

Application No.: A.21-04-  
Exhibit No.: \_\_\_\_\_  
Witness: Coreen G. Salcido

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

**\*\*PUBLIC VERSION\*\***

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



**April 15, 2021**

**TABLE OF CONTENTS**

I. INTRODUCTION ..... 1

II. BACKGROUND ..... 2

III. 2022 ERRRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS ..... 3

IV. RETURN OF THE OVERCOLLECTED 2018 AND 2019 LGBA RECORDED  
ACTIVITY ..... 5

V. COMPARISON OF 2020 RECORDED VS ACTUAL YEAR-END BALANCES IN  
GHG BALANCING ACCOUNTS ..... 5

VI. GREEN TARIFF SHARED RENEWABLE BALANCING ACCOUNT (“GTSRBA”) ..... 7

VII. TREE MORTALITY NON-BYPASSABLE CHARGE BALANCING ACCOUNT  
 (“TMNBCBA”) ..... 7

VIII. SOLAR ON MULTIFAMILY AFFORDABLE HOUSING (“SOMAH”) PROGRAM ..... 8

IX. DAC-SASHBA ..... 8

X. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) ..... 9

XI. POWER CHARGE INDIFFERENCE ADJUSTMENT (PCIA) UNDERCOLLECTION  
BALANCING ACCOUNT (CAPBA) ..... 10

XII. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE ..... 10

XIII. SUMMARY ..... 11

XIV. QUALIFICATIONS ..... 12

**ATTACHMENT A – DECLARATION OF COREEN G. SALCIDO**

**ATTACHMENT B – DECLARATION OF JAMES MAGILL REGARDING  
CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-024, *et al.***

**ATTACHMENT C – FORECASTED 2021 YEAR END BALANCE OF PABA**

1                                   **PREPARED DIRECT TESTIMONY OF**  
2                                   **COREEN G. SALCIDO**  
3                                   **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

4 **I. INTRODUCTION**

5           The purpose of my testimony is to address cost recovery related to San Diego Gas &  
6 Electric Company’s (“SDG&E”) Energy Resource Recovery Account (“ERRA”), Competition  
7 Transition Charge (“CTC”), Local Generation (“LG”) revenue requirements and Tree Mortality  
8 Non-Bypassable revenue requirements. More specifically, my testimony:

- 9           • Describes SDG&E’s ERRA, Transition Cost Balancing Account (“TCBA”),  
10           Local Generating Balancing Account (“LGBA”), Tree Mortality Non-  
11           Bypassable Charge Balancing Account (“TMNBCBA”), Solar on  
12           Multifamily Affordable Housing (“SOMAH”) Program funding,  
13           Disadvantaged Communities Single Family Solar Homes program (“DAC-  
14           SASH”), Portfolio Allocation Balancing Account (“PABA”), and Power  
15           Charge Indifference Adjustment (“PCIA”) Undercollection Balancing  
16           Account (“CAPBA”); and,  
17           • Sets forth SDG&E’s forecasted 2022 ERRA, CTC, LG, TMNBC, PABA and  
18           CAPBA revenue requirements, and describes SDG&E’s request for  
19           authorization from the Commission to return the overcollected 2018 LGBA  
20           recorded activity of \$(91.08) million as requested in A.19-05-007 and the  
21           overcollected 2019 LGBA recorded activity of \$(0.888) million as requested  
22           in A.20-06-001.<sup>1</sup>

23           In addition, my testimony presents the comparison between the recorded 2020 year-end  
24 balances with the actual 2020 year-end balances in the GHG allowance revenues and expenses

---

<sup>1</sup> A.20-06-001 is pending Commission approval.

1 balancing accounts. Finally, my testimony requests authorization of the revenue requirement of the  
2 San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage costs as  
3 described in Section XII below.

## 4 **II. BACKGROUND**

5 Pursuant to California Public Utilities Commission (“Commission”) Decisions  
6 (“D.”) 02-10-062 and D.02-12-074, the purpose of the ERRA balancing account is to provide full  
7 recovery of SDG&E’s energy procurement costs associated with serving SDG&E’s bundled service  
8 customers. Energy procurement costs include expenses associated with the California Independent  
9 System Operator (“CAISO”) such as energy and ancillary services load charges, CAISO revenues  
10 from utility generation and supply contracts, contract costs, generation fuel costs, CAISO-related  
11 costs, and hedging costs. The ERRA records revenues from SDG&E’s Electric Energy Commodity  
12 Cost (“EECC”) rate schedule, adjusted to exclude commodity revenues assigned to the Non-Fuel  
13 Generation Balancing Account (“NGBA”),<sup>2</sup> and other Commission approved adjustments.

14 The purpose of the TCBA is to accrue all CTC revenues and recover all CTC-eligible  
15 generation-related costs. Pursuant to D.02-12-074 and D.02-11-022, payments to Qualifying  
16 Facilities (“QFs”) that are above the market benchmark proxy are charged to the TCBA. Eligible  
17 CTC expenses<sup>3</sup> reflect the difference between the market proxy and the contract price of costs  
18 associated with certain QF contracts.

19 The purpose of the LGBA is to record the revenues and costs of generation and other energy  
20 sources where the Commission has determined that the resource is subject to the Cost Allocation  
21 Mechanism (“CAM”). Such generation may take the form of purchase power agreements,

---

<sup>2</sup> In compliance with D.03-12-063, the NGBA became effective January 1, 2004.

<sup>3</sup> Expenses eligible for CTC recovery are defined by Assembly Bill (“AB”) 1890.

company-owned generation units associated with new generation resources, and any other resources approved by the Commission for CAM treatment.

### III. 2022 ERRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS

As shown in Table 1 below, SDG&E’s 2022 ERRA revenue requirement forecast is \$495.901 million, including forecasted GHG costs as well as franchise fees and uncollectibles (“FF&U”). The direct testimony of SDG&E witness Mr. Stefan Covic provides a detailed discussion of the Greenhouse Gas (“GHG”) costs.

**TABLE 1**  
**ERRA REVENUE REQUIREMENT**  
**(\$Millions of Dollars)**

No.	Component	2022 Forecast		2021 Forecast		Change from Prior Year	
1.	Load ISO Charges						
2.	Supply ISO Revenues	-		-		-	
3.	Contract Costs (non-CTC)						
4.	Contract Costs (CTC up to market)						
5.	Generation Fuel	-		-		-	
6.	Net Supply ISO Revenues						
7.	CAISO Misc. Costs						-
8.	Hedging Costs						
9.	GHG Costs						
10.	Subtotal		489.956		655.482		(165.526)
11.	FF&U <sup>4</sup>		5.945		7.953		(2.008)
12.	<b>TOTAL<sup>5</sup></b>		<b>495.901</b>		<b>663.435</b>		<b>(167.534)</b>

The forecasted cost components set forth in the line items contained in Table 1 above, and the reasons for the \$(167.534) million decrease in the 2022 ERRA revenue requirement forecast –

<sup>4</sup> The 2021 Forecasts reflect the franchise fee and uncollectible factor of 1.0121448. The 2022 Forecasts reflect the franchise fee and uncollectible factor of 1.012133

<sup>5</sup> Sums may not equal due to rounding.

1 as compared to the 2021 ERRA revenue requirement (as submitted in the 2021 Forecast) – are  
2 addressed in Mr. Covic’s testimony.

3 As shown in Table 2 below, SDG&E’s 2022 CTC revenue requirement forecast is \$11.696  
4 million, including FF&U.

5 **TABLE 2**  
6 **CTC REVENUE REQUIREMENT**  
7 **(\$Millions of Dollars)**

No.	Component	2022 Forecast	2021 Forecast	Change from Prior Year
1.	QF Contracts	11.556	11.265	0.291
2.	FF&U <sup>6</sup>	0.140	0.137	0.004
3.	<b>TOTAL</b>	<b>11.696</b>	<b>11.401</b>	<b>0.295</b>

8  
9 For CTC-eligible purchase power contracts, the power purchased is recorded to the ERRA at  
10 the market proxy of ████████ MWh. The difference between the actual contract price and the  
11 market proxy is included in the 2022 CTC forecast and recorded to the TCBA. SDG&E witness  
12 Mr. Covic discusses the market proxy in greater detail in his testimony.

13 As shown in Table 3 below, SDG&E’s 2022 Local Generation (“LG”) revenue requirement  
14 forecast is \$143.125 million, including FF&U.

15 **TABLE 3**  
16 **LG REVENUE REQUIREMENT**  
17 **(\$Millions of Dollars)**

No.	Component	2022 Forecast	2021 Forecast	Change from Prior Year
1.	Combined Heat & Power	██████	██████	██████
2.	Energy Storage	██████	██████	██████
3.	Peakers & Resource Adequacy	██████	██████	██████
4.	Local Generation GHG	-	-	-
5.	<b>SUBTOTAL</b>	<b>141.409</b>	<b>138.817</b>	<b>2.592</b>
6.	FF&U <sup>7</sup>	1.716	1.686	0.030
7.	<b>TOTAL<sup>8</sup></b>	<b>143.125</b>	<b>140.503</b>	<b>2.622</b>

18  

---

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> Sums may not equal due to rounding.

1 The LGBA was authorized in D.13-03-029. The LGBA records the LG costs and the  
2 revenues received from SDG&E’s LG rate. On a monthly basis, the LGBA compares the LG costs  
3 with the revenues received. Interest is applied to any over- or under-collected balance at the three-  
4 month Commercial Paper rate. The LGBA utilizes sub-accounts for each generation resource.

5 **IV. RETURN OF THE OVERCOLLECTED 2018 AND 2019 LGBA RECORDED**  
6 **ACTIVITY**

7 D.21-01-017 approved SDG&E’s request not to seek the return of the over-collected 2018  
8 LGBA recorded activity of \$(91.084) million in its 2021 ERRRA Forecast application and to seek the  
9 return of those funds as part of its 2022 Energy Resource Recovery Account forecast application.<sup>9</sup>

10 In SDG&E’s 2019 ERRRA Compliance Application, which is pending approval in A.20-06-  
11 001, SDG&E presented a monthly summary of accounting entries recorded to the LGBA during  
12 2019, totaling \$(0.888) million. In that application, SDG&E proposed to return the overcollected  
13 2019 recorded activity of \$(0.888) million in this 2022 ERRRA Forecast Application.

14 Therefore, SDG&E is seeking authorization to return the over-collected 2018 and 2019  
15 LGBA recorded activity of \$(91.084) million and \$(0.888) million, respectively, in this Application,  
16 pending the approval of A.20-06-001.

17 **V. COMPARISON OF 2020 RECORDED VS ACTUAL YEAR-END BALANCES IN**  
18 **GHG BALANCING ACCOUNTS**

19 In accordance with Finding of Fact (“FOF”) 13 of D.14-10-033, utilities must reconcile  
20 forecast amounts with recorded amounts until all actuals are available for the forecast year.  
21 Consistent with this methodology, SDG&E provides a comparison of the 2020 year-end  
22 recorded/forecasted balances with the 2020 year-end actual balances in three GHG balancing  
23 accounts in Table 4 below. More specifically, (1) GHG allowance revenues are recorded in the  
24 GHG Revenue Balancing Account (“GHGRBA”); (2) expenses are recorded in the GHG Customer

---

<sup>9</sup> D.21-01-017 at OP 5.

1 Outreach and Education Memorandum Account (“GHGCOEMA”); and (3) expenses are recorded  
 2 in the GHG Administrative Costs Memorandum Account (“GHGACMA”).

3 **TABLE 4**  
 4 **COMPARISON OF 2020 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG**  
 5 **BALANCING ACCOUNTS**

Line	Description	2020 Recorded <sup>1</sup> (\$)	2020 Actual (\$)	Difference
<b>(1) GHGRBA</b>				
1	<b>Beginning Balance 1/1/2020</b>	325,486	325,486	-
2	Allowance Revenue	(106,782,171)	(104,691,923)	2,090,248
3	Revenue returned to customers	89,277,438	91,416,125	2,138,687
4	Franchise Fees and Uncollectibles	(1,070,218)	(1,095,856)	(25,638)
5	Transfer to GHGCOEMA and GHGACMA <sup>2,3</sup>	29,021	29,021	-
6	Allowance Set Aside for Multi-Family Program <sup>4</sup>	18,222,844	18,222,844	-
7	Allowance Set Aside for DAC-SASH <sup>5</sup>	1,030,000	1,030,000	-
8	Allowance Set Aside for DAC-GT <sup>6</sup>	866,297	866,297	-
9	Allowance Set Aside for CSGT <sup>7</sup>	1,242,248	1,242,248	-
10	Interest	31,992	32,549	557
11	<b>Ending Balance 12/31/2020</b>	<b>3,172,937</b>	<b>7,376,791</b>	<b>4,203,854</b>
<b>(2) GHGCOEMA</b>				
12	<b>Beginning Balance 1/1/2020</b>	18,505	18,505	-
13	Transfer from GHGRBA <sup>2</sup>	350	350	-
14	Expenses	(18,811)	31,996	50,808
15	Interest	133	139	6
16	<b>Ending Balance 12/31/2020</b>	<b>177</b>	<b>50,991</b>	<b>50,813</b>
<b>(3) GHGACMA</b>				
17	<b>Beginning Balance 1/1/2020</b>	(45,171)	(45,171)	-
18	Transfer from GHGRBA <sup>3</sup>	(29,371)	(29,371)	-
19	Expenses	60,865	10,057	(50,808)
20	Interest	(367)	(372)	(5)
21	<b>Ending Balance 12/31/2020</b>	<b>(14,044)</b>	<b>(64,856)</b>	<b>(50,812)</b>

<sup>1</sup>Per A.20-04-014 (2021 ERRRA Forecast Update November 7, 2020) Attachment G. Template D-1: Annual Allowance Revenue Receipts and Customer Returns; and Template D-3: Detail of Outreach and Administrative Expenses. Recorded amounts represent actual recorded activity from January through September 2020 and forecasted amounts from October through December 2020.

<sup>2</sup>Transfer per D.20-01-005 from GHGRBA to GHGCOEMA. This represents the 1/1/20 projected overcollected balance of (\$350).

<sup>3</sup>Transfer per D.20-01-005 from GHGRBA to GHGACMA. This represents the 1/1/20 projected overcollected balance of (\$29,629), plus 2020 forecasted expenses of \$59,000.

<sup>4</sup>Transfer per D.20-01-005 from GHGRBA to SOMAH. This represents Jan-Jun 2020 program funding of \$5,618,639 plus 2016-2019 undercollection of \$12,604,205.

<sup>5</sup>Transfer per D.20-01-005 from GHGRBA to DAC-SASH. This represents the program funding for 2020.

<sup>6</sup>Transfer per D.20-01-005 from GHGRBA to DAC-GT. This represents the program funding for 2020.

<sup>7</sup>Transfer per D.20-01-005 from GHGRBA to CSGT. This represents the program funding for 2020.



1 **VI. GREEN TARIFF SHARED RENEWABLE BALANCING ACCOUNT (“GTSRBA”)**

2 Per D.15-01-051, SDG&E established the GTSRBA<sup>10</sup> to record the difference between the  
3 revenues collected from individual customers electing to participate in the GTSR program and the  
4 incremental costs incurred to serve customers participating in that program. The GTSR program  
5 consists of both a Green Tariff (“GT”) component and an Enhanced Community Renewables  
6 (“ECR”) component which are recorded in separate subaccounts with the GTSRBA. SDG&E’s  
7 GTSR program began in 2016 and recorded activity through 2020 as described in SDG&E’s Annual  
8 GTSR Program Progress Report filed on March 15, 2021 (A.12-01-008). SDG&E is requesting  
9 recovery of the undercollected GTSRBA 2019 recorded activity \$2.0193 million, pending the  
10 approval of A.20-06-001, in this instant application.<sup>11</sup> In addition, SDG&E is requesting recovery  
11 of the undercollected GTSRBA 2018 ending balance of \$0.125 million pursuant to D.21-01-017.<sup>12</sup>

12 **VII. TREE MORTALITY NON-BYPASSABLE CHARGE BALANCING ACCOUNT**  
13 **(“TMNBCBA”)**

14 Per D.18-12-003, SDG&E filed AL 3343-E<sup>13</sup> established the TMNBCBA to record the tree  
15 mortality related procurement costs. As noted in D.18-12-003, Ordering Paragraph (“OP”) 9, the  
16 TMNBCBA cost will be recovered through the public purpose programs (“PPP”) charge.

17 SDG&E’s 2022 TMNBC revenue requirement forecast is \$ [REDACTED] million (\$ [REDACTED]  
18 including FF&U), which is described in Mr. Covic’s testimony.

---

<sup>10</sup> See SDG&E Advice Letter (“AL”) 2889-E, approved June 23, 2016 and effective May 28, 2016.

<sup>11</sup> A.20-06-001 is pending Commission approval.

<sup>12</sup> D.21-01-017 at OP 4.

<sup>13</sup> Two supplemental ALs were filed for AL 3343. AL 3343-B was submitted on May 31, 2019 and approved on July 19, 2019 with a July 2, 2019 effective date. AL 3343-E was approved on July 19, 2019 with an effective date of July 2, 2019.

1 **VIII. SOLAR ON MULTIFAMILY AFFORDABLE HOUSING (“SOMAH”) PROGRAM**

2 D.17-12-022 OP 4, at p. 69, states that the IOUs “each shall reserve 10% of the proceeds  
3 from the sale of greenhouse gas allowances defined in Public Utilities Code Section 748.5 through  
4 its annual Energy Resource Recover Account (ERRA) proceedings for use in the Solar on  
5 Multifamily Affordable Housing Program, starting with its ongoing 2018 ERRA forecast  
6 proceeding.” D.20-04-012, issued on April 23, 2020, continues authorization of allocation of funds  
7 to the SOMAH program through June 30, 2026.

8 In Template D-1: Annual Allowance Revenue Receipts and Customer Returns in  
9 Attachment G to this Application, SDG&E presents the SOMAH Program prior year true-up  
10 funding for October through December 2020 request of \$(0.209) (\$0.212 million including  
11 FF&U).<sup>14</sup> The true-up is also presented in the testimony of SDG&E witness Ms. Fuhrer.

12 **IX. DAC-SASHBA**

13 The purpose of the DAC-SASHBA is to balance allocated greenhouse gas (“GHG”)  
14 allowance revenues and program costs. The DAC-SASH Balancing Account was established in  
15 2019 in Commission Decision 18-06-027 and Advice Letter 3410-E. D.18-06-027 OP 8 states that  
16 the DACSASH program will be funded with GHG allowance proceeds if available and recovered  
17 through the PPP mechanism if GHG allowance proceeds are unavailable.

18 In the 2022 ERRA direct testimony of SDG&E Witness Mr. Covic, he states the total DAC-  
19 SASH program funding is estimated to be \$1.030 million. The forecasted 2022 GHG allowance  
20 revenues available for clean energy and energy efficiency programs as set forth in the direct  
21 testimony of Mr. Covic will be sufficient to cover the entire \$1.030 million after setting aside  
22 funding for the Solar on Multifamily Affordable Housing (“SOMAH”) Program.

---

<sup>14</sup> AL 3704-E filed March 1, 2021. The January through September 2021 SOMAH true-up will be included in the November Update.

1 **X. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)**

2 Pursuant to Commission Decision 18-10-019 and Advice Letter 3318-E,<sup>15</sup> the purpose of the  
3 PABA is to record the “above-market” costs and revenues associated with all generation resources  
4 that are eligible for cost recovery through the PCIA rates, including SDG&E’s Utility-Owned  
5 Generation (“UOG”). Costs recorded in each vintage subaccount will include, but are not limited  
6 to, fuel, GHG costs, third party power purchase contracts costs, and UOG’s revenue requirement.  
7 The above-market costs of all generation resources that are eligible for cost recovery through the  
8 PCIA rates, including SDG&E’s UOG, are also recorded in the PABA.

9 SDG&E’s 2022 PABA revenue requirement forecast includes the fuel costs for its electric  
10 generation facilities, including Miramar Energy Facility I (“Miramar I”), Miramar Energy Facility  
11 II (“Miramar II”), Palomar Energy Center (“Palomar”), Desert Star Energy Center (“Desert Star”),  
12 and the Cuyamaca Peak Energy Plant (“Cuyamaca”). The actual fuel costs of Miramar I, Miramar  
13 II, Palomar, Desert Star, and Cuyamaca are recorded in the PABA for recovery through commodity  
14 rates.

15 **TABLE 5**  
16 **PABA REVENUE REQUIREMENT**  
17 **(\$Millions of Dollars)**

No.	Component	2022 Forecast <sup>16</sup>	2021 Forecast <sup>17</sup>	Change from Prior Year
1.	Supply ISO Revenues			
2.	Contract Costs (non-CTC)			
3.	Generation Fuel			
4.	GHG Costs			
5.	Subtotal	337.612	328.484	9.128
6.	FF&U	4.096	3.985	0.111
7.	TOTAL	341.708	332.469	9.239

18  

---

<sup>15</sup> See SDG&E AL 3318-E, filed on December 10, 2018, and approved on May 30, 2019.

<sup>16</sup> Table 5 does not include the 2021 Year End Forecasted PABA balance of \$(97.315) million, including FF&U shown in attachment C.

<sup>17</sup> The Updated November 2021 Forecast, included the 2020 forecasted year-end PABA under collected balance of \$123.812 million, including FF&U (not shown in Table 5 above).

1 As Table 5 indicates, SDG&E's 2022 PABA revenue requirement forecast is \$341.708  
2 million, including FF&U. In addition, D.19-10-001 authorized the recovery of the PABA prior  
3 year-end balance to be recovered through the ERRA Forecast filing. SDG&E requests recovery of  
4 the projected 2021 year-end balances recorded to PABA of \$(96.149) million \$(97.315) million  
5 including FF&U), as shown in Attachment C. The proposed 2021 PABA year-end balance is  
6 projected based on two months of actuals (January and February of 2021) and ten months of  
7 forecasted expenses and revenues. The forecasted year-end balance will be updated in SDG&E's  
8 November Update filing and will include actual recorded entries from January through September.

9 **XI. POWER CHARGE INDIFFERENCE ADJUSTMENT (PCIA) UNDERCOLLECTION**  
10 **BALANCING ACCOUNT (CAPBA)**

11 Pursuant to Commission Decision 18-10-019 and Advice Letter 3436-E,<sup>18</sup> the purpose of the  
12 CAPBA is to record the obligation that accrues for departing load ("DL") customers in the event  
13 that the half-cent per kWh PCIA rate cap is reached. The CAPBA is comprised of a subaccount for  
14 each customer vintage, as well as a specific bundled subaccount, which capture the shortfall amount  
15 that is financed by bundled customers for DL customers when the DL PCIA rate is capped, and the  
16 repayment amount from DL customers to bundled customers. In addition, pursuant to OP 10,  
17 SDG&E has established the trigger mechanism for CAPBA. In her testimony, SDG&E witness Ms.  
18 Fuhrer discusses the CAPBA in greater detail.

19 **XII. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE**

20 This section of my testimony requests authorization of the SONGS Unit 1 Offsite Spent Fuel  
21 Storage costs revenue requirement of \$1.09 million (\$1.11 million including FF&U) for 2022,  
22 which are described in Mr. Covic's testimony. The authorized revenue requirement is tracked in  
23 SDG&E's Nuclear Decommissioning Adjustment Mechanism account.

---

<sup>18</sup> See SDG&E AL 3436-E, filed on September 30, 2019, and approved on October 30, 2019.

1 **XIII. SUMMARY**

2 My testimony presents the following revenue requirements for which SDG&E seeks  
3 recovery in this 2022 ERRR Forecast Application:

- 4 • the 2022 ERRR revenue requirement forecast of \$495.90 million (which  
5 includes forecasted GHG costs);
- 6 • the 2022 CTC revenue requirement forecast of \$11.696 million;
- 7 • the 2022 LG revenue requirement forecast of \$143.125 million;
- 8 • the 2022 TMNBC revenue requirement forecast of \$ [REDACTED] million;
- 9 • the 2022 PABA revenue requirement forecast of \$341.708 million; and
- 10 • the 2021 forecasted year-end PABA over collected balance of \$(97.315)  
11 million.

12 Each of these amounts include FF&U.

13 SDG&E is requesting authorization from the Commission to return the overcollected 2018  
14 and 2019 recorded LGBA activity of \$(91.084) million and \$(0.888) million, respectively. SDG&E  
15 is also requesting recovery of the undercollected 2018 GTSRBA ending balance of \$0.125 million  
16 and the undercollected 2019 recorded activity of \$2.0193 million.

17 In addition, my testimony also presents the comparison of the 2020 recorded/forecasted vs.  
18 actual year-end balances in the GHG allowance revenues and expenses balancing accounts.

19 Finally, SDG&E requests that the Commission approve the 2022 revenue requirement of  
20 \$1.09 million (\$1.10 million including FF&U) for the forecasted SONGS Unit 1 Offsite Spent Fuel  
21 Storage costs.

22 This concludes my prepared direct testimony.

1 **XIV. 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 Sempra  
8 Energy Subsidiaries; Sempra Renewables, Sempra Energy and Sempra Global including Asset  
9 Manager, Senior Compensation Advisor and Compensation Analyst.

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

**ATTACHMENT A**

**DECLARATION OF COREEN G. SALCIDO**

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

**DECLARATION  
OF COREEN G. SALCIDO**

**A.21-04-\_\_**

Application of San Diego Gas & Electric Company (U 902-E)  
for Approval of Its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts

I, Coreen G. Salcido, declare as follows:

1. I am the Validation and Analysis Manager for San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s April 15, 2021 Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Validation and Analysis Manager, I am thoroughly familiar with the facts and representations in this Declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information (“Protected Information”) in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix (“Matrix”) attached to the Commission’s Decision (“D.”) 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and



- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code. As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

<b>Confidential Information</b>	<b>Matrix Reference</b>	<b>Reason for Confidentiality</b>
Table 1, line 1: Load ISO Charges	II.A.2 V.C	Utility Electric Price Forecasts; confidential for 3 years. LSE Total Energy Forecast; confidential for the front 3 years.
Table 1, lines 2 and 6: Supply ISO Revenues	II.A.2 II.B.1 II.B.3 II.B.4	Utility Electric Price Forecasts; confidential for 3 years. Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 3: Contract Costs (non-CTC)	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 4: Contract Costs (CTC up to market)	II.B.3 II.B.4	Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 5: Generation Fuel	II.B.1 II.B.4	Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 7: CAISO Misc. Costs	II.A.2	Utility Electric Price Forecasts; confidential for 3 years.
Table 1, line 8: Hedging Costs	I.A.4	Long-term Fuel (gas) Buying and Hedging Plans; confidential for 3 years.
Section III, fourth paragraph. CTC market proxy price	II.A.2 II.B.3	Utility Electric Price Forecasts; confidential for 3 years. Generation Cost Forecasts of QF Contracts; confidential for 3 years.
Table 3, line 1: Combined Heat & Power	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for 3 years.
Table 3, line 2: Energy Storage	II.B.1	Utility Retained Generation

<b>Confidential Information</b>	<b>Matrix Reference</b>	<b>Reason for Confidentiality</b>
Table 3, line 3: Peakers & Resource Adequacy	II.B.3 II.B.4	Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 5, line 1: Supply ISO Revenues	II.A.2 II.B.1  II.B.3  II.B.4	Utility Electric Price Forecasts; confidential for 3 years. Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 5, line 2: Contract Costs (non-CTC)	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 5, line 3: Generation Fuel	II.B.1  II.B.4	Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Section VII, second paragraph, and section XIII Summary: Tree Mortality contract	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.

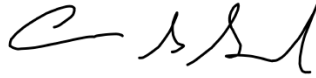
4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. SDG&E will comply with the limitations on confidentiality specified in the Matrix for the Protected Information.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized, masked or otherwise protected in a manner that would allow further disclosure of the data while still protecting confidential information.

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

Executed this 15th day of April, 2021, at San Diego, California.

A handwritten signature in black ink, appearing to read 'C. Salcido', written over a horizontal line.

Coreen G. Salcido  
Validation & Analysis Manager  
San Diego Gas & Electric Company

**ATTACHMENT B**

**DECLARATION OF JAMES MAGILL REGARDING  
CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS  
PURSUANT TO D.16-08-024, *et al.***

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

**DECLARATION OF JAMES MAGILL  
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS  
PURSUANT TO D.16-08-024, *et al.***

I, James Magill, do declare as follows:

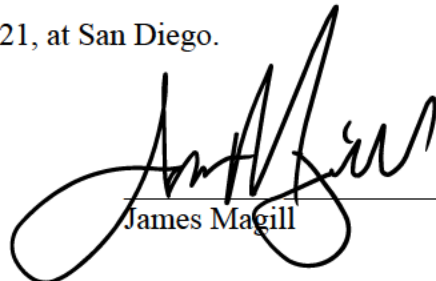
1. I am the Manager of the Settlements & Systems department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Miguel Romero, Vice President of Energy Supply. I have reviewed Coreen G. Salcido’s Prepared Direct Testimony (“Testimony”) in support of SDG&E’s “Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts” (“Application”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decisions (“D.”) 16-08-024, D.17-05-035, and D.17-09-023 to demonstrate that the confidential information (“Protected Information”) provided in the Testimony is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

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

Executed this 15th day of April, 2021, at San Diego.

  
James Magill

# ATTACHMENT A

## SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2022 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
Table 1, line 9: GHG Costs	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g).	GHG emissions forecasts: Providing these forecasts to market participants would allow them to know SDG&E’s forecasted GHG obligation, thereby compromising SDG&E’s contractual bargaining power such that customer costs are likely to rise. Thus, the release of this non-public confidential information will unjustifiably allow market participants to use this information to the disadvantage of SDG&E’s customers.
Table 3, line 4: Local Generation GHG	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g).	GHG emissions forecasts: Providing these forecasts to market participants would allow them to know SDG&E’s forecasted GHG obligation, thereby compromising SDG&E’s contractual bargaining power such that customer costs are likely to rise. Thus, the release of this non-public confidential information will unjustifiably allow market participants to use this information to the disadvantage of SDG&E’s customers.
Table 5, line 4: GHG Costs	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g).	GHG emissions forecasts: Providing these forecasts to market participants would allow them to know SDG&E’s forecasted GHG obligation, thereby compromising SDG&E’s contractual bargaining power such that customer costs are likely to rise. Thus, the release of this non-public confidential information will unjustifiably allow market participants to use this information to the disadvantage of SDG&E’s customers.

**ATTACHMENT C**

**FORECASTED 2021 YEAR END BALANCE OF PABA**

**SAN DIEGO GAS & ELECTRIC**  
**ATTACHMENT C**  
**FORECASTED 2021 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES**  
**(THOUSANDS OF DOLLARS)**

Line No.	Yin 2005	Yin 2006	Yin 2007	Yin 2008	Yin 2009	Yin 2010	Yin 2011	Yin 2012	Yin 2013	Yin 2014	Yin 2015	Yin 2016	Yin 2017	Yin 2018	Yin 2019	Yin 2020	Yin 2021	Total
<b>Recorded Balances from January to February 2021 (a)</b>																		
1	254	12,720	(25,696)	(841)	(3,368)	33,897	49,291	(3,816)	(2,332)	(221)	363	0	1,771	23,340	(3,825)	(15,190)	0	43,742
2	2,677	4,804	293	3,866	4,893	11,643	22,842	4,617	(165)	153	0	0	0	3,767	0	4,832	0	79,632
3	0	0	0	0	2,194	904	0	0	0	0	0	0	0	0	0	0	0	3,588
4	(810)	(381)	0	(1,420)	(1,696)	(2,135)	(4,491)	(1,750)	(111)	(68)	0	0	0	0	0	0	0	(13,064)
5	(198)	(48)	0	0	(853)	(560)	(700)	(239)	(13)	(19)	0	0	0	(2,846)	0	(4,923)	0	(10,861)
6	(4,441)	(5,521)	(2,582)	(5,252)	(9,202)	(16,160)	(40,974)	(12,586)	(544)	(355)	(1,212)	0	401	0	873	(2,570)	0	(120,187)
7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	203	0	203
8	(1)	(1)	(1)	(1)	(1)	6	7	(2)	(1)	(0)	(0)	0	0	5	(1)	(4)	0	2
9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	115,238	0	115,238
10	(2,518)	11,573	(27,966)	(3,648)	(8,034)	27,594	26,975	(13,775)	(3,165)	(510)	(829)	0	2,173	24,265	(2,953)	97,587	0	98,293
<b>Forecast from March to December 2021 (b)</b>																		
13																		
14																		
15																		
16																		
17																		
18																		
19																		
20																		
21																		
22																		
<b>Year-End 2021 Forecast (c = a + b)</b>																		
25	36,364	39,759	45,708	25,948	51,033	105,791	299,991	93,123	4,840	2,728	0	0	0	25,943	28,229	4,832	0	953,626
26	(21,927)	(27,259)	(12,751)	(25,933)	(57,455)	(120,130)	(273,312)	(57,816)	(3,845)	972	(8,292)	0	2,846	0	6,238	71,904	(100,688)	(726,505)
27	(14,778)	(11,514)	(30,005)	(1,753)	(2,062)	(27,373)	(89,826)	(34,539)	(3,324)	(1,073)	0	0	0	0	0	0	0	(282,546)
28	(3,925)	(2,808)	0	(6,355)	(7,464)	(7,878)	(23,226)	(9,031)	(812)	(294)	0	0	0	0	0	0	0	(63,050)
29	(1,836)	(1,165)	(14,207)	(2,460)	(6,337)	(5,729)	(14,843)	(3,188)	(326)	(156)	0	0	0	(18,672)	(27,615)	(4,923)	0	(138,808)
30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,238	0	2,238
31	(1)	(1)	(0)	(1)	0	8	13	(1)	(0)	(0)	0	0	0	5	(1)	(6)	2	17
32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	115,238	0	115,238
33	(5,849)	9,743	(36,951)	(11,395)	(25,653)	(21,414)	(51,913)	(15,268)	(5,799)	1,957	(7,909)	0	4,618	30,616	3,026	174,093	(100,686)	(96,149)
34	(71)	118	(448)	(138)	(311)	(260)	(630)	(185)	(70)	24	(96)	-	56	371	37	2,112	(1,222)	(1,187)
35	(5,920)	9,861	(37,400)	(11,533)	(25,965)	(21,674)	(52,543)	(15,454)	(5,870)	1,981	(8,005)	0	4,674	30,987	3,063	176,206	(101,907)	(97,315)