allocation Factors	Illustrative SAPC Generation Revenue Allocation
Residential	42.83%	52.78%
Small Commercial	13.27%	15.37%
Medium and Large Commercial and Industrial	42.03%	29.51%
Agriculture	1.50%	1.90%
Streetlighting	0.37%	0.44%
System	100.00%	100.00%

In order to calculate bundled customer rates pursuant to this Application, SDG&E will apply the SAPC methodology to the authorized ERRA trigger undercollection amount to determine the revenues for each customer class. SDG&E will then divide the allocated class revenues by the approved sales determinants[23] to calculate SDG&E's applicable commodity rates by rate schedule. SDG&E will collect the undercollection from the ERRA trigger proposal through customers' applicable commodity rates, consistent with SDG&E's ERRA balancing account. Table 2 presents the illustrative class average rate impacts associated with the undercollection from the 2020 ERRA trigger of $124 million[24] using the current effective 2019 bundled sales determinants[25] and the

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[21] Pursuant to D.21-01-017.

[22] Actual SAPC generation revenue allocation factors will depend on the commodity revenues authorized at the time SDG&E implements this Application.

[23] Current effective electric bundled sales pursuant to D.18-11-035 but SDG&E will implement the bundled sales pursuant to D.21-01-017, which are not yet implemented into rates.

[24] $124.000 million is without Franchise Fees & Uncollectibles ("FF&U"). With FF&U it is $125.504 million.

[25] Pursuant to D.18-11-035.

SAPC methodology. SDG&E is requesting rate recovery of this undercollection beginning March 1, 2021 to be amortized over a 10-month period ending December 31, 2021.[26] The $124 million[27] will increase the system average rate by 0.934 cents per kWh, or 3.89%.[28] Without the Residential Semi-Annual California Climate Credit ("CCC"), the system average rate would increase by 0.934 cents per kWh, or 3.82%. A typical non-California Alternate Rates for Energy ("CARE") residential customer in the inland climate zone using 400 kWh could see a monthly summer bill increase of 3.5%, or $3.88 (from $111.71 to $115.59). A typical non-CARE residential customer in the inland climate zone using 400 kWh could see a monthly winter bill increase of 3.4%, or $3.82 (from $112.36 to $116.18).[29]

Table 2 – Illustrative Rate Impacts for Bundled Customers[30]

Customer Classes	Current Effective Rates[31] (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	27.130	28.093	0.963	3.55%
Small Commercial	25.084	25.897	0.813	3.24%
Medium and Large Commercial and Industrial	22.123	23.091	0.968	4.38%
Agriculture	16.980	17.666	0.686	4.04%
Streetlighting	22.132	22.764	0.632	2.86%
System	23.993	24.927	0.934	3.89%

26 Due to SDG&E's new billing system implementing April 1, 2021, SDG&E cannot accommodate any rate change in April or May of 2021 in order to provide the new billing system the necessary stability it needs to go live effectively. For this reason, it is necessary that SDG&E's expedited application be approved by February 2021 to ensure that the new rates can be implemented in March 2021. Otherwise, SDG&E will not be able to implement rates until June 2021.

27 $124.000 million is without FF&U. With FF&U it is $125.504 million.

28 This value excludes the portion of revenues that Departing Load customers are forecasted to be responsible for with respect to the 2020 ERRA Trigger balance as discussed in Section III.B. This value does however include the portion of revenues that are capped for Departing Load customers pursuant to the PCIA cap in D.18-10-019 as discussed in Section III.B.

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

30 Differences due to rounding.

31 Rates effective October 1, 2020 per AL 3619-E.

B. Cost Recovery Proposal, Proposed Illustrative PCIA Rates and Departing Load Rate Impact

In this Application, SDG&E is also proposing to increase the current effective vintage PCIA rates (which are reflected in **Attachment B**) in order to do a one-time transfer of the 2020 ERRA undercollection balance to the 2020 PABA vintage. Due to the cumulative nature of PCIA rates, SDG&E proposes to include the ERRA undercollection "rate adder" to increase PCIA rates for the 2020 and 2021[32] vintage in order to maintain customer indifference with respect to those customers departing bundled service in 2021[33] but who were receiving bundled service in 2020 and are responsible for the 2020 ERRA undercollection balance incurred on their behalf. SDG&E is proposing to increase PCIA rates for the 2020 and 2021 vintage, up to the half a cent PCIA cap pursuant to D.18-10-019, using the existing rate allocation applied for the PCIA common template – *i.e.*, using the generation revenue allocation factors.[34] The existing approved generation allocation factors[35] will be applied to the authorized vintage 2020 ERRA undercollection amount to determine the revenues for each customer class by vintage. SDG&E divides the allocated class revenues by the vintage system billing determinants[36] to calculate SDG&E's proposed ERRA Undercollection PCIA rates, which are rate adders (reflected in **Attachment A**) to the current effective vintage PCIA rates,[37] to determine final illustrative PCIA rates as shown in **Attachment C**.

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[32] PCIA vintage 2021 will be established in SDG&E's 2021 ERRA Forecast Application (A.20-04-014) which was approved by the Commission January 14, 2021 but not yet implemented into rates. As such, actual impacts to PCIA vintage 2021 will be dependent on SDG&E implementing the 2021 ERRA Forecast Application and PCIA vintage 2021 into rates before or at the same time as this 2020 ERRA Trigger Application.

[33] Customers departing bundled service January 1, 2021 through June 30, 2021 will be vintage 2020 PCIA customers while those departing bundled service July 1, 2021 through June 30, 2022 will be vintage 2021 PCIA customers.

[34] Approved in D.17-08-030, in Phase 2 of SDG&E's 2016 GRC.

[35] *Id.*

[36] Approved in D.19-01-001.

[37] Approved January 16, 2020 via D.20-01-005 and implemented per AL 3500-E on February 1, 2020.

Due to the PCIA cap, vintage 2020 will be capped when compared to current effective PCIA rates pursuant to D.20-01-005.[38] The revenue shortfall resulting from the rate cap is tracked in the customer vintage subaccount within PCIA under-collection balancing account ("CAPBA"),[39] for repayment at a later date, and is currently estimated at $11.943 million ($12.088 million including FF&U) for vintage 2020 due to this proposal.[40] The forecasted revenue shortfall from these departed load customers in vintage 2020 is then divided by the authorized bundled sales to calculate the increase in bundled customers' commodity rates in 2021 to cover the shortfall,[41] which is $11.943 million ($12.088 million including FF&U) due to this proposal. The forecasted portion of the 2020 ERRA Trigger balance that Departing Load is responsible for is $23.757 million ($24.045 million including FF&U).[42]

Table 3 presents the capped 2020 vintage PCIA rate impacts associated with the undercollection from the ERRA trigger of $124 million.[43] SDG&E is requesting rate recovery of this undercollection beginning March 1, 2021 to be amortized over a 10-month period ending

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38 *Id.*

39 AL 3436-E established the CAPBA and was approved on October 31, 2019.

40 The actual vintage 2020 revenue shortfall will depend on the PCIA rates capped against at the time SDG&E implements this 2020 ERRA Trigger Application. Current effective PCIA rates are pursuant to D.20-01-005 and implemented February 1, 2020 via AL 3500-E. If SDG&E's 2021 PCIA rates presented in SDG&E's 2021 ERRA Forecast Application (A.20-04-014) are approved as proposed, the vintage 2020 PCIA rates will not change due to this application as they are already capped in SDG&E's 2021 ERRA Forecast Application. As such, the vintage 2020 revenue shortfall will be the entire portion of the 2020 ERRA Trigger balance that Departing Load is responsible for, which is $23.757 million ($24.045 million including FF&U).

41 SDG&E's current effective bundled sales were approved in D.18-11-035 and implemented January 1, 2019 per AL 3326-E. However, at the time of this Application's implementation, SDG&E's approved bundled sales will be pursuant to D.21-01-017.

42 This value includes the revenue shortfall due to the PCIA cap pursuant to D.18-10-019 and tracked in SDG&E's CAPBA account.

43 $124.000 million is without FF&U. With FF&U it is $125.504 million.

December 31, 2021.[44] SDG&E proposes to increase the applicable PCIA vintage rates that were responsible for the 2020 ERRA undercollection balance. Those vintages responsible for the undercollection include: 2020 and 2021. A typical residential Departing Load customer in the 2020 PCIA vintage using 400 kWh per month could see a bill increase of approximately $2 (from $13 to $15) from the PCIA charge.[45]

Table 3 - Illustrative PCIA Rate Impacts for Departing Load Customers in Vintage 2020[46]

Customer Classes	Current Effective Rates[47] (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	3.265	3.736	0.471	14.42%
Small Commercial	2.744	3.145	0.401	14.62%
Medium and Large Commercial and Industrial	3.024	3.606	0.582	19.23%
Agriculture	2.281	2.628	0.347	15.20%
Streetlighting	2.146	2.454	0.309	14.40%
System	3.059	3.559	0.500	16.35%

IV. SUMMARY AND RELIEF REQUESTED

Consistent with the rate recovery proposed in this supplemental testimony, SDG&E requests the following relief in the Commission's forthcoming decision in this proceeding:

[44] Due to SDG&E's new billing system implementing April 1, 2021, SDG&E cannot accommodate any rate change in April or May of 2021 in order to provide the new billing system the necessary stability it needs to go live effectively. For this reason, it is necessary that SDG&E's expedited application be approved by February 2021 to ensure that the new rates can implemented in March 2021. Otherwise, SDG&E will not be able to implement rates until June 2021.

[45] Customers' actual bill impacts will vary with usage per month, by season and by climate zone.

[46] Differences due to rounding.

[47] Rates effective February 1, 2020 per AL 3500-E.

1. Approve SDG&E's undercollected ERRA Trigger balance of $124 million[48] for collection in commodity rates and its proposal to amortize the undercollection over 10 months using the SAPC methodology beginning March 1, 2021 and ending December 31, 2021; and,

2. Approve SDG&E's proposal to transfer the 2020 ERRA Trigger undercollection to vintage 2020 of PABA and its proposal to collect the 2020 ERRA Trigger balance of $124 million[49] in PCIA rate adders as presented in Attachment A.

This concludes my prepared supplemental testimony.

[48] $124.000 million is before FF&U. With FF&U it is $125.504 million.

[49] *Id.*

V. WITNESS QUALIFICATIONS

My name is Stacy Fuhrer and my business address is 8330 Century Park Court, San Diego, California 92123. I received a bachelor's degree in International Management from Central College in 2010, and a master's degree in Global Management from Thunderbird School of Global Management in 2011.

I am a Rate Strategy Project Manager II in the Customer Pricing Department of SDG&E. My primary responsibilities include planning, development, and implementation of rate related proceedings, cost-of-service studies and preparation of various regulatory filings. I have been employed by SDG&E since April 2017 and have held my current position since March 2020. I also served as a gas marketer for Sempra Infrastructure for two years. I have been employed with Sempra Energy or SDG&E for 6 years.

I have previously testified before the California Public Utilities Commission.

ATTACHMENT A

PROPOSED ILLUSTRATIVE PCIA RATE ADDERS WITH 10-MONTH AMORTIZATION

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
2020 ERRA TRIGGER

ATTACHMENT A – PROPOSED ILLUSTRATIVE PCIA RATE ADDERS WITH 10-MONTH AMORTIZATION

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers[1]

($/kWh)

Rate Group	PCIA 2001 Vintage	PCIA 2002 Vintage	PCIA 2003 Vintage	PCIA 2004 Vintage	PCIA 2005 Vintage	PCIA 2006 Vintage	PCIA 2007 Vintage	PCIA 2008 Vintage	PCIA 2009 Vintage	PCIA 2010 Vintage
Residential	-	-	-	-	-	-	-	-	-	-
Small Commercial	-	-	-	-	-	-	-	-	-	-
Medium & Large C&I	-	-	-	-	-	-	-	-	-	-
Agriculture	-	-	-	-	-	-	-	-	-	-
Streetlighting	-	-	-	-	-	-	-	-	-	-
System Total	-	-	-	-	-	-	-	-	-	-

[1] As noted in Section II, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E's PCIA rates are applicable to both DA and CCA customers.

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
2020 ERRA TRIGGER

ATTACHMENT A CONTINUED – PROPOSED ILLUSTRATIVE RATE ADDERS WITH 10-MONTH AMORTIZATION

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers[1]

($/kWh)

Rate Group	PCIA 2011 Vintage	PCIA 2012 Vintage	PCIA 2013 Vintage	PCIA 2014 Vintage	PCIA 2015 Vintage	PCIA 2016 Vintage	PCIA 2017 Vintage	PCIA 2018 Vintage	PCIA 2019 Vintage	PCIA 2020 Vintage	PCIA 2021 Vintage
Residential	-	-	-	-	-	-	-	-	-	0.00471	0.01064
Small Commercial	-	-	-	-	-	-	-	-	-	0.00401	0.00900
Medium & Large C&I	-	-	-	-	-	-	-	-	-	0.00582	0.01154
Agriculture	-	-	-	-	-	-	-	-	-	0.00347	0.00764
Streetlighting	-	-	-	-	-	-	-	-	-	0.00309	0.00698
System Total	-	-	-	-	-	-	-	-	-	0.00500	0.01065

1 As noted in Section II, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E's PCIA rates are applicable to both DA and CCA customers.

ATTACHMENT B

CURRENT EFFECTIVE PCIA RATES

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
2020 ERRA TRIGGER

ATTACHMENT B - CURRENT EFFECTIVE PCIA RATES[1]

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers[2]

($/kWh)

Rate Group	PCIA 2001 Vintage	PCIA 2002 Vintage	PCIA 2003 Vintage	PCIA 2004 Vintage	PCIA 2005 Vintage	PCIA 2006 Vintage	PCIA 2007 Vintage	PCIA 2008 Vintage	PCIA 2009 Vintage	PCIA 2010 Vintage
Residential	0.00005	(0.00044)	(0.00044)	0.00908	0.01109	0.01359	0.01476	0.01713	0.01718	0.02092
Small Commercial	0.00004	(0.00037)	(0.00037)	0.00762	0.00931	0.01140	0.01238	0.01438	0.01441	0.01756
Medium & Large C&I	0.00003	(0.00041)	(0.00041)	0.00817	0.00998	0.01223	0.01328	0.01542	0.01546	0.01891
Agriculture	0.00003	(0.00030)	(0.00030)	0.00626	0.00765	0.00937	0.01018	0.01181	0.01185	0.01443
Streetlighting	0.00003	(0.00029)	(0.00029)	0.00597	0.00729	0.00893	0.00970	0.01126	0.01129	0.01375
System Total	0.00004	(0.00041)	(0.00041)	0.00840	0.01026	0.01257	0.01365	0.01585	0.01589	0.01939

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1 SDG&E's 2020 ERRA Forecast Application approved January 16, 2020 via D.20-01-005 and implemented per AL 3500-E on February 1, 2020.

2 As noted in Section II, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E's PCIA rates are applicable to both DA and CCA customers.

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
2020 ERRA TRIGGER

ATTACHMENT B CONTINUED – CURRENT EFFECTIVE PCIA RATES[1]

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers[2]

($/kWh)

Rate Group	PCIA 2011 Vintage	PCIA 2012 Vintage	PCIA 2013 Vintage	PCIA 2014 Vintage	PCIA 2015 Vintage	PCIA 2016 Vintage	PCIA 2017 Vintage	PCIA 2018 Vintage	PCIA 2019 Vintage	PCIA 2020 Vintage
Residential	0.02919	0.03151	0.03175	0.03154	0.03205	0.03205	0.03187	0.03187	0.03147	0.03265
Small Commercial	0.02452	0.02647	0.02668	0.02650	0.02693	0.02693	0.02678	0.02678	0.02644	0.02744
Medium & Large C&I	0.02683	0.02910	0.02935	0.02913	0.02964	0.02964	0.02946	0.02946	0.02906	0.03024
Agriculture	0.02034	0.02200	0.02217	0.02202	0.02239	0.02239	0.02226	0.02226	0.02197	0.02281
Streetlighting	0.01918	0.02070	0.02086	0.02072	0.02106	0.02106	0.02094	0.02094	0.02068	0.02146
System Total	0.02726	0.02948	0.02972	0.02951	0.03001	0.03001	0.02983	0.02983	0.02944	0.03059

1 SDG&E’s 2020 ERRA Forecast Application approved January 16, 2020 via D.20-01-005 and implemented per AL 3500-E on February 1, 2020.

2 As noted in Section II, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E’s PCIA rates are applicable to both DA and CCA customers.

ATTACHMENT C

PROPOSED ILLUSTRATIVE TOTAL PCIA RATES WITH 10-MONTH AMORTIZATION

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
2020 ERRA TRIGGER

ATTACHMENT C – PROPOSED ILLUSTRATIVE TOTAL PCIA RATES WITH 10-MONTH AMORTIZATION

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers[1]

($/kWh)

Rate Group	PCIA 2001 Vintage	PCIA 2002 Vintage	PCIA 2003 Vintage	PCIA 2004 Vintage	PCIA 2005 Vintage	PCIA 2006 Vintage	PCIA 2007 Vintage	PCIA 2008 Vintage	PCIA 2009 Vintage	PCIA 2010 Vintage
Residential	0.00005	(0.00044)	(0.00044)	0.00908	0.01109	0.01359	0.01476	0.01713	0.01718	0.02092
Small Commercial	0.00004	(0.00037)	(0.00037)	0.00762	0.00931	0.01140	0.01238	0.01438	0.01441	0.01756
Medium & Large C&I	0.00003	(0.00041)	(0.00041)	0.00817	0.00998	0.01223	0.01328	0.01542	0.01546	0.01891
Agriculture	0.00003	(0.00030)	(0.00030)	0.00626	0.00765	0.00937	0.01018	0.01181	0.01185	0.01443
Streetlighting	0.00003	(0.00029)	(0.00029)	0.00597	0.00729	0.00893	0.00970	0.01126	0.01129	0.01375
System Total	0.00004	(0.00041)	(0.00041)	0.00840	0.01026	0.01257	0.01365	0.01585	0.01589	0.01939

1 As noted in Section II, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E's PCIA rates are applicable to both DA and CCA customers.

SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT
2020 ERRA TRIGGER

ATTACHMENT C CONTINUED – PROPOSED ILLUSTRATIVE TOTAL PCIA RATES WITH 10-MONTH AMORTIZATION

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers[1]

($/kWh)

Rate Group	PCIA 2011 Vintage	PCIA 2012 Vintage	PCIA 2013 Vintage	PCIA 2014 Vintage	PCIA 2015 Vintage	PCIA 2016 Vintage	PCIA 2017 Vintage	PCIA 2018 Vintage	PCIA 2019 Vintage	PCIA 2020 Vintage	PCIA 2021 Vintage
Residential	0.02919	0.03151	0.03175	0.03154	0.03205	0.03205	0.03187	0.03187	0.03147	0.03736	0.01064
Small Commercial	0.02452	0.02647	0.02668	0.02650	0.02693	0.02693	0.02678	0.02678	0.02644	0.03145	0.00900
Medium & Large C&I	0.02683	0.02910	0.02935	0.02913	0.02964	0.02964	0.02946	0.02946	0.02906	0.03606	0.01154
Agriculture	0.02034	0.02200	0.02217	0.02202	0.02239	0.02239	0.02226	0.02226	0.02197	0.02628	0.00764
Streetlighting	0.01918	0.02070	0.02086	0.02072	0.02106	0.02106	0.02094	0.02094	0.02068	0.02454	0.00698
System Total	0.02726	0.02948	0.02972	0.02951	0.03001	0.03001	0.02983	0.02983	0.02944	0.03559	0.01065

[1] As noted in Section II, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E's PCIA rates are applicable to both DA and CCA customers.