Application No.: <u>A.22-05-XXX</u> Exhibit No.:

Witness: Sheri Miller

PREPARED DIRECT TESTIMONY OF

SHERI MILLER

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

REDACTED - PUBLIC VERSION

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



May 31, 2022

TABLE OF CONTENTS

1.	PURPOSE AND OVERVIEW	ا
II.	PCIA-ELIGIBLE COSTS	1
III.	PCIA BENCHMARKS	2
IV.	VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES	4
V.	MARKET OFFER OF REC ATTRIBUTES	5
VI.	SALES OF REC ATTRIBUTES	6
VII.	GREEN TARIFF SHARED RENEWABLES	e
VIII.	MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND ANNUAL TRUE-UP	8
IX.	OTHER COSTS RECOVERED IN PABA	8
X.	SUMMARY	9
XI.	QUALIFICATIONS	11
ATTA	CHMENT A – DECLARATION OF SHERI MILLER	
ATTA	CHMENT B – DECLARATION OF JAMES MAGILL REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSU TO D.16-08-024, et al.	ANT

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

I. PURPOSE AND OVERVIEW

This testimony describes the process of forecasting San Diego Gas & Electric Company's ("SDG&E") Power Charge Indifference Adjustment ("PCIA") costs in the 2023 Energy Resource Recovery Account ("ERRA") Forecast. The PCIA cost is equivalent to the utility's total portfolio costs, less its market value and its sales revenues, in a given year. Additional regulatory history of the PCIA is provided in SDG&E witness Gwen Morien's testimony.

The forecasted PCIA costs are calculated using the modeled forecast costs and volumes provided by SDG&E witness Matt O'Connell, and the final PCIA costs presented in this testimony are used by SDG&E witness Kristina Ghianni in her testimony describing the 2023 balancing account revenue requirements. This PCIA testimony also supports SDG&E witness Gwen Morien's development of customer rates in her testimony.

II. **PCIA-ELIGIBLE COSTS**

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

The monthly resource cost includes both contract costs and costs related to Utility-Owned Generation ("UOG"). The UOG operation and maintenance ("O&M") and capital-related expenses were approved for recovery through the Non-Fuel Generation Balancing Account

("NGBA") mechanism in the General Rate Case ("GRC") decision D.19-09-051. Since above-market costs are required to be recovered through the PCIA mechanism, the above-market UOG costs are recovered in PABA, and the market value of the UOG costs is recovered through NGBA.

The forecasted actual costs, generation volumes and the CAISO net revenues are provided for each resource in the direct testimony of Matt O'Connell. Each of the PCIA-eligible resources is identified as belonging to a specific year, called the resource's "vintage," which corresponds to the year in which the contract was executed. The costs, generation, CAISO net revenues, and market value of attributes are assigned the vintage of the generating resource.

III. PCIA BENCHMARKS

Pursuant to D.19-10-001, Energy Division issues updated PCIA market price benchmarks ("MPB") in the beginning of November. This May filing of the 2023 ERRA Forecast uses the latest available benchmarks to calculate PCIA, shown in Table 1 below, that were received from Energy Division on November 1, 2021. In October of 2022, Energy Division will issue new benchmarks, and SDG&E will submit an updated 2023 ERRA Forecast in its October Update incorporating the new benchmarks, and Table 1 below will be updated accordingly.

Table 1 – 2022 SDG&E Forecast Adders

Energy Index On-Peak	\$71.72 (\$/MWh)
Energy Index Off-Peak	\$56.53 (\$/MWh)
System RA	\$6.03 (\$/kW-month)
Local RA	\$6.36 (\$/kW-month)
Flexible RA	\$6.41 (\$/kW-month)
Renewable Portfolio Standard ("RPS") adder – REC	\$13.70 (\$/MWh)

SDG&E uses the on-peak and off-peak energy indexes together with the on-peak and off-peak load weighting factors to calculate the forecast weighted average price of the energy component of the contract attributes. This price is then multiplied by the forecasted hourly generation for each resource to calculate the expected market value of the PCIA resource generation in 2023. This expected market value represents the amount of CAISO revenue that SDG&E expects to receive for its PCIA resources, including contracted resources and UOG. This amount is presented in Ms. Ghianni's testimony in Table 6 "PABA revenue requirement," labeled "Supply ISO Revenues." The actual CAISO revenues will be recorded in PABA each month when they are received by SDG&E, and the revenue will partially offset the costs of the PCIA resources.

To calculate the forecast market value of the RA attributes of the resources, each resource is assigned to one of the Local, Flex, or System RA categories, based on the RA category that the resource most commonly serves, and if a resource serves more than one category, Local is assigned first if applicable, then Flex, and then System. The most updated monthly net qualifying capacity ("NQC") listing is obtained from the CAISO website, and an average monthly NQC value for each resource is calculated. The resource's NQC value is then multiplied by the assigned RA benchmark to calculate the forecasted market value of the RA for 2023, as shown in Attachment A of this testimony. The resulting forecast market value for contract resources is then included in ERRA revenue requirement as an expense, as it represents the value of the RA attributes which SDG&E retained to use for the RA compliance obligations on behalf of its bundled customers. The market value associated with UOG resources is excluded from ERRA and instead recovered in NGBA, because the UOG costs were previously

approved for recovery in D.19-09-051, which approved SDG&E's 2019 GRC application (A.17-10-007).

To calculate the forecast market value of the REC attributes of the resources, the applicable REC benchmark is applied to the 2023 forecasted generation of each renewable resource. The resulting forecast market value for contract resources is then included in the ERRA revenue requirement as an expense, as it represents the value of the REC attributes which SDG&E retained to use for the Renewable Portfolio Standard ("RPS") compliance obligations on behalf of its bundled customers. As with the RA value discussed above, the market value associated with RECs from UOG generation is excluded from ERRA and recovered in NGBA. The total of the REC and RA market values for contracts is included in Ms. Ghianni's testimony in Table 1 labeled "ERRA Revenue Requirement," on line 3 "non-CTC contract costs," and also mentioned in Ms. Morien's testimony as part of the "up-to-market" energy procurement costs recovered in ERRA.

IV. VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES

Pursuant to D.21-05-030 and D.22-01-004, SDG&E is in the process of implementing the RPS voluntary allocation process for 2023 delivery. SDG&E submitted its pro forma allocation contracts for approval on February 28, 2022. Once SDG&E receives Commission approval of the contract templates, SDG&E will commence the process of finalizing the terms of each contract for the eligible Load Serving Entities ("LSE") in its territory that accept RPS allocations for 2023.

In addition, on February 19, 2022, SDG&E filed Advice Letter ("AL") 3936-E requesting approval of two bilateral contracts to sell a significant amount of bundled RECs to San Diego Community Power ("SDCP") and California Energy Alliance ("CEA") with deliveries beginning in 2022. On April 15, 2022, the Commission issued draft Resolution E-5206 which would

approve the proposed transactions with SDCP and CEA without modifications. These two counterparties have already signed agreements to purchase bundled RECs beginning in 2022 with the understanding that the sales transactions will convert to PCIA REC allocations at the beginning of 2023. They also stated in their Joint CCA response to protests of this AL that "after 2022, SDCP and CEA will voluntarily elect to receive 100% of their allocation of long-term bundled RECs in the Voluntary Allocation Market Offer ("VAMO") process. The draft Resolution was approved on May 19, 2022¹, and therefore SDG&E is including the forecasted REC sales/allocation revenue for these two contracts in this initial 2023 ERRA Forecast filing. In addition, SDG&E is also assuming that it will take 100% of its own REC allocations, and therefore those revenues to PABA and corresponding debits to ERRA are included in this ERRA Forecast. SDG&E however reserves the right under D.21-05-030 to take less than its full allocation.

In addition to SDCP and CEA, SDG&E has several other LSEs in its territory that will also have options to receive allocations of RECs. Because SDG&E does not at this time have signed agreements with them, no estimates for potential revenues are included in this forecast. If allocation contracts are signed after this May ERRA forecast is filed but before the October update is due, the impacts will be included in the October update PCIA calculations.

V. MARKET OFFER OF REC ATTRIBUTES

Pursuant to D.21-05-030, SDG&E submitted its pro forma market offer contracts for approval on April 4, 2022. On April 11, 2022, an Assigned Commissioner's Ruling ("ACR") was issued in R.18-07-003 that created two tracks in the 2022 RPS plan review cycle to address voluntary allocation and market offer processes. The ACR ordered the IOUs to jointly file a

¹ E-5206.

market offer process to be reviewed and approved in the 2022 RPS Track 1 filing due on May 2, 2022, with a proposed decision due in Q3 2022. Once a final decision is adopted in the RPS Track 1 filing, and SDG&E also receives approval of its submitted market offer contract templates, SDG&E will hold a market offer solicitation to sell any 2023 generation RPS that remains after the voluntary allocation contracting process described in the section above is complete. If the resulting market offer contracts are signed before the October update is filed, the market offer estimated revenues will be included in the October update PCIA calculations.

VI. SALES OF REC ATTRIBUTES

Pursuant to D.21-05-030 and D.22-01-004, in the first quarter of 2022, SDG&E issued a Request for Information ("RFI") to its RPS counterparties asking if they had any interest in negotiating changes to contracts, including contract assignment or buyout. SDG&E received a minimal number of responses, but it is possible that if the responses received result in successful contract changes, SDG&E's PCIA-eligible portfolio could be affected. Also in the first quarter of 2022, SDG&E issued a similar RFI to its market participant contacts, soliciting interest in RPS energy or attributes, which yielded responses from several companies. If these responses result in successful negotiations for RPS sales, this would also affect SDG&E's PCIA-eligible portfolio. Any changes to the 2023 PCIA portfolio would result in changes to the 2023 PABA revenue requirement being requested in this ERRA proceeding. If resulting contracts are signed and receive Commission approval after this May ERRA forecast is filed but before the October update is due, the impacts will be included in the October update PCIA calculations.

VII. GREEN TARIFF SHARED RENEWABLES

A history of Senate Bill ("SB") 43, which was intended to expand access to renewable energy to ratepayers, is provided in Ms. Morien's testimony. As Mr. O'Connell describes in his testimony, SDG&E provides its bundled customers with the option to purchase 100% renewable

energy through the Green Tariff Shared Renewables ("GTSR") program, branded as EcoChoice and EcoShare. The EcoChoice option enables customers to purchase renewable energy from contracted solar resources that have been dedicated to the program, which include Midway Solar and Wister Solar. The costs for these resources are recovered in the Green Tariff Shared Renewable Balancing Account ("GTSRBA").

If customers' usage for the year surpasses the output from the dedicated resources, then SDG&E uses generation from an established Interim Pool of solar resources to provide the renewable energy. Normally the costs for these resource contracts are included in the PCIA calculations and recovered through PABA, however, any volumes of Interim Pool energy that are forecasted to be used for the GTSR program are removed from PABA and ultimately excluded from the PCIA calculations. They are forecasted instead as energy costs in the GTSRBA. The costs in the GTSRBA are fully recovered from SDG&E's bundled customers that have enrolled in the EcoChoice program. However, in 2023 EcoChoice customer usage is forecasted to be lower than the total generation of the dedicated resources, and because of that, it will not be necessary to recover any Interim Pool contract costs in GTSRBA.

SB 43 Section 2833(s) states that "a participating utility shall, in the event of participant customer attrition or other causes that reduce customer participation or electrical demand below generation levels, apply the excess generation from the eligible renewable energy resources procured through the utility's green tariff shared renewables Program to the utility's renewable portfolio standard procurement obligations or bank the excess generation for future use to benefit all customers in accordance with the renewables portfolio standard banking and procurement rules approved by the commission." Pursuant to this mandate, SDG&E has included the forecasted excess generation from both of its green tariff dedicated generators in the cost

recovery mechanism used for its RPS eligible contracts, namely ERRA and PABA.As Ms. 2 Morien mentions in her testimony, GTSR customer rates include a PCIA component for the 3 above market cost of the Utility's existing procurement portfolio. The GTSR resources, however, are a subset of the total portfolio. Therefore, and pursuant to AB 43 and D.15-01-051, 5 GTSR customer rates must be adjusted for the difference between the relative value of energy 6 and capacity of the GTSR resources and the value of the resources in SDG&E's total portfolio. 7 SDG&E adjusts the weighted cost of GTSR power to reflect the time-of-use ("TOU") allocation 8 of the GTSR resources. The weighted cost of GTSR capacity is adjusted to reflect the relative NQC value of the GTSR resources. The energy and capacity adjustments together are 10 \$0.03190/MWh, which will be an incremental adjustment to the PCIA portion of the GTSR 11 customer rate.

VIII. MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND ANNUAL TRUE-UP

Accruals for the estimated REC and RA market values of PCIA eligible resources are recorded monthly to PABA and ERRA by SDG&E's Settlements & Systems group as part of the monthly accounting close process. Pursuant to D.19-10-001, these amounts will be adjusted when the updated 2022 benchmarks are received from Energy Division later this year. The October Update filing of my testimony will include a true-up of the REC and RA market values recorded during January-August 2022, to reflect the updated benchmarks. This true-up will be included in the October Update of the forecasted PABA year-end balance in my testimony.

IX. OTHER COSTS RECOVERED IN PABA

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As Mr. O'Connell describes in his testimony, this forecast of 2023 PABA revenue requirements includes the natural gas fuel costs and associated GHG expenses for PCIA-eligible

conventional resources. These costs are included in the PCIA as part of the above-market cost calculation of the gas-fired resources in their respective vintages.

In addition, SDG&E is including the 2022 PABA year-end forecasted balance of \$72.781 million in its 2023 Indifference Amount, pursuant to D.19-10-001 which authorized the PABA prior year-end balance recovery through that mechanism. The 2022 PABA forecasted year-end balance is calculated using three months of actual data and nine months of forecasted data. It is presented in Attachment C to my testimony, and also mentioned in Ms. Morien's testimony.

X. SUMMARY

A summary of the total 2023 forecasted PCIA above market cost (without FF&U) is shown in Table 2 below. The CAISO revenues, fuel, GHG costs, and total PABA revenue requirement shown below are also referenced in Ms. Ghianni's testimony.

Table 2 – 2023 PCIA Forecast Summary

	PCIA Components	2023 Forecast (in millions)
1.	PCIA contract costs	
2.	UOG costs	\$210
3.	Generation fuel cost	
4.	Direct GHG costs	
5.	Less REC sales	\$0
6.	Less RA sales	
7.	Less REC allocations	
8.	Less contract REC market value	(\$36)
9.	Less contract RA market value	(\$160)
10.	Less CAISO supply revenues	(\$538)

² This figure consists of SDCP and CEA's REC allocations discussed in Section IV above.

	PCIA Components	2023 Forecast (in millions)	
11.	= Total Indifference Amount revenue		
	requirement		

This concludes my prepared direct testimony.

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XI. QUALIFICATIONS

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

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

I received a Bachelor of Science degree in Accounting and a Masters of Business

Administration from National University. I am also a Certified Public Accountant licensed in the state of California.

I have previously testified before the California Public Utilities Commission.

ATTACHMENT A DECLARATION OF SHERI MILLER

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF SHERI MILLER

A.22-05-XXX

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, Sheri Miller, declare as follows:

- 1. I am a Principal Settlements Advisor for San Diego Gas & Electric Company ("SDG&E"). I included my Prepared Direct Testimony ("Testimony") in support of SDG&E's May 31, 2022 Application for Approval of its 2023 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts ("Application"). Additionally, as a Principal Settlements Advisor, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.
- 2. I am providing this Declaration to demonstrate that the confidential information ("Protected Information") in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix ("Matrix") attached to the Commission's Decision ("D.") 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:
 - that the material constitutes a particular type of data listed in the Matrix;
 - the category or categories in the Matrix the data correspond to;
 - that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
 - that the information is not already public; and
 - that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.¹ As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

Location of Protected	Matrix	Reason for Confidentiality and Timing							
Information	Reference	g							
Amounts highlighted in yellow in Table 2 of testimony named	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three							
"2023 PCIA Forecast Summary"	II.B.4	years Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years							
Cells highlighted in yellow in Attachment C "Forecasted 2022 Year End Balance of PABA"	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years							
	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years							
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years							
	IV.A	Forecast of IOU Generation Resources; confidential for three years							
	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years							
	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)							
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2023 ERRA forecast workpapers_Miller.xlsx", tab 'Utility Owned Generation'	IV.A	Forecast of IOU Generation Resources; confidential for three years							

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

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing							
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2023 ERRA forecast workpapers_Miller.xlsx", tab 'Workpaper IOU TPS'	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three years							
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2023 ERRA forecast workpapers_Miller.xlsx", tab 'IOU Total Portfolio summary'	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three years							
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2023 ERRA forecast workpapers_Miller.xlsx", tab 'Indifference Amount Cale'	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three 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 2022, in San Diego, California.

Sheri Miller

Sheri Miller
Principal Settlements Advisor
San Diego Gas & Electric Company

ATTACHMENT B

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

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

I, James Magill, do declare as follows:

- 1. I am the Manager of 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 Sheri Miller's Prepared Direct Testimony ("Testimony") in support of SDG&E's "Application for Approval of its 2023 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.
- 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.
- 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 31st day of May, 2022, at San Diego.

James Mabil

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2023 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts

Location of Protected	Legal Authority	Narrative Justification
Information		
Table 2, line 4: Direct	D.14-10-033;	GHG emissions forecasts: Providing these
GHG Costs	D.16-08-024;	forecasts to market participants would allow
	D.17-05-035;	them to know SDG&E's forecasted GHG
	D.17-09-023;	obligation, thereby compromising SDG&E's
	Public Utilities	contractual bargaining power such that
	Code Section	customer costs are likely to rise. Thus, the
	454.5(g).	release of this non-public confidential
		information will unjustifiably allow market
		participants to use this information to the
		disadvantage of SDG&E's customers.

ATTACHMENT C FORECASTED 2022 YEAR END BALANCE OF PABA

CONFIDENTIAL

SAN DIEGO GAS & ELECTRIC

Attachment C

FORECASTED 2022 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES

(THOUSANDS OF DOLLARS)

Line No.		Vin 2002	Vin 2004	Vin 2005	Vin 2006	Vin 2007	Vin 2008	Vin 2009	Vin 2010	Vin 2011	Vin 2012	Vin 2013	Vin 2014	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019	Vin 2020	Vin 2021	Total
	Recorded Balances from January to March 2022 (a)																				
1	Beginning Balances																				
2	Portfolio Costs																				
3	Brown Power Market Value																				
4	Imputed REC Market Value																				
5	Imputed RA Market Value																				
6	PCIA Billed Customer Revenue																				
7	CAPBA Amortization																				
8	Interest																				
9	Transfers																				
10	Recorded Balances from January to March 2022																				
11																					
12	Forecast from April to December 2022 (b)																				
13	Portfolio Costs																				
14	Brown Power Market Value																				
15	Imputed REC Market Value																				
16	Imputed RA Market Value																				
17	PCIA Billed Customer Revenue																				
18	REC MPB true up (October update only)																				
19	RA MPB true up (October update only)																				
20	UOG REC MPB true up (October update only)																				
21	UOG RA MPB true up (October update only)																				
22	CAPBA Amortization																				
23	Interest																				
24	Forecasted Activity from April to December 2022																				
25																					
26	Year-End 2022 Forecast (c = a + b)																				
27	Portfolio Costs	0	230,447	29,524	33,997	73,090	27,330	68,943	85,645	243,705	72,416	4,429	999	0	0	8,857	41,263	0	0	0	920,645
28	Brown Power Market Value	0	(114,443)	(14,475)	(12,064)	(42, 138)	(751)	756	(26,025)	(119,357)	(24,769)	(3,326)	(1,339)	0	0	(11,044)	0	0	0	0	(368,975)
29	Imputed REC Market Value	0	(1,656)	(3,314)	(3,160)	0	(5,711)	(7,061)	(6,310)	(20, 165)	(10,079)	(802)	(227)	0	0	(2,764)	0	0	0	0	(61,249)
30	Imputed RA Value	0	(37,465)	(1,765)	(1,356)	(24,277)	(2,525)	(7,257)	(6,065)	(12,908)	(3,343)	(329)	(180)	0	0	(192)	(35,607)	0	0	0	(133,270)
31	PCIA Billed Customer Revenue	(357)	(49,487)	(22,334)	(23,770)	36,528	(28,310)	(113,278)	(66,312)	(63,471)	(52, 186)	26,481	1,271	(22,237)	23,822	(12,612)	(16,396)	17,942	(65,938)	30,995	(399,649)
32	CAPBA Amortization	0	0	0	0	0	0	109	354	527	14	0	0	597	0	220	10	0	610	0	2,441
33	Interest	(1)	(10)	(22)	(5)	30	(22)	(126)	(11)	(45)	(47)	26	3	(48)	39	(21)	30	21	158	189	140
34	Transfers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
35	Total Year-End Balance Forecast	(490)	1,404	(12,137)	1,081	11,144	(12,486)	(81,582)	(10,435)	(17,553)	(29,180)	17,180	2,016	(28,409)	23,861	(13,358)	15,294	13,264	81,740	107,955	69,311
36	2020 CAPBA Trigger amortization																		3,470		3,470
37	Total Year-End Balance Forecast with amortization	(490)	1,404	(12,137)	1,081	11,144	(12,486)	(81,582)	(10,435)	(17,553)	(29, 180)	17,180	2,016	(28,409)	23,861	(13,358)	15,294	13,264	85,209	107,955	72,781