

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

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Approval of its 2024  
Electric Procurement Revenue Requirement  
Forecasts, 2024 Electric Sales Forecast, and GHG-  
Related Forecasts

Application 23-05-\_\_\_\_\_  
(Filed May 15, 2023)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY  
(U 902-E) FOR APPROVAL OF ITS 2024 ELECTRIC PROCUREMENT REVENUE  
REQUIREMENT FORECASTS, 2024 ELECTRIC SALES FORECAST, AND GHG-  
RELATED FORECASTS**

**\*\*REDACTED – PUBLIC VERSION\*\***

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**I. INTRODUCTION**

In compliance with California Public Utilities Commission (“Commission”) Decisions (“D.”) 02-10-062, D.02-12-074, D.04-01-050, D.13-09-003, D.14-10-033, D.19-06-026, D.20-03-019, D.21-12-040, D.22-01-023,<sup>1</sup> D.22-03-003, and D.22-12-042, San Diego Gas & Electric Company (“SDG&E”) hereby submits this Application (“Application”) for Approval of its 2024 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 Cost Balancing Account (“TCBA”);<sup>2</sup> (4) the Local Generation (“LG”) revenue requirement tracked in the Local Generating Balancing Account (“LGBA”);<sup>3</sup> (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”)

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<sup>1</sup> D.22-01-023, Ordering Paragraph (“OP”) 3 moved the deadline for SDG&E to file its ERRA forecast application to May 15 of each year.

<sup>2</sup> The purpose of the TCBA is to accrue all the CTC revenues and recover all CTC-eligible generation-related costs.

<sup>3</sup> 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”).

account; (6) the Modified Cost Allocation Methodology (“MCAM”) revenue requirement; (7) San Diego Community Power’s (“SDCP”) Disadvantaged Communities – Green Tariff (“DAC-GT”) and Community Solar – Green Tariff (“CS-GT”) revenue requirements; (8) the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement; and (9) the GHG allowance revenues and return allocations. By this Application, SDG&E also seeks Commission approval of its 2024 electric sales forecast as directed by D.22-03-003.

SDG&E also requests approval for its proposed 2024: (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; (3) rate components for the Green Tariff Shared Renewables (“GTSR”) Program; and (4) MCAM rates. SDG&E respectfully requests that the Commission approve the forecasts and proposals in this Application for recovery in rates beginning January 1, 2024.

As discussed in greater detail below and in the testimonies accompanying this Application, SDG&E hereby requests approval of a total 2024 forecasted revenue requirement of \$700.9 million.<sup>4</sup> This total forecast is comprised of 2024 forecasts of the following:

- (1) the ERRA revenue requirement: \$432.5 million and the projected 2023 ERRA year-end balance of \$26.9 million;
- (2) the PABA revenue requirement: \$90.5 million and the projected 2023 PABA year-end balance of \$(32.3) million;
- (3) the CTC revenue requirement: \$16.8 million;
- (4) the LG revenue requirement: \$245.5 million and the projected 2023 year-end balance recorded to the LGBA of \$120.8 million;

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<sup>4</sup> This forecasted revenue requirement excludes Franchise Fees and Uncollectibles (“FF&U”) unless otherwise noted. SDG&E is also requesting approval of its 2024 TMNBC revenue requirement, which is set forth in testimony of Brenda Hua and confidentiality declaration attached thereto. SDG&E omitted the 2024 TMNBC revenue requirement figures from the text of this Application due to confidentiality concerns.

- (5) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement: \$1.3 million;
- (6) the MCAM revenue requirement of \$0.3 million;
- (7) the SDCP DAC-GT and CS-GT program revenue requirements of \$0.4 million and \$0.3 million, respectively, pursuant to Resolution E-5246;
- (8) the TMNBC revenue requirement as set forth in the testimony of Brenda Hua and confidentiality declaration attached thereto; and
- (9) the following GHG allowance revenue return allocations:
  - (a) \$(201.6) million for small business and residential California Climate Credit (“CCC”).<sup>5</sup>
  - (b) \$(0.5) million for Emissions-Intensive and Trade-Exposed (“EITE”) Customer Return.

These GHG allowance revenue return allocations are based on the following 2024 forecasts of GHG revenues and expenses, for which SDG&E also requests approval:

- (1) the GHG allowance revenues: \$(203.4) million;
- (2) the GHG allowance revenue set aside for clean energy/energy efficiency programs of \$13.1 million; and
- (3) the GHG administration, customer education and outreach plan costs of \$0.08 million.

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<sup>5</sup> The California Climate Credit is the semi-annual line item credit that goes to residential and small business customers. It was previously referred to as the “climate dividend.” Pursuant to D.14-01-012, the Energy Division issued a letter on January 27, 2014 notifying the electric utilities that “California Climate Credit” will be used as the name for all on-bill credits of GHG allowance revenues.

The 2024 revenue requirement forecasts sought in this application result in a total revenue requirement decrease of \$88.7<sup>6</sup> million compared to the amounts currently effective in rates.<sup>7</sup> These components are shown in detail in Table 1, below.

<b>TABLE 1 Proposed Revenue Requirements (\$M)<sup>8</sup></b>					
<b>Line</b>	<b>Description</b>	<b>Currently Effective Revenue Requirement</b>	<b>2024 Revenue Requirement</b>	<b>Change from Current</b>	<b>Change (%)</b>
		w/out FF&U	w/out FF&U	w/out FF&U	w/out FF&U
1	ERRA	538.5	432.5	(106.0)	-19.7%
2	ERRA Year-end Balance	153.4	26.9	(126.4)	-82.4%
3	PABA	97.8	90.5	(7.3)	-7.4%
4	PABA Year-end Balance	(14.6)	(32.3)	(17.7)	121.8%
5	CAPBA Trigger	(3.1)	-	3.1	-100.0%
6	CTC	10.6	16.8	6.2	57.9%
7	LG	187.6	245.5	57.9	30.9%
8	LGBA Year-end Balance	0.4	120.8	120.4	30,445.5%
9	GHG Revenues for Return	(183.0)	(202.1)	(19.1)	10.4%
10	SONGS	1.3	1.3	(0.0)	-2.0%
11	Modified CAM	-	0.3	0.3	0.0%
12	SDCP DAC-GT/CS-GT	0.6	0.7	0.1	11.6%
13	<b>Total<sup>9</sup></b>	<b>789.6</b>	<b>700.9</b>	<b>(88.7)</b>	<b>-11.2%</b>

<sup>6</sup> This amount excludes FF&U and the 2024 TMNBC revenue requirement due to confidentiality concerns.

<sup>7</sup> The rate impacts resulting from the revenue requirements requested in this Application are calculated using current effective rates as of January 1, 2023 per Advice Letter (“AL”) 4129-E, approved on January 30, 2023.

<sup>8</sup> This table reflects a consolidated summary of proposed revenue requirements for both bundled and departed load combined. See Table 1 in the Prepared Direct Testimony of Rachele R. Baez for a detailed breakout of proposed revenue requirements for bundled and departed load separately.

<sup>9</sup> Sums may not equal due to rounding. Sums do not include the TMNBC revenue requirement.

In addition, the testimony of Mr. Kenneth Schiermeyer presents SDG&E’s 2024 Electric Sales Forecast as set forth in Table 2 below:

**TABLE 2**  
**Proposed 2024 Annual Electric Net Sales (GWh)<sup>10</sup>**

Sector	Proposed 2024
Residential	6,059
Small Commercial	2,322
Med & Large Com/Ind	9,491
Agricultural	342
Lighting	76
<b>Total</b>	18,291

In total, these changes, when implemented with SDG&E’s 2024 sales forecast, would decrease the total bundled system average rate 3.3 cents per kWh, or –8.5%. Without the Residential and Small Business Semi-Annual CCC, the total bundled system average rate would decrease by 3.2 cents per kWh, or -8.1%. For unbundled customers, SDG&E’s system average delivery plus PCIA rates will decrease 0.3 cents per kWh, or -1.4%. Without the Residential and Small Business Semi-Annual CCC, SDG&E’s system average delivery plus PCIA rates would decrease 0.2 cents per kWh, or -1.2%.

A typical bundled non-California Alternative Rates for Energy (“CARE”) residential customer using 400 kilowatt-hours (“kWh”) could see a monthly bill decrease of -8.4%, or \$15 (from \$173 to \$158). A typical bundled CARE residential customer using 400 kWh could see a monthly bill decrease of -9.9%, or \$11 (from \$109 to \$98).<sup>11</sup> A typical unbundled non-CARE residential customer using 400 kWh could see a monthly bill decrease of -7.2%, or \$7 (from \$101 to

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<sup>10</sup> Note that the total amount reflected in the table may not sum up due to rounding.

<sup>11</sup> Customers’ actual bill impacts will vary with usage per month, by season and by climate zone. Please refer to the testimony of SDG&E witness Baez for additional details on rate and bill impacts.



\$94). A typical unbundled CARE residential customer using 400 kWh could see a monthly bill decrease of -8.2%, or \$5 (from \$60 to \$55).<sup>12</sup> Section VIII below summarizes the relief SDG&E requests from the Commission in this Application.

Finally, SDG&E notes that in August 2022, the United States congress passed the Inflation Reduction Act (“IRA”), which included Investment Tax Credits (“ITCs”) for renewable energy infrastructure, including standalone energy storage technology. SDG&E has eight energy storage and microgrid projects scheduled to come online in 2023 that would be eligible for these credits. SDG&E is eligible to claim the ITCs on these projects on its 2023 federal tax return, which is expected to be filed in October 2024. SDG&E intends to provide these benefits to customers via a reduction to the same account as the capital projects after the final amount of the ITCs are determined at the time of filing the federal tax return. As such, at this time, SDG&E is not including the tax credits in the 2023 year-end balancing account forecasts and will include the tax credits in the 2024 year-end balancing account forecasts in its 2025 ERRA Forecast Application filing.

## **II. BACKGROUND AND SUMMARY OF APPLICATION**

SDG&E’s 2024 forecasts and proposals in this Application contain several categories of electric procurement activities, each of which is described below and discussed in testimony. Prior to 2016, SDG&E had filed an annual application seeking approval of its forecasted revenue requirements for ERRA, CTC and LG and a separate application regarding GHG-related forecasts. In accordance with D.14-10-033, in which the Commission directed the utilities to incorporate GHG-related forecasts and proposals into their annual ERRA forecast applications, SDG&E began

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<sup>12</sup> Customers’ actual bill impacts will vary with usage per month, by season and climate zone and when a customer became an unbundled customer (Power Charge Indifference Adjustment (“PCIA”)) vintage. Please refer to the testimony of SDG&E witness Baez for additional details on rate and bill impacts.

including its GHG-related forecasts in its 2016 Application and has continued that approach ever since. Also, in accordance with D.22-03-003, SDG&E is now including the approval of its 2024 Electric Sales Forecast as part of this Application.

Likewise, as in prior Applications, SDG&E is again proposing to incorporate its 2024 forecast of its SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement – formerly an element of its General Rate Cases (“GRC”) – in this Application. In accordance with D.19-10-001, SDG&E has included its PABA revenue requirement in this Application. In addition, SDG&E seeks to recover its 2024 LGBA forecasted revenue requirement as further described in Section II.D below. SDG&E has also included 2024 proposed rate components for the Green Tariff Shared Renewables Program, as further described in Section II.I below. In accordance with Resolution E-5241, SDG&E has also included its 2024 MCAM revenue requirement and proposed MCAM rate components in this Application. Finally, pursuant to Resolution E-5246, SDG&E included SDCP’s DAC-GT and CS-GT program revenue requirements in this Application.

#### **A.     ERRA**

In D.02-10-062, the Commission established the ERRA balancing account – the power procurement balancing account required by Pub. Util. Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities (“IOUs”) with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator-related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers.<sup>13</sup>

The ERRA regulatory process consists of: (1) an annual forecast proceeding to adopt a forecast of the utility’s electric procurement cost revenue requirement and electricity sales for the

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<sup>13</sup> See D.02-10-062 at pp. 60-61.

upcoming year; and (2) an annual compliance proceeding to review the utility's compliance in the preceding year regarding energy resource contract administration, least-cost dispatch, fuel procurement, and the ERRA balancing account. There is also an update process for new information (e.g., fuel and purchased power forecasts, GHG verified volumes and associated costs, and additional GHG estimates for current year) which takes place in the Fall of each year ("October Update").<sup>14</sup>

Pub. Util. Code Section 454.5(d)(3) also specified that the balance of the ERRA was not to exceed 5% of the IOUs' actual recorded generation revenues for the prior calendar year, excluding revenues collected for the Department of Water Resources ("DWR").<sup>15</sup> Accordingly, in D.02-10-062, the Commission established a trigger mechanism designed to avoid the 5% threshold point, pursuant to which IOUs must file an expedited application for approval to adjust rates in 60 days from the date when their ERRA balance reaches an undercollection or overcollection of 4% and is projected to exceed the 5% trigger.<sup>16</sup> As currently implemented, the trigger process exists independently of, but in conjunction with, the forecast process used for this Application.

In D.22-01-023, the Commission directed each of the IOUs to modify their respective Electric Preliminary Statements governing the ERRA and PABA accounts to allow them to place year-end ERRA balances in the most-recent vintage subaccount of PABA each year.<sup>17</sup> The modifications clarify that disposition of the year-end balance in the ERRA account shall be to the

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<sup>14</sup> D.22-01-023, OP 1 changed the release of the Market Price Benchmarks from November 1<sup>st</sup> to October 1<sup>st</sup> of each year to allow for the update process to take place in October instead of November.

<sup>15</sup> D.02-10-062 at p.58, n.30; *see also* D.11-05-005.

<sup>16</sup> In D.07-05-008 at 6, the Commission modified D.02-10-062 by adding a new rule to the trigger procedures, pursuant to which SDG&E is permitted to file an advice letter seeking to maintain rates when it expects an undercollection or overcollection above the 4% trigger will self-correct within 120 days.

<sup>17</sup> D.22-01-023 at OP 4.

PABA upon submission (where a Tier 1 advice letter is currently required) or approval (where a Tier 2 advice letter is currently required) by the Commission of the applicable compliance advice letter addressing such balance.

## **B. PABA**

Pursuant to D.18-10-019 and Advice Letter 3318-E,<sup>18</sup> the PABA was established to record the “above-market” costs and revenues associated with all generation resources that are eligible for cost recovery through the PCIA rates, including SDG&E’s Utility-Owned Generation (“UOG”). The PABA is comprised of a series of subaccounts referred to as “vintage subaccounts.” Costs recorded in each vintage subaccount include, but are not limited to, fuel, GHG costs, third-party power purchase contracts, and UOG’s revenue requirement. The above-market costs of all generation resources that are eligible for cost recovery through the PCIA rates, including SDG&E’s UOG, are recorded in the PABA. D.19-10-001 authorized any over/under collection in the PABA vintage subaccounts in a given year to be rolled into the next year’s ERRA Forecast filing.

## **C. CTC**

The TCBA is designed to accrue all ongoing CTC revenues and recover all ongoing CTC-eligible generation-related costs.<sup>19</sup> In accordance with D.02-12-074 and D.02-11-022, payments to Qualifying Facilities (“QFs”) that are above the market benchmark proxy price (*i.e.*, above-market QF power costs) are charged to the TCBA. Eligible above market CTC expenses reflect the difference between the market benchmark proxy price and the costs associated with QF contracts.

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<sup>18</sup> SDG&E AL 3318-E, filed on December 10, 2018, and approved on May 30, 2019.

<sup>19</sup> Assembly Bill (“AB”) 1890 established the expenses that are eligible for CTC recovery.

#### **D. LG**

The LGBA is designed to record the costs and revenues of Local Generation where the Commission has determined that the generation resource is subject to the CAM.<sup>20</sup> Such generation may take the form of power purchase agreements, company-owned generation units associated with new generation resources, or any other resources approved by the Commission for CAM treatment. The costs recorded in the LGBA are recovered via the Local Generation Charge (“LGC”) rate component.

In this Application, SDG&E is requesting recovery for costs related to peaker generators that have been previously approved for CAM treatment, including Carlsbad, Pio Pico, and Escondido. These plants are described in testimony, along with the CAM-eligible combined heat & power plants. SDG&E is also requesting recovery for costs related to eight energy storage facilities and four microgrid energy storage resources in SDG&E’s service territory that have been approved for CAM treatment.

#### **E. PCIA**

The PCIA is another rate component of this Application. In D.06-07-030, as modified by D.07-01-030, the Commission resolved various issues relating to the cost responsibility surcharge applicable to Direct Access (“DA”) and Municipal Departing Load customers within the service territories of the IOUs.<sup>21</sup> The PCIA component of the cost responsibility surcharge is intended to preserve bundled customer indifference to customers that migrate from bundled load by ensuring that departing load customers pay their share of the cost responsibility associated with the above-market-costs of the utilities’ total procurement portfolio. Under the methodology adopted by the

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<sup>20</sup> The Commission adopted its CAM policy in D.06-07-029, which it later modified in D.11-05-005. The basic purpose of the CAM is to allow the advantages and costs of new generation to be shared by all benefiting customers in an IOU’s service territory.

<sup>21</sup> In D.07-01-025, the Commission adopted the PCIA methodology for Community Choice Aggregation (“CCA”) customers.

Commission in D.08-09-012, the Commission refined the indifference amount methodology by introducing the requirement to vintage departing load customers, based on their departure date, when assigning responsibility for the total portfolio of resources.

In D.18-10-019, the Commission adopted an annual true-up mechanism as well as a cap that limits the change of the PCIA rate from one year to the next. Starting in forecast year 2020, the cap level of the PCIA rate was set at 0.5 cents/kWh more than the prior year's PCIA, differentiated by system average vintage rate. AL 3436-E established the PCIA under-collection balancing account (CAPBA).<sup>22</sup> CAPBA establishes an interest-bearing balance account that will be used in the event that the PCIA cap is reached, in order to track any obligation that accrues for departing load customers by vintage subaccounts. However, D.21-05-030 in the PCIA Order Instituting Rulemaking, R.17-06-026, subsequently removed the PCIA cap and required SDG&E to dispose of any remaining CAPBA balance in PCIA Rates through December 31, 2023. SDG&E is requesting to transfer any remaining balances in the CAPBA subaccounts to the corresponding PABA vintage subaccounts and close the CAPBA preliminary statement.

The PCIA rates are based on applicable costs from SDG&E's total portfolio of resources, including its forecasted ERRAs, PABA and CTC revenue requirements, as well as its authorized 2023 Non-Fuel Generation Balancing Account ("NGBA") revenue requirement. Although SDG&E proposes to update the currently effective PCIA rates in this Application, it will not be able to provide final PCIA rates until certain market price information, such as the forecasted 2024 Market Price Benchmarks, become available.<sup>23</sup> Once the necessary information becomes available, SDG&E will update its proposed PCIA rates in the October Update to this Application.

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<sup>22</sup> SDG&E AL 3436-E was filed on September 30, 2019, approved on October 31, 2019.

<sup>23</sup> SDG&E notes that the 2024 NGBA revenue requirement is not expected to be available until the resolution of SDG&E's pending General Rate Case. As such, SDG&E plans to utilize the current authorized 2023 NGBA revenue requirements to calculate PCIA rates.

#### **F. SONGS Unit 1 Offsite Spent Fuel Storage Costs**

As noted above, SDG&E tracks the authorized spent fuel storage costs revenue requirement in its NDAM account. SDG&E is seeking authorization to recover these costs through the ERRA forecast application process, and it is thus seeking authorization of the forecast 2024 revenue requirement for SONGS Unit 1 Offsite Spent Fuel Costs in this Application.

#### **G. TMNBC**

AL 3343-E established the Tree Mortality Non-Bypassable Charge Balancing Account (“TMNBCBA”) to record the tree mortality related procurement costs incurred as directed by Resolution E-4770 and Resolution E-4805.<sup>24</sup> As noted in D.18-12-003, OP 9, the TMNBCBA cost will be recovered through the Public Purpose Programs (“PPP”) charge. Details regarding the TMNBC revenue requirement are discussed in the testimony of Jimmy Elias and Brenda Hua.

#### **H. GHG Costs and Allowance Revenues**

Pursuant to the California Global Warming Solutions Act of 2006, AB 32, the California Air Resources Board (“CARB”) designed a statewide GHG cap-and-trade program in which certain utilities are required to participate. The cap-and-trade program creates a cap on major sources of GHG emissions – including power plants, fuel suppliers and industrial facilities – to achieve GHG reduction goals.

Utilities incur costs both by purchasing allowances for their own compliance obligation under the cap-and-trade program and, indirectly, through GHG costs embedded in the wholesale price of electricity. These GHG costs are incorporated into the generation component of electricity rates through the ERRA process in the same manner as other procurement-related costs, and they result in a carbon price signal intended to incent an overall reduction in GHG emission. The state allocates GHG allowances to ratepayers with the utilities acting as intermediaries to hold and then

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<sup>24</sup> AL 3343-E was approved on July 19, 2019, with an effective date of July 2, 2019.

sell the allowances for ratepayers' benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that result from GHG compliance.

In D.14-10-033, the Commission adopted methodologies for calculating forecasts of GHG allowance revenue and GHG costs, as well as recorded GHG allowance revenue and GHG costs. The decision further adopted Confidentiality Protocols for cap-and-trade related data and required the utilities to use a proxy price in their forecasts. However, in D.19-04-016, the Commission found that the language in OP 9 of D.14-10-033 was ambiguous as it failed to distinguish between the differing compliance obligations in the utilities' ERRA forecast and ERRA compliance proceedings.<sup>25</sup> The Commission clarified the requirements of D.14-10-033 to state that compliance with Attachment C shall be demonstrated in the ERRA compliance proceeding and not the ERRA forecast proceeding.<sup>26</sup> Accordingly, SDG&E is not including Attachment C (or supporting testimony regarding methodologies) in this ERRA forecast application. Rather, SDG&E will comply with D.19-04-016, OP 3, which directs the IOUs to demonstrate compliance with the revised D.15-01-024 Attachment C in its ERRA compliance filings and not in its ERRA forecasts. SDG&E will submit the GHG Weighted Average Cost compliance testimony for record year 2022 in its record year 2022 ERRA Compliance testimony, which will be filed on June 1, 2023.

Nonetheless, this Application includes SDG&E's GHG Revenue and Reconciliation Application Form (Attachment D of the Decisions listed above) as Attachment G to this Application. SDG&E will further update this information in its forthcoming October Update.

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<sup>25</sup> D.19-04-016 at FOF 17.

<sup>26</sup> *Id.* at OP 3.



## **I. Proposed Rate Components for the Green Tariff Shared Renewables Program**

In 2013, California enacted the Green Tariff Shared Renewables (“GTSR”) Program, established in Senate Bill (“SB”) 43.<sup>27</sup> That legislation intended to promote renewable energy by expanding access to renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation (*e.g.*, residential customers who could not install onsite solar panels). In D.15-01-051 – implementing SB 43 – the Commission required the three large California IOUs to establish the GTSR Program. This program has two features administered by the utilities: (1) a Green Tariff component, which allows customers to purchase energy with a greater share of renewables; and (2) an Enhanced Community Renewables component, which allows customers to purchase renewable energy from community-based projects.

On August 25, 2022, Administrative Law Judges Petersen and Pulsifer issued a ruling in A.22-05-022, *et al.* immediately suspending SDG&E’s EcoChoice, Green Tariff program and directed SDG&E to “quickly disenroll customers from its Green Tariff option who will remain on their otherwise applicable rate.”<sup>28</sup> The ruling declined to suspend SDG&E’s EcoShare, Enhanced Community Renewables (“ECR”) program; therefore, SDG&E presents only ECR 2024 rates in this Application.

## **J. MCAM**

Pursuant to D.22-05-015 and Advice Letter 4043-E,<sup>29</sup> the purpose of MCAM balancing account is to record the net costs related with the procurement of energy resources by SDG&E incurred on behalf of certain load-serving entities (“LSEs”) in the following circumstances: (1) opt-

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<sup>27</sup> SB 43, Stats. 2013-2014, Ch. 413 (Cal. 2013).

<sup>28</sup> August 25, 2022, *Administrative Law Judge’s Ruling Granting Request for Green Tariff Suspension*, OP 1 (issued in A.22-05-022 *et al.*). In light of this ruling, D.22-12-042 directed that Green Tariff rates should remain at \$0 until further guidance is provided in A.22-05-022 or in an appropriate proceeding.

<sup>29</sup> See SDG&E AL 4043-E, filed on July 18, 2022 and approved on January 12, 2023.

out procurement-related costs, including incremental administrative costs for customers of LSEs that have opted out of self-procurement; (2) backstop procurement-related costs, including incremental administrative costs for customers of LSEs that fail to provide the capacity required by D.19-11-016 and or/D.21-06-035; and (3) opt-out LSEs that have left the market and no longer serve customers.

On January 12, 2023, the Commission issued Resolution E-5241 approving SDG&E's cost recovery to implement MCAM.<sup>30</sup> As such, SDG&E implemented its MCAM balancing account and transferred the costs from Resource Adequacy Procurement Memorandum Account ("RAPMA") to this account.<sup>31</sup> In accordance with Resolution E-5241, SDG&E presents its 2024 MCAM revenue requirement and proposed MCAM rate components in this Application.

#### **K. SDCP DAC-GT and CS-GT**

Resolution E-5246 approved SDCP's Advice Letter 10-E to create tariffs to implement its Disadvantaged Communities – Green Tariff ("DAC-GT") and Community Solar – Green Tariff ("CS-GT") programs.<sup>32</sup> Resolution E-5246 directs SDG&E to include SDCP's 2024 budget estimate in its 2024 ERRA forecast filing.<sup>33</sup> SDCP's DAC-GT and CS-GT program revenue requirements for 2024 are presented in this Application.

#### **L. Sales Forecast**

In D.22-03-003, the Commission directed SDG&E to file its subsequent annual electric sales forecast in its ERRA forecast applications. D.22-03-003 also requires the application to include the

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<sup>30</sup> E-5241, OP 1.

<sup>31</sup> See Resolution E-5117. RAPMA is an interim memorandum account that existed to record costs until the MCAMBA was created and approved in D.22-05-015.

<sup>32</sup> Resolution E-5246 issued March 16, 2023.

<sup>33</sup> The 2024 budgets are found in SDCP's AL 010-E, which was approved by Resolution E-5246 (March 16, 2023).

testimony required in OP 8 of D.21-12-040. SDG&E submits the testimony of Mr. Schiermeyer in compliance with these directives.

By this Application, SDG&E seeks approval of its electric sales forecast for the year 2024. SDG&E's 2024 electric sales forecast is based on the California Energy Commission's ("CEC") 2022 California Energy Demand Update forecast, which was adopted by the CEC on January 25, 2023.

### **III. SUMMARY OF PREPARED TESTIMONY**

In support of this Application, including the requests outlined above, SDG&E provides the testimony of seven witnesses. Each testimony is summarized below:

#### **A. Rachelle R. Baez**

Ms. Baez's testimony presents the illustrative rate and bill impacts associated with the cost recovery of SDG&E's 2024 forecast of its: (1) ERRA revenue requirement and the projected 2023 ERRA year-end balance; (2) PABA revenue requirement and the projected 2023 PABA year-end balance; (3) CTC revenue requirement; (4) LG revenue requirement and the projected 2023 year-end balance; (5) SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement; (6) GHG allowance revenue return; (7) MCAM revenue requirement; (8) SDCP's DAC-GT and CS-GT revenue requirements; and (9) TMNBC revenue requirement. Ms. Baez also proposes the 2024 PCIA component of the cost responsibility surcharge applicable to departing load customers. Further, Ms. Baez presents the methodology for the GHG allowance revenue returns, which involves identifying and supporting the 2024 forecast GHG allowance revenue return allocation amounts (including the California Climate Credit) in Attachment G to this Application. Ms. Baez also proposes the 2024 rate components associated with the GTSR program (specifically the ECR). Finally, Ms. Baez proposes the 2024 MCAM rates.

**B. Jimmy Elias**

Mr. Elias's testimony describes the resources that SDG&E expects to use in 2024 to meet its forecast bundled customer load. Mr. Elias then forecasts the procurement costs that SDG&E expects to record to the ERRA, TCBA, PABA and LGBA, as well as procurement costs related to the Green Tariff Shared Renewables program in 2024. In addition, Mr. Elias provides a forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. Elias also presents SDG&E's forecast of 2024 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which (as noted below) Ms. Hua uses in her 2024 forecast of the ERRA revenue requirement. Additionally, Mr. Elias provides a 2024 forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2024. Mr. Elias also provides the 2024 TMNBC forecast.

**C. Brenda Hua**

Ms. Hua's testimony describes the purpose of the ERRA, PABA, TCBA, LGBA and CAPBA. Using cost information provided by Mr. Elias, Ms. Hua then presents SDG&E's 2024 forecast of: (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; (3) the LG revenue requirement; and (4) the PABA revenue requirement. Ms. Hua also presents LGBA year-end balance that SDG&E seeks to recover in this Application. Additionally, Ms. Hua compares the 2022 year-end recorded balances with the 2022 year-end actual balances in the GHG balancing accounts used for GHG expenses (GHG Customer Outreach and Education Memorandum Account and GHG Administrative Costs Memorandum Account) and GHG allowance revenues (GHG Revenue Balancing Account). Ms. Hua also presents SDG&E's 2024 forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement. Lastly, Ms. Hua discusses the history of the TMNBCBA and how the related revenue requirement provided in Mr. Elias's testimony is recorded and collected from ratepayers via the PPP charge.

**D. Stephen M. Elliot**

Mr. Stephen M. Elliot's testimony presents SDG&E's 2022 costs for GHG compliance instruments used to satisfy obligations under the CARB's cap-and-trade program. Additionally, Mr. Elliot provides the 2022 revenues. Mr. Elliot's testimony also describes the cap-and-trade program and details the methodology behind SDG&E's calculation of its unadjusted 2022 actual revenues and estimated costs. Mr. Elliot's testimony also includes a forecast of the costs of ongoing customer education and outreach as well as the ongoing administrative and billing costs associated with the return of GHG allowance revenues to customers.

**E. Sheri Miller**

Ms. Sheri Miller's testimony describes the process of forecasting SDG&E's PCIA costs in the 2024 ERRR forecast Application. The forecasted PCIA costs are calculated using the modeled forecast costs and volumes provided by SDG&E witness Mr. Elias, and the final PCIA costs presented in this testimony are used by SDG&E witness Ms. Hua in her testimony describing the 2024 balancing account revenue requirements. Ms. Miller's testimony also supports SDG&E witness Ms. Baez's development of customer PCIA rates. Ms. Miller's testimony also presents the projected PABA year-end balance.

**F. Ken Schiermeyer**

Mr. Schiermeyer's testimony presents SDG&E's 2024 Electric Sales Forecast as set forth in the Table 2 above. SDG&E's 2024 Electric Sales Forecast is based on the CEC latest adopted California Energy Demand forecast. Mr. Schiermeyer's testimony also describes SDG&E's meet-and-confer activities as required by D.19-06-026, D.20-03-019, and D.22-03-003. Mr. Schiermeyer's testimony also presents SDG&E's proposal to allow the Commission sufficient time to review alternative sales forecast proposals in the proceeding and for SDG&E to implement such alternative proposals as required by D.22-12-042.

**G. Dan Skopec**

As required by D.21-04-010, OP 10, Mr. Skopec's testimony describes the implementation, use and oversight of an effective internal control and review process to ensure the accuracy of the information submitted in connection with this year's ERRR forecast application.

**IV. STATUTORY AND PROCEDURAL REQUIREMENTS**

**A. Rule 2.1 (a) – (c)**

In accordance with Rule 2.1 (a) – (c) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.

**1. Rule 2.1 (a) - Legal Name**

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E's attorney in this matter is Roger A. Cerda.

**2. Rule 2.1 (b) - Correspondence**

Correspondence or communications, including any data requests, regarding this Application should be addressed to:

Geneveve Bucsit  
Regulatory Case Manager  
San Diego Gas & Electric Company  
8330 Century Park Court, CP31D  
San Diego, California 92123  
Telephone: (619) 676-8991  
Email: gbucsit@sdge.com

with copies to:

Roger A. Cerda  
San Diego Gas & Electric Company  
8330 Century Park Court, CP32D  
San Diego, CA 92123  
Telephone: (858) 654-1781  
Facsimile: (619) 699-5027  
Email: rcerda@sdge.com

**3. Rule 2.1 (c)**

**a. Proposed Category of Proceeding**

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting because SDG&E proposes to recover the forecasted revenue requirements described in this Application from its ratepayers, and the costs will thus influence SDG&E's rates.

**b. Need for Hearings**

SDG&E does not believe that approval of this application will require evidentiary hearings. SDG&E has provided ample supporting testimony, analysis and documentation that provide the Commission with a sufficient record upon which to grant the relief requested. However, to the extent that evidentiary hearings may be required, SDG&E requests that any schedule set forth by the Commission include a procedural mechanism by which the parties can specifically identify material issues of fact in dispute that warrant an evidentiary hearing. Similarly, pursuant to Rule 2.6 (b), any protest that requests evidentiary hearings "must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the application."

**c. Issues to be Considered**

The issues to be considered in this Application are as follows:

1. Whether the Commission should approve SDG&E's total 2024 forecast revenue requirement of \$700.9 million and the amount of the 2024 Tree Mortality Non-Bypassable Charge forecast revenue requirement, to become effective in rates on January 1, 2024;

2. Whether the Commission should approve SDG&E's 2024 Energy Resource Recovery Account forecast revenue requirement of \$432.5 million and the projected 2023 ERRA year-end balance of \$26.9 million;
3. Whether the Commission should approve a 2024 Portfolio Allocation Balancing Account forecast revenue requirement of \$90.5 million and the projected 2023 PABA year-end balance of \$(32.3) million;
4. Whether the Commission should approve a 2024 Competition Transition Charge forecast revenue requirement of \$16.8 million;
5. Whether the Commission should approve a 2024 Local Generation forecast revenue requirement of \$245.5 million and the projected 2023 LGBA year-end balance of \$120.8 million;
6. Whether the Commission should approve the 2024 San Onofre Nuclear Generating Station Unit 1 Offsite Spent Fuel Storage Cost forecast revenue requirement of \$1.3 million;
7. Whether the Commission should approve SDG&E's 2024 Modified Cost Allocation Methodology revenue requirement of \$0.03 million;
8. Whether the Commission should approve SDG&E to recover San Diego Community Power's 2024 Disadvantaged Communities – Green Tariff and Community Solar – Green Tariff revenue requirements of \$0.4 million and \$0.3 million, respectively, pursuant to Resolution E-5246;
9. Whether the Commission should approve SDG&E's 2024 Tree Mortality Non-Bypassable Charge forecast revenue requirement;
10. Whether the Commission should approve SDG&E's 2024 forecasts of GHG revenues, revenue set-asides and returns and administrative expenses, which include:
  - a. Forecast GHG allowance revenues;
  - b. Forecast set asides for clean energy/energy efficiency programs.
  - c. Forecast revenue returns to small business and emissions intensive trade-exposed retail customers;
  - d. GHG administration, customer education and outreach plan costs; and
  - e. Forecast revenue returns to residential and small business customers via the California Climate Credit.
11. Whether the Commission should approve SDG&E's proposed vintage Power Charge Indifference Adjustment in rates;
12. Whether the Commission should approve SDG&E's proposed 2024 rate components for the Green Tariff Shared Renewables Program (*i.e.*, the Enhanced Community Renewables program);
13. Whether the Commission should approve SDG&E's proposed 2024 Modified Cost Allocation Methodology rates;
14. Whether the Commission should approve SDG&E's 2024 Electric Sales Forecast; and



15. Whether the Commission should approve SDG&E’s request to transfer the remaining balances in the CAPBA subaccounts to the corresponding PABA vintage subaccounts and close the CAPBA preliminary statement.

SDG&E does not believe there are any issues related to safety considerations that need to be considered in this Application.

**d. Proposed Schedule (Amended)**

SDG&E proposes the following schedule, which is based on the milestones used in last year’s ERRA Forecast proceeding:

<u><b>ACTION</b></u>	<u><b>DATE</b></u>
Application filed	May 15, 2023
Protests / Responses	June 14, 2023
Reply to Protests / Responses	June 26, 2023
Prehearing Conference	July 13, 2023
Intervenor Testimony	August 18, 2023
Rebuttal Testimony	September 8, 2023
Rule 13-9 Meet and Confer deadline - Parties inform ALJ whether hearings are necessary and identify the specific disputed issues of material fact, witness lists and cross-examination estimates	September 22, 2023
Evidentiary Hearings (if needed)	September 29, 2023
Concurrent Opening Briefs	October 4, 2023
Concurrent Reply Briefs	October 11, 2023
SDG&E October Update	October 13, 2023
Comments on October Update	October 30, 2023
Reply Comments on October Update	November 7, 2023
Proposed Decision	November 28, 2023
Comments on Proposed Decision	December 5, 2023
Reply Comments on Proposed Decision	December 8, 2023
Commission Final Decision	December 14, 2023

**B. Rule 2.2 – Articles of Incorporation**

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on

September 10, 2014 in connection with SDG&E Application 14-09-008 and is incorporated herein by reference.

**C. Rule 3.2 – Authority to Change Rates**

In accordance with Rule 3.2 (a) – (d) of the Commission’s Rules of Practice and Procedure, SDG&E provides the following information.<sup>34</sup>

**1. Rule 3.2 (a) (1) – Balance Sheet**

SDG&E’s financial statement, balance sheet and income statement for the six-month period ending September 30, 2022 are included with this Application as **Attachment A**.

**2. Rule 3.2 (a) (2) – Statement of Effective Rates**

A statement of all of SDG&E’s presently effective electric rates can be viewed electronically on SDG&E’s website. **Attachment B** to this Application provides the current table of contents from SDG&E’s electric tariffs on file with the Commission.

**3. Rule 3.2 (a) (3) – Statement of Proposed Rate Change**

A statement of proposed rate changes is attached as **Attachment C**.

**4. Rule 3.2 (a) (4) – Description of Property and Equipment**

SDG&E is in the business of generating, transmitting and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange and Imperial Counties. This includes a composite 92% ownership in the 500 kV Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500 kV Sunrise Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of

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<sup>34</sup> Note Rule 3.2(a)(9) is not applicable to SDG&E.

the Moreno gas compressor station in Riverside County and the Rainbow station located in San Diego County. The gas is transmitted through high and low-pressure distribution mains and service lines.

Applicant's original cost of utility plant, together with the related reserves for depreciation and amortization six-month period ending September 30, 2022 is shown on the Statement of Original Cost and Depreciation Reserves included in **Attachment D**.

**5. Rule 3.2 (a) (5) and (6) – Summary of Earnings**

A summary of SDG&E's earnings (for the total utility operations for the company) for six-month period ending September 30, 2022 is included as **Attachment E** to this Application.

**6. Rule 3.2 (a) (7) – Statement Regarding Tax Depreciation**

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, "flow through accounting" has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

**7. Rule 3.2 (a) (8) – Proxy Statement**

A copy of the most recent proxy statement sent to all shareholders of SDG&E's parent company, Sempra Energy, dated March 29, 2023, was mailed to the Commission on April 13, 2022, and is incorporated herein by reference.

**8. Rule 3.2 (a) (10) – Statement re Pass Through to Customers**

The rate increases reflected in this Application pass through to customers only increased costs to SDG&E for the services or commodities furnished by it.

**9. Rule 3.2 (b) – Notice to State, Cities and Counties**

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing this Application, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in **Attachment F** to this Application.

**10. Rule 3.2 (c) – Newspaper Publication**

In compliance with Rule 3.2 (c) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing of this Application, publish in newspapers of general circulation in each county in its service territory notice of this Application.

**11. Rule 3.2 (d) – Bill Insert Notice**

In compliance with Rule 3.2 (d) of the Commission’s Rules of Practice and Procedure, SDG&E will, within 45 days after the filing of this Application, provide notice of this Application to all of its customers along with the regular bills sent to those customers that will generally describe the proposed rate changes addressed in this Application.

**V. MEET-AND-CONFER EFFORTS, WORKSHOP ACTIVITIES, AND MISCELLANEOUS COMPLIANCE REQUIREMENTS**

**A. Departing Load Forecasting**

D.19-06-026 adopted a meet-and-confer requirement whereby: (a) A meeting between load-serving LSEs that anticipate load migration shall occur reasonably in advance of the filing deadline for initial year ahead forecasts; and (b) In each LSE’s initial year ahead forecast filing, each LSE

shall describe the dates of meetings with other LSEs to discuss load migration, any agreements, and any continued areas of disagreement.<sup>35</sup>

Additionally, in OP 1 of D.20-03-019 Considering Working Group Proposals on Departing Load Forecast and Presentation of Power Charge Indifference Adjustment Rate on Bills and Tariffs (filed February 25, 2020), the Commission ordered SDG&E to report in each regulatory filing its meet-and-confer activities and information exchange with Community Choice Aggregators in SDG&E's service territory, if the regulatory filing involves a departing load forecast.<sup>36</sup>

SDG&E held a meet-and-confer meeting regarding load forecasting on March 16, 2023. SDG&E invited numerous entities to participate in the March 16th meet-and-confer meeting. Attendees to the meeting included representatives for San Diego Community Power ("SDCP"), Clean Energy Alliance ("CEA") and Orange County Power Authority ("OCPA"). The items addressed at the meet-and-confer meeting included: (1) an overview of SDG&E's load forecast process for departing load; (2) an overview of the meet-and-confer requirement; and (3) an overview of regulatory proceedings and schedules. The parties continue to exchange information regarding load forecasting through a collaborative effort. The parties have reached agreement on the process by which the non-IOU LSEs are to provide forecast data to SDG&E as well as the templates to be used to submit their data. There have not been any specific areas of disagreement at this point. Information provided by the non-IOU LSEs to SDG&E include monthly energy sales, peak demand and customer forecast data.

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<sup>35</sup> *Decision Adopting Local Capacity Obligations for 2020-2022, Adopting Flexible Capacity Obligations for 2020, and Refining the Resource Adequacy Program* at OP 14 (filed in Rulemaking (R.) 17-09-020).

<sup>36</sup> Filed in R.17-06-026.

## **B. Sales Forecast Workshop**

D.22-03-033 directed SDG&E to hold an all-party workshop no later than March 31 of each year to work with stakeholders and to consider any input they may propose prior to filing its annual sales forecast with the Commission for the upcoming year.<sup>37</sup> In preparation for filing its ERRA forecast application (which now includes the annual sales forecast), SDG&E held an all-party workshop on March 2, 2023. Participants to the workshop included SDCP, CEA and OCPA.

## **C. Delays Relating to Review and Implementation Electric Sales Forecast**

D.22-12-042 directed SDG&E to include a proposal to allow the Commission sufficient time to review alternative sales forecast proposals in the proceeding and for SDG&E to implement such alternative proposals.<sup>38</sup> SDG&E's proposal is set forth in Section VI.B of Mr. Schiermeyer's testimony.

## **D. Consultation with Energy Division Staff Regarding Improvements to Application**

D.22-12-042 directed SDG&E to "consult with the Commission's Energy Division to identify clarity, process, and data provision improvements for its next Energy Resource Recovery Account Forecast application and [] include a section in its application outlining these discussions and the improvements it has made."<sup>39</sup> On March 23, 2023, SDG&E's ERRA forecast witness teams participated in a video conference with Energy Division staff to discuss specific recommendations, improvements or enhancements that could be incorporated into SDG&E's future ERRA forecast application. As a result of these discussions, SDG&E has incorporated the following specific recommendations into this year's Application:

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<sup>37</sup> D.22-03-003 at OP 4.

<sup>38</sup> D.22-12-042 at OP 10.

<sup>39</sup> D.22-12-042 at OP 13.

- Energy Division staff requested a more comprehensive breakdown of rate tables, including breakouts based on bundled and departed loads and breakdown by revenue requirement and rate component. SDG&E has added Attachments B & C to the Direct Testimony of Rachelle R. Baez to address this request.
- Energy Division staff requested to preview the SOMAH figures to be included in the Application prior to the filing to ensure they are being presented in the appropriate manner. On May 8, 2023, SDG&E transmitted to Energy division staff a draft copy of the relevant portion of Ms. Hua’s testimony and tables which contain the SOMAH figures.
- Energy Division staff suggested a meeting with SDG&E’s ERRRA team approximately one week after the October Update filing to review any significant changes. SDG&E is amenable to the suggested meeting and will coordinate scheduling with Energy Division staff.
- Energy Division staff requested that SDG&E transmit all confidential and public versions of testimony, application and workpapers to specific staff members as soon as possible after the submission of the application. SDG&E will ensure that this request is met.
- Energy Division staff suggested that SDG&E might consider rounding up the Climate Credit and SOMAH figures to the nearest dollar for ease of reference. However, upon further review and consideration, SDG&E elected not to round off these figures.

SDG&E remains open to further discussions with Energy Division staff regarding additional improvements that can be made to facilitate the Commission’s review and analysis of the Application.

## **VI. CONFIDENTIAL INFORMATION**

SDG&E is submitting the confidential testimony supporting this Application in both public (redacted) and non-public (unredacted and confidential) form, consistent with SDG&E's declarations of confidential treatment attached to the confidential testimonies and submitted in conformance with D.06-06-066, D.08-04-023 and other applicable orders and statutory provisions. In short, confidential treatment is necessary in this proceeding to avoid inappropriate disclosure of the confidential and commercially sensitive information (pertaining to SDG&E's electric procurement resources and strategies) that SDG&E witnesses must identify to support SDG&E's revenue requirements forecasts for 2024. Additionally, SDG&E is contemporaneously filing a motion for leave to file confidential information in **Attachment G** to this Application under seal.

## **VII. SERVICE**

This is a new application. No service list has been established. Accordingly, SDG&E will electronically serve this application, testimony and related exhibits on parties to the service list for the following proceeding: *Application of SDG&E for Approval of its 2023 Electric Procurement Revenue Forecasts, 2023 Electric Sales Forecast, and GHG-related Forecasts (A.22-05-025)*. Electronic copies will also be served on Acting Chief Administrative Law Judge ("ALJ") Michelle Cooke.

## **VIII. CONCLUSION AND SUMMARY OF RELIEF REQUESTED**

WHEREFORE, San Diego Gas & Electric Company requests that the Commission:

- (1) grant authority to change rates by approving as reasonable SDG&E's 2024 forecast of its ERRR revenue requirement pertaining to SDG&E's load, the resources available to meet SDG&E's load, and various input assumptions regarding fuel costs, GHG costs, and costs for SDG&E's various electric resources;
- (2) grant authority to change rates by approving as reasonable SDG&E's projected 2023 ERRR year-end balance;



- (3) grant authority to change rates by approving as reasonable SDG&E's 2024 forecast of its PABA revenue requirement;
- (4) grant authority to change rates by approving as reasonable SDG&E's projected 2023 PABA year-end balance;
- (5) grant authority to change rates by approving as reasonable SDG&E's 2024 forecast of its CTC revenue requirement;
- (6) grant authority to change rates by approving as reasonable SDG&E's 2024 forecast of its LG revenue requirement;
- (7) grant authority to change rates by approving as reasonable SDG&E's projected 2023 LGBA year-end balance;
- (8) grant authority to change rates by approving as reasonable SDG&E's 2024 forecast of its SONGS Unit 1 Offsite Spent Fuel Cost revenue requirement;
- (9) grant authority to change rates by approving as reasonable SDG&E's 2024 MCAM revenue requirement;
- (10) grant authority to change rates by approving as reasonable SDG&E to collect SDCP's 2024 DAC-GT and CS-GT program revenue requirements;
- (11) grant authority to change rates by approving as reasonable SDG&E's 2024 forecast of its TMNBC revenue requirement;
- (12) approve SDG&E's 2024 forecast of its GHG allowance revenues;
- (13) approve SDG&E's 2024 forecast for its GHG administration, customer education and outreach activities;
- (14) adopt SDG&E's 2024 forecast of its GHG allowance revenue return allocations for the residential and small business California Climate Credit;
- (15) adopt SDG&E's proposed vintage PCIA rates;

- (16) adopt SDG&E's proposed 2024 rate components for the Green Tariff Shared Renewables Program (specifically the ECR program);
- (17) adopt SDG&E's proposed 2024 MCAM rates;
- (18) approve SDG&E's 2024 Electric Sales Forecast;
- (19) grant authority to transfer any remaining balances in the CAPBA subaccounts to the corresponding PABA vintage subaccounts and close the CAPBA preliminary statement;
- (20) grant authority to implement the revenue requirements and PCIA rates adopted herein, as updated with November 2023 actuals and December 2023 forecasts in SDG&E's annual year-end process pursuant to Resolution E-5217, on January 1, 2024; and
- (21) grant such additional relief as the Commission believes is just and reasonable.

SDG&E is ready to proceed with its showing in this Application.

Respectfully submitted,

/s/ Roger A. Cerda

Roger A. Cerda

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

8330 Century Park Court, CP32D

San Diego, CA 92123

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Email: [rcerda@sdge.com](mailto:rcerda@sdge.com)

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Estella de Llanos

Estela de Llanos

San Diego Gas & Electric Company

Vice President – Energy Procurement and Sustainability

DATED at San Diego, California, this 15th day of May 2023.

## **OFFICER VERIFICATION**

I, Estela de Llanos, declare as follows:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF ITS 2024 ELECTRIC PROCUREMENT REVENUE REQUIREMENT FORECASTS, 2024 ELECTRIC SALES FORECAST, AND GHG-RELATED FORECASTS** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on May 15, 2023 at San Diego, California.

By: /s/ Estela de Llanos  
Estela de Llanos  
San Diego Gas & Electric Company  
Vice President – Energy  
Procurement and Sustainability

**ATTACHMENT A**

**BALANCE SHEET AND INCOME STATEMENT AND  
FINANCIAL STATEMENT**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**Sep 2022**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$	5,060,162,058
401	OPERATING EXPENSES	2,949,395,094		
402	MAINTENANCE EXPENSES	244,645,757		
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	713,799,008		
408.1	TAXES OTHER THAN INCOME TAXES	163,453,007		
409.1	INCOME TAXES	47,798,742		
410.1	PROVISION FOR DEFERRED INCOME TAXES	185,697,450		
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(99,876,303)		
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(326,256)		
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-		
	TOTAL OPERATING REVENUE DEDUCTIONS			4,204,586,499
	NET OPERATING INCOME			855,575,559

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-		
417	REVENUES OF NONUTILITY OPERATIONS	-		
417.1	EXPENSES OF NONUTILITY OPERATIONS	(4,814,573)		
418	NONOPERATING RENTAL INCOME	28,877		
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-		
419	INTEREST AND DIVIDEND INCOME	16,771,864		
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	63,754,673		
421	MISCELLANEOUS NONOPERATING INCOME	1,506,220		
421.1	GAIN ON DISPOSITION OF PROPERTY	94,975		
	TOTAL OTHER INCOME	77,342,036		
421.2	LOSS ON DISPOSITION OF PROPERTY	-		
425	MISCELLANEOUS AMORTIZATION	187,536		
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	39,358,631		
	TOTAL OTHER INCOME DEDUCTIONS	\$ 39,546,167		
408.2	TAXES OTHER THAN INCOME TAXES	631,399		
409.2	INCOME TAXES	2,596,543		
410.2	PROVISION FOR DEFERRED INCOME TAXES	63,744,854		
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(58,296,334)		
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	\$ 8,676,462		
	TOTAL OTHER INCOME AND DEDUCTIONS			\$ 29,119,407
	INCOME BEFORE INTEREST CHARGES			884,694,966
	EXTRAORDINARY ITEMS AFTER TAXES			-
	NET INTEREST CHARGES*			203,275,094
	NET INCOME			\$ 681,419,872

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$19,832,180)

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**Sep 2022**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 6,598,399,584
NET INCOME (FROM PRECEDING PAGE)	681,419,872
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 7,279,819,456</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
September 30, 2022

<b>(a) Amounts and Kinds of Stock Authorized:</b>			
Common Stock	255,000,000	shares	Without Par Value
<b>Amounts and Kinds of Stock Outstanding:</b>			
Common Stock	116,583,358	shares	291,458,395

**(b) Brief Description of Mortgage:**

Full information as to this item is given in Decision Nos. 93-09-069, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, 15-08-011, 18-02-012, and 20-04-015 to which references are hereby made.

**(c) Number and Amount of Bonds Authorized and Issued:**

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid as of Q4' 2021
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	-	-	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
1.9140% Series PPP, due 2022	03-12-15	-	-	854,496
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	12,500,000
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	15,000,000
4.15% Series SSS, due 2048	05-17-18	400,000,000	400,000,000	16,600,000
4.10% Series TTT, due 2049	05-31-19	400,000,000	400,000,000	16,400,000
3.32% Series UUU, due 2050	04-07-20	400,000,000	400,000,000	13,280,000
1.70% Series VVV, due 2030	09-28-20	800,000,000	800,000,000	13,713,333
2.95% Series WWW, due 2051	08-13-21	750,000,000	750,000,000	-
3.00% Series XXX, due 2032	03-11-22	500,000,000	500,000,000	-
3.70% Series YYY, due 2052	03-11-22	500,000,000	500,000,000	-
<b>Total First Mortgage Bonds:</b>		<b>7,400,000,000</b>	<b>7,400,000,000</b>	<b>233,235,329</b>
<b>Total Bonds:</b>				
		<b>7,400,000,000</b>	<b>7,400,000,000</b>	<b>233,235,329</b>
3.362% Term Loan, due 2024	02-18-22	200,000,000	200,000,000	-
3.362% Term Loan, due 2024	05-18-22	200,000,000	200,000,000	-
<b>TOTAL LONG-TERM DEBT</b>		<b>7,600,000,000</b>	<b>7,600,000,000</b>	<b>233,235,329</b>

**SAN DIEGO GAS & ELECTRIC COMPANY  
FINANCIAL STATEMENT**

September 30, 2022

Other Indebtedness	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2021
Commercial Paper & ST Bank Loans	Various	Various	Various	-	\$1,818,092

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

Preferred Stock	Shares Outstanding	2017	2018	2019	2020	2021
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
<b>Total</b>	-	-	-	-	-	-

Common Stock		2017	2018	2019	2020	2021
Dividend to Parent	[1]	450,000,000	250,000,000	-	200,000,000	300,000,000

[1] San Diego Gas & Electric Company dividend to parent.



**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**Sep 2022**

1. UTILITY PLANT		2022
101	UTILITY PLANT IN SERVICE	\$ 24,158,112,218
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	112,194,000
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,933,370,825
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(7,348,050,316)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(808,095,020)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(2,688,017)
118	OTHER UTILITY PLANT	2,030,663,995
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(456,446,782)
120	NUCLEAR FUEL - NET	-
TOTAL NET UTILITY PLANT		\$ 19,622,811,625
<b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	\$ 6,003,644
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(326,049)
158	NON-CURRENT PORTION OF ALLOWANCES	141,883,412
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	815,856,584
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	22,177,902
TOTAL OTHER PROPERTY AND INVESTMENTS		\$ 985,595,493

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**Sep 2022**

**3. CURRENT AND ACCRUED ASSETS**

		2022
131	CASH	\$ 143,501,056
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	-
136	TEMPORARY CASH INVESTMENTS	75,000,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	773,418,856
143	OTHER ACCOUNTS RECEIVABLE	88,363,143
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(64,734,032)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	-
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	137,939,374
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	155,153,073
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(141,883,412)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	563,740
165	PREPAYMENTS	221,250,034
171	INTEREST AND DIVIDENDS RECEIVABLE	2,424,617
173	ACCRUED UTILITY REVENUES	86,965,039
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	32,648,083
175	DERIVATIVE INSTRUMENT ASSETS	86,691,749
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(22,177,902)
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<b>\$ 1,575,123,418</b>

**4. DEFERRED DEBITS**

181	UNAMORTIZED DEBT EXPENSE	\$ 51,295,045
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,930,596,264
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	430,126
184	CLEARING ACCOUNTS	365,971
185	TEMPORARY FACILITIES	1,154,002
186	MISCELLANEOUS DEFERRED DEBITS	383,298,947
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	5,887,280
190	ACCUMULATED DEFERRED INCOME TAXES	120,531,890
	<b>TOTAL DEFERRED DEBITS</b>	<b>3,493,559,525</b>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>\$ 25,677,090,061</b>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**Sep 2022**

<b>5. PROPRIETARY CAPITAL</b>		2022
201	COMMON STOCK ISSUED	\$ 291,458,395
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	591,282,978
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	802,165,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	7,179,819,456
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(9,380,302)
TOTAL PROPRIETARY CAPITAL		\$ 8,830,740,255
<b>6. LONG-TERM DEBT</b>		
221	BONDS	\$ 7,400,000,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	400,000,000
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(20,210,990)
TOTAL LONG-TERM DEBT		\$ 7,779,789,010
<b>7. OTHER NONCURRENT LIABILITIES</b>		
227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,470,158,389
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	21,748,864
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	28,329,020
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	10,668,118
230	ASSET RETIREMENT OBLIGATIONS	879,965,983
TOTAL OTHER NONCURRENT LIABILITIES		\$ 2,410,870,374

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**Sep 2022**

**8. CURRENT AND ACCRUED LIABILITIES**

		2022
231	NOTES PAYABLE	\$ -
232	ACCOUNTS PAYABLE	852,681,695
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	92,177,886
235	CUSTOMER DEPOSITS	45,134,600
236	TAXES ACCRUED	67,374,794
237	INTEREST ACCRUED	76,199,570
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	9,701,310
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	229,273,962
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	72,439,179
244	DERIVATIVE INSTRUMENT LIABILITIES	16,219,106
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(10,668,118)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
		-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 1,450,533,984

**9. DEFERRED CREDITS**

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 128,134,866
253	OTHER DEFERRED CREDITS	490,980,394
254	OTHER REGULATORY LIABILITIES	2,004,146,873
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	12,779,815
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	2,005,944,842
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	563,169,648
		5,205,156,438
	TOTAL DEFERRED CREDITS	5,205,156,438
	TOTAL LIABILITIES AND OTHER CREDITS	\$ 25,677,090,061

# **ATTACHMENT B**

## **STATEMENT OF PRESENT RATES**

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

Cal. P.U.C. Sheet No

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(Continued)

3C5  
Advice Ltr. No. 3923-E  
Decision No. D.21-12-029

Issued by  
**Dan Skopec**  
Vice President  
Regulatory Affairs

Submitted Dec 28, 2021  
Effective Jan 1, 2022  
Resolution No. \_\_\_\_\_



**III. Memorandum Accounts (Continued)**

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Advice Ltr. No. 3421-E

Decision No. \_\_\_\_\_

Issued by  
**Dan Skopec**  
Vice President  
Regulatory Affairs

Submitted Aug 15, 2019

Effective Sep 16, 2019

Resolution No. \_\_\_\_\_

SAMPLE FORMS

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132-20101	12-10	Affidavit for Small Business Customer...	22132-E
135-00061	12-00	Voluntary Rate Stabilization Program Contract for Fixed Price Electric Energy with True-up...	14001-E
135-559	07-87	Power Line Analysis and/or Engineering Study Agreement...	5978-E
135-659	10-92	Annual Certification Form - Master Metered Accounts.....	7542-E
139-0001	02-07	Energy Payment Deferral Plan for Citrus & Agricultural Growers...	19981-E
142-00012	02-03	Scheduled Load Reduction Program Contract...	16102-E
142-140	08-93	Request for Service on Schedule LR.....	7912-E
142-259	07-87	Contract for Service, Schedule S-I(Standby Service - Interruptible)...	5975-E
142-359A	07-87	Contract for Service, Schedule S (Standby Service)....	5974-E
142-459		Agreement for Standby Service.....	6507-E

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## SAMPLE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>	
142-732	04/22	Application and Statement of Eligibility for the California Alternate Rates for Energy (CARE) Program...	36063-E	
142-732/1	04/22	Residential Rate Assistance Application (IVR/System-Gen...	36064-E	
142-732/2	04/22	Sub-metered Household Application and Statement of Eligibility for California Alternate Rates for Energy (CARE) Program...	36065-E	
142-732-3	04/22	CARE Program Recertification Application & Statement of Eligibility...	37261-E	T
142-732/4	04/22	CARE/FERA Program Renewal – Application & Statement of Eligibility for Sub-metered Customers...	36067-E	
142-732/5	04/22	CARE Post Enrollment Verification...	36068-E	
142-732/6	04/22	Residential Rate Assistance Application (Vietnamese)...	36069-E	
142-732/8	04/22	Residential Rate Assistance Application (Direct Mail)...	36070-E	
142-732/10	04/22	Residential Rate Assistance Application (Mandarin Chinese)...	36071-E	
142-732/11	04/22	Residential Rate Assistance Application (Arabic)...	36072-E	
142-732/12	04/22	Residential Rate Assistance Application (Armenian)...	36073-E	
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142-732/14	04/22	Residential Rate Assistance Application (Hmong)...	36075-E	
142-732/15	04/22	Residential Rate Assistance Application (Khmer)...	36076-E	
142-00832	04/22	Application for CARE for Qualified Nonprofit Group Living Facilities	36082-E	
142-732/16	04/22	Residential Rate Assistance Application (Korean)	36077-E	
142-732/17	04/22	Residential Rate Assistance Application (Russian)	36078-E	
142-732/18	04/22	Residential Rate Assistance Application (Tagalog)...	36079-E	
142-732/19	04/22	Residential Rate Assistance Application (Thai)...	36080-E	
142-732/20	02/23	FERA Program Recertification Application & Statement of Eligibility..	37262-E	N
142-740	04/22	Residential Rate Assistance Application (Easy/App)	36081-E	
142-959	06-96	Standard Form Contract for Service New Job Incentive Rate Service	9129-E	
142-1059	06-96	Standard Form Contract for Service New Job Connection Credit...	9130-E	
142-1159	03-94	Standard Form Contract - Use of Rule 20A Conversion Funds to Fund New Job Connection Credit	8103-E	
142-1359	05-95	Request for Contract Minimum Demand...	8716-E	
142-1459	05-95	Agreement for Contact Closure Service...	8717-E	
142-1559	05-95	Request for Conjunctive Billing...	8718-E	
142-1659	05-95	Standard Form Contract - Credits for Reductions in Overhead to Underground Conversion Funding Levels...	8719-E	
142-01959	01-01	Consent Agreement...	14172-E	
142-02559	01-98	Contract to Permit Billing of Customer on Schedule AV-1 Prior to Installation of all Metering and Equipment Required to Provide a Contract Closure in Compliance With Special Condition 12 of Schedule AV-1...	11023-E	
142-2760	12-12	Interconnection Agreement for Net Energy Metering Solar or Wind Electric Generating Facilities for Other than Residential or Small Commercial of 10 Kilowatts or Less...	26167-E	
142-02760.5	07-14	Interconnection Agreement for Virtual Net Metering (VNM) Photovoltaic Electric Generating Facilities...	16697-E	

**SAMPLE FORMS**

<b><u>FORM NO.</u></b>	<b><u>DATE</u></b>	<b><u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u></b>	<b><u>CAL C.P.U.C. SHEET NO.</u></b>
142-02762	01-13	Fuel Cell Generating Facility NEM and Interconnection Agreement	23444-E
142-02763	10-12	NEM/VNM-A Inspection Report...	23234-E
142-02765	01-15	NEM Application & Interconnection Agreement for Customers with Solar and/or Wind Electric Generating Facilities of 30 kW or Less...	26168-E
142-02766	01-15	NEM Application & Interconnection Agreement for Solar and/or Wind Electric Generating Facilities Greater than 30 kW or up to 1000 kW...	26169-E
142-02768	02-09	Photovoltaic Generation Allocation Request Form...	21148-E
142-02769	07-14	NEM Aggregation Form...	25293-E
142-02770	12-12	Generation Credit Allocation Request Form...	23288-E
142-02771	08-16	Rule 21 Generator Interconnection Agreement (GIA)...	28051-E
142-02772	06-14	Rule 21 Detailed Study Agreement...	25065-E
142-02773	08-22	Interconnection App for Solar and/or Wind ONLY >30 Kw...	36852-E
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142-02775	07-20	Net Energy Metering Non-Export / Non-Import Power Control Based Equipment Attestation	33417-E
142-02776	04/21	Emergency Standby Generator Installation Request	34665-E
142-3201		Residential Hotel Application for Residential Rates	5380-E
142-3242		Agreement for Exemption from Income Tax Component on Contributions and Refundable Advances...	6041-E
142-4032	05-20	Application for California Alternate Rates for Energy (CARE) Program for Qualified Agricultural Employee Housing Facilities...	33313-E
142-4035	06-05	Application for California Alternate Rates for Energy (CARE) Program for Migrant Farm Worker Housing Centers...	18415-E
142-05200	08-16	Generator Interconnection Agreement for Fast Track Process...	28054-E
142-05201	08-16	Exporting Generating Facility Interconnection Request...	28055-E
142-05202	01-01	Generating Facility Interconnection Application Agreement...	14152-E
142-05203	10-21	Generating Facility Interconnection Application...	35506-E
142-05204	07-16	Rule 21 Pre-Application Report Request...	27744-E
142-05205	07-02	Optional Binding Mandatory Curtailment Plan Contract...	17729-E
142-05207	06-19	Base Interruptible Program Contract...	32132-E
142-05209	06-19	No Insurance Declaration...	32133-E
142-05210	06-04	Rolling Blackout Reduction Program Contract...	18273-E
142-05211	06-04	Bill Protection Application...	18273-E
142-05213	07-03	Technical Incentive Program Application...	30079-E
142-05215	06-19	Third Party Marketer Agreement for BIP...	32134-E
142-05216	06-19	Notice by Aggregator to Add, Change or Delete Customers for BIP...	32135-E
142-05217	06-19	Notice by Customer to Add, Change, or Terminate Aggregator for BIP...	32136-E
142-05219	01-18	Technical Incentive Program Agreement...	30080-E
142-05219/1	01-18	Customer Generation Agreement	15384-E
142-05220	07-18	Armed Forces Pilot Contract...	30800-E
142-05221	10-21	Application for Contract Demand Charge Suspension....	35507-E
142-05301	03-23	Aggregator Agreement for Capacity Bidding Program (CBP)...	37301-E
142-05302	02-18	Notice to Add, Change, or Terminate Aggregator for Capacity Bidding...	30210-E

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**SAMPLE FORMS**

<b><u>FORM NO.</u></b>	<b><u>DATE</u></b>	<b><u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u></b>	<b><u>CAL C.P.U.C. SHEET NO.</u></b>
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142-05304	06-19	Prohibited Resources Attestation.....	32137-E
142-0541	06-02	Generating Facility Interconnection Agreement	29058-E
142-0542	06-17	(3 <sup>rd</sup> Party Inadvertent Export)	29059-E
		Generating Facility Interconnection Agreement	
142-0543	06-17	(3 <sup>rd</sup> Party Non-Exporting)	29060-E
		Generating Facility Interconnection Agreement	
142-0544	06-17	(Inadvertent Export)	19323-E
		Generating Facility Interconnection Agreement (Continuous Export)	
142-0545	06-06	Generation Bill Credit Transfer Allocation Request Form	21852-E
142-0546	11-21	Local Government – Generation Bill Credit Transfer Allocation	
		Request Form (RES-BCT)	35617-E
142-0600	06-13	SDG&E's Final Standard Form Re-Mat PPA	23604-E
143-359		Service Agreement between the Customer and SDG&E for Optional	
		UDC Meter Services	
143-00212		Resident's Agreement for Water Heater Switch Credit	
143-459		Resident's Agreement for Air Conditioner or Water Heater Switch...	3543-E
143-559		Owner's Agreement for Air Conditioner or Water Heater Switch...	3545-E
143-659		Owner's Agreement for Air Conditioner Switch Payment...	3699-E
143-759	12-97	Occupant's Agreement for Air Conditioner Switch Payment...	3700-E
143-01212	1-99	Letter of Understanding between the Customer's	11855-E
		Authorized Meter Supplier and SDG&E for	
		Optional UDC Meter Services	
143-1459B	12-97	Thermal Energy Storage Agreement...	5505-E
143-01759	12-97	Meter Data and Communications Request...	11004-E
143-01859	2-99	Energy Service Provider Service Agreement...	10572-E
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143-01959/1	2-99	Request for the Hourly PX Rate Option (Spanish)...	11888-E
143-02059	12-99	Direct Access Service Request (DASR)...	13196-E
143-02159	12-97	Termination of Direct Access (English)...	11889-E
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143-2259	12-97	Departing Load Competition Transition Charge Agreement...	10629-E
143-02359	12-97	Customer Request for SDG&E to Perform	11007-E
143-02459	12-97	ESP Request for SDG&E to Perform ESP Meter Services...	11008-E
143-02659	3-98	ESP Request to Receive Meter Installation/Maintenance Charges	11175-E
143-02759	12-17	Direct Access Customer Relocation Declaration....	29838-E
143-02760	12-12	Six Month Notice to Return to Direct Access Service...	23319-E
143-02761	01-12	Six Month Notice to Return to Bundled Portfolio Service...	22730-E
143-02762	02-13	Direct Access Customer Assignment Affidavit...	23432-E
143-02763	04-10	Notice of Intent to Transfer to DA During OEW	21709-E

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SAMPE FORMS

<u>FORM NO.</u>	<u>DATE</u>	<u>APPLICATIONS, AGREEMENTS AND CONTRACTS</u>	<u>CAL C.P.U.C. SHEET NO.</u>
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142-05210	06-04	Rolling Blackout Reduction Program Contract...	18273-E
142-05211	06-04	Bill Protection Application...	18273-E
142-05213	07-03	Technical Incentive Program Application...	30079-E
142-05215	06-19	Third Party Marketer Agreement for BIP...	32132-E
142-05216	06-19	Notice by Aggregator to Add, Change or Delete Customers for BIP...	32133-E
142-05217	06-19	Notice by Customer to Add, Change, or Terminate Aggregator for BIP...	18273-E
142-05219	01-18	Technical Incentive Program Agreement...	18273-E
142-05219/1	01-18	Customer Generation Agreement	30079-E
142-05220	07-18	Armed Forces Pilot Contract...	32134-E
142-05300	07-18	Capacity Bidding Program Customer Contract...	32135-E
142-05301	07-18	Aggregator Agreement for Capacity Bidding Program (CBP)...	32136-E
142-05302	02-18	Notice to Add, Change, or Terminate Aggregator for Capacity Bidding...	30080-E
142-05215	06-19	Third Party Marketer Agreement for BIP...	15384-E
142-05216	06-19	Notice by Aggregator to Add, Change or Delete Customers for BIP...	30800-E
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144-0812	08-13	Event Notification Form.....	23703-E
144-0813	08-13	Future Communications Contact Information Form.....	23704-E
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183-1000	07-14	PEV Submetering Pilot (Phase I) Customer Enrollment Agreement	26187-E
183-2000	07-14	Submeter MDMA Registration Agreement.....	26188-E
185-1000	02-14	Customer Information Service Request Form.....	24202-E
185-2000	12-15	Energy Efficiency Financing Pilot Programs Authorization or Revocation of Authorization to Release Customer Information	26941-E
187-1000	04-15	Rule 33 Standard Non-Disclosure Agreement (NDA).....	26294-E
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189-1000	10-21	Mobilehome Park Utility Upgrade Agreement.....	35481-E
189-2000	06-21	Mobilehome Park Utility Conversion Application.....	34960-E
190-1000	10-15	Bioenergy Market Adjusting Tariff Power Purchase Agreement	26846-E
190-2000	10-15	Green Tariff Shared Renewables (GTSR) Enhanced Community Renewables (ECR) Program Project Development Tariff Rider and Amendment	26874-E
195-1000	05-17	Station Power -Agreement for Energy Storage Devices	28966-E
200-1000	09-17	Declaration of Eligibility for Foodbank Discount	32193-E
205-1000	12-20	Eligible Economic Development Rate Customer Application	338546864-E

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San Diego Gas & Electric Company  
San Diego, California

Original Cal. P.U.C. Sheet No. 31176-E

Canceling \_\_\_\_\_ Cal. P.U.C. Sheet No. \_\_\_\_\_

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144-0813	03-09	Critical Peak Pricing - Future Communications Contact Information Form	21135-E
155-100	03-06	Application and Contract for Unmetered Service.....	30273-E
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110-00432/2	07-16	Form of Bill - Past Due Format	27837-E

(Continued)

16C15

Advice Ltr. No. 3292-E

Decision No. \_\_\_\_\_

Issued by  
**Dan Skopec**  
Vice President  
Regulatory Affairs

Submitted Nov 1, 2018

Effective \_\_\_\_\_

Resolution No. \_\_\_\_\_

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**COLLECTION NOTICES**

<b><u>FORM NO.</u></b>	<b><u>DATE</u></b>		<b><u>CAL C.P.U.C.</u></b> <b><u>SHEET NO.</u></b>	
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10100752	08-22	Final Notice Before Disconnected (Delivered)	36869-E	
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101-00753/4	04-11	Urgent Notice Payment Request for Past Due Bill	22327-E	
101-00753/5	02-04	Urgent Notice Payment Request for Returned Payment	16948-E	
101-00753/6	02-04	Urgent Notice Payment Request for Final Bill.	16949-E	
101-00753/7	02-04	Urgent - Sign Up Notice for Service	16950-E	
101-00753/8	03-23	Reminder Notice – Payment Request for Past Due Bill	34135-E	T
101-00753/9	02-04	Closing Bill Transfer Notification	16952-E	
101-00753/10	03-14	Payment Agreement Confirmation	24580-E	
101-00753/11	02-04	ESP Reminder Notice – Payment Request for Past Due Bill	16954-E	
101-00754	03-14	Final Notice Before Disconnection (mailed), Notice of Past Due Closing	24581-E	
101-01071	08-22	Notice of Disconnect	36870-E	
101-01072	08-22	Notice of Disconnect (delivered).....	36871-E	T
101-01073	03-23	Notice of Shut-off (Mailed).....	34137-E	
101-02171	05-10	Notice to Landlord - Termination of Tenant's Gas/Electric Service (two or more units)	21885-E	
101-02172	03-14	Notice of Disconnect (MDTs).....	24582-E	
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107-04212	4-99	Notice of Temporary Electric Service Interruption (English & Spanish)	12055-E	
115-00363/2	9-00	Sorry We Missed You.....	13905-E	
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# **ATTACHMENT C**

## **STATEMENT OF PROPOSED RATES**

## ILLUSTRATIVE IMPACT ON ELECTRIC RATES AND BILLS

The tables shown below illustrate the changes in rates that would result from CPUC approval of this application, compared to current rate levels.

If SDG&E’s application is approved by the CPUC, the average monthly bill for a typical non-California Alternate Rates for Energy (CARE) unbundled residential customer using 400 kilowatt-hours (kWh) per month in 2024 is estimated to decrease by \$7, or 7%.<sup>1</sup> The average monthly bill for a typical non-CARE bundled residential customer using 400 kilowatt-hours (kWh) per month in 2024 is estimated to decrease by \$15, or 8%.

The first table below provides illustrative rate changes for unbundled customers, while the second table presents illustrative rate changes for bundled customers. The percentages shown do not necessarily reflect the changes that you may see on your bill. Actual bill impacts will vary based on a number of factors, including usage, pricing plan and, if unbundled, when the customer became an unbundled customer (Power Charge Indifference Adjustment (PCIA) vintage).

### SAN DIEGO GAS & ELECTRIC COMPANY’S ILLUSTRATIVE ELECTRIC UNBUNDLED RATE CHANGE (TOTAL RATES INCLUDE AVERAGE ELECTRIC DELIVERY AND PCIA)<sup>2</sup>

Customer Class	Current Unbundled Class Average Rates Effective 1/1/2023 <sup>3</sup> (¢/kWh)	Proposed Unbundled Class Average Rates per Application (¢/kWh)	Total Rate Change (¢/kWh)	Percentage Rate Change (%)
<b>Residential Small</b>	23.0	21.6	(1.4)	-6%
<b>Commercial Medium and Large C&amp;I<sup>4</sup></b>	23.6	23.2	(0.4)	-2%
<b>Agricultural Lighting</b>	17.7	18.0	0.3	2%
<b>System Total</b>	14.7	14.6	(0.1)	-1%
	22.6	22.0	(0.6)	-3%
	20.1	19.8	(0.3)	-1%

<sup>1</sup> Unbundled charges include SDG&E’s electric delivery rates along with PCIA rates. Electric generation rates for unbundled customers are set by a customer’s respective ESP such as a Community Choice Aggregator or Direct Access provider and are not reflected in unbundled rates and bill impacts.

<sup>2</sup> Excludes electric generation costs which are provided by an unbundled customer’s respective Energy Service Provider.

<sup>3</sup> Rates effective January 1, 2023, per Advice Letter (AL) 4129-E.

<sup>4</sup> C&I stands for Commercial and Industrial.



**SAN DIEGO GAS & ELECTRIC COMPANY'S ILLUSTRATIVE ELECTRIC  
BUNDLED RATE CHANGE  
(TOTAL RATES INCLUDE AVERAGE ELECTRIC DELIVERY AND GENERATION)**

<b>Customer Class</b>	<b>Current Bundled Class Average Rates Effective 01/01/2023<sup>5</sup> (¢/kWh)</b>	<b>Proposed Bundled Class Average Rates per Application (¢/kWh)</b>	<b>Total Rate Change (¢/kWh)</b>	<b>Percentage Rate Change (%)</b>
<b>Residential Small</b>	40.4	36.7	(3.6)	-9%
<b>Commercial Medium and Large C&amp;I<sup>6</sup></b>	40.2	37.0	(3.2)	-8%
<b>Agricultural Lighting</b>	37.6	34.3	(3.2)	-9%
<b>System Total</b>	28.6	25.8	(2.8)	-10%
	34.6	32.0	(2.6)	-8%
	38.5	35.2	(3.3)	-8%

<sup>5</sup> Rates effective January 1, 2023, per Advice Letter (AL) 4129-E.

<sup>6</sup> C&I stands for Commercial and Industrial.

## **ATTACHMENT D**

### **COST OF PROPERTY AND DEPRECIATION RESERVE**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**COST OF PROPERTY AND**  
**DEPRECIATION RESERVE APPLICABLE THERETO**  
**AS OF SEPTEMBER 30, 2022**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>ELECTRIC DEPARTMENT</b>			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	89,259,399.92	68,903,550.65
	Intangible Contra Accounts	(979,446.23)	(813,874.50)
	<b>TOTAL INTANGIBLE PLANT</b>	<u>88,502,795.05</u>	<u>68,292,576.45</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	91,430,573.97	58,744,955.95
312	Boiler Plant Equipment	165,040,942.75	106,417,122.43
314	Turbogenerator Units	133,511,708.78	72,951,378.14
	Palomar Contra E-314	(772,160.26)	(368,871.38)
315	Accessory Electric Equipment	87,059,340.72	57,996,083.94
316	Miscellaneous Power Plant Equipment	68,619,347.92	25,017,557.13
	Palomar Contra E-316	(849,751.57)	(360,717.28)
	<b>TOTAL STEAM PRODUCTION</b>	<u>558,566,520.60</u>	<u>320,444,027.22</u>
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	24,895,662.62	14,130,467.68
342	Fuel Holders, Producers & Accessories	21,651,513.75	11,790,271.82
343	Prime Movers	94,666,257.32	61,464,991.94
344	Generators	337,415,965.51	178,135,946.18
345	Accessory Electric Equipment	33,070,154.31	20,761,448.58
346	Miscellaneous Power Plant Equipment	69,413,417.06	25,446,553.88
	<b>TOTAL OTHER PRODUCTION</b>	<u>581,339,767.44</u>	<u>311,732,108.04</u>
	<b>TOTAL ELECTRIC PRODUCTION</b>	<u>1,139,906,288.04</u>	<u>632,176,135.26</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	84,014,663.24	0.00
350.2	Land Rights	172,653,462.16	31,597,560.00
352	Structures and Improvements	758,085,367.56	135,393,185.25
353	Station Equipment	2,224,516,232.15	586,688,688.87
354	Towers and Fixtures	932,543,782.06	271,595,714.40
355	Poles and Fixtures	1,033,860,910.19	201,776,401.46
355	Pole retirement error correction-top side	0.00	0.00
356	Overhead Conductors and Devices	902,299,699.08	302,711,510.03
357	Underground Conduit	570,865,982.14	111,918,467.76
358	Underground Conductors and Devices	585,361,504.02	111,764,066.48
359	Roads and Trails	389,216,973.48	60,260,882.44
	<b>TOTAL TRANSMISSION</b>	<b>7,653,418,576.08</b>	<b>1,813,706,476.69</b>
360.1	Land	17,456,813.30	0.00
360.2	Land Rights	99,464,772.46	52,173,073.37
361	Structures and Improvements	13,146,706.95	2,964,204.84
362	Station Equipment	680,285,050.47	304,326,314.12
363	Storage Battery Equipment	214,144,165.87	84,899,663.18
364	Poles, Towers and Fixtures	1,104,814,274.78	319,953,383.07
364	Pole retirement error correction-top side	0.00	0.00
365	Overhead Conductors and Devices	1,290,326,443.86	271,514,865.84
366	Underground Conduit	1,780,203,283.62	643,242,666.29
367	Underground Conductors and Devices	2,129,497,051.54	1,075,407,457.29
368.1	Line Transformers	794,531,736.03	299,908,336.44
368.2	Protective Devices and Capacitors	38,332,276.32	19,194,410.68
369.1	Services Overhead	347,434,483.52	101,541,177.71
369.2	Services Underground	423,134,822.37	290,189,014.14
370.1	Meters	220,521,040.62	150,214,398.87
370.2	Meter Installations	79,291,539.93	42,272,026.86
371	Installations on Customers' Premises	78,670,640.50	36,039,624.57
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	37,168,830.67	24,796,976.23
		0.00	(6,840,137.69)
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>9,348,423,932.81</b>	<b>3,711,797,455.81</b>
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	45,469,034.54	30,589,885.91
392.1	Transportation Equipment - Autos	0.00	0.00
392.2	Transportation Equipment - Trailers	58,145.67	28,256.53
393	Stores Equipment	46,031.37	7,776.63
394.1	Portable Tools	41,601,787.72	13,743,828.47
394.2	Shop Equipment	278,147.42	239,395.35
395	Laboratory Equipment	5,362,045.10	1,876,392.64
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	449,872,684.24	188,688,184.06
398	Miscellaneous Equipment	3,207,227.05	1,503,543.29
	<b>TOTAL GENERAL PLANT</b>	<b>553,267,774.58</b>	<b>236,794,764.55</b>
101	<b>TOTAL ELECTRIC PLANT</b>	<b>18,783,519,366.56</b>	<b>6,462,767,408.76</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>GAS PLANT</b>			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	<b>TOTAL INTANGIBLE PLANT</b>	<b>86,104.20</b>	<b>86,104.20</b>
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,168,803.11	1,564,702.96
	<b>TOTAL STORAGE PLANT</b>	<b>2,168,803.11</b>	<b>1,564,702.96</b>
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,514,781.26	1,764,053.54
366	Structures and Improvements	23,217,546.80	12,558,833.18
367	Mains	624,010,312.51	113,199,600.17
368	Compressor Station Equipment	105,603,323.62	78,704,584.89
369	Measuring and Regulating Equipment	30,000,722.64	19,805,508.90
371	Other Equipment	2,842,373.52	468,589.36
	<b>TOTAL TRANSMISSION PLANT</b>	<b>793,838,204.10</b>	<b>226,501,170.04</b>
374.1	Land	1,514,272.84	0.00
374.2	Land Rights	8,530,726.84	7,681,619.60
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,602,374,399.01	485,457,868.05
376	Top-side retirement adjustment	0.00	0.00
378	Measuring & Regulating Station Equipment	21,240,723.36	10,595,284.13
380	Distribution Services	594,808,556.16	318,098,082.81
380	Top-side retirement adjustment	0.00	0.00
381	Meters and Regulators	193,268,020.01	89,695,948.42
382	Meter and Regulator Installations	137,882,493.17	55,456,903.35
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,369,723.13
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,397,017.90	7,346,998.71
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>2,572,576,466.90</b>	<b>975,763,681.30</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	0.00
392.2	Transportation Equipment - Trailers	0.00	0.00
394.1	Portable Tools	25,850,635.83	5,806,405.08
394.2	Shop Equipment	42,767.98	13,711.96
395	Laboratory Equipment	0.00	0.00
396	Power Operated Equipment	0.00	0.00
397	Communication Equipment	2,256,363.98	1,244,718.09
398	Miscellaneous Equipment	1,278,665.32	222,878.39
	TOTAL GENERAL PLANT	<u>29,428,433.11</u>	<u>7,287,713.52</u>
101	TOTAL GAS PLANT	<u>3,398,098,011.42</u>	<u>1,211,203,372.02</u>
<b>COMMON PLANT</b>			
303	Miscellaneous Intangible Plant	12,163,133.85	1,919,999.67
303	Miscellaneous Intangible Plant	859,900,787.04	403,567,391.09
	Common Contra Account	(4,128,951.21)	(2,656,134.06)
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,796.01	0.00
389.2	Land Rights	27,776.34	27,776.34
390	Structures and Improvements	583,752,446.46	209,942,736.79
391.1	Office Furniture and Equipment - Other	41,568,396.79	15,651,709.47
	Common Contra Account	0.00	0.00
391.2	Office Furniture and Equipment - Computer E	131,800,455.65	71,669,137.22
	Common Contra Account	(19,579.43)	(16,706.09)
392.1	Transportation Equipment - Autos	406,252.33	304,398.88
392.2	Transportation Equipment - Trailers	107,977.72	23,005.37
392.3	Transportation Equipment - Aviation	12,139,287.63	5,500,173.93
393	Stores Equipment	332,982.68	84,612.37
394.1	Portable Tools	1,520,840.18	722,899.78
394.2	Shop Equipment	142,759.33	100,626.94
394.3	Garage Equipment	2,141,161.92	770,711.76
395	Laboratory Equipment	1,731,094.98	1,074,017.53
396	Power Operated Equipment	0.00	0.00
397	Communication Equipment	371,015,361.50	147,343,955.51
398	Miscellaneous Equipment	3,432,185.50	848,012.77
118.1	TOTAL COMMON PLANT	<u>2,025,529,165.27</u>	<u>856,878,325.27</u>
	TOTAL ELECTRIC PLANT	18,783,519,366.56	6,462,767,408.76
	TOTAL GAS PLANT	3,398,098,011.42	1,211,203,372.02
	TOTAL COMMON PLANT	<u>2,025,529,165.27</u>	<u>856,878,325.27</u>
101 & 118.1	TOTAL	<u>24,207,146,543.25</u>	<u>8,530,849,106.05</u>
101	PLANT IN SERV-SONGS FULLY RECOVERE	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CLOUD CONTRA		
	Electric	0.00	0.00
	Common	(12,163,133.85)	(1,919,999.66)
		<u>(12,163,133.85)</u>	<u>(1,919,999.66)</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,494,846.06)	(1,494,846.06)
		<u>(1,494,846.06)</u>	<u>(1,494,846.06)</u>
101	Accrual for Retirements		
	Electric	(9,631,777.03)	(9,631,777.03)
	Gas	(1,488,787.82)	(1,488,787.82)
		<u>(1,488,787.82)</u>	<u>(1,488,787.82)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(11,120,564.85)</u>	<u>(11,120,564.85)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	112,194,000.02	34,933,458.68
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT LEASED TO OTHERS	<u>112,194,000.02</u>	<u>34,933,458.68</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,327,964,060.08	
	Gas	184,149,194.20	
	Common	403,165,557.37	
		<u>403,165,557.37</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,915,278,811.65</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	814,947,874.28
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	814,947,874.28
101.1	ELECTRIC CAPITAL LEASES	1,307,422,019.46	107,115,165.99
118.1	COMMON CAPITAL LEASE	88,692,067.06	28,645,493.53
		1,396,114,086.52	135,760,659.52
143	FAS 143 ASSETS - Legal Obligation	5,644,907.38	(806,834,633.91)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	174,391,052.31	57,026,426.73
143	FAS 143 ASSETS - COR - Legal Obligation	0.00	(2,122,169,519.79)
	TOTAL FAS 143	180,035,959.69	(2,871,977,726.97)
	UTILITY PLANT TOTAL	27,785,990,856.37	6,629,977,960.99



**ATTACHMENT E**  
**SUMMARY OF EARNINGS**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**SUMMARY OF EARNINGS**  
**Sep 2022**  
**(\$ IN MILLIONS)**

Line No.	Item	Amount
1	Operating Revenue	\$ 5,060
2	Operating Expenses	<u>4,205</u>
3	Net Operating Income	<u>\$ 856</u>
4	Weighted Average Rate Base	\$ 13,521
5	Rate of Return*	7.55%
	*Authorized Cost of Capital	

**ATTACHMENT F**

**GOVERNMENTAL ENTITIES RECEIVING NOTICE**

State of California  
Attorney General's Office  
P.O. Box 944255  
Sacramento, CA 94244-2550

State of California  
Attn. Director Dept of General  
Services  
PO Box 989052  
West Sacramento, CA 95798-9052

Department of U.S. Administration  
General Services Administration  
300 N. Los Angeles St. #3108  
Los Angeles, CA 90012

Naval Facilities Engineering  
Command  
Navy Rate Intervention  
1314 Harwood Street SE  
Washing Navy Yard, DC 20374

Alpine County  
Attn. County Clerk  
99 Water Street, P.O. Box 158  
Markleeville, CA 96120

Borrego Springs Chamber of  
Commerce Attn. City Clerk  
786 Palm Canyon Dr  
PO Box 420  
Borrego Springs CA 92004-0420

City of Carlsbad  
Attn. City Attorney  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Carlsbad  
Attn. Office of the County Clerk  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Chula Vista  
Attn: Office of the City Clerk  
276 Fourth Avenue  
Chula Vista, California 91910-2631

City of Chula Vista  
Attn. City Attorney  
276 Fourth Ave  
Chula Vista, Ca 91910-2631

City of Coronado  
Attn. Office of the City Clerk  
1825 Strand Way  
Coronado, CA 92118

City of Coronado  
Attn. City Attorney  
1825 Strand Way  
Coronado, CA 92118

City of Dana Point  
Attn. City Attorney  
33282 Golden Lantern  
Dana Point, CA 92629

City of Dana Point  
Attn. City Clerk  
33282 Golden Lantern  
Dana Point, CA 92629

City of Del Mar  
Attn. City Attorney  
1050 Camino Del Mar  
Del Mar, CA 92014

City of Del Mar  
Attn. City Clerk  
1050 Camino Del Mar  
Del Mar, CA 92014

City of El Cajon  
Attn. City Clerk  
200 Civic Way  
El Cajon, CA 92020

City of El Cajon  
Attn. City Attorney  
200 Civic Way  
El Cajon, CA 92020

City of Encinitas  
Attn. City Attorney  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Encinitas  
Attn. City Clerk  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Escondido  
Attn. City Clerk  
201 N. Broadway  
Escondido, CA 92025

City of Escondido  
Attn. City Attorney  
201 N. Broadway  
Escondido, CA 92025

City of Fallbrook  
Chamber of Commerce  
Attn. City Clerk  
111 S. Main Avenue  
Fallbrook, CA 92028

City of Fallbrook  
Chamber of Commerce  
Attn. City Attorney  
111 S. Main Avenue  
Fallbrook, CA 92028

City of Imperial Beach  
Attn. City Clerk  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Imperial Beach  
Attn. City Attorney  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

Julian Chamber of Commerce  
P.O. Box 1866  
2129 Main Street  
Julian, CA

City of Laguna Beach  
Attn. City Clerk  
505 Forest Ave  
Laguna Beach, CA 92651

City of Laguna Beach  
Attn. City Attorney  
505 Forest Ave  
Laguna Beach, CA 92651

City of Laguna Niguel  
Attn. City Attorney  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Laguna Niguel  
Attn. City Clerk  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Lakeside  
Attn. City Clerk  
9924 Vine Street  
Lakeside CA 92040

City of La Mesa  
Attn. City Attorney  
8130 Allison Avenue  
La Mesa, CA 91941

City of La Mesa  
Attn. City Clerk  
8130 Allison Avenue  
La Mesa, CA 91941

City of Lemon Grove  
Attn. City Clerk  
3232 Main St.  
Lemon Grove, CA 92045

City of Lemon Grove  
Attn. City Attorney  
3232 Main St.  
Lemon Grove, CA 92045

City of Mission Viejo  
Attn: City Clerk  
200 Civic Center  
Mission Viejo, CA 92691

City of Mission Viejo  
Attn: City Attorney  
200 Civic Center  
Mission Viejo, CA 92691

City of National City  
Attn. City Clerk  
1243 National City Blvd  
National City, CA 92050

City of National City  
Attn. City Attorney  
1243 National City Blvd  
National City, CA 92050

City of Oceanside  
Attn. City Clerk  
300 N. Coast Highway  
Oceanside, CA 92054-2885

City of Oceanside  
Attn. City Attorney  
300 N. Coast Highway  
Oceanside, CA 92054-2885

County of Orange  
Attn. County Counsel  
P.O. Box 1379  
Santa Ana, CA 92702

County of Orange  
Attn. County Clerk  
12 Civic Center Plaza, Room 101  
Santa Ana, CA 92701

City of Poway  
Attn. City Clerk  
P.O. Box 789  
Poway, CA 92064

City of Poway  
Attn. City Attorney  
P.O. Box 789  
Poway, CA 92064

City of Ramona  
Attn. City Clerk  
960 Main Street  
Ramona, CA 92065

City of Ramona  
Attn. City Attorney  
960 Main Street  
Ramona, CA 92065

City of San Diego  
Attn. Mayor  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

City of San Clemente  
Attn. City Clerk  
100 Avenida Presidio  
San Clemente, CA 92672

City of San Clemente  
Attn. City Attorney  
100 Avenida Presidio  
San Clemente, CA 92672

County of San Diego  
Attn. County Counsel  
1600 Pacific Hwy  
San Diego, CA 92101

County of San Diego  
Attn. County Clerk  
P.O. Box 121750  
San Diego, CA 92101

City of San Diego  
Attn. City Attorney  
1200 Third Ave.  
Suite 1620  
San Diego, CA 92101

City of San Diego  
Attn. City Clerk  
202 C Street, 2<sup>nd</sup> Floor  
San Diego, CA 92101

City of San Marcos  
Attn. City Attorney  
1 Civic Center Dr.  
San Marcos, CA 92069

City of San Marcos  
Attn. City Clerk  
1 Civic Center Dr.  
San Marcos, CA 92069

City of Santee  
Attn. City Clerk  
10601 Magnolia Avenue  
Santee, CA 92071

City of Santee  
Attn. City Attorney  
10601 Magnolia Avenue  
Santee, CA 92071

City of Solana Beach  
Attn. City Attorney  
635 S. Highway 101  
Solana Beach, CA 92075

Spring Valley Chamber of  
Commerce  
Attn. City Clerk  
3322 Sweetwater Springs Blvd,  
Ste. 202  
Spring Valley, CA 91977-3142

Valley Center Chamber of  
Commerce  
Attn. City Clerk  
P.O. Box 8  
Valley Center, CA 92082

City of Vista  
Attn. City Attorney  
200 Civic Center Drive, Bldg. K  
Vista, CA 92084

City of Vista  
Attn. City Clerk  
200 Civic Center Drive  
Vista, CA 92084

City of Aliso Viejo  
12 Journey  
Aliso Viejo, CA 92656

**ATTACHMENT G**

**GHG REVENUE AND RECONCILIATION FORM  
(ATTACHMENT D OF DECISIONS D.14-10-033  
AND D.15-01-024)**

## 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		Year 2022		Year 2023		Year 2024	
		Forecast	Recorded	Forecast	Recorded <sup>1</sup>	Forecast	Recorded	Forecast	Recorded
1	Proxy GHG Price (\$/MT)	17.12	23.15	28.86	28.86	29.02	N/A	31.60	N/A
2	Allocated Allowances (MT)	6,766,147	6,732,862	6,737,256	6,651,508	6,586,708	-	6,435,664	-
3	Revenues (\$)	3,172,937							
4	Prior Balance		7,376,791	(15,086,698)	(19,307,155)	(5,109,732)	(1,132,444)	(9,932,608)	-
5	Allowance Revenue	(115,836,437)	(161,825,842)	(194,403,522)	(189,236,214)	(191,139,679)	(188,263,848)	(203,386,289)	-
6	Interest	2,372	13,371	(16,300)	(286,178)	(740,443)	821,263	434,728	-
7	Franchise Fees and Uncollectibles	(1,189,180)	(1,176,522)	(2,112,270)	(2,301,661)	(2,111,339)	(2,183,472)	(2,422,761)	-
8	<b>Subtotal Revenues</b>	<b>(113,850,308)</b>	<b>(155,612,202)</b>	<b>(211,618,790)</b>	<b>(211,131,208)</b>	<b>(199,101,193)</b>	<b>(190,758,501)</b>	<b>(215,306,931)</b>	<b>-</b>
9	Expenses (\$)								
10	Outreach and Administrative Expenses (from Template D3) <sup>2</sup>	45,133	104,957	59,799	27,778	27,778	81,000	83,000	-
11	Franchise Fees and Uncollectibles	-	-	-	-	-	-	-	-
12	Interest	-	(25)	-	-	-	-	-	-
13	<b>Subtotal Expenses</b>	<b>45,133</b>	<b>104,932</b>	<b>59,799</b>	<b>27,778</b>	<b>27,778</b>	<b>81,000</b>	<b>83,000</b>	<b>-</b>
14	<b>Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$)</b> (Sum of Lines 14a through 14g)	<b>17,773,708</b>	<b>38,035,035</b>	<b>20,261,326</b>	<b>16,039,939</b>	<b>16,039,939</b>	<b>(1,400,043)</b>	<b>13,110,972</b>	<b>-</b>
14a	SOMAH (Current Year's Request) <sup>3</sup>	11,583,644	31,023,996	19,440,352	12,015,972	12,015,972	-	12,015,972	-
14d	Prior Year SOMAH True-up (Oct - Dec) <sup>4,5</sup>	100,486	(108,540)	(209,026)	2,933,967	2,933,967	(1,400,043)	-	-
14e	DAC SASH	1,030,000	2,060,000	1,030,000	1,090,000	1,090,000	-	1,095,000	-
14f	DAC-GT	-	-	-	-	-	-	-	-
14g	CS-GT	-	-	-	-	-	-	-	-
15	<b>Net GHG Revenues Available for Customers in Forecast Year (\$)</b> (Line 8 + Line 13 + Line 14)	<b>(96,031,467)</b>	<b>(117,472,235)</b>	<b>(191,297,664)</b>	<b>(195,063,491)</b>	<b>(183,033,476)</b>	<b>(192,077,544)</b>	<b>(202,112,959)</b>	<b>-</b>
16	GHG Revenue Returned to Eligible EITE Customers and Small Business Volumetric Customers(\$)								
17	EITE Customer Return	838,557	389,294	389,295	514,470	514,470	514,470	514,470	-
18	Small Business Volumetric Return	1,656,571	2,922,616	-	-	-	-	-	-
19	Semi-Annual Climate Credit								
20	Number of Eligible Residential Bundled Households <sup>9</sup>	1,351,533	1,319,172	1,307,609	631,782	668,860	668,860	640,591	-
21	Number of Eligible Residential Unbundled Households <sup>9</sup>	-	51,539	54,259	748,759	702,461	702,461	745,141	-
22	Number of Eligible Small Business Customers	-	-	125,715	126,523	131,966	124,648	117,568	-
23	<b>Total Customers Eligible for Climate Credit</b>	<b>1,351,533</b>	<b>1,370,711</b>	<b>1,487,583</b>	<b>1,507,064</b>	<b>1,503,287</b>	<b>1,495,969</b>	<b>1,503,300</b>	<b>-</b>
24	<b>Per-Customer Semi-Annual Climate Credit</b> <b>(-0.5 x (Line 15 + 17 + 18) ÷ Line 23)</b>	<b>34.60</b>	<b>34.60</b>	<b>64.17</b>	<b>64.17</b>	<b>60.71</b>	<b>60.71</b>	<b>67.05</b>	<b>-</b>
25	<b>Total Revenue Distributed for the Climate Credit (\$)</b> <b>(2 x Line 23 x Line 24)</b>	<b>93,536,339</b>	<b>94,853,170</b>	<b>190,908,370</b>	<b>193,416,576</b>	<b>182,519,006</b>	<b>181,630,466</b>	<b>201,598,489</b>	<b>-</b>
26	<b>Revenue Balance (\$)</b> <b>(Line 15 + Line 17 + Line 18 + Line 25)</b>	<b>N/A</b>	<b>(19,307,155)</b>	<b>N/A</b>	<b>(1,132,444)</b>	<b>N/A</b>	<b>(9,932,608)</b>	<b>N/A</b>	<b>-</b>
<b>CONFIDENTIAL INFORMATION</b>									

<sup>1</sup> Recorded data is equal to Forecast for GHG Revenues and Expenses and will be updated with the October Update Filing.

<sup>2</sup> 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.

<sup>3</sup> The IOUs' forecasted GHG proceeds exceed \$1 billion; therefore, pursuant to D.22-09-009, SDG&E has set aside the set amount of \$12,015,971.92.

<sup>4</sup> October through December prior year SOMAH True-up is two years in arrears due to the timing of actual GHG auction revenues.

<sup>5</sup> AL 4167-E is effective March 1, 2023. The proportions in the AL were determined in coordination with the other IOUs. Their corresponding AL numbers are: 4978-E for SCE, 6869-E for PG&E, 214-E for Liberty, and 712-E for PacifiCorp.

<sup>9</sup> 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**

Line	Description	Year 2021		Year 2022 <sup>1</sup>		Year 2023		Year
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast
1	<b>Direct GHG Emissions (MTCO2e)</b>							
2	Utility Owned Generation (UOG)							
3	Tolling Agreements							
4	Energy Imports (Specified)							
5	Energy imports (Unspecified)							
6	Qualifying Facility (QF) Contracts							
7	Contracts with Financial Settlement							
8	<b>Subtotal</b>							
9	<b>Total Emissions (MTCO2e)</b>							
10	<b>Proxy GHG Price (\$/MT)</b>	17.12	23.15	28.86	28.86	28.96		31.60
11	<b>GHG Costs (\$)</b>							
12	Direct GHG Costs							
13	Direct GHG Costs - Financial Settlement							
14	Previous Year's Forecast Reconciliation (Line 16)							
15	<b>Total Costs</b>							
16	<b>Forecast Variance (\$)²</b>							

**CONFIDENTIAL INFORMATION**

<sup>1</sup>Recorded data is equal to forecast and will be updated with the October Update Filing.

<sup>2</sup>Also reflects adjustment for shift in regulatory accounting from cash to accrual

**Template D-3: Detail of Outreach and Administrative Ex**

Line Description	2022		2023	
	Forecast	Recorded	Forecast	Recorded <sup>1</sup>
<b>1 Utility Outreach Expenses (\$)</b>				
2a SMB Communications	23,000	27,821	23,000	23,000
2b Other (Consultant)				
<b>3 Subtotal Outreach</b>	<b>23,000</b>	<b>27,821</b>	<b>23,000</b>	<b>23,000</b>
<b>4 Utility Administrative Expenses (\$)</b>				
5 Marketing - SDG&E (email, bill insert)	59,000	17,477	58,000	58,000
<b>6 Subtotal Administrative</b>	<b>59,000</b>	<b>17,477</b>	<b>58,000</b>	<b>58,000</b>
<b>7 Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)</b>	<b>82,000</b>	<b>45,298</b>	<b>81,000</b>	<b>81,000</b>
<b>8 Additional (Non-Utility) Statewide Outreach (\$)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>9 Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)</b>	<b>82,000</b>	<b>45,298</b>	<b>81,000</b>	<b>81,000</b>

<sup>1</sup>Recorded data is equal to Forecast and will be updated with the October Update Filing.