

Application No.: A.21-04-010
Exhibit No.: _____
Witness: Sheri Miller

UPDATED PREPARED DIRECT TESTIMONY OF
SHERI MILLER
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

*****REDACTED - PUBLIC VERSION*****

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



November 8~~April 1~~, 2021

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TO D.16-08-024, *et al.*

1 **UPDATED PREPARED DIRECT TESTIMONY OF**
2 **SHERI MILLER**
3 **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

4 **I. PURPOSE AND OVERVIEW**

5 This updated testimony describes the process of forecasting San Diego Gas & Electric
6 Company's ("SDG&E") Power Charge Indifference Adjustment ("PCIA") costs in the 2022
7 Energy Resource Recovery Account ("ERRA") Forecast. The PCIA cost is equivalent to the
8 utility's total portfolio costs, less its market value, in a given year. Additional regulatory history
9 of the PCIA is provided in SDG&E witness ~~Stacy Fuhrer~~Gwendolyn Morien's testimony.

10 The forecasted PCIA costs are calculated using the modeled forecast costs and volumes
11 provided by SDG&E witness ~~Stefan Cove~~Matthew O'Connell, and the final PCIA costs
12 presented in this testimony are used by SDG&E witness Coreen Salcido in her testimony
13 describing the 2022 balancing account revenue requirements. This PCIA testimony also
14 supports SDG&E witness Gwendolyn Morien~~Stacy Fuhrer~~'s development of customer rates in
15 her testimony.

16 **II. PCIA-ELIGIBLE COSTS**

17 Decision ("D.")18-10-019 directed the Investor-Owned Utilities ("IOUs") to record
18 above-market costs of PCIA-eligible resources to the Portfolio Allocation Balancing Account
19 ("PABA"). The primary inputs included in the above-market cost calculations are 1) the
20 monthly resource costs, 2) net revenues received from the California Independent System
21 Operator ("CAISO") for the PCIA resource's energy and ancillary services sold to CAISO, net
22 of CAISO charges, and 3) the market value of the renewable energy credits ("RECs") and
23 resource adequacy ("RA") associated with the PCIA resources.

24 The monthly resource cost includes both contract costs and costs related to Utility-Owned
25 Generation ("UOG"). The UOG operation and maintenance ("O&M") and capital-related

1 expenses were approved for recovery through the Non-Fuel Generation Balancing Account
2 (“NGBA”) mechanism in the General Rate Case (“GRC”) decision D.19-09-051. Since above-
3 market costs are required to be recovered through the PCIA mechanism, the above-market UOG
4 costs are recovered in PABA, and the market value of the UOG costs is recovered through
5 NGBA.

6 The forecasted actual costs, generation volumes and the CAISO net revenues are
7 provided for each resource in the direct testimony of Matthew O’ConnellStefan Covie. Each of
8 the PCIA-eligible resources is identified as belonging to a specific year, called the resource’s
9 “vintage”, which corresponds to the year in which the contract was executed. The costs,
10 generation, CAISO net revenues, and market value of attributes are assigned the vintage of the
11 generating resource.

12 III. PCIA BENCHMARKS

13 Pursuant to D.19-10-001, every year Energy Division issues updated PCIA market price
14 benchmarks (“MPB”) in the beginning of November. This April filing of the 2022 ERR
15 Forecast uses the then latest available benchmarks to calculate PCIA, shown in Table 1 below,
16 that were received from Energy Division on November 2, 2020. In early November of 2021,
17 Energy Division will issued new benchmarks, and Table 1 below has been updated accordingly.
18 and SDG&E will submit anhas also updated 2022 ERR Forecast testimony and calculations,
19 including the PCIA calculation, using the in its November Update incorporating the new
20 benchmarks, and Table 1 below will be updated accordingly-new benchmarks.

21 **TABLE 1 – 2021 SDG&E FORECAST ADDERS**
22

<u>Date recorded</u>	<u>Recorded PABA January- September 2021</u>	<u>Recorded PABA true-up October 2021</u>
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<u>Market Price Benchmark</u>	<u>Provided by Energy Division on November 2, 2020</u>	<u>Provided by Energy Division on November 1, 2021</u>
Energy Index On-Peak	\$44.43 (\$/MWh)	<u>Actual CAISO revenues</u>
Energy Index Off-Peak	\$34.34 (\$/MWh)	<u>Actual CAISO revenues</u>
System RA	\$6.10 (\$/kW-month)	<u>\$7.33 (\$/kW-month)</u>
Local RA	\$5.59 (\$/kW-month)	<u>\$5.93 (\$/kW-month)</u>
Flexible RA	\$5.69 (\$/kW-month)	<u>\$5.39 (\$/kW-month)</u>
Renewable Portfolio Standard (“RPS”) adder – REC	\$14.49 (\$/MWh)	<u>\$14.23 (\$/MWh)</u>

1
2 SDG&E uses the on-peak and off-peak energy indexes together with the on-peak and off-
3 peak load weighting factors to calculate the forecast weighted average price of the energy
4 component of the contract attributes. This price is then multiplied by the forecasted hourly
5 generation for each resource to calculate the expected market value of the PCIA resource
6 generation in 2021. This expected market value represents the amount of CAISO revenue that
7 SDG&E expects to receive for its PCIA resources, including contracted resources and UOG.
8 This amount is presented in Ms. Salcido’s testimony in Table 6 “PABA revenue requirement,”
9 labeled “Supply ISO Revenues.” The actual CAISO revenues will be recorded in PABA each
10 month when they are received by SDG&E, and the revenue will partially offset the costs of the
11 PCIA resources.

12 To calculate the forecast market value of the RA attributes of the resources, each resource
13 is assigned to one of the Local, Flex, or System RA categories, based on the RA category that the
14 resource most commonly serves, and if a resource serves more than one category, Local is
15 assigned first if applicable, then Flex, and then System. The most updated monthly net

1 qualifying capacity (“NQC”) listing is obtained from the CAISO website, and an average
2 monthly NQC value for each resource is calculated. The resource’s NQC value is then
3 multiplied by the assigned RA benchmark to calculate the forecasted market value of the RA for
4 2022, as shown in Attachment A of this testimony. The resulting forecast market value for
5 contract resources is then included in the ERRA revenue requirement as an expense, as it
6 represents the value of the RA attributes which SDG&E retained to use for the RA compliance
7 obligations on behalf of its bundled customers. The market value associated with UOG
8 resources is excluded from ERRA and instead recovered in NGBA, because the UOG costs were
9 previously approved for recovery in D.19-09-051, which approved SDG&E’s 2019 GRC
10 application (A.17-10-007).

11 To calculate the forecast market value of the REC attributes of the resources, the
12 applicable REC benchmark is applied to the 2021 forecasted generation of each renewable
13 resource. The resulting forecast market value for contract resources is then included in the
14 ERRA revenue requirement as an expense, as it represents the value of the REC attributes which
15 SDG&E retained to use for the Renewable Portfolio Standard (“RPS”) compliance obligations
16 on behalf of its bundled customers. As with the RA value discussed above, the market value
17 associated with RECs from UOG generation is excluded from ERRA and recovered in NGBA.
18 The total of the REC and RA market values for contracts is included in Ms. Salcido’s testimony
19 in Table 1 labeled “ERRA Revenue Requirement,” as part of the on line 3 “non-CTC contract
20 costs,” shown on line 3, and also mentioned in Ms. MorienFuhner’s testimony as part of the “up-
21 to-market” energy procurement costs recovered in ERRA.

22 **IV. SALES OF REC AND RA ATTRIBUTES**

23 As Mr. O’ConnellCovic mentions in his testimony, the load forecast used in this filing
24 was developed internally by SDG&E, and it takes into consideration expected departing load in

1 2022. Mr. ~~O'Connell~~~~Covie~~ then develops a forecast of the supply volumes in SDG&E's electric
2 portfolio and determines if there will be excess REC or RA attributes that are not needed to serve
3 bundled customers. For the~~is~~ April forecast filing, SDG&E ~~has~~ included an estimated REC sales
4 forecast at the market benchmark price that ~~was~~is not based on any current or future sales
5 contract agreements. In its November Update filing, SDG&E ~~is~~will ~~including~~e forecasted
6 volumes associated with ~~any~~ 2022 REC sales agreements that SDG&E ~~subsequently enters~~
7 ~~into~~expects to execute before the end of 2021.¹ Also included in this forecast is an RA sales
8 contract that has already begun. In the attachment to Mr. ~~O'Connell~~~~Covie~~'s testimony, the
9 forecasted REC and RA sales revenues are included in the contract costs total in PABA, as an
10 offset to expense.

11 V. GREEN TARIFF SHARED RENEWABLES (“GTSR”)

12 A history of Senate Bill (“SB”) 43, which was intended to expand access to renewable
13 energy to ratepayers, is provided in Ms. ~~Fuhrer~~~~Morien~~'s testimony. As Mr. ~~Covie~~~~O'Connell~~
14 describes in his testimony, SDG&E provides its bundled customers with the option to purchase
15 100% renewable energy through the GTSR program, branded as EcoChoice and EcoShare. The
16 EcoChoice option enables customers to purchase renewable energy from contracted solar
17 resources that have been dedicated to the program, which include Midway Solar and Wister
18 Solar. The costs for these resources are recovered in the Green Tariff Shared Renewable
19 Balancing Account (“GTSRBA”), and if the generation from these resources is not fully utilized
20 by EcoChoice customers, the remaining costs are recovered in ERRA.

¹ SDG&E is in the process of executing sales contracts with both San Diego Community Power and Clean Energy Alliance. Once executed, SDG&E will submit these contracts for Commission approval pursuant to a Tier 3 Advice Letter and expects them to be approved prior to the issuance of a Commission decision in this ERRA Forecast Proceeding.

1 If customers' usage for the year surpasses the output from the dedicated resources, then
2 SDG&E uses generation from an established Interim Pool of solar resources to provide the
3 renewable energy. Normally the costs for these resource contracts are included in the PCIA
4 calculations and recovered through PABA, however, any volumes of Interim Pool energy that
5 are forecasted to be used for the GTSR program are removed from PABA and ultimately
6 excluded from the PCIA calculations. They are forecasted instead as energy costs in the
7 GTSRBA. The costs in the GTSRBA are fully recovered from SDG&E's bundled customers
8 that have enrolled in the EcoChoice program. However, in 2022 EcoChoice customer usage is
9 forecasted to be lower than the total generation of the dedicated resources, and because of that, it
10 will not be necessary to recover any Interim Pool contract costs in GTSRBA.

11 As Ms. ~~MorienFuhner~~ mentions in her testimony, GTSR customer rates include a PCIA
12 component for the above market cost of the Utility's existing procurement portfolio. The GTSR
13 resources, however, are a subset of the total portfolio. Therefore, and pursuant to AB 43 and
14 D.15-01-051, GTSR customer rates must be adjusted for the difference between the relative
15 value of energy and capacity of the GTSR resources and the value of the resources in SDG&E's
16 total portfolio. SDG&E adjusts the weighted cost of GTSR power to reflect the time-of-use
17 ("TOU") allocation of the GTSR resources. The weighted cost of GTSR capacity is adjusted to
18 reflect the relative NQC value of the GTSR resources. The energy and capacity adjustments
19 together are \$0.015320758/MWhkWh, which will be an incremental adjustment to the PCIA
20 portion of the GTSR customer rate.

21 VI. MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND 22 ANNUAL TRUE-UP

23 Accruals for the estimated REC and RA market values for the portion of PCIA eligible
24 resources used for SDG&E's bundled customers' compliance obligations are recorded monthly

1 as a credit to PABA and a debit to ERRA by SDG&E's Settlements & Systems group as part of
2 the monthly accounting close process. Pursuant to D.19-10-001, these amounts ~~will behave~~
3 ~~beenare being~~ adjusted ~~when to reflect~~ the updated 2021 benchmarks ~~that have beenare~~ received
4 from Energy Division ~~on November 1stlater this year~~. The November Update filing of my
5 testimony ~~will~~ includes a true-up of the REC and RA market values recorded during January-
6 September 2021, to reflect the updated benchmarks. This true-up ~~is also~~~~will be~~ included in the
7 November Update of Attachment A-C (the forecasted PABA year-end balance) in Ms. Salcido's
8 testimony.

9 In the annual true-up, amounts recorded for the REC and RA market values during the
10 first nine months of the year are revalued and the balancing accounts adjusted accordingly. REC
11 and RA attributes that were offered for sale but remained unsold are valued at a zero benchmark,
12 meaning that no credit is recorded to PABA for the market value. SDG&E offers its excess REC
13 and RA attributes for sale on at least an annual basis, therefore any REC and RA attributes that
14 are neither used for compliance nor sold are considered unsold. Pursuant to D.18-10-019, actual
15 energy (brown power) revenues received from CAISO for PCIA-related generation are booked to
16 PABA in the month received, and therefore energy market value does not require a true-up entry
17 in the November update filing, because the recorded CAISO revenues reflect actual updated
18 market prices.

19 During the period January through September 2021, the REC market value was
20 calculated monthly using estimated generated volumes and recorded as part of SDG&E's
21 monthly financial closing process. The final amount, including the true-up, is shown in Table 2
22 and was calculated using actual volume deliveries and the updated benchmark of \$14.23/MWh.
23

1

TABLE 2 - 2021 RPS Market Value True Up

	<u>Price</u>	<u>Volumes</u>	<u>Amount Recorded</u>
<u>Estimated RECs Retained</u>	<u>\$14.49/MWh</u>	<u>4,931,987 MWh</u>	<u>\$71.7 million</u>
<u>Actual RECs Retained, valued at updated MPB</u>	<u>\$14.23/MWh</u>	<u>5,276,981 MWh</u>	<u>\$75.1 million</u>
<u>Volume Update portion of true-up</u>	<u>\$14.49/MWh</u>	<u>344,994 MWh</u>	<u>\$5.0 million</u>
<u>MPB Update portion of true-up</u>	<u>(\$14.23 - \$14.49)/MWh</u>	<u>5,276,981 MWh</u>	<u>\$1.4 million</u>
<u>Additional adjustments</u>	<u>n/a</u>	<u>n/a</u>	<u>\$0.2 million</u>
<u>Total Impact – increase to REC market value</u>	<u>n/a</u>	<u>n/a</u>	<u>\$3.4 million</u>
<u>Bundled RECs Sold (energy + RECs)</u>	<u>Contract</u>	<u>0 MWh</u>	<u>\$0 million</u>

2

3 During the period January through September 2021, the RA market value was calculated
4 monthly from January to September using the Net Qualifying Capacity (“NQC”) values of the
5 PCIA-eligible generators, adjusted for days the resources were unavailable due to outage. This
6 monthly RA market value was recorded as part of SDG&E’s monthly financial closing process.
7 The final amount, including the true-up, is shown in Table 3 and was calculated using the
8 updated benchmarks and final capacity volumes.

TABLE 3 - 2021 RA Market Value True Up

<u>Contract Resources</u>	<u>Price</u>	<u>Capacity</u>	<u>Amount Recorded</u>
<u>Estimated Local RA Retained</u>	<u>\$5.59 (\$/kW-month)</u>	<u>1,225 MW monthly average</u>	<u>\$59.2 million</u>
<u>Actual Local RA Retained</u>	<u>\$5.93 (\$/kW-month)</u>	<u>1,203 MW monthly average</u>	<u>\$64.1 million</u>
<u>Estimated Flex RA Retained</u>	<u>\$5.69 (\$/kW-month)</u>	<u>15 MW monthly average</u>	<u>\$0.7 million</u>
<u>Actual Flex RA Retained</u>	<u>\$5.39 (\$/kW-month)</u>	<u>45 MW monthly average</u>	<u>\$2.2 million</u>
<u>Estimated System RA Retained</u>	<u>\$6.10 (\$/kW-month)</u>	<u>57 MW monthly average</u>	<u>\$2.6 million</u>
<u>Actual System RA Retained</u>	<u>\$7.33 (\$/kW-month)</u>	<u>48 MW monthly average</u>	<u>\$3.1 million</u>
<u>Utility-Owned Generation</u>	<u>Price</u>	<u>Capacity</u>	<u>Amount Recorded</u>
<u>Estimated Local RA Retained</u>	<u>\$5.59 (\$/kW-month)</u>	<u>506 MW monthly average</u>	<u>\$24.9 million</u>
<u>Actual Local RA Retained</u>	<u>\$5.93 (\$/kW-month)</u>	<u>506 MW monthly average</u>	<u>\$26.4 million</u>
<u>Estimated Flex RA Retained</u>	<u>\$5.69 (\$/kW-month)</u>	<u>93 MW monthly average</u>	<u>\$4.7 million</u>
<u>Actual Flex RA Retained</u>	<u>\$5.39 (\$/kW-month)</u>	<u>160 MW monthly average</u>	<u>\$4.5 million</u>
<u>Estimated System RA Retained</u>	<u>\$6.10 (\$/kW-month)</u>	<u>60 MW monthly average</u>	<u>\$3.2 million</u>
<u>Actual System RA Retained</u>	<u>\$7.33 (\$/kW-month)</u>	<u>60 MW monthly average</u>	<u>\$3.9 million</u>
<u>Total UOG true-up Impact</u>	<u>n/a</u>	<u>n/a</u>	<u>\$1.8 million</u>
<u>Total Combined Contract and UOG Impact-increase to RA market value</u>	<u>n/a</u>	<u>n/a</u>	<u>\$8.7 million</u>

1 **VII. OTHER COSTS RECOVERED IN PABA**

2 As Mr. O’ConnellCovie describes in his testimony, this forecast of 2022 PABA revenue
 3 requirements includes the natural gas fuel costs and associated GHG expenses for PCIA-eligible
 4 conventional resources. These costs are included in the PCIA as part of the above-market cost
 5 calculation of the gas-fired resources in their respective vintages.

6 **VIII. SUMMARY**

7 A summary of the updated total 2022 forecasted PCIA above market cost (without
 8 FF&U) is shown in Table 42 below. The CAISO revenues, fuel, GHG costs, and total PABA
 9 revenue requirement shown below are also referenced in Ms. Salcido’s testimony.

10 **Table 2—2022 PCIA Forecast Summary**

	PCIA Components	2022 Forecast (in millions)
1.	PCIA contract costs	
2.	Less REC sales	
3.	Less RA sales	
4.	Less contract REC market value	
5.	Less contract RA market value	
6.	Less CAISO supply revenues	
7.	Generation fuel	
8.	Direct GHG costs	
9.	= Total PABA revenue requirement	
10.	UOG costs	
11.	Less UOG RA market value	
12.	= UOG items	

13.	Sum of Contract above market cost + UOG items = Total Indifference Amount	
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TABLE 4 – 2022 PCIA Forecast Summary

	<u>PCIA Components</u>	<u>2022 Forecast April filing (in millions)</u>	<u>2022 Forecast November update filing (in millions)</u>
1.	<u>PCIA-eligible contract portfolio cost</u>		
2.	<u>PCIA-eligible UOG portfolio cost</u>	\$198	\$201
3.	<u>Generation fuel cost</u>		
4.	<u>GHG cost</u>		
5.	<u>Subtotal Portfolio cost</u>		
6.	<u>Less forecasted REC & RA sales revenue</u>		
7.	<u>Less market value of energy</u>	(\$356)	(\$490)
8.	<u>Less market value of RECs</u>	(\$44)	(\$52)
9.	<u>Less market value of RA</u>	(\$139)	(\$158)
10.	<u>Subtotal Portfolio market value</u>	(\$540)	(\$700)
11.	<u>Indifference Amount - decrease</u>		

This concludes my prepared direct testimony.

1 **IX. QUALIFICATIONS**

2 My name is Sheri Miller. My business address is 8315 Century Park Court, San Diego,
3 CA 92123. I am employed by SDG&E as a Principal Settlement Advisor in the Settlements &
4 Systems group in the Energy Supply organization. My responsibilities include writing and
5 reviewing ERRA witness testimony and advising on regulatory and legislative matters that
6 impact SDG&E's energy and gas procurement settlements and cost recovery processes.

7 I joined SDG&E in October 2000, and since that time, I have held various positions at
8 SDG&E including Senior Accountant, Principal Accountant, and Settlements Manager. I have
9 experience with many aspects of SDG&E's accounting processes, including approving the gas and
10 electric commodity invoices and overseeing the reporting processes.

11 I received a Bachelor of Science degree in Accounting and a Masters of Business
12 Administration from National University. I am also a Certified Public Accountant licensed in
13 the state of California.

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

ATTACHMENT A

DECLARATION OF SHERI MILLER

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

**DECLARATION
OF SHERI MILLER**

A.21-04-010

**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, Sheri Miller, declare as follows:

1. I am a Principal Settlements Advisor for San Diego Gas & Electric Company (“SDG&E”). I sponsored my Updated Prepared Direct Testimony (“Testimony”) in support of SDG&E’s November Update to Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as the Principal Settlements Advisor, 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.¹ As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Testimony page 11, table 4, 1. lines 1, 3, 5, 6 2. line 4 3. line 11	1. II.B.4 2. GHG 3. V.C	1. Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years 2. See declaration of Mr. Magill 3. Total Energy Forecast – Bundled Customer, confidential for three years (rates are in Ms. Morien’s testimony)
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL PCIA 2022 ERRA forecast wp.xlsx”, tab: ‘PABA YE’ 1. top section 2. middle section	1. XI 2. II.B.4	1. Actual procurement cost confidential 3 years 2. Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL PCIA 2022 ERRA forecast wp.xlsx”, tab: ‘Utility Owned Generation’ 1. Cells E9:E14	1. II.B.1	1. Generation Cost Forecasts of Utility Retained Generation, confidential for three years
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL PCIA 2022 ERRA forecast wp.xlsx”, tab: ‘Workpaper_IOU TPS’ 1. Highlighted rows in section 1.0	1. II.B.1 & II.B.4	1. Generation Cost Forecasts of Utility Retained Generation, confidential for three years 1. Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years

¹ In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-D. Accordingly, SDG&E seeks confidential treatment of this data under those provisions, as applicable.

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL PCIA 2022 ERRA forecast wp.xlsx”, tab: ‘IOU Total Portfolio Summary’ 1. Highlighted rows in section 1.0	1. II.B.1 & II.B.4	1. Generation Cost Forecasts of Utility Retained Generation, confidential for three years 1. Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL PCIA 2022 ERRA forecast wp.xlsx”, tab: ‘Indifference Amount Calc’ 1. Lines 1, 7, 27, 29 2. Lines 32 & 33	1. II.B.1 & II.B.4 2. V.C	1. Generation Cost Forecasts of Utility Retained Generation, confidential for three years 1. Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years 2. Total Energy Forecast – Bundled Customer, confidential for three years (rates are in Ms. Morien’s testimony)
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL PCIA 2022 ERRA forecast wp.xlsx”, tab: ‘2022 MPB – Solar Adjustment’ 1. Cells E12 and E13	1. VII.G	1. RPS contracts details 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 8th day of November, 2021, in San Diego, California.

A handwritten signature in cursive script that reads "Sheri Miller". The signature is written in black ink and is positioned above a horizontal line.

Sheri Miller
Principal Settlements Advisor
San Diego Gas & Electric Company

ATTACHMENT B

**DECLARATION OF JAMES MAGILL
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 Settlements and Systems in the Electric & Fuel Procurement Department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Estela M. de Llanos, Vice President Energy Procurement & Sustainability. I have reviewed Sheri Miller’s Updated Prepared Direct Testimony (“Testimony”) in support of SDG&E’s November Update to 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 8th day of November, 2021, at San Diego, California.



James Magill
Manager – Settlements and Systems

**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 4, line 4: Direct 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.