BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts	Application 21-04-010 (Filed April 15, 2021)

SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E) NOVEMBER UPDATE TO APPLICATION

*****REDACTED – PUBLIC VERSION*****

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November 8, 2021

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I. INTRODUCTION

On April 15, 2021, San Diego Gas & Electric Company ("SDG&E") submitted its Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts ("Application").[1] In November of each year, SDG&E updates certain information in the testimony supporting its forecast application using data that was not available at the time it submitted its application ("November Update"). Consistent with that practice, and per the July 15, 2021 Scoping Memo and Ruling of Assigned Commissioner as well as Administrative Law Judge Douglas Long's November 5, 2021 *E-mail Ruling Granting Extension of Time to File November Update*, SDG&E hereby submits its November Update, which consists of updated information sponsored by several SDG&E witnesses.

II. BACKGROUND

In the Application, SDG&E requested approval of its 2022 forecast of (1) the Energy Resource Recovery Account ("ERRA") revenue requirement, which includes greenhouse gas ("GHG") costs; (2) the Portfolio Allocation Balancing Account ("PABA") revenue requirement; (3) the Competition Transition Charge ("CTC") revenue requirement tracked in the Transition

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[1] SDG&E subsequently filed an *Amended* Application on May 10, 2021 to correct language regarding the PABA balancing account for vintage year 2020. For purposes of this update, all references to "Application" shall mean the May 10th Amended Application.

Cost Balancing Account ("TCBA");[2] (4) the Local Generation ("LG") revenue requirement tracked in the Local Generating Balancing Account ("LGBA");[3] (5) the San Onofre Nuclear Generating Station ("SONGS") Unit 1 Offsite Spent Fuel Storage Cost revenue requirement tracked in SDG&E's Nuclear Decommissioning Adjustment Mechanism ("NDAM") account; (6) the Tree Mortality Non-Bypassable Charge ("TMNBC") revenue requirement; and (7) the GHG allowance revenues and return allocations. SDG&E also requested authorization to return the sum of the 2018 and 2019 overcollected balance recorded to the LGBA. Additionally, SDG&E requested approval for its proposed 2022 (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment ("PCIA") rates; and (3) rate components for the Green Tariff Shared Renewables ("GTSR") Program. Lastly, SDG&E requested authorization to allocate 2022 bundled commodity revenues using the System Average Percent Change ("SAPC") methodology. SDG&E's Application was supported by the testimony of six witnesses.

In November of each year, SDG&E updates the testimony it submitted earlier in the year with its original Application. The November Update has traditionally served to update testimony regarding the CTC Market Price Benchmark ("MPB") and the PCIA benchmarks. This information is provided to SDG&E by the Commission's Energy Division, which compiles and provides updated input assumptions to the investor-owned utilities ("IOUs") so that the MPB can be calculated. These assumptions typically do not become available until early November, as they include forward price curves for all the trading days in October.

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[2] The purpose of the TCBA is to accrue all the CTC revenues and recover all CTC-eligible generation-related costs.

[3] The purpose of the LGBA is to record revenues and costs of generation and other energy sources where the Commission has determined that the resource is subject to the Cost Allocation Mechanism ("CAM").

Other updates to the ERRA testimony are warranted since approximately six months have passed since the filing of the Application, and various input assumptions have changed, including with respect to gas, electric and GHG forward price curves; the sales forecast (which is based on the sales forecast set forth in SDG&E's 2022 Sales Forecast Application (A.21-08-010); and Power Purchase Agreement contract terms and projected operations. These updates result in changes to forecasted ERRA, PABA, CAPBA, PCIA, CTC and LG expenses and GHG quantities and expenses.

SDG&E has also made several additional updates based on Commission decisions that require certain updates be included in the November Update and/or other relevant information that has become available since the submission of the Application.

In Decisions ("D.")18-10-019 and D.19-10-001, the Commission directed utilities to use vintage-billing determinants for calculating PCIA rates, calculate true-ups based on the updated MPBs provided by the Energy Division for PABA costs, and include in the ERRA Forecast November Update any under or over-collected balance associated with PABA.

As required by Commission decisions in Application ("A.") 13-08-002, annual GHG forecast applications (now incorporated into the ERRA forecast filling) include reconciliation of prior years. These prior years are unaffected by changes to the MPB, but volumetric changes to SDG&E's 2020 GHG emissions, as well as changes to current year emissions, purchases and sales, have led to modifications to 2020-2021 GHG data, as further explained in the testimony of Scott Lewis. Final verification of annual emissions takes place August of the following year. The 2020 emission volumes became final in August 2021 and both the 2020 volumes and costs have thus changed since the Application was submitted.

D.21-05-030 removed the PCIA cap and trigger mechanisms effective as of May 24, 2021. Per that decision, SDG&E was required to leave its 2021 capped PCIA rates and rate adders in effect through 2021 and implement the removal of the PCIA cap in rates effective January 1, 2022.[4] D.21-05-030 also directed SDG&E to address its projected 2021 CAPBA year end balance in its 2022 ERRA forecast application.[5] SDG&E's request to address the 2021 CAPBA year-end balance is set forth in the updated testimonies of Coreen Salcido and Gwendolyn Morien. In addition, Table 1 below reflects the 2021 CAPBA year-end balance related to the removal of the PCIA cap pursuant to D.21-05-030.

In addition, on May 7, 2021, SDG&E filed its *Expedited Application of SDG&E Under the Energy Resource Recovery Account Trigger Mechanism* (A.21-05-006) ("ERRA Trigger Application") in accordance with D.02-10-062 in order to address the forecasted undercollection of its ERRA balance. In the ERRA Trigger Application, SDG&E requested that the Commission authorize it to address the projected 2021 year-end ERRA balance as part of the November Update in this 2022 ERRA Forecast Proceeding.[6] While the Commission has yet to issue a decision in the ERRA Trigger Application, SDG&E is hopeful that a decision will be issued by the end of the year so that it can recover its projected $148 million ERRA undercollection as part of rates that are implemented on January 1. As such, SDG&E includes in the Updated Testimony of Coreen Salcido language that reflects the proposed transfer of the 2021 ERRA year-end undercollection to the PABA in order to address the 2021 ERRA year-end balance in this proceeding.

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[4] D.21-05-030, Ordering Paragraph ("OP") 1.

[5] D.21-05-030, p. 8 and OP 1.

[6] A.21-05-006, p. 7.

On August 23, 2021, the Commission issued D.21-08-026, which modified the formulas and distribution methods to be used in calculating the customer climate credits the State provides through California Air Resources Board's ("CARB") Cap and Trade Program.[7] The updated testimony of Gwendolyn Morien utilizes the new formulas and methodologies as required by D. 21-08-026 in calculating and distributing the GHG allowances regarding EITE entities, Small Businesses, and Residential customers. In addition, D.21-08-026 approved the modification of the GHG templates D-1 through D-5 of Appendix D of D. 14-10-033 (and later modified by D. 14-10-055 and D.15-01-024) to facilitate the changes made to the California Climate Credits.[8] The new GHG templates were approved and deemed effective on October 14, 2021 pursuant Advice Letter 4587-E-C. SDG&E's November Update utilizes the new GHG templates in Attachment G hereto.

Pursuant to D.19-11-016, which ordered the creation of an interim memo account until the Commission adopted a modified cost allocation mechanism ("CAM"), SDG&E implemented the Resource Adequacy Procurement Memorandum Account ("RAPMA") in 2021. The RAPMA tracks and records the net costs related to the procurement of incremental resource adequacy ("RA") capacity and related administrative costs that are not currently recovered in rates. SDG&E is not requesting any revenue requirement related to the RAPMA in this forecast filing, as the balance of RAPMA will be addressed upon the Commission's approval of the modified CAM. A description of the RAPMA is set forth in the Updated Testimony of Coreen Salcido.

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7 D.21-08-026, pp. 2-3.

8 *Id.* at pp. 49-51.

Finally, SDG&E would like to highlight for the Commission that it is recommending approval of an *alternative* amortization period and delayed implementation date for the Green Tariff Shared Renewables ("GTSR") Program rate components to minimize any unintended rate impact to ratepayers. As detailed in the Updated Testimony of Gwendolyn Morien, SDG&E has and will continue to undergo significant load departure during 2021 and 2022, which will result in diminishing participation in the GTSR Program in 2022. Due to certain statutory requirements dictating how GTSR rates are to be calculated and the current undercollection in the GTSR Program, SDG&E believes that a 12-month amortization of 2022 GTSR Program rates would result in a sudden and significant rate increase to participating customers. By utilizing an alternative 21-month amortization with a delayed April 1, 2022 implementation date for the new GTSR rates,[9] SDG&E will have additional time to communicate the rate increase to GTSR customers and allow them an opportunity to opt out of the rate if they choose to. A delayed implementation date would also allow the Commission to consider alternative mitigation efforts, including a possible suspension of the GTSR Program to protect ratepayers.

III. SUMMARY OF UPDATES TO THE APPLICATION

In its Application, SDG&E sought approval of a total 2022 forecasted revenue requirement of $630.816 million. In this November Update, SDG&E seeks approval of its *updated* total 2022 forecasted revenue requirement of $713.936 million, which is comprised of

[9] To be clear, SDG&E is only seeking a delayed implementation date for the 2022 GTSR Program rates. All other rates will still be implemented on January 1, 2022.

several forecasts of specific items.[10] [11] Table 1 below reflects SDG&E's proposed changes to the forecasts set forth in the Application:

TABLE 1 – 2021 Revenue Requirement Forecasts

Forecast	Application	November 8, 2021 Update
ERRA revenue requirement	$495.901 million	$786.955 million
PABA revenue requirement	$341.708 million	$181.940 million
CTC revenue requirement	$11.696 million	$9.577 million
LG revenue requirement	$143.125 million	$146.842 million
SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement	$1.108 million	$1.188 million
TMNBC revenue requirement	Confidential – *See* Testimony of Coreen Salcido	Confidential – *See* Testimony of Coreen Salcido
GHG allowance revenue return allocations	$0 million for small businesses $(111.160) million for residential California Climate Credit	$0 million for small business volumetric return $(190.908) million for Residential & Small Business California Climate Credit
PABA Balance	$(159.590) million	$(111.698) million
LGBA 2018 Balance	$(91.084) million	$(91.084) million
LGBA 2019 Balance	$(.888) million	$(.888) million
CAPBA 2021 Balance	$0	$(17.988)
Total 2022 forecasted revenue requirement	$630.816 million	$713.936 million

10 This forecasted revenue requirement includes Franchise Fees and Uncollectibles ("FF&U"). SDG&E notes that the current FF&U rate of 1.012133 is used for illustrative purposes in calculating the 2022 revenue requirements. An updated FF&U rate was approved in SDG&E's General Rate Case ("GRC") decision D.19-09-051, and pursuant to that decision, SDG&E will implement the new Commission approved FF&U rate on January 1, 2022, per AL 3885-E.

11 SDG&E is also requesting approval of its 2022 TMNBC revenue requirement, which is set forth in the Updated Testimony of Coreen Salcido and confidentiality declaration attached thereto. SDG&E omitted the 2022 TMNBC revenue requirement figures from the text of this November Update due to confidentiality concerns. As explained below and in the Updated Testimony of Ms. Salcido, since the revenue requirement associated with the TMNBC will be collected via the Public Purpose Program ("PPP") charge, it is not included in this total.

In its Application, SDG&E also sought approval of certain forecasts used to calculate GHG allowance revenue return allocations. In this November Update, SDG&E has proposed certain changes to those forecasts, as reflected in Table 2 below:

TABLE 2 – 2021 GHG Revenue and Expense Forecasts

Forecast	Application	November 8, 2021 Update
GHG allowance revenues	$128.412 million	$194.404 million
GHG allowance revenue set aside for clean energy/energy efficiency programs	$13.662 million	$20.261 million
GHG administration, customer outreach and outreach plan costs	$0.059 million	$0.060 million

In its Application, SDG&E also compared the 2022 revenue requirement forecasts against the amounts that were currently effective in rates at that time and concluded that there was a combined total decrease of $530.621 million. In total, these changes would decrease the current system average rate by 5.109 cents per kilowatt hour, or 18.58%. Based on those numbers, SDG&E projected that a typical non-CARE residential customer using 425 kilowatt hours could see a monthly bill decrease of 17.79%, or $23.72. Based on those numbers, SDG&E projected that a typical CARE residential customer using 425 kilowatt hours could see a monthly bill decrease of 17.79%, or $15.42.

Based on this November Update, SDG&E projects a combined total decrease of $447.501 million compared to the currently effective rates. In total, these changes would increase the current system average bundled rate by 0.145 cents per kilowatt hour, or 0.52%. Based on these numbers, SDG&E projects that a typical bundled non-CARE residential customer using 425 kilowatt hours could see a monthly bill decrease of 2.82%, or $3.84. Based on these numbers, SDG&E projects that a typical bundled CARE residential customer using 425 kilowatt hours could see a monthly bill decrease of 2.82%, or $2.49.

IV. SUPPORTING TESTIMONY

This November Update includes the testimony of six SDG&E witnesses. Each witness has prepared a markup (served concurrently herewith) of their original direct testimony, in which updates are reflected in a redline format. Those witnesses (and summaries of the updates they performed) are as follows:

A. Mr. Matt O'Connell

Mr. O'Connell[12] updates SDG&E's 2022 forecast of the procurement costs that it expects to record to the ERRA, TCBA, PABA and LGBA, as well as procurement costs related to the Green Tariff Shared Renewables program in 2022. In addition, Mr. O'Connell provides an update to the forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. O'Connell also updates SDG&E's forecast of 2022 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which Ms. Salcido uses in her 2022 forecast of the ERRA revenue requirement. Additionally, Mr. O'Connell provides an updated forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2022. Mr. O'Connell also provides an updated forecast of Tree Mortality Non-Bypassable Charge Balancing Account ("TMNBC") costs. Lastly, Mr. O'Connell's updated testimony supports Ms. Morien's development of the GHG allowance revenue return allocation and the volumetric revenue return for small business and residential customers, the GTSR program, and the PCIA.

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[12] Mr. O'Connell has adopted the Prepared Direct Testimony of Stefan Covic (April 15, 2021) as his own.

B. Ms. Coreen Salcido

Based on updated forecasts provided by Mr. O'Connell, Ms. Salcido updates SDG&E's 2022 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; (3) the LG revenue requirement; (4) TMNBC revenue requirement; and (5) PABA revenue requirement and the projected PABA year-end balance. Ms. Salcido also compares SDG&E's 2020 year-end balances with the actual 2020 year-end balances in the GHG allowance revenues and expenses balancing accounts, as well as reconciliation of the 2021 GHG Allowance Revenue & Expenses. Lastly, Ms. Salcido's testimony requests authorization of the revenue requirement of the SONGS Unit 1 Offsite Spent Fuel Storage costs.

C. Ms. Gwendolyn Morien

Based on the updated revenue requirements provided by Ms. Salcido, Ms. Morien[13] updates the rate impacts associated with the ERRA, PABA, CTC, LG, SONGS revenue requirements as well as the GHG allowance revenue return and sum of the activity in the LGBA. Based on 2022 Energy Division input factors that recently became available, Ms. Morien updates the CTC and PCIA rates. Ms. Morien also addresses the disposition of the 2021 PCIA under-collection balancing account ("CAPBA") year-end balance per D.21-05-030 (which removed the PCIA cap and trigger mechanisms). Ms. Morien also updates the 2021 allowance revenue return based on updated information provided by Mr. O'Connell. Ms. Morien also updates the 2022 rate components associated with the Green Tariff ("GT") and Enhanced Community Renewables ("ECR") programs.

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[13] Ms. Morien adopted the Amended Prepared Direct Testimony of Stacy Fuhrer (May 10, 2021) as her own.

D. Mr. Scott Lewis

Mr. Scott Lewis's testimony updates revenues and costs for GHG compliance instruments to satisfy SDG&E's 2020-2021 compliance obligations under the cap-and-trade program. Mr. Lewis' testimony also includes SDG&E's 2020-2021 revenues related to the sale of its allowance allocation.

E. Ms. Sheri Miller

Ms. Sheri Miller's testimony updates the forecasted Power Charge Indifference Adjustment ("PCIA") costs to include the updated PCIA market price benchmarks issued by Energy Division in the beginning of November.

F. Ms. April Bernhardt

Ms. Bernhardt updates the projected ongoing education and outreach costs related to the crediting of GHG allowance revenues on customers' bills in the year 2022.

V. CONFIDENTIALITY

Along with its original Prepared Direct Testimony, SDG&E submitted declarations attesting to the confidentiality of data presented therein. SDG&E requested that the confidential information in its Prepared Direct Testimony be kept confidential pursuant to Public Utilities Code §§ 583, 454.5(g), D.06-06-066, D.08-04-023, and D.14-10-033, as identified in SDG&E's confidentiality matrix. This November Update contains confidential information that is identified in SDG&E's confidentiality matrix and covered by declarations, which are being submitted with the respective Updated Prepared Direct Testimony. SDG&E requests that the same confidential treatment requested with the original filing apply to the information marked confidential in this November Update.

VI. CONCLUSION

SDG&E respectfully requests that the Commission approve the forecasts and proposals in its Application, subject to the updates contained in this November Update.

Respectfully submitted,
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UPDATED ATTACHMENT G

GHG REVENUE AND RECONCILATION APPLICATION FORM
(Attachment D of Decisions D.14-10-033 and D.15-01-024 as modified by AL 4587-E-C)

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Attachment D of Decision 14-10-033, as amended by advice letters listed below.

Yellow shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

Advice Letter 4587-E-A/B/C
(Southern California Edison Company ID U 338 E)
Advice Letter 6326-E-A/B/C
(Pacific Gas and Electric Company ID U 39 E)
Advice Letter 3845-E-A/B/C
(San Diego Gas & Electric Company ID U 902 E)
Advice Letter 177-E-A/B/C
(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)
Advice Letter 425-E-A/B/C
(Bear Valley Electric Service Company ID U 913 E)
Advice Letter 660-E-A/B/C
(PacifiCorp U 901 E)

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line	Description	Year 2021 Forecast	Year 2021 Recorded[1]	Year 2022 Forecast	Year 2022 Recorded
1	**Proxy GHG Price ($/MT)**	17.12	N/A	28.86	N/A
2	**Allocated Allowances (MT)**	6 766 147	6 732 862	6 737 256	-
3	**Revenues ($)**				
4	Prior Balance	3 172 937	7 376 791	(15 086 698)	-
5	Allowance Revenue	(115 836 437)	(133 698 111)	(194 403 522)	-
6	Interest	2 372	13 699	(16 300)	-
7	Franchise Fees and Uncollectibles	(1 189 180)	(1 133 230)	(2 112 270)	-
8	**Subtotal Revenues**	(113 850 308)	(127 440 851)	(211 618 790)	-
9	**Expenses ($)**				
10	Outreach and Administrative Expenses (from Template D3)[2]	45 133	45 160	59 799	-
11	Franchise Fees and Uncollectibles	-	-	-	-
12	Interest	-	(27)	-	-
13	**Subtotal Expenses**	45 133	45 133	59 799	-
14	**Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ($) (Sum of Lines 14a through 14g)**	17 773 708	17 773 709	20 261 326	-
14a	**SOMAH (Current Year's Request)**	11 583 644	11 583 644	19 440 352	-
14b	**SOMAH True-up (July - Dec 2020)[3]**	5 820 202	5 820 202	-	
14c	**Prior Year SOMAH True-up (Jan - June 2020)[4]**	(760 623)	(760 623)	-	
14d	**Prior Year SOMAH True-up (Oct - Dec)[5]**	100 486	100 486	(209 026)	
14e	**DAC SASH**	1 030 000	1 030 000	1 030 000	
14f	**DAC-GT**	-	-	-	-
14g	**CS-GT**	-	-	-	-
15	**Net GHG Revenues Available for Customers in Forecast Year ($) (Line 8 Line 13 Line 14)**	(96 031 467)	(109 622 009)	(191 297 664)	-
16	**GHG Revenue Returned to Eligible EITE Customers and Small Business Volumetric Customers($)**				
17	EITE Customer Return	838 557	389 295	389 295	-
18	Small Business Volumetric Return[6]	1 656 571	2 757 158	-	-
19	**Semi-Annual Climate Credit**				
20	Number of Elig ble Residential Bundled Households[7]	1 351 533	[redacted]		-
21	Number of Elig ble Residential Unbundled Households[7]	-			-
22	Number of Elig ble Small Business Customers	-	-	125 715	-
23	**Total Customers Eligible for Climate Credit**	1 351 533	1 320 648	1 487 583	-
24	**Per-Customer Semi-Annual Climate Credit (-0.5 x (Line 15 17 18) Line 23)**	34.60	34.60	64.17	-
25	**Total Revenue Distributed for the Climate Credit ($) (2 x Line 23 x Line 24)**	93 536 339	91 388 859	190 908 370	-
26	**Revenue Balance ($) (Line 15 Line 17 Line 18 Line 25)**	N/A	(15 086 698)	N/A	-

[1] Recorded data reflects actual data for January 2021 to September 2021 (through the third quarter) and updated forecasted data for October 2021 to December 2021 (fourth quarter).
[2] Forecasted Outreach & Administrative Expenses are the forecasted expenses (from Template D-3) adjusted for any forecasted prior year's under/over-collection in the GHGCOEMA and GHGACMA.
[3] In 2021 the true-up includes actual GHG allowance auction revenues for July-September 2020 and a forecast for October through December 2020.
[4] In 2021 SOMAH true-up for PY 2020 is based on actual GHG allowance auction revenues for Jan through June 2020.
[5] October through December prior year SOMAH True-up is two years in arrears due to the timing of actual GHG auction revenues.
[6] Small Business Volumetric Returns were distributed in 2021.
[7] SDG&E did not present forecasted bundled vs. unbundled residential customers in 2021; therefore the forecasted number of residential customers presented in 2021 is inclusive of bundled and unbundled customers.

Template D-2: Annual GHG Emissions and Associated Costs					
		Year 2021		Year 2022	
Line	Description	Forecast	Recorded[1]	Forecast	Recorded
1	**Direct GHG Emissions (MTCO2e)**				
2	Utility Owned Generation (UOG)	[redacted]			
3	Tolling Agreements				
4	Energy Imports (Specified)				
5	Energy imports (Unspecified)				
6	Qualifying Facility (QF) Contracts				
7	Contracts with Financial Settlement				
8	**Subtotal**				
9	**Total Emissions (MTCO2e)**				
10	**Proxy GHG Price ($/MT)**	17.12	20.75	28.86	-
11	**GHG Costs ($)**				
12	Direct GHG Costs	[redacted]			
13	Direct GHG Costs - Financial Settlement				
14	Previous Year's Forecast Reconciliation (Line 16)				
15	**Total Costs**				
16	**Forecast Variance ($)[2]**				

CONFIDENTIAL INFORMATION

[1]Recorded data is equal to forecast and will be updated with the November Update Filing.

[2]Also reflects adjustment for shift in regulatory accounting from cash to accrual

Template D-3: Detail of Outreach and Administrative Expenses

Line	Description	2021 Forecast	2021 Recorded[1]	2022 Forecast	2022 Recorded
1	**Utility Outreach Expenses ($)**				
2a	SMB Communications	-		23,000	-
2b	Other (Consultant)		(45,263)		
3	**Subtotal Outreach**	-	(45,263)	23,000	-
4	**Utility Administrative Expenses ($)**				
5	Marketing - SDG&E (email, bill insert)	59,000	82,089	59,000	-
6	**Subtotal Administrative**	59,000	82,089	59,000	-
7	**Utility Outreach and Administrative Expenses ($) (Line 3 + Line 6)**	59,000	36,825	82,000	-
8	**Additional (Non-Utility) Statewide Outreach ($)**	-	-	-	-
9	**Total Outreach and Administrative Expenses ($) (Line 7 + Line 8)**	59,000	36,825	82,000	-

[1] Recorded data reflects actual data for January 2021 to September 2021 (through the third quarter) and updated forecasted data for October 2021 to December 2021 (fourth quarter).