

Proceeding No.: A.20-12-  
Exhibit No.: \_\_\_\_\_  
Witness: Stacy Fuhrer

**PREPARED DIRECT TESTIMONY OF**  
**STACY FUHRER**  
**ON BEHALF OF**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

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



**December 11, 2020**

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1                                   **PREPARED DIRECT TESTIMONY OF**  
2                                   **STACY FUHRER**  
3                                   **ON BEHALF OF SDG&E**

4 **I.       INTRODUCTION**

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

- 15                   •       **Section II:** - I discuss the background of PCIA, as well as its applicability to  
16                               SDG&E's ERRA balance.
- 17                   •       **Section III:** - I discuss SDG&E's 10-month amortization cost recovery proposal  
18                               of its ERRA undercollected balance and its transfer to the 2020 PABA vintage  
19                               and present rate impacts for bundled<sup>1</sup> commodity rates and PCIA rates.
- 20                   •       **Section IV:** - I provide a summary of my testimony and the relief requested.
- 21                   •       **Section V:** - I provide my witness qualifications.

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<sup>1</sup> 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.

1 **II. BACKGROUND**

2 **A. PCIA Rates**

3 In D.06-07-030, modified by D.07-01-030, the Commission established authority for the  
4 PCIA component of the Cost Responsibility Surcharge (“CRS”) to preserve bundled customer  
5 indifference by ensuring Departing Load customers pay their share of the cost responsibility  
6 associated with the above-market costs based on an administrative benchmark, also known as the  
7 “indifference amount” of the utilities’ total procurement resource portfolio.<sup>2</sup>

8 In D.08-09-012, the Commission continued to refine the indifference amount  
9 methodology to better protect bundled customer indifference by introducing the requirement to  
10 “vintage” Departing Load customers, based on their departure date, when determining the  
11 customers’ cost responsibility for the “total portfolio” of resources.<sup>3</sup> Assigning customers to a  
12 vintage ensured that Departing Load customers pay their share of above-market costs associated  
13 with the specific vintage portfolio of resources that were acquired to serve them prior to their  
14 departure from bundled load service in order to better protect bundled customer indifference.  
15 After departure from bundled service, the Departing Load customers are not required to pay for  
16 above-market costs associated with utility procurement commitments after that load departs.

17 In D.11-12-018, the Commission adopted further refinement to the indifference amount  
18 methodology recognizing that regulatory and industry changes had impacted energy procurement  
19 practices. Changes to the Market Price Benchmark (“MPB”) methodology, used to determine  
20 the “above-market” value of electricity, now included the addition of a renewables portfolio  
21 standards adder (“RPS adder”) to better reflect the market value of renewable resources and a

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<sup>2</sup> In D.07-01-025, the Commission adopted the PCIA methodology for Community Choice Aggregation (“CCA”) customers.

<sup>3</sup> D.08-09-012, OP 10.

1 revised resource adequacy capacity adder (“CAP adder”), which resulted in vintage MPBs.<sup>4</sup> The  
2 vintage portfolio of resources calculation was revised to better reflect time-of-use load variations  
3 and also removed load-related costs incurred by the California Independent System Operator  
4 (“CAISO”) that are then charged to the utilities.

5 In accordance with D.16-09-044, the Joint Utilities and CCAs<sup>5</sup> developed a uniform  
6 workpaper template through the PCIA Working Group to “facilitate comparison and analysis of  
7 the PCIA across utilities.”<sup>6</sup> Pursuant to OP 1 of D.17-08-026 and consistent with SDG&E’s  
8 2020 ERRA Forecast, SDG&E has reflected the uniform workpaper template as attached in  
9 Appendix 7 of D.06-07-030 as part of this filing. The Commission further ordered in D.18-10-  
10 019 that PG&E, SCE and SDG&E develop a uniform common template for the calculation of  
11 each of their PCIA rates reflecting the changes ordered in the Decision.<sup>7</sup> SDG&E submitted its  
12 common template to the Commission’s Energy Division and concurrently served the updated  
13 common template to the service list for its ERRA proceeding.

14 In D.18-10-019, the Commission issued a decision modifying the PCIA methodology  
15 revising inputs to the MPB that is used to calculate the PCIA. The revised methodology affects  
16 PCIA rates that were effective as of January 1, 2019. In addition to the revised MPB inputs, the  
17 decision also adopted an annual true-up mechanism, as recommended by a number of parties, as  
18 well as a cap that will limit the change of the PCIA rate from one year to the next. Starting in

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<sup>4</sup> D.11-12-018, OP 2.

<sup>5</sup> 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.

<sup>6</sup> D.17-08-026, p. 2.

<sup>7</sup> D.18-10-019, OP 3.

1 forecast year 2020, the cap level of the PCIA rate is set at 0.5 cents/kWh more than the prior  
2 year's PCIA, differentiated by system average vintage rate. In Advice Letter ("AL") 3318-E, the  
3 PABA was established to record the "above-market" costs and revenues associated with all  
4 PCIA eligible resources by vintage subaccounts. This balancing account became effective on  
5 January 1, 2019.

6 In D.19-10-001, the Commission issued a decision further modifying the PCIA  
7 methodology revising the inputs to the billing determinants (sales) that is used to calculate the  
8 PCIA rates. The revised methodology affects PCIA rates that are effective February 1, 2020.<sup>8</sup>  
9 This revision ordered SDG&E to use vintage billing determinants of those responsible for the  
10 vintage portfolio to determine PCIA rates, instead of the previously used system billing  
11 determinants. In addition, the decision authorized any over/under-collection in the PABA  
12 vintage subaccounts in a given year to be rolled into the next year's ERRA Forecast filing. The  
13 decision adopted the methodology for SDG&E to true-up the values in PABA for the imputed  
14 RPS and Resource Adequacy ("RA") costs using the updated benchmarks provided by the  
15 Energy Division on November 1st. The true-up amounts for both RPS and RA will be booked as  
16 adjustments to PABA annually through the ERRA Forecast filing.

17 AL 3436-E established the PCIA under-collection balancing account ("CAPBA").<sup>9</sup>  
18 CAPBA establishes an interest-bearing balance account that will be used in the event that the

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<sup>8</sup> 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.

<sup>9</sup> SDG&E AL 3436-E was filed on September 30, 2019 and approved on October 31, 2019.

1 PCIA cap is reached, in order to track any obligation that accrues for Departing Load customers  
2 by vintage subaccounts.<sup>10</sup>

3 **B. Indifference Methodology**

4 Under Commission rules,<sup>11</sup> Departing Load customers are responsible for their fair share  
5 of above-market costs, or an indifference amount, incurred by the utility on behalf of those  
6 customers when electric generation costs exceed the current market price, or MPB. To maintain  
7 bundled customer indifference to the departure of SDG&E's customers to non-utility service,  
8 SDG&E calculates the indifference amount to determine the cost responsibility for direct access  
9 ("DA"), CCA and other Departing Load as follows:

10 
$$\text{Indifference Amount} = \text{CTC} + \text{PCIA}$$

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

15 **C. Treatment of SONGS-related Costs**

16 On July 26, 2018, the Commission approved D.18-07-037 adopting the majority of the  
17 2018 Revised Settlement Agreement ("Agreement"), which stated, in part, that SDG&E would  
18 cease collecting in rates the revenue requirement authorized to be recovered related to the San  
19 Onofre Nuclear Generation Station ("SONGS") regulatory asset. SDG&E's PCIA rates

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<sup>10</sup> 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.

<sup>11</sup> California Public Utilities Code Section 365.2.

1 therefore no longer include SONGS-related Regulatory Asset costs.<sup>12</sup> The only remaining  
2 SONGS-related costs included in PCIA rates are non-fuel-related costs authorized in SDG&E's  
3 2019 General Rate Case ("GRC").<sup>13</sup>

#### 4 **D. PCIA Rate Caps**

5 Pursuant to D.18-10-019, SDG&E must now evaluate whether the \$0.005/kWh PCIA cap  
6 has been reached based on the system average PCIA rate by customer vintage, using a  
7 comparison between the prior year's DA/CCA PCIA rates and those proposed in the current  
8 proceeding.<sup>14</sup> If the system average PCIA rate by customer vintage is forecasted to increase by  
9 more than \$0.005/kWh, then all PCIA rates for that customer vintage would be capped. The  
10 revenue shortfall resulting from the rate cap is tracked in the customer vintage subaccount within  
11 CAPBA. The forecasted revenue shortfall from these Departing Load customers is then divided  
12 by the authorized bundled sales to calculate the increase in bundled customers' commodity rates  
13 to cover the shortfall.<sup>15</sup>

### 14 **III. 10-MONTH AMORTIZATION PROPOSAL**

#### 15 **A. Cost Recovery Proposal and Rate Impact for Bundled Customers**

16 SDG&E proposes to increase bundled commodity rates in order to collect the 2020  
17 ERRA undercollection from its bundled customers using the existing rate allocation applied for

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<sup>12</sup> 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.

<sup>13</sup> D.19-09-051.

<sup>14</sup> SDG&E's CAPBA Preliminary Statement pursuant to AL 3436-E and approved October 30, 2019.

<sup>15</sup> SDG&E's bundled sales were approved in D.18-11-035 and implemented January 1, 2019 per AL 3326-E.



1 the ERRA balancing account. The existing approved generation allocation factors<sup>16</sup> will be  
2 applied to the authorized ERRA trigger undercollection amount to determine the revenues for  
3 each customer class. SDG&E divides the allocated class revenues by the approved sales  
4 determinants<sup>17</sup> to calculate SDG&E's commodity rate schedules. SDG&E will collect the  
5 undercollection from the ERRA trigger proposal through customers' applicable commodity rates,  
6 consistent with SDG&E's ERRA balancing account.

7 Table 1 presents the class average rate impacts associated with the undercollection from  
8 the 2020 ERRA trigger of \$119 million.<sup>18</sup> SDG&E is requesting rate recovery of this  
9 undercollection beginning March 1, 2021 to be amortized over a 10-month period ending  
10 December 31, 2021.<sup>19</sup> The \$119 million<sup>20</sup> will increase the system average rate by 0.893 cents  
11 per kWh, or 3.72%.<sup>21</sup> Without the Residential Semi-Annual California Climate Credit ("CCC"),  
12 the system average rate would increase by 0.893 cents per kWh, or 3.65%. A typical non-  
13 California Alternate Rates for Energy ("CARE") residential customer in the inland climate zone  
14 using 400 kWh could see a monthly summer bill increase of 3.3%, or \$3.72 (from \$111.71 to

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<sup>16</sup> Approved in D.17-08-030, in Phase 2 of SDG&E's 2016 GRC.

<sup>17</sup> Approved in D.18-11-035, per AL 3326-E, approved May 3, 2019 and effective January 1, 2019.

<sup>18</sup> \$119.000 million is without Franchise Fees & Uncollectibles ("FF&U"). With FF&U it is \$120.444 million.

<sup>19</sup> 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.

<sup>20</sup> \$119.000 million is without FF&U. With FF&U it is \$120.444 million.

<sup>21</sup> 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.

1 \$115.43). A typical non-CARE residential customer in the inland climate zone using 400 kWh  
 2 could see a monthly winter bill increase of 3.3%, or \$3.66 (from \$112.36 to \$116.02).<sup>22</sup>

3 **Table 1 – Illustrative Rate Impacts For Bundled Customers<sup>23</sup>**

Customer Classes	Current Effective Rates <sup>24</sup> (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	27.130	28.050	0.920	3.39%
Small Commercial	25.084	25.861	0.777	3.10%
Medium and Large Commercial and Industrial	22.123	23.048	0.925	4.18%
Agriculture	16.980	17.635	0.655	3.86%
Streetlighting	22.132	22.736	0.604	2.73%
System	23.993	24.886	0.893	3.72%

4  
 5 **B. Cost Recovery Proposal, Proposed Illustrative PCIA Rates and Departing**  
 6 **Load Rate Impact**

7 In this Application, SDG&E is also proposing to increase the current effective vintage  
 8 PCIA rates (which are reflected in **Attachment B**) in order to do a one-time transfer of the 2020  
 9 ERRA undercollection balance to the 2020 PABA vintage. Due to the cumulative nature of  
 10 PCIA rates, SDG&E proposes to include the ERRA undercollection “rate adder” to increase  
 11 PCIA rates for the 2020 and 2021<sup>25</sup> vintage in order to maintain customer indifference with

<sup>22</sup> Customers’ actual bill impacts will vary with usage per month, by season and by climate zone.

<sup>23</sup> Differences due to rounding.

<sup>24</sup> Rates effective October 1, 2020 per AL 3619-E.

<sup>25</sup> PCIA vintage 2021 will be established in SDG&E’s 2021 ERRA Forecast Application (A.20-04-014) which is pending approval before the Commission. 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.

1 respect to those customers departing bundled service in 2021<sup>26</sup> but who were receiving bundled  
2 service in 2020 and are responsible for the 2020 ERRAs undercollection balance incurred on their  
3 behalf. SDG&E is proposing to increase PCIA rates for the 2020 and 2021 vintage, up to the  
4 half a cent PCIA cap pursuant to D.18-10-019, using the existing rate allocation applied for the  
5 PCIA common template – *i.e.*, using the generation revenue allocation factors.<sup>27</sup> The existing  
6 approved generation allocation factors<sup>28</sup> will be applied to the authorized vintage 2020 ERRAs  
7 undercollection amount to determine the revenues for each customer class by vintage. SDG&E  
8 divides the allocated class revenues by the vintage system billing determinants<sup>29</sup> to calculate  
9 SDG&E’s proposed ERRAs Undercollection PCIA rates, which are rate adders (reflected in  
10 **Attachment A**) to the current effective vintage PCIA rates,<sup>30</sup> to determine final illustrative PCIA  
11 rates as shown in **Attachment C**.

12 Due to the PCIA cap, vintage 2020 will be capped when compared to current effective  
13 PCIA rates pursuant to D.20-01-005.<sup>31</sup> The revenue shortfall resulting from the rate cap is  
14 tracked in the customer vintage subaccount within PCIA under-collection balancing account  
15 (“CAPBA”),<sup>32</sup> for repayment at a later date, and is currently estimated at \$11.029 million

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<sup>26</sup> 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.

<sup>27</sup> Approved in D.17-08-030, in Phase 2 of SDG&E’s 2016 GRC.

<sup>28</sup> *Id.*

<sup>29</sup> Approved in D.19-01-001.

<sup>30</sup> Approved January 16, 2020 via D.20-01-005 and implemented per AL 3500-E on February 1, 2020.

<sup>31</sup> *Id.*

<sup>32</sup> AL 3436-E established the CAPBA and was approved on October 31, 2019.

1 (\$11.163 million including FF&U) for vintage 2020 due to this proposal.<sup>33</sup> The forecasted  
2 revenue shortfall from these departed load customers in vintage 2020 is then divided by the  
3 authorized bundled sales to calculate the increase in bundled customers' commodity rates in  
4 2021 to cover the shortfall,<sup>34</sup> which is \$11.029 million (\$11.163 million including FF&U) due to  
5 this proposal. The forecasted portion of the 2020 ERRA Trigger balance that Departing Load is  
6 responsible for is \$22.799 million (\$23.075 million including FF&U).<sup>35</sup>

7 Table 2 presents the capped 2020 vintage PCIA rate impacts associated with the  
8 undercollection from the ERRA trigger of \$119 million.<sup>36</sup> SDG&E is requesting rate recovery of  
9 this undercollection beginning March 1, 2021 to be amortized over a 10-month period ending  
10 December 31, 2021.<sup>37</sup> SDG&E proposes to increase the applicable PCIA vintage rates that were  
11 responsible for the 2020 ERRA undercollection balance. Those vintages responsible for the  
12 undercollection include: 2020 and 2021. A typical residential Departing Load customer in the

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<sup>33</sup> 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 \$22.799 million (\$23.075 million including FF&U).

<sup>34</sup> SDG&E's bundled sales were approved in D.18-11-035 and implemented January 1, 2019 per AL 3326-E.

<sup>35</sup> 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.

<sup>36</sup> \$119.000 million is without FF&U. With FF&U it is \$120.444 million.

<sup>37</sup> 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.

1 2020 PCIA vintage using 400 kWh per month could see a bill increase of approximately \$2  
2 (from \$13 to \$15) from the PCIA charge.<sup>38</sup>

3 **Table 2 - Illustrative PCIA Rate Impacts for Departing Load Customers in Vintage 2020<sup>39</sup>**

<b>Customer Classes</b>	<b>Current Effective Rates<sup>40</sup> (¢/kWh)</b>	<b>Proposed Rates (¢/kWh)</b>	<b>Change (¢/kWh)</b>	<b>Change (%)</b>
Residential	3.265	3.738	0.473	14.48%
Small Commercial	2.744	3.147	0.403	14.67%
Medium and Large Commercial and Industrial	3.024	3.603	0.579	19.14%
Agriculture	2.281	2.629	0.347	15.23%
Streetlighting	2.146	2.456	0.310	14.45%
System	3.059	3.559	0.500	16.35%

4  
5 **IV. SUMMARY AND RELIEF REQUESTED**

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

- 8 1. Approve SDG&E’s undercollected ERRA Trigger balance of \$119 million<sup>41</sup> for  
9 collection in commodity rates and its proposal to amortize the undercollection  
10 over 10 months using generation revenue allocation factors beginning March 1,  
11 2021 and ending December 31, 2021; and,

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<sup>38</sup> Customers’ actual bill impacts will vary with usage per month, by season and by climate zone.

<sup>39</sup> Differences due to rounding.

<sup>40</sup> Rates effective February 1, 2020 per AL 3500-E.

<sup>41</sup> \$119.00 million is before FF&U. With FF&U it is \$120.444 million.

1  
2  
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4  
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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 \$119 million<sup>42</sup> in PCIA rate adders as presented in Attachment A.

This concludes my prepared direct testimony.

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<sup>42</sup> *Id.*

1 **V. WITNESS QUALIFICATIONS**

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

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

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

**ATTACHMENT A**

**PROPOSED PCIA RATE ADDERS WITH 10-MONTH AMORTIZATION USING  
GENERATION REVENUE ALLOCATION FACTORS**



**SAN DIEGO GAS & ELECTRIC COMPANY - ELECTRIC DEPARTMENT  
2020 ERRR TRIGGER**

**ATTACHMENT A – PROPOSED ILLUSTRATIVE PCIA RATE ADDERS WITH 10-MONTH AMORTIZATION USING  
GENERATION REVENUE ALLOCATION FACTORS**

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers<sup>1</sup>

(\$/kWh)

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

<sup>1</sup> 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 ERRR TRIGGER**

**ATTACHMENT A CONTINUED – PROPOSED ILLUSTRATIVE RATE ADDERS WITH 10-MONTH AMORTIZATION  
USING GENERATION REVENUE ALLOCATION FACTORS**

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers<sup>1</sup>

(\$/kWh)

<b>Rate Group</b>	<b>PCIA 2011 Vintage</b>	<b>PCIA 2012 Vintage</b>	<b>PCIA 2013 Vintage</b>	<b>PCIA 2014 Vintage</b>	<b>PCIA 2015 Vintage</b>	<b>PCIA 2016 Vintage</b>	<b>PCIA 2017 Vintage</b>	<b>PCIA 2018 Vintage</b>	<b>PCIA 2019 Vintage</b>	<b>PCIA 2020 Vintage</b>	<b>PCIA 2021 Vintage</b>
Residential	-	-	-	-	-	-	-	-	-	0.00473	0.01021
Small Commercial	-	-	-	-	-	-	-	-	-	0.00403	0.00864
Medium & Large C&I	-	-	-	-	-	-	-	-	-	0.00579	0.01107
Agriculture	-	-	-	-	-	-	-	-	-	0.00347	0.00733
Streetlighting	-	-	-	-	-	-	-	-	-	0.00310	0.00670
System Total	-	-	-	-	-	-	-	-	-	0.00500	0.01022

<sup>1</sup> 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 ERRR TRIGGER**

**ATTACHMENT B - CURRENT EFFECTIVE PCIA RATES<sup>1</sup>**

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers<sup>2</sup>

(\$/kWh)

<b>Rate Group</b>	<b>PCIA 2001 Vintage</b>	<b>PCIA 2002 Vintage</b>	<b>PCIA 2003 Vintage</b>	<b>PCIA 2004 Vintage</b>	<b>PCIA 2005 Vintage</b>	<b>PCIA 2006 Vintage</b>	<b>PCIA 2007 Vintage</b>	<b>PCIA 2008 Vintage</b>	<b>PCIA 2009 Vintage</b>	<b>PCIA 2010 Vintage</b>
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

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

<sup>2</sup> 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 ERRR TRIGGER**

**ATTACHMENT B CONTINUED – CURRENT EFFECTIVE PCIA RATES<sup>1</sup>**

Power Charge Indifference Adjustment Rates for Direct Access and Community Choice Aggregation Customers<sup>2</sup>

(\$/kWh)

<b>Rate Group</b>	<b>PCIA 2011 Vintage</b>	<b>PCIA 2012 Vintage</b>	<b>PCIA 2013 Vintage</b>	<b>PCIA 2014 Vintage</b>	<b>PCIA 2015 Vintage</b>	<b>PCIA 2016 Vintage</b>	<b>PCIA 2017 Vintage</b>	<b>PCIA 2018 Vintage</b>	<b>PCIA 2019 Vintage</b>	<b>PCIA 2020 Vintage</b>
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

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

<sup>2</sup> 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 ERRR 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<sup>1</sup>

(\$/kWh)

<b>Rate Group</b>	<b>PCIA 2001 Vintage</b>	<b>PCIA 2002 Vintage</b>	<b>PCIA 2003 Vintage</b>	<b>PCIA 2004 Vintage</b>	<b>PCIA 2005 Vintage</b>	<b>PCIA 2006 Vintage</b>	<b>PCIA 2007 Vintage</b>	<b>PCIA 2008 Vintage</b>	<b>PCIA 2009 Vintage</b>	<b>PCIA 2010 Vintage</b>
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

<sup>1</sup> 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 ERRR 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<sup>1</sup>

(\$/kWh)

<b>Rate Group</b>	<b>PCIA 2011 Vintage</b>	<b>PCIA 2012 Vintage</b>	<b>PCIA 2013 Vintage</b>	<b>PCIA 2014 Vintage</b>	<b>PCIA 2015 Vintage</b>	<b>PCIA 2016 Vintage</b>	<b>PCIA 2017 Vintage</b>	<b>PCIA 2018 Vintage</b>	<b>PCIA 2019 Vintage</b>	<b>PCIA 2020 Vintage</b>	<b>PCIA 2021 Vintage</b>
Residential	0.02919	0.03151	0.03175	0.03154	0.03205	0.03205	0.03187	0.03187	0.03147	0.03738	0.01021
Small Commercial	0.02452	0.02647	0.02668	0.02650	0.02693	0.02693	0.02678	0.02678	0.02644	0.03147	0.00864
Medium & Large C&I	0.02683	0.02910	0.02935	0.02913	0.02964	0.02964	0.02946	0.02946	0.02906	0.03603	0.01107
Agriculture	0.02034	0.02200	0.02217	0.02202	0.02239	0.02239	0.02226	0.02226	0.02197	0.02629	0.00733
Streetlighting	0.01918	0.02070	0.02086	0.02072	0.02106	0.02106	0.02094	0.02094	0.02068	0.02456	0.00670
System Total	0.02726	0.02948	0.02972	0.02951	0.03001	0.03001	0.02983	0.02983	0.02944	0.03559	0.01022

<sup>1</sup> 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.