

Application No.: A.21-04-010
Exhibit No.: _____
Witness: Coreen G. Salcido

PREPARED REBUTTAL TESTIMONY OF
COREEN G. SALCIDO
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



AUGUST 13, 2021

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1 Parties' request for an order directing SDG&E to make these workpapers available on the
2 grounds of relevancy.

3 On June 16, 2021, the CCA Parties filed a Motion to Compel Discovery seeking the last
4 years workpapers that show derivation of certain Power Charge Indifference Adjustment (PCIA)
5 rates. On June 24, 2021, Administrative Law Judge Douglas Long issued an email ruling on the
6 Motion to Compel Discovery denying the CCA Parties' request:

7 As shown by SDG&E in its response, and as is clear in the application,
8 these rates are already in effect and were adopted by the Commission in
9 prior closed proceedings. The Alliance has already sought leave to reply
10 to SDG&E's response, which is not an automatic allowance in the
11 Commission's rules.

12 The request by the Alliance for leave to reply to SDG&E's response is
13 denied.

14 The Motion to Compel Discovery is denied. Alliance has not shown that
15 its request for workpapers is relevant or necessary for this proceeding.³

16 Given that the Commission has already denied the CCA Parties' request for prior
17 workpapers as irrelevant and unnecessary, the same result should obtain here. Accordingly, Mr.
18 Dickman's request for access to prior workpapers should be rejected as well.

19 **B. The ERRA Forecast Process Allows Parties Sufficient Opportunity to**
20 **Evaluate the Details of SDG&E's Application, Including the PABA Balance**

21 At pages 18-21 of his Testimony, Mr. Dickman makes various arguments as to why the
22 stakeholders in SDG&E's ERRA proceedings should be given access to the confidential details
23 approved in previous ERRA forecast proceedings in order to evaluate the current application,
24 specifically the PABA balance.⁴ While SDG&E appreciates the CCA Parties' need to evaluate
25 the current ERRA forecast application, SDG&E believes the existing ERRA forecast process,

³ ALJ Ruling (June 24, 2021).

⁴ Dickman Testimony at pp. 18-21.

1 including the November Update, provides all stakeholders with a sufficient opportunity to review
2 and evaluate the filing without the need to relitigate the details of previous proceedings, which
3 have already been approved by the Commission and are closed.

4 For example, the development of the 2021 PABA year-end balance in this proceeding is
5 not impacted by the prior year’s revenue requirement set forth in the 2021 ERRRA Forecast PCIA
6 workpapers. The workpapers in previous years are not relevant to the current proceeding as they
7 deal with previous PCIA rates. Those prior workpapers deal with PCIA rates that were adopted in
8 three different Commission proceedings that are now closed - *i.e.*, D.21-01-017 issued in A.20-04-
9 014 (SDG&E’s 2021 ERRRA Forecast Proceeding), D.20-12-028 issued in A.20-07-009 (SDG&E’s
10 2020 CAPBA Trigger Proceeding) and D.21-02-014 issued in A.20-12-007 (SDG&E’s 2020
11 ERRRA Trigger Proceeding) - and implemented via Advice Letter (“AL”) 3669-E-A⁵ and AL 3696-
12 E-A-B.^{6,7} Since these rates have already been approved and implemented, they are not relevant to
13 any issue the Commission will be deciding in this year’s ERRRA Forecast Proceeding. SDG&E’s
14 PCIA workpapers, pursuant to D.21-01-017, D.20-12-028 and D.21-02-014, have no bearing on
15 the 2022 PCIA rates SDG&E is requesting in this instant Application. The proposed PCIA rates in
16 this instant Application will supersede those authorized in D.21-01-017 because SDG&E will
17 replace the 2021 PABA revenue requirement and the 2020 PABA year-end balance with the 2022
18 PABA revenue requirement and 2021 PABA year-end balance. Moreover, the inputs,
19 assumptions, balancing account amounts and revenue requirements used in the various 2020
20 proceedings that set the current effective PCIA rates are different than those used in the current

⁵ AL 3669-E-A, approved February 1, 2021, implemented D.20-12-028.

⁶ AL 3696-E-A-B, approved March 29, 2021, implemented D.21-01-017 and D.21-02-014.

⁷ To clarify, Data Request 2.5 calls for the production of three sets of workpapers – one for each of the 2020 SDG&E proceedings that set PCIA rates.

1 year's ERRA Forecast Proceeding. Therefore, they would not provide any assistance in evaluating
2 or comparing the 2021 year-end PABA balance with last year's PCIA workpapers.

3 SDG&E's 2021 PABA year-end balance, while initially based on the authorized 2021
4 PABA revenue requirement pursuant to D.21-01-017, is adjusted in the ERRA forecast
5 proceeding to account for updated market assumptions, a forecast of expected customer revenues
6 and is a rolling balancing account making it subject to further change. SDG&E's 2022 ERRA
7 Forecast Application, and its projected 2021 PABA year-end balance is currently based on two
8 months of actual expenses and revenues (January and February 2021) and ten months of
9 forecasted expenses and revenues (March through December 2021). Contesting the forecast
10 which is comprised of ten months of forecasted costs and revenues is of little value as the
11 forecast for the PABA balancing account can fluctuate widely once actual expenses and revenues
12 are received throughout the year. The forecasted revenue requirement is calculated using the
13 best available data at the time, according to established guidelines. As actual expenses and
14 revenues are incurred, they are recorded to the balancing accounts independent of the forecasted
15 data.

16 SDG&E notes that it will update this projected 2021 PABA year-end balance as part of
17 the November Update to include an additional seven months of actuals. Accordingly, SDG&E's
18 previous PCIA workpapers would provide no tool or insight to understanding the key drivers
19 behind SDG&E's projected 2021 PABA year-end balance. Moreover, SDG&E notes that it
20 provided monthly the ERRA Report filed with CPUC to the CCA Parties in Data Request 2
21 Question 27.

22 Finally, Mr. Dickman argues that understanding what is happening to the PCIA in a
23 particular year, and over a period of several years, can inform the Commission regarding

1 potential structural changes that should be made to the PCIA framework.⁸ However, evaluating
2 “potential structural changes that should be made to the PCIA framework” is not within scope of
3 this ERRA Forecast Proceeding, and therefore, should not be used as a basis for compelling
4 production of last year’s workpapers.

5 **III. CONCLUSION**

6 This concludes my prepared rebuttal testimony.

⁸ Dickman Testimony at p. 21.

1 **IV. QUALIFICATIONS**

2 My name is Coreen G. Salcido. I am employed by SDG&E as the Validation & Analysis
3 Manager in the Settlements & Systems Department. My business address is 8315 Century Park
4 Court, San Diego, California 92123. My current responsibilities include approving the gas and
5 electric commodity invoices and overseeing the reporting processes. I began working in
6 Settlements & Systems as the Validation & Analysis Manager in April 2019.

7 I joined SDG&E in April 2019, prior to that I have held various positions with the
8 Sempra Energy Subsidiaries; Sempra Renewables, Sempra Energy and Sempra Global including
9 Asset Manager, Senior Compensation Advisor and Compensation Analyst.

10 I have not previously testified before the California Public Utilities Commission.