Application No.: A.22-05-025
Exhibit No.: SDGE-03
Witness: Kristina M. Ghianni

PREPARED DIRECT TESTIMONY OF

KRISTINA M. GHIANNI

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

*****REDACTED, PUBLIC VERSION*****

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

May 31, 2022

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PREPARED DIRECT TESTIMONY OF
KRISTINA M. GHIANNI
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

I. INTRODUCTION

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

- Describes SDG&E's ERRA, Transition Cost Balancing Account ("TCBA"), Local Generating Balancing Account ("LGBA"), Tree Mortality Non-Bypassable Charge Balancing Account ("TMNBCBA"), Solar on Multifamily Affordable Housing ("SOMAH") Program funding, Disadvantaged Communities Single Family Solar Homes program ("DAC-SASH"), Portfolio Allocation Balancing Account ("PABA"), Power Charge Indifference Adjustment ("PCIA") Undercollection Balancing Account ("CAPBA"), and Resource Adequacy Procurement Memorandum Account ("RAPMA"); and,
- Sets forth SDG&E's forecasted 2023 ERRA, CTC, LG, TMNBC, and PABA revenue requirements. In addition, my testimony presents the comparison between the recorded 2021 year-end balances with the actual 2021 year-end balances in the GHG allowance revenues and expenses balancing accounts. Finally, my testimony requests authorization of the revenue requirement of the San Onofre Nuclear Generating Station ("SONGS") Unit 1 Offsite Spent Fuel Storage costs as described in Section XIII below.

II. BACKGROUND

Pursuant to California Public Utilities Commission ("Commission") Decisions ("D.") 02-10-062 and D.02-12-074, the purpose of the ERRA balancing account is to provide full recovery of SDG&E's energy procurement costs associated with serving SDG&E's bundled service customers. Energy procurement costs include expenses associated with the California Independent System Operator ("CAISO") such as energy and ancillary services load charges, CAISO revenues from utility generation and supply contracts, contract costs, generation fuel costs, CAISO-related costs, and hedging costs. The ERRA records revenues from SDG&E's Electric Energy Commodity Cost ("EECC") rate schedule, adjusted to exclude commodity revenues assigned to the Non-Fuel Generation Balancing Account ("NGBA"),[1] and other Commission approved adjustments.

The purpose of the TCBA is to accrue all CTC revenues and recover all CTC-eligible generation-related costs. Pursuant to D.02-12-074 and D.02-11-022, payments to Qualifying Facilities ("QFs") that are above the market benchmark proxy are charged to the TCBA. Eligible CTC expenses[2] reflect the difference between the market proxy and the contract price of costs associated with certain QF contracts.

The purpose of the LGBA is to record the 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"). Such generation may take the form of purchase power agreements, company-owned generation units associated with new generation resources, and any other resources approved by the Commission for CAM treatment.

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[1] In compliance with D.03-12-063, the NGBA became effective January 1, 2004.

[2] Expenses eligible for CTC recovery are defined by Assembly Bill ("AB") 1890.

III. 2023 ERRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS

As shown in Table 1 below, SDG&E's 2023 ERRA revenue requirement forecast is $433.755 million, including forecasted GHG costs as well as franchise fees and uncollectibles ("FF&U"). The direct testimony of SDG&E witness Mr. Matthew O'Connell provides a detailed discussion of the Greenhouse Gas ("GHG") costs.

TABLE 1
ERRA REVENUE REQUIREMENT
($Millions of Dollars)

No.	Component	2023 Forecast		2022 Forecast		Change from Prior Year	
1.	Load ISO Charges		[redacted]		[redacted]		[redacted]
2.	Supply ISO Revenues	(13.872)		-		(13.872)	
3.	Contract Costs (non-CTC)	[redacted]		[redacted]		[redacted]	
4.	Contract Costs (CTC up to market)	[redacted]		[redacted]		[redacted]	
5.	Generation Fuel	-		-		-	
6.	Net Supply ISO Revenues		[redacted]		[redacted]		[redacted]
7.	CAISO Misc. Costs		[redacted]		[redacted]		-
8.	Hedging Costs		[redacted]		[redacted]		[redacted]
9.	GHG Costs		[redacted]		[redacted]		[redacted]
10.	Subtotal		428.607		489.956		(61.349)
11.	FF&U[3]		5.148		5.945		(0.797)
12.	**TOTAL[4]**		**433.755**		**495.901**		**(62.146)**

The forecasted cost components set forth in the line items contained in Table 1 above, and the reasons for the $ (62.146) million decrease in the 2023 ERRA revenue requirement forecast – as compared to the 2022 ERRA revenue requirement (as submitted in the 2022 Forecast) – are addressed in Mr. O'Connell's testimony.

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[3] The 2023 forecast reflects the franchise fee and uncollectible factor of 1.012011.

[4] Sums may not equal due to rounding.

As shown in Table 2 below, SDG&E's 2023 CTC revenue requirement forecast is $11.232 million, including FF&U.

TABLE 2
CTC REVENUE REQUIREMENT
($Millions of Dollars)

No.	Component	2023 Forecast	2022 Forecast	Change from Prior Year
1.	QF Contracts	11.098	11.556	(0.458)
2.	FF&U[5]	0.133	0.140	(0.007)
3.	**TOTAL**	**11.232**	**11.696**	**(0.465)**

For CTC-eligible purchase power contracts, the power purchased is recorded to the ERRA at the market proxy of [redacted]/MWh. The difference between the actual contract price and the market proxy is included in the 2023 CTC forecast and recorded to the TCBA. SDG&E witness Mr. O'Connell discusses the market proxy in greater detail in his testimony.

As shown in Table 3 below, SDG&E's 2023 Local Generation ("LG") revenue requirement forecast is $175.361 million, including FF&U.

TABLE 3
LG REVENUE REQUIREMENT
($Millions of Dollars)

No.	Component	2023 Forecast	2022 Forecast	Change from Prior Year
1.	Combined Heat & Power	[redacted]	[redacted]	[redacted]
2.	Energy Storage			
3.	Peakers & Resource Adequacy			
4.	Local Generation GHG	10.544	-	10.544
5.	SUBTOTAL	**173.279**	**141.409**	**31.870**
6.	FF&U[6]	2.081	1.716	0.366
7.	**TOTAL[7]**	**175.361**	**143.125**	**32.236**

The LGBA was authorized in D.13-03-029. The LGBA records the LG costs and the revenues received from SDG&E's LG rate. On a monthly basis, the LGBA compares the LG

[5] *Id.*

[6] *Id.*

[7] Sums may not equal due to rounding.

costs with the revenues received. Interest is applied to any over- or under-collected balance at the three-month Commercial Paper rate. The LGBA utilizes sub-accounts for each generation resource. In addition, D.21-05-004 was approved on May 6, 2021, clarifying direct GHG costs of a resource are appropriately recorded in the balancing account to which cost recovery of the underlying resource is approved. In accordance with the decision SDG&E has included GHG costs in the 2023 Forecast for LGBA.

IV. RETURN OF THE UNDERCOLLECTED 2020 LGBA RECORDED ACTIVITY

In its Record Year 2020 ERRA Compliance application (A.21-06-004), SDG&E requested review of the 2020 LGBA undercollected activity of $0.396 million ($0.400 million including FF&U) and sought authority to recover the 2020 recorded activity in its 2023 ERRA Forecast proceeding. The application was approved on May 5, 2022, in D.22-05-006. Accordingly, SDG&E is requesting to recover the undercollected 2020 LGBA recorded activity in rates.

V. COMPARISON OF 2021 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS

In accordance with Finding of Fact ("FOF") 13 of D.14-10-033, utilities must reconcile forecast amounts with recorded amounts until all actuals are available for the forecast year. Consistent with this methodology, SDG&E provides a comparison of the 2021 year-end recorded/forecasted balances with the 2021 year-end actual balances in three GHG balancing accounts in Table 4 below. More specifically, (1) GHG allowance revenues are recorded in the GHG Revenue Balancing Account ("GHGRBA"); (2) expenses are recorded in the GHG Customer Outreach and Education Memorandum Account ("GHGCOEMA"); and (3) expenses are recorded in the GHG Administrative Costs Memorandum Account ("GHGACMA").

TABLE 4
COMPARISON OF 2021 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS

Line	Description	2021 Recorded[1] ($)	2021 Actual ($)	Difference
	(1) GHGRBA			
1	**Beginning Balance 1/1/2021**	7,376,791	7,376,791	-
2	Allowance Revenue	(133,698,111)	(161,825,842)	(28,127,731)
3	Revenue returned to customers	94,535,311	98,145,288	3,609,977
4	Franchise Fees and Uncollectibles	(1,133,230)	(1,176,522)	(43,292)
5	Transfer to GHGCOEMA and GHGACMA[2, 3]	45,133	104,932	59,799
6	Allowance Set Aside for Multi-Family Program[4]	16,743,709	35,975,035	19,231,326
7	Allowance Set Aside for DAC-SASH[5]	1,030,000	2,060,000	1,030,000
8	Allowance Set Aside for DAC-GT[6]	-	-	-
9	Allowance Set Aside for CSGT[7]	-	-	-
10	Interest	13,699	13,371	(328)
11	**Ending Balance 12/31/2021**	**(15,086,698)**	**(19,326,947)**	**(4,240,249)**
	(2) GHGCOEMA			
12	**Beginning Balance 1/1/2021**	50,991	50,991	-
13	Transfer from GHGRBA[2]	(177)	(28,753)	(28,576)
14	Expenses	(45,263)	(45,263)	-
15	Interest	26	26	-
16	**Ending Balance 12/31/2021**	**5,576**	**(23,000)**	**(28,576)**
	(3) GHGACMA			
17	**Beginning Balance 1/1/2021**	(64,856)	(64,856)	-
18	Transfer from GHGRBA[3]	(44,956)	(76,179)	(31,223)
19	Expenses	82,089	84,676	2,588
20	Interest	(53)	(51)	2
21	**Ending Balance 12/31/2021**	**(27,777)**	**(56,410)**	**28,633)**

[1]Per A.21-04-010 (2022 ERRA Forecast Update November 15, 2021) Attachment G. Template D-1: Annual Allowance Revenue Receipts and Customer Returns; and Template D-3: Detail of Outreach and Administrative Expenses. Recorded amounts represent actual recorded activity from January through September 2021 and forecasted amounts from October through December 2021.
[2] This represents the GHGCOEMA expense true-up. The 2021 Recorded column shows the approved true-up per D.21-01-017, which was approved in January 2021. The 2021 Actual column shows the approved true-up per D.21-01-017 in addition to D.21-12-040, which was approved in December 2021.
[3] This represents the GHGACMA expense true-up. The 2021 Recorded column shows the approved true-up per D.21-01-017, which was approved in January 2021. The 2021 Actual column shows the approved true-up per D.21-01-017 in addition to D.21-12-040, which was approved in December 2021.
[4] This represents the program funding and true-ups for SOMAH. The 2021 Recorded column shows approved funding per D.21-01-017, which was approved in January 2021. The 2021 Actual column shows approved funding per D.21-01-017 in addition to D.21-12-040, which was approved in December 2021.
[5] This represents the program funding for DAC-SASH. The 2021 Recorded column shows approved funding per D.21-01-017, which was approved in January 2021. The 2021 Actual column shows approved funding per D.21-01-017 in addition to D.21-12-040, which was approved in December 2021.
[6] This represents the program funding for DAC-GT. The 2021 Recorded column shows approved funding per D.21-01-017, which was approved in January 2021. The 2021 Actual column shows approved funding per D.21-01-017 in addition to D.21-12-040, which was approved in December 2021.

[7] This represents the program funding for CSGT. The 2021 Recorded column shows approved funding per D.21-01-017, was approved in January 2021. The 2021 Actual column shows approved funding per D.21-01-017 in addition to D21-12-040, which was approved in December 2021.

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

Per D.15-01-051, SDG&E established the GTSRBA[8] to record the difference between the revenues collected from individual customers electing to participate in the GTSR program and the incremental costs incurred to serve customers participating in that program. The GTSR program consists of both a Green Tariff (“GT”) component and an Enhanced Community Renewables (“ECR”) component which are recorded in separate subaccounts with the GTSRBA. SDG&E’s GTSR program began in 2016 and recorded activity through 2021 as described in SDG&E’s Annual GTSR Program Progress Report filed on March 15, 2022 (A.12-01-008). In its 2020 ERRA Compliance application A.21-06-004, SDG&E requested review of the 2020 GTSRBA undercollected activity of $1.388 million. The 2020 GTSRBA activity was approved in D.22-05-006 on May 5, 2022. However, as mentioned in Ms. Morien’s testimony, SDG&E is requesting not to include this activity in 2023 rates.

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

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

SDG&E’s 2023 TMNBC contract cost forecast is $[redacted] million ([redacted] including FF&U), which is described in Mr. O’Connell’s testimony. The TMNBC account is also

[8] *See* SDG&E Advice Letter (“AL”) 2889-E, approved June 23, 2016 and effective May 28, 2016.

[9] Two supplemental ALs were filed for AL 3343. AL 3343-B was submitted on May 31, 2019 and approved on July 19, 2019 with a July 2, 2019 effective date. AL 3343-E was approved on July 19, 2019 with an effective date of July 2, 2019.

forecasted to receive $[redacted] million in CAISO revenues, and $[redacted] million in REC and RA sales revenues, resulting in net costs of $[redacted] million.

VIII. SOLAR ON MULTIFAMILY AFFORDABLE HOUSING ("SOMAH") PROGRAM

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

In Template D-1: Annual Allowance Revenue Receipts and Customer Returns in Attachment G to this Application, SDG&E presents the SOMAH Program prior year true-up funding for October through December 2021 request of $2.960 million ($2.996 million including FF&U).[11] The true-up is also presented in the testimony of SDG&E witness Ms. Morien.

IX. DAC-SASHBA

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

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[10] On May 13, 2022, SCE filed a Petition for Modification of D.17-12-022 seeking to change the allocation to 10%, not to exceed $100 million statewide. Should the PFM be granted prior to the October Update, SDG&E will update its testimony accordingly.

[11] AL 3704-E filed March 1, 2021. The January through September 2021 SOMAH true-up will be included in the November Update.

In the 2023 ERRA direct testimony of SDG&E Witness Mr. O'Connell, he states the total DAC-SASH program funding is estimated to be $1.030 million ($1.042 million including FF&U). The forecasted 2023 GHG allowance revenues available for clean energy and energy efficiency programs as set forth in the direct testimony of Mr. O'Connell will be sufficient to cover the entire $1.030 million after setting aside funding for the Solar on Multifamily Affordable Housing ("SOMAH") Program.

X. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)

Pursuant to Commission Decision 18-10-019 and Advice Letter 3318-E,[12] the purpose of the PABA is 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"). Costs recorded in each vintage subaccount will include, but are not limited to, fuel, GHG costs, third party power purchase contracts costs, 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 also recorded in the PABA.

SDG&E's 2023 PABA revenue requirement forecast includes the fuel costs for its electric generation facilities, including Miramar Energy Facility I ("Miramar I"), Miramar Energy Facility II ("Miramar II"), Palomar Energy Center ("Palomar"), Desert Star Energy Center ("Desert Star"), and the Cuyamaca Peak Energy Plant ("Cuyamaca"). The actual fuel costs of Miramar I, Miramar II, Palomar, Desert Star, and Cuyamaca are recorded in the PABA for recovery through commodity rates.

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[12] *See* SDG&E AL 3318-E, filed on December 10, 2018, and approved on May 30, 2019.

TABLE 5
PABA REVENUE REQUIREMENT
($Millions of Dollars)

No.	Component	2023 Forecast[13]	2022 Forecast[14]	Change from Prior Year
1.	Supply ISO Revenues	[redacted]	[redacted]	[redacted]
2.	Contract Costs (non-CTC)			
3.	Generation Fuel			
4.	GHG Costs			
5.	TOTAL	15.355	337.612	(322.257)

As Table 5 indicates, SDG&E's 2023 PABA revenue requirement forecast is $15.355 million. In addition, D.19-10-001 authorized the recovery of the PABA prior year-end balance to be recovered through the ERRA Forecast filing. SDG&E requests recovery of the projected 2022 year-end balances recorded to PABA of $72.781 million as shown in Ms. Sheri Miller's testimony workpapers. The proposed 2022 PABA year-end balance is projected based on three months of actuals (January through March of 2022) and nine months of forecasted expenses and revenues. The forecasted year-end balance will be updated in SDG&E's October Update filing and will include actual recorded entries from January through August.

In addition, pursuant to D.22-01-023, SDG&E shall transfer the 2022 ending balance of ERRA to the most recent subaccount of PABA. The projected 2022 year-end balance of ERRA is $(1.993) million and will be updated in SDG&E's October Update filing.

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

Pursuant to Commission Decision 18-10-019 and Advice Letter 3436-E,[15] the purpose of the CAPBA is to record the obligation that accrues for departing load ("DL") customers in the

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13 Table 5 does not include the 2022 Year End Forecasted PABA balance of $72.781 million, as shown in Attachment C to Ms. Miller's testimony.

14 The Updated November 2022 Forecast, included the 2021 forecasted year-end PABA under collected balance of $123.812 million, including FF&U (not shown in Table 5 above).

15 *See* SDG&E AL 3436-E, filed on September 30, 2019, and approved on October 30, 2019.

event that the half-cent per kWh PCIA rate cap is reached. The CAPBA is comprised of a subaccount for each customer vintage, as well as a specific bundled subaccount, which capture the shortfall amount that is financed by bundled customers for DL customers when the DL PCIA rate is capped, and the repayment amount from DL customers to bundled customers.

D.21-05-030 in the PCIA Order Instituting Rulemaking, R.17-06-026, removed the PCIA cap and required SDG&E to dispose of any remaining CAPBA balance in PCIA Rates. SDG&E's 2023 PCIA rates include CAPBA amounts that remain outstanding related to the 2020 CAPBA Trigger.[16] Please see the Prepared Direct Testimony of SDG&E witness Ms. Morien for a discussion of how SDG&E proposes to redistribute the remainder of the 2020 CAPBA Trigger balance in greater detail.

In addition, SDG&E is proposing to close CAPBA after amortization is complete on December 31, 2023 and transfer any remaining balance to PABA.

XII. RESOURCE ADEQUACY PROCUREMENT MEMORANDUM ACCOUNT (RAPMA)

Pursuant to D.19-11-016, which ordered the creation of a memo account in the interim period until the commission adopts a modified cost allocation mechanism, SDG&E implemented the RAPMA in 2021. The RAPMA tracks and records the net costs related to the procurement of incremental resource adequacy (RA) capacity and related administrative costs that are not currently recovered in rates. Such costs may include: (1) contract costs of incremental resource procurement to meet needs for bundled customers and/or unbundled customers of load-serving entities (LSEs) that have opted-out of self-procurement or deficient LSEs that are unable to meet

[16] D.20-12-028.

their procurement obligations, and (2) administrative costs associated with the incremental resource procurement process, such as outside Independent Evaluator costs.

On March 29, 2022 the Commission issued a proposed decision regarding modified CAM treatment. On May 19, 2022 the Commission approved a revised proposed decision on modified CAM. SDG&E will incorporate the cost recovery impacts from this decision in the October Update to this 2023 forecast filing. The current forecast of 2023 costs is $15.0 million.

XIII. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE

This section of my testimony requests authorization of the SONGS Unit 1 Offsite Spent Fuel Storage costs revenue requirement of $1.174 million ($1.188 million including FF&U) for 2023, which are described in Mr. O'Connell's testimony. The authorized revenue requirement is tracked in SDG&E's Nuclear Decommissioning Adjustment Mechanism account.

XIV. SUMMARY

My testimony presents the following revenue requirements for which SDG&E seeks recovery in this 2023 ERRA Forecast Application:

- the 2023 ERRA revenue requirement forecast of $433.755 million (which includes forecasted GHG costs);
- the 2023 CTC revenue requirement forecast of $11.232 million;
- the 2023 LG revenue requirement forecast of $175.361 million;
- the 2023 TMNBC revenue requirement forecast of [redacted] million;
- the 2023 PABA revenue requirement forecast of $15.355 million; and
- the 2022 forecasted undercollected balance, excluding previously authorized CAPBA amounts recorded to PABA of $72.781 million.

Except for PABA, each of these amounts include FF&U.

SDG&E is requesting authorization from the Commission to recover the undercollected 2020 recorded LGBA activity of $0.400 million SDG&E is also requesting recovery of the undercollected 2020 GTSRBA ending balance of $1.388 million. In addition, my testimony also presents the comparison of the 2021 recorded/forecasted vs. actual year-end balances in the GHG allowance revenues and expenses balancing accounts.

Finally, SDG&E requests that the Commission approve the 2023 revenue requirement of $1.174 million ($1.188 million including FF&U) for the forecasted SONGS Unit 1 Offsite Spent Fuel Storage costs.

This concludes my prepared direct testimony.

XV. QUALIFICATIONS

My name is Kristina M. Ghianni. I am employed by SDG&E as a Principal Accountant Supervisor in the Settlements & Systems Department. My business address is 8315 Century Park Court, San Diego, California 92123. My primary responsibilities include approving gas and electric commodity invoices, preparing various compliance filings, and preparing and reconciling the monthly closing process. I joined SDG&E in 2006. In 2013, I began working in the Settlements & Systems Department and have held positions of increasing responsibilities.

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

ATTACHMENT A

DECLARATION OF KRISTINA M. GHIANNI

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

DECLARATION
OF KRISTINA GHIANNI

A.22-05-___
Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2023 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts

I, Kristina Ghianni, declare as follows:

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

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

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

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

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

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

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

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

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

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

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

Executed this 31st day of May, 2021, at San Diego, California.

/s/ Kristina Ghianni
Kristina Ghianni
Validation & Analysis Manager
San Diego Gas & Electric Company

ATTACHMENT B

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

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

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

I, James Magill, do declare as follows:

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

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

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

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

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

James Magill

ATTACHMENT A

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

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