

Application No.: A.18-04-004
Exhibit No.: _____
Witness: Khoang T. Ngo

UPDATED PREPARED DIRECT TESTIMONY OF
KHOANG T. NGO
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

*****redacted, public version*****

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

November 7 ~~April 13~~, 2018



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1 **UPDATED PREPARED DIRECT TESTIMONY OF**

2 **KHOANG T. NGO**

3 **ON BEHALF OF**

4 **SAN DIEGO GAS & ELECTRIC COMPANY**

5 **I. INTRODUCTION**

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

- 10 ■ describes SDG&E's ERRA, Transition Cost Balancing Account ("TCBA"), and
11 Local Generating Balancing Account ("LGBA");
- 12 ■ sets forth SDG&E's forecasted 2019 ERRA, CTC, and LG revenue requirements;
13 and
- 14 ■ requests recovery of the December 31, 2016 LGBA undercollected activity of
15 \$0.524 million, ~~as pending the approval of~~ in the 2016 ERRA Compliance
16 application in A.17-06-006.

17 In addition, my testimony presents the comparison between the recorded 2017 year-end
18 balances with the actual 2017 year-end balances in the GHG allowance revenues and expenses
19 balancing accounts, as well as a reconciliation of the 2018 GHG Allowance Revenue & Expenses.

20 Finally, my testimony requests authorization of the revenue requirement of the San Onofre Nuclear
21 Generating Station ("SONGS") Unit 1 Offsite Spent Fuel Storage costs as described in Section
22 VIII below.

1 **II. BACKGROUND**

2 Pursuant to California Public Utilities Commission (“Commission”) Decisions
3 (“D.”) 02-10-062 and D.02-12-074, the purpose of the ERRA balancing account is to provide full
4 recovery of SDG&E’s energy procurement costs associated with serving SDG&E’s bundled
5 service customers. Energy procurement costs include expenses associated with the California
6 Independent System Operator (“CAISO”) such as energy and ancillary services load charges,
7 CAISO revenues from utility generation and supply contracts, contract costs, generation fuel costs,
8 CAISO-related costs, hedging costs, and previously approved equity re-balancing costs related to
9 the financial statement consolidation under Accounting Standards Codification 810 (“ASC 810”)¹
10 of the Otay Mesa Energy Center (“OMEC”). The ERRA records revenues from SDG&E’s
11 Electric Energy Commodity Cost (“EECC”) rate schedule, adjusted to exclude commodity
12 revenues assigned to the Non-Fuel Generation Balancing Account (“NGBA”),² and other
13 Commission approved adjustments.

14 The purpose of the TCBA is to accrue all CTC revenues and recover all CTC-eligible
15 generation-related costs. Pursuant to D.02-12-074 and D.02-11-022, payments to Qualifying
16 Facilities (“QFs”) that are above the market benchmark proxy are charged to the TCBA. Eligible
17 CTC expenses³ reflect the difference between the market proxy and the contract price of costs
18 associated with certain QF contracts.

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

¹ ASC 810, effective January 1, 2010, amended Financial Accounting Standards Board (“FASB”) Interpretation No. 46(R).

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

³ Expenses eligible for CTC recovery are defined by Assembly Bill (“AB”) 1890, Stats. 1996, Ch. 854.

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

3 **III. 2019 ERRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS**

4 As shown in Table 1 below, SDG&E’s 2019 ERRA revenue requirement forecast is
 5 ~~\$1,230.297~~~~1,127.908~~ million, including forecasted GHG costs as well as franchise fees and
 6 uncollectibles (“FF&U”). The direct testimony of SDG&E witness Ms. Montanez provides a
 7 detailed discussion of the Greenhouse Gas (“GHG”) costs.

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

No.	Component	2019 Forecast		2018 Forecast		Change from Prior Year
1.	Load ISO Charges					<u>42.854</u> (50.561)
2.	Supply ISO Revenues					(<u>34.181</u>)(39.908)
3.	Contract Costs (non-CTC)					(<u>114.302</u>)(104.078)
4.	Contract Costs (CTC up to market)					(<u>30.344</u>)(6.916)
5.	Generation Fuel					<u>31.494</u> 13.020
6.	Net Supply ISO Revenues					(<u>147.333</u>)(57.882)
7.	Equity Re-balancing Costs					(3.178)
8.	CAISO Misc. Costs					0.00 <u>42</u>
9.	Hedging Costs					(<u>15.421</u>)(0.968)
10.	Direct and Indirect GHG Costs					(<u>1.926</u>)(3.617)
11.	Subtotal		<u>1,215.534</u> 1,114.374		1,340.539	(<u>125.005</u>)(26.164)
12.	FF&U ⁴		<u>14.763</u> 13.534		16.281	(<u>1.516</u>)(2.747)

⁴ The 2019 and 2018 Forecasts reflect the franchise fee and uncollectible factor of 1.0121448.

No.	Component	2019 Forecast		2018 Forecast		Change from Prior Year	
13.	TOTAL ⁵		1,230.297 1,127.908		1,356.819		(126.521) (28.910)

While the GHG Forecast was formerly filed in a separate application, SDG&E began including the GHG Forecast within the ERRA Forecast beginning in 2016 (Application 15-04-014), in accordance with D.14-10-033. Consistent with that approach, the 2019 GHG Forecast is included in this ERRA Forecast Application.

The forecasted cost components set forth in the line items contained in Table 1 above, and the reasons for the \$~~126.521~~~~228.910~~ million decrease in the 2019 ERRA revenue requirement forecast – as compared to the 2018 ERRA revenue requirement (as submitted in the 2018 Forecast) – are addressed in Ms. Montanez’s testimony.

SDG&E’s 2019 ERRA 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 ERRA for recovery through commodity rates. SDG&E’s non-fuel costs for these facilities are recorded in the NGBA and also recovered through SDG&E’s commodity rates.

As shown in Table 2 below, SDG&E’s 2019 CTC revenue requirement forecast is \$~~17.705~~~~13.391~~ million, including FF&U.

TABLE 2 - CTC REVENUE REQUIREMENT
(\$Millions of Dollars)

No.	Component	2019 Forecast		2018 Forecast		Change from Prior Year	
1.	QF Contracts		17.493 13.230		24.015		(6.522) (10.785)

⁵ Sums may not equal due to rounding.

2.	FF&U ⁶	<u>0.212</u> 1.61	0.292	<u>(0.079)</u> (1.31)
3.	TOTAL	<u>17.705</u> 13.391	24.307	<u>(6.601)</u> (10.916)

For CTC-eligible purchase power contracts, the power purchased is recorded to the ERRA at the market proxy of \$52.47~~66.59~~/MWh. The difference between the actual contract price and the market proxy is included in the 2019 CTC forecast and recorded to the TCBA. SDG&E witness Ms. Montanez discusses the market proxy of \$52.47~~66.59~~/MWh in greater detail.

As shown in Table 3 below, SDG&E's 2019 LG revenue requirement forecast is \$179.592~~196.545~~ million, including FF&U.

**TABLE 3 - LG REVENUE REQUIREMENT
(\$Millions of Dollars)**

No.	Component	2019 Forecast	2018 Forecast ⁷	Change from Prior Year
1.	New Generation PPAs			
2.	Combined Heat & Power			
3.	Energy Storage			
4.	Peakers			
5.	Local Generation GHG			
6.	SUBTOTAL	<u>177.437</u> 194.186	158.502	<u>18.935</u> 35.685
7.	FF&U ⁸	<u>2.155</u> 2.359	1.925	<u>0.230</u> 0.433
8.	TOTAL	<u>179.592</u> 196.545	160.427	<u>19.165</u> 36.118

The LGBA was authorized in D.13-03-029. The LGBA records the LG costs and the revenues received from SDG&E's Local Generation ("LG") rate. On a monthly basis, the LGBA compares the LG costs with the revenues received. Interest is applied to any over- or

⁶*Ibid.*

⁷ Pursuant to D.17-07-005, SDG&E updated its authorized rate of return on rate base in Advice Letter 3120-E (approved October 26, 2017, effective January 1, 2018) with impacts to revenue requirements to be reflected in the January 1, 2018 Consolidated filing, which impacted the LG revenue requirement that was approved in D.17-12-014. This adjustment for SDG&E's 2018 cost of capital results in a change in the LG revenue requirement from \$160.427 million to \$160.218 million including FF&U.

⁸Sums may not equal due to rounding.

1 under-collected balance at the three-month Commercial Paper rate. The LGBA utilizes sub-
2 accounts for each generation resource. For the 2019 LG Forecast, SDG&E owned energy
3 storage is shown on a separate line item. For the 2018 LG Forecast it was included in the New
4 Generation PPAs category.

5 **IV. COST RECOVERY OF LGBA UNDERCOLLECTION**

6 In SDG&E’s 2016 ERRR Compliance Application (A.17-06-006), SDG&E presented a
7 monthly summary of accounting entries recorded to the LGBA during 2016, totaling \$0.524
8 million. In that application, SDG&E proposed to request cost recovery in this 2019 ERRR
9 Forecast Application. Accordingly, SDG&E seeks recovery of the 2016 activity, pending
10 approval of the 2016 ERRR Compliance Application.

11 **V. COMPARISON OF 2017 RECORDED VS ACTUAL YEAR-END BALANCES IN**
12 **GHG BALANCING ACCOUNTS**

13 In accordance with Finding of Fact (“FOF”) 13 of D.14-10-033, utilities must reconcile
14 forecast amounts with recorded amounts until all actuals are available for the forecast year.
15 Consistent with this methodology, SDG&E provides a comparison of the 2017 year-end
16 recorded/forecasted balances with the 2017 year-end actual balances in three GHG balancing
17 accounts in Table 4 below. More specifically, (1) GHG allowance revenues are recorded in the
18 GHG Revenue Balancing Account (“GHGRBA”); (2) expenses are recorded in the GHG
19 Customer Outreach and Education Memorandum Account (“GHGCOEMA”); and (3) expenses
20 are recorded in the GHG Administrative Costs Memorandum Account (“GHGACMA”).

TABLE 4 - COMPARISON OF 2017 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS

Line	Description	2017 Recorded¹ (\$)	2017 Actual (\$)	Difference
	(1) GHGRBA			-
1	Beginning Balance 1/1/2017	4,334,941	4,334,941	-
2	Allowance Revenue	(89,584,150)	(92,539,677)	(2,955,527)
3	Revenue returned to customers	80,574,985	82,602,929	2,027,944
4	Franchise Fees and Uncollectibles	(966,839)	(991,175)	(24,336)
5	Transfer to GHGCOEMA and GHGACMA ^{2,3}	(2,063)	(2,063)	-
5	Allowance Set Aside for Multi-Family Program ⁴	1,281,995	-	(1,281,995)
6	Interest	65,962	65,917	(45)
7	Ending Balance 12/31/2017	(4,295,169)	(6,529,128)	(2,233,959)
	(2) GHGCOEMA			
8	Beginning Balance 1/1/2017	(140,690)	(140,690)	-
9	Transfer from GHGRBA ²	667	667	-
10	Expenses	-	-	0
11	Interest	(1,462)	(1,429)	33
12	Ending Balance 12/31/2017	(141,485)	(141,452)	33
	(3) GHGACMA			
13	Beginning Balance 1/1/2017	(48,474)	(48,474)	-
14	Transfer from GHGRBA ³	1,396	1,396	-
15	Expenses	49,770	34,770	(15,000)
16	Interest	(244)	(265)	(21)
17	Ending Balance 12/31/2017	2,448	(12,573)	(15,021)

¹Per A.17-04-016 (2018 ERRA Forecast Update November 9, 2017) 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 2017 and forecasted amounts from October through December 2017.

²Transfer per D.16-12-053 (page 22) from GHGRBA to GHGCOEMA. This represents 1/1/17 projected overcollected balance of (\$140,667), plus 2017 forecasted expenses of \$140,000.

³Transfer per D.16-12-053 (page 22) from GHGRBA to GHGACMA. This represents 1/1/17 projected overcollected balance of (\$48,896), plus 2017 forecasted expenses of \$47,500.

⁴The 2017 Allowance Set Aside for Multi-Family Program of \$1,281,995 was not used/transferred from GHGRBA in 2017.

1 **VI. RECONCILIATION OF 2018 GHG ALLOWANCE REVENUE AND EXPENSES**

2 Pursuant to OP 11 of D.14-10-033, SDG&E is providing a fourth quarter update by
3 presenting its 2018 GHG Allowance Revenue and Expense Reconciliation. This process consists
4 of updating the 2018 recorded amounts to determine the December 31, 2018 true-up balances for
5 the GHGRBA, GHGCOEMA and GHGACMA.

6 In Template D-1: Annual Allowance Revenue Receipts and Customer Returns in
7 Attachment G to this Application, SDG&E presents a ~~12/31/~~December 31, 2018 recorded
8 GHGRBA balance of (~~3.373~~0.686) million. This reflects activity recorded through September
9 30, 2018 and forecasted for the last three months of 2018, including amounts of \$10.348 million of
10 revenue transferred ~~from~~to GHGACMA ~~and~~, GHGCOEMA and Solar on Multifamily Affordable
11 Housing Balancing Account (“SOMAHBA”).

12 In Template D-3: Detail of Outreach and Administrative Expenses, SDG&E presents
13 \$0.023 million for total 2018 expenses. This reflects activity recorded through September 30,
14 2018 and forecasted for the last three months of 2018 for GHGCOEMA and GHGACMA. Table 4
15 below shows a summary of all activity recorded in these accounts.

16 The December 31, 2018 GHGRBA true-up balance is (~~0.6863.373~~) million as shown on
17 Template D-1 and the combined December 31, 2018 GHGCOEMA and GHGACMA expense
18 true-up balance is (\$0.183) million as presented in Table 5, line 11. The total prior year true-up for
19 the revenue and expense reconciliation is (~~3.556~~0.869) million.

20

TABLE 5 - GHGCOEMA and GHGACMA Recorded Under/(Over) Collection and Expense True-Up

<u>Line</u>	<u>Description</u>	<u>2018 Recorded¹ (\$)</u>
<u>1</u>	<u>Beginning 1/1/2018 GHGCOEMA Balance</u>	<u>(141,452)</u>
<u>2</u>	<u>Transfer from GHGRBA²</u>	<u>1,485</u>
<u>3</u>	<u>Expenses</u>	<u>-</u>
<u>4</u>	<u>Interest</u>	<u>(2,583)</u>
<u>5</u>	<u>Ending 12/31/2018 GHGCOEMA Balance</u>	<u>(142,550)</u>
-	-	-
<u>6</u>	<u>Beginning 1/1/2018 GHGACMA Balance</u>	<u>(12,573)</u>
<u>7</u>	<u>Transfer from GHGRBA²</u>	<u>(49,948)</u>
<u>8</u>	<u>Expenses</u>	<u>23,343</u>
<u>9</u>	<u>Interest</u>	<u>(1,088)</u>
<u>10</u>	<u>Ending 12/31/2018 GHGACMA Balance</u>	<u>(40,266)</u>
-	-	-
<u>11</u>	<u>12/31/2018 Expense True-Up (Line 5 + Line 10)</u>	<u>(182,816)</u>

¹The 2018 recorded amounts reflect actual data for January to September 2018 (through the third quarter) and updated forecasted data for October to December 2018 (fourth quarter).

²Per D.17-12-014, adopting 2018 administrative and customer outreach forecast of \$187,500 (page 16) and 12/31/2017 outreach and administrative expense true-up (page 25) of (\$139,037): Transfer from GHGRBA of \$48,463

VII. GREEN TARIFF SHARED RENEWABLE BALANCING ACCOUNT (GTSRBA)

3 Per D.15-01-051, SDG&E established the GTSRBA⁹ to record the difference between the
 4 revenues collected from individual customers electing to participate in the GTSR program and the
 5 incremental costs incurred to serve customers participating in that program. The GTSR program
 6 consists of both a Green Tariff (“GT”) component and an Enhanced Community Renewables
 7 (“ECR”) component which are recorded in separate subaccounts with the GTSRBA. SDG&E’s
 8 GTSR program began in 2016 and recorded minimal activity during the year as described in

1 SDG&E’s Annual GTSR Program Progress Report filed on March 15, 2018 (A.12-01-008).
2 SDG&E’s ECR program has not yet begun. SDG&E is not requesting recovery in this instant
3 application.

~~VI.~~ **III. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE**

5 This section of my testimony requests authorization of the SONGS Unit 1 Offsite Spent
6 Fuel Storage costs revenue requirement of \$1.08455 million (\$1.09768 million including FF&U)
7 for 2019, which are described in Ms. Montanez’s testimony. The authorized revenue
8 requirement is tracked in SDG&E’s Nuclear Decommissioning Adjustment Mechanism account.

9 **IX. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)**

10 Pursuant to Alternate Proposed Decision in R.17-06-026 in Ordering Paragraph (OP) 7¹⁰,
11 SDG&E will “establish a Portfolio Allocation Balancing Account (PABA) with subaccounts for
12 each vintage portfolio to account for billed revenues, generation resource costs, net California
13 Independent System Operator market revenues associated with energy and ancillary services, and
14 revenues associated with the renewable energy (RPS) Adder and the Resource Adequacy (RA)
15 capacity in each vintage portfolio.” Above-market commodity costs subject to the Power Charge
16 Indifference Amount (“PCIA”) rate that are currently booked into ERRA will begin to be booked
17 into PABA in 2019 and will be balanced against PCIA customer revenues by vintage. At or
18 below market costs that are currently balanced in ERRA will continue to be booked into ERRA.

19 SDG&E is currently in the process of drafting its proposed PABA preliminary statement
20 and the necessary proposed modifications to the ERRA to be included in its Tier 2 advice letter.
21 SDG&E’s PABA account shall take effect January 1, 2019, subject to advice letter approval.

⁹ See SDG&E Advice Letter 2889-E, approved June 23, 2016.

¹⁰ Pursuant to R.17-06-026 (page 155).

IV.H.X. SUMMARY

2 My testimony presents the following revenue requirements for which SDG&E seeks
3 recovery in this 2019 ERRA Forecast Application:

- 4 ■ the 2019 ERRA revenue requirement forecast (which includes forecasted GHG
5 costs) of \$1,230.297 ~~1,127.908~~ million;
- 6 ■ the 2019 CTC revenue requirement forecast of \$17.705 ~~13.391~~ million; and
- 7 ■ the 2019 LG revenue requirement forecast of \$179.592 ~~196.545~~ million.

8 Each of these amounts include FF&U.

9 SDG&E also requests recovery of the December 31, 2016 LGBA activity of \$0.524
10 million.

11 In addition, my testimony also presents the comparison of the 2017 recorded/forecasted
12 vs. actual year-end balances in the GHG allowance revenues and expenses balancing accounts,
13 as well as a reconciliation of the 2018 GHG Allowance Revenue & Expenses.

14 Finally, SDG&E requests that the Commission approve the 2019 revenue requirement of
15 \$1.08455 million (\$1.09768 million including FF&U) for the forecasted SONGS Unit 1 Offsite
16 Spent Fuel Storage costs.

17 This concludes my prepared direct testimony.

18

XI. QUALIFICATIONS

2 My name is Khoang T. Ngo. I am employed by SDG&E as the Senior Energy
3 Administrator in the Settlements & Systems Department. My business address is 8315 Century
4 Park Court, San Diego, California 92123. My current responsibilities include handling the
5 payment, recovery, and regulatory reporting processes for SDG&E's procurement activities. I
6 began working in Settlements & Systems as a Senior Energy Administrator in November 2013.

7 I have been employed by SDG&E since January of 2000. In addition to my current role in
8 Settlements & Systems, I have worked in two other departments at SDG&E in positions of
9 increasing responsibility. From January 2000 to August 2006, I was employed in the Cost
10 Accounting group where I was primarily responsible for the accounting related to Electric
11 Transmission assets, prepared FERC Forms, and involved in the monthly close functions of the
12 transmission FERC accounts. From August 2006 to September 2013, I worked in the Electric
13 Transmission Planning group. My responsibilities included managing the generator
14 interconnection contracts, interconnection financial security deposits, CAISO study agreements
15 and reconciling engineering interconnection and network reliability costs.

16 I have not previously testified before this Commission.

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

**DECLARATION
OF KHOANG T. NGO**

A.18-04-__

Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2019 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

I, Khoang T. Ngo, declare as follows:

1. I am a Senior Energy Administrator for San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s November 7, 2018 Application for Approval of its 2019 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Senior Energy Administrator, 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, lines 3 and 7: Contract Costs (non-CTC) & Equity Re-balancing Costs	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 8: CAISO Misc. Costs	II.A.2	Utility Electric Price Forecasts; confidential for 3 years.
Table 1, line 9: Hedging Costs	I.A.4	Long-term Fuel (gas) Buying and Hedging Plans; confidential for 3 years.
Table 3, line 1: New Generation PPAs	II.A.2 II.B.1 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 Non-QF Bilateral Contracts; confidential for 3 years.

Confidential Information	Matrix Reference	Reason for Confidentiality
Table 3, line 2: Combined Heat & Power	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for 3 years.
Table 3, line 4: Peakers	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.

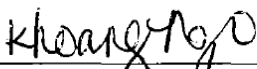
4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

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 7th day of November, 2018, at San Diego, California.



Khoang T. Ngo
Senior Energy Administrator
San Diego Gas & Electric Company

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

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

I, Hillary M. Hebert, do declare as follows:


1. I am the Manager of the Resource Planning department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Kendall Helm, Vice President of Energy Supply. I have reviewed Khoang Ngo’s Prepared Direct Testimony (“Testimony”) in support of SDG&E’s “Application ... for Approval of its 2019 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 7th day of November, 2018, at San Diego.


Hillary M. Hebert

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2019 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
Table 1, line 10: Direct and Indirect 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 5: 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.