

Application No.: A.19-04-xxx
Exhibit No.: _____
Witness: Ana Garza-Beutz

PREPARED DIRECT TESTIMONY OF
ANA GARZA-BEUTZ
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

*****Public Version*****

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

April 15, 2019



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

I. PURPOSE AND OVERVIEW

My testimony presents San Diego Gas & Electric Company's ("SDG&E's") 2018¹ costs for greenhouse gas ("GHG") compliance instruments used to satisfy its compliance obligations under the California Air Resources Board's ("ARB") cap-and-trade program pursuant to Assembly Bill ("AB") 32. My testimony also includes SDG&E's 2018 revenues related to the sale of its allowance allocation.² Appendix A of this testimony includes SDG&E's Weighted Average Cost calculation ("WAC") as required in Decision ("D.") 14-10-033, subsequently corrected in D.14-10-055 and D.15-01-024 and pending further modification if the Proposed Decision ("PD") "Order Modifying Decision 15-01-024, Attachment C" mailed on March 22, 2019³ is approved. The purpose of this testimony is to present both SDG&E's 2018 costs/revenues as well as SDG&E's WAC, in accordance with applicable decisions. The following sections describe the cap-and-trade program and detail SDG&E's unadjusted 2018 actual revenues and estimated costs. These costs and revenues are further adjusted to recorded

¹ The 2017 volumes and costs became final in September 2018 and were reported as part of SDG&E's Updated 2019 ERRRA Forecast Filing (A.18-04-004); thus the 2017 volumes and costs are not reported in my April 2019 testimony. The 2018 estimated emissions and costs reported in this testimony are subject to change due to emission verification for all of 2018. Additionally, this testimony does not include 2019 emissions, costs and revenues since only January and February estimates are available at this time. In my November 2019 update of this testimony, I will include estimated costs and revenues for January through September of 2019 and forecasts for October – December 2019, all of which are subject to changes when actualized and/or verified.

² The 2018 emissions and costs are subject to change due to emission verification which will become final in August 2019. 2018 revenues, however, are now final.

³ The PD adopts a modified version of the Petition for Modification ("PFM") filed by SDG&E, Pacific Gas and Electric Company ("PG&E") and Southern California Edison Company ("SCE") on August 1, 2018.

1 numbers for the purposes of reconciliation as further explained in the testimony of SDG&E
2 witnesses Ms. Chihwaro and Ms. Montanez.⁴

3 **II. BACKGROUND**

4 **A. AB 32 Background**

5 The Global Warming Solutions Act of 2006, also referred to as Assembly Bill (“AB”) 32,⁵
6 establishes a goal of reducing California’s GHG emissions to the 1990 level by 2020. The statute
7 grants ARB broad authority to regulate GHG emissions to reach this target. ARB’s Scoping Plan
8 includes a recommendation that California adopt a portfolio of emissions reduction measures,
9 including a California GHG cap-and-trade program.⁶

10 In October 2011, ARB released its Final Regulation Order, which was approved by its
11 Board and by the Office of Administrative Law (“OAL”) in December 2011.⁷ The ARB
12 regulations create a GHG emissions allowance cap-and-trade system, with compliance obligations
13 in the electricity sector applicable to “first deliverers of electricity”⁸ that emit more than 25,000
14 Metric Tons (“MT”) of GHG. The regulation requires that first deliverers of electricity, including
15 investor-owned utilities (“IOUs”) such as SDG&E, obtain all the compliance instruments required
16 to meet their compliance obligations by November 1 of the year following the end of a compliance
17 period. Compliance instruments consist of allowances and offsets. An allowance is a limited,
18 tradable authorization to emit up to one MT of carbon dioxide equivalent (“CO₂e”) and an offset is

⁴ SDG&E witness Mr. DeTuri provides a forecast of the 2020 GHG costs.

⁵ AB 32, Stats. 2006, Ch. 488.

⁶ ARB Resolution 11-32 (October 20, 2011) at 3-4. Available at:
<https://www.arb.ca.gov/regact/2010/capandtrade10/res11-32.pdf>.

⁷ The ARB Final Regulation Order from December 2011 is codified at 17 CCR § 95800 *et seq.* and is also available at: <http://www.arb.ca.gov/regact/2010/capandtrade10/capandtrade10.htm>.

⁸ “First deliverers of electricity” is defined in Section 95811(b) of ARB’s Final Regulation Order as electricity generators inside California and electricity importers.

1 a project that reduces GHG in sectors outside of those covered in the cap-and-trade program.⁹
2 Section 95892(b) of ARB’s Final Regulation Order establishes that IOUs are required to sell all
3 their free allowances and acquire an amount equal to their direct compliance obligations. There
4 are also annual requirements to surrender at least 30% of expected annual obligations each year by
5 November 1 of the following year.

6 **B. GHG Actual Revenue**

7 The revenues discussed in my testimony result from the sale of allowances allocated to
8 SDG&E by ARB for the benefit of its ratepayers. ARB requires that the allowances that are
9 allocated annually to the IOUs be made available for sale at the ARB auctions. Allowances given
10 to the IOUs must all be consigned by the last auction of that year. Except for the November 2012
11 auction, where ARB specified the amount that each IOU needed to auction, all other amounts
12 consigned at auctions are up to the discretion of each IOU, provided the entire annual volume is
13 consigned by the end of each year. Revenues are calculated by multiplying the volume sold by the
14 auction settlement price. The revenues presented in this testimony consist of allowances sold in
15 the 2018 February, May, August, and November auctions.

16 **C. GHG Estimated Emission Volumes**

17 The 2018 direct emissions will be the estimated/calculated GHG emissions for: (1)
18 SDG&E’s California utility-owned generation (“UOG”), (2) California generators with whom
19 SDG&E has contracts where SDG&E is responsible for GHG costs, (3) estimated emissions
20 associated with SDG&E imports of both specified electricity and unspecified electricity, and (4)
21 Renewable Portfolio Standard adjustment (“RPS Adjustment”). The RPS Adjustment is calculated
22 by multiplying the out-of-state renewable megawatt-hours (“MWh”) eligible for RPS adjustment

⁹ Refer to Section 95801 of ARB’s Final Regulation Order for definitions.

1 by the ARB assigned unspecified emission factor. The 2018 direct volumes may change because
2 they are subject to: (1) emission estimates and emission reporting verification, (2) changing
3 emission factors, and (3) contractual requirements for reviewing tolling agreement emissions for
4 potential reductions. If there are such changes, they will be reflected in future testimony.

5 The 2018 indirect emissions are estimated emissions based on net purchases from the
6 California electricity market controlled by the California Independent System Operator
7 Corporation (“CAISO”) measured in MWh and multiplied by the ARB assigned unspecified
8 emission factor. Indirect emissions are not overseen by ARB. Indirect emissions are comprised of
9 estimated GHG emissions for which SDG&E was exposed because of purchasing power from third
10 parties. The 2018 indirect emissions within this testimony are those calculated in SDG&E’s 2018
11 ERRA Forecast Application and will be updated in my Updated 2020 ERRA Forecast testimony in
12 November 2019.

13 **D. GHG Cost Categories**

14 The costs outlined in my testimony are broken down into two categories of GHG costs:
15 direct costs and indirect costs. SDG&E defines direct costs of a given compliance year as the net
16 cost of procuring compliance instruments that can be used to satisfy SDG&E’s compliance year
17 obligation. SDG&E defines indirect costs of a given compliance year as the GHG compliance
18 costs embedded in the price of electricity delivered in that year, which are passed on from sellers.

19 Section III below addresses the carbon price for 2018. Section IV.A addresses direct GHG
20 emissions associated with SDG&E’s UOG plants, procurement of electricity from tolling
21 agreements, electricity imports attributed to SDG&E, and credits from SDG&E’s eligible RPS
22 Adjustment. Section IV.B addresses the approximate 2018 indirect GHG emissions for which
23 SDG&E paid as GHG costs embedded in electricity prices charged by third parties to SDG&E

1 under contract for various supplies.¹⁰ Section IV.C summarizes the GHG costs based on the
2 carbon prices in Section III and emissions in Sections IV.A and IV.B.

3 **III. CARBON PRICE METHODOLOGY**

4 **A. Price for Direct GHG Emissions**

5 SDG&E has used and continues to use the Weighted Average Cost (“WAC”) of
6 Compliance Instruments by compliance period recorded monthly, as described in Attachment C of
7 Decision (D.) 14-10-033 (subsequently corrected by D.14-10-055 and D.15-01-024) to calculate its
8 direct emissions pricing. However, as noted above, to present a consistent interpretation and
9 showing regarding the Attachment C WAC calculation, SDG&E, SCE, and PG&E jointly
10 submitted on August 1, 2018 a PFM that, if adopted, clarifies and renders uniform the
11 interpretation and calculation of the WAC calculation. On March 22, 2019, the Commission
12 issued a PD that would implement the PFM with slight modifications. While the PFM/PD is
13 currently pending, SDG&E has decided to apply the methodology set forth in Attachment C of the
14 PFM/PD to ensure a consistent treatment of the WAC calculation with the other IOUs.

15 The WAC price shown below is based on the monthly January 2018 – December 2018
16 WAC prices and calculations found in Attachment A of this testimony. These WAC prices were
17 calculated utilizing the approach detailed in Attachment C of the PFM/PD, as described above.
18 The use of this approach represents a shift from the approach SDG&E used to calculate its WACs
19 for 2013-2016. Implementation of the PFM/PD approach necessitated a one-time adjustment or
20 true-up. The one-time true-up to adjust SDG&E’s WAC compliance instrument inventory and
21 WAC inventory balance cost from the 2013-2016 WAC approach reflects the methodology
22 clarified by Attachment C of the PFM/PD. This true-up ensured that SDG&E’s approach is

¹⁰ Indirect GHG costs are estimated based on the assumptions described herein.

1 compliant with both the current and the proposed Attachment C. This one-time adjustment was
2 implemented in the November update (in 2018) of my testimony for the 2019 ERRA Forecast and
3 it enabled SDG&E to reflect this accounting adjustment so that it can be captured in SDG&E’s
4 upcoming ERRA Compliance proceeding for Record Year 2018.

5 The WAC price is listed in the table below:

6 Jan-Dec 2018 WAC (\$/MT)	[REDACTED]
----------------------------	------------

7 **B. Price for Indirect Emissions**

8 The embedded GHG costs for indirect emissions are estimated by using the average
9 CAISO GHG Allowance Price Indices, as listed in the table below.¹¹ Indirect costs are estimated
10 since it is assumed that the GHG cost was passed on by all sources of power from market
11 purchases.

12 2018 CAISO GHG Prices	
Jan - Dec 2018	\$15.31

13 **IV. GHG COMPLIANCE COSTS**

14 **A. Direct Greenhouse Gas Emissions**

15 Under ARB’s cap-and-trade program, the “first deliverer of electricity” within California
16 must surrender one allowance or offset credit for each MT of GHG emissions. Accordingly,
17 SDG&E had direct compliance obligations for GHGs emitted from burning natural gas at its UOG
18 plants, namely, the Palomar Energy Center (“Palomar”) and Miramar Energy Facility I and II
19 (collectively, “Miramar”).¹² SDG&E’s UOG GHG emission volumes are derived from

¹¹ Annual CAISO prices are a straight average of public daily GHG prices published on CAISO’s OASIS website.

¹² ARB’s Mandatory Reporting Regulation require use of emission factors from federal regulations - 40 Code of Federal Regulation (“CFR”) Section 98. For pipeline natural gas, there are three components – CO₂, CH₄, and NO₂. Table C-1 of 40 CFR Section 98 provides an emissions rate for CO₂ of 0.05302

1 information extracted from each covered plant’s Continuous Emissions Monitoring Systems
 2 (“CEMS”) and that plant’s annual fuel usage. The data is reported to ARB (under the mandatory
 3 GHG reporting rule) and undergoes a rigorous quality assurance/quality control (“QA/QC”)
 4 process with supporting documentation from the CEMS systems. The data is then subject to third
 5 party verification by an ARB-certified verifier. The 2018 UOG emissions will become final in
 6 August 2019. The 2018 estimated UOG emissions are as follows:

Jan-Dec 2018 California UOG Plants	Emissions Estimate (in MT)
Palomar Energy Center	[REDACTED]
Miramar Energy Facilities	[REDACTED]
Total	[REDACTED]

7
 8 In addition, SDG&E has agreements with some California generators which stipulate that
 9 if SDG&E is dispatching the plant, then SDG&E will provide compliance instruments to the
 10 generator for its GHG compliance obligations. The generators covered by these agreements
 11 include, the Otay Mesa Energy Center (“OMEC”), the Orange Grove Energy Center (“Orange
 12 Grove”), Goal Line, the Escondido Energy Center (“EEC”), the Pio Pico Energy Center (“Pio
 13 Pico”) and the Carlsbad Energy Center (“Carlsbad”), which became operational in 2018. The
 14 estimated emissions for these plants can be calculated by multiplying the MMBtu burned with
 15 the emission factor of 0.05307 MT/MMBtu associated with natural gas as the input fuel. These
 16 estimates are subject to change, not only because the emissions estimates are based on fuel
 17 calculations instead of emission meter read calculations, but also because the tolling agreement

MT/MMBtu. Table C-2 of 40 CFR Section 98 gives a default emission factor for CH4 of 0.000001
 MT/MMBtu. Using a Global Warming Potential of 21, the resulting CO₂e emission rate is 0.00002
 MT/MMBtu. The default NO₂ emission rate is given as 0.0000001 MT/MMBtu, and its Global Warming
 Potential is 310, resulting in a CO₂e emission rate of 0.00003 MT/MMBtu. Combining the 3 elements
 results in an overall emission rate of 0.05307 MT/MMBtu.

1 contracts state that SDG&E will only cover the emissions generated resulting from SDG&E
 2 dispatches of efficiently run plants. The 2018 estimated SDG&E obligations to tolling
 3 agreement partners are shown below. SDG&E will be analyzing the 2018 tolling data and could
 4 potentially adjust the 2018 estimated emissions for non-SDG&E dispatches, inefficiencies or
 5 based on verification. If there are such changes, they will be reflected in future testimony.

Jan-Dec 2018 California Tolling Generators	Emissions Estimate (in MT)
Otay Mesa Energy Center	
Orange Grove Energy Center	
Goal Line	
Escondido Energy Center	
Pio Pico	
Carlsbad Energy Center	
Total	

7 An entity that delivers out-of-state electricity to a delivery point inside California is also
 8 responsible for the GHG emissions associated with generation of that electricity. For known
 9 imports, called “specified sources,” the estimated GHG emissions related to the portion of outputs
 10 of plants that are delivered to California are covered in the cap-and-trade program and as such the
 11 importer of that electricity has a compliance obligation. SDG&E has a contract with Yuma
 12 Cogeneration Associates (“YCA”) in Arizona and owns the Desert Star Energy Center (“Desert
 13 Star”) combined cycle plant in Nevada. These out-of-state generators are specified sources. The
 14 compliance obligation for the power imported from each of these sources is calculated by the
 15 product of the imported power times the transmission loss correction factor as listed in section
 16 95111 of ARB’s mandatory reporting regulation, and the specified emissions factor assigned to
 17 those facilities by ARB.¹³ As with SDG&E’s other estimated obligations, specified imports are

¹³ Specified Emission Factors are updated annually by ARB. They can be found at:
<http://www.cdsupport.com/confluence/display/calhelp/Reporting+Form+Instructions>.

1 also subject to change, and those changes will be reflected in future testimony. The 2018
 2 estimated emissions for SDG&E’s specified imports are as follows:

Jan-Dec 2018 Specified Imports	Specified Import Estimates (in MWh)	Emission Factor Estimates	Transmission Loss Factor	Emissions Estimate (in MT)
Desert Star		0.416	1.00	
YCA		0.701	1.02	
Total				

3
 4 In addition to specified sources, importing of “unspecified sources” also generates a
 5 compliance obligation. SDG&E procured both contracted imports and market imports from
 6 unspecified sources in 2018. The cap-and-trade compliance obligation for these unspecified
 7 imports is calculated by multiplying the number of MWh imported, adjusted upward by two
 8 percent to account for transmission losses between the point of generation and the California
 9 border, by the ARB default rate, as stated in its regulation (currently 0.428 MT/MWh).¹⁴ Finally,
 10 ARB recognizes that the building of new renewable generation outside California reduces GHG.
 11 As such, the cap-and-trade regulations allow for an RPS Adjustment. The RPS Adjustment
 12 reduces an entity’s GHG compliance burden and is calculated by assigning the default emission
 13 rate (currently 0.428 MT/MWh) to the GHG-free renewable energy, as measured at the point of
 14 generation. The adjustment does not account for the transmission losses from the point of
 15 generation to California,¹⁵ and the cap-and-trade regulations also allow that they be taken in
 16 following years. SDG&E successfully claimed the undelivered portion of its potential 2014 RPS

¹⁴ ARB’s Mandatory Reporting Regulation (MRR), Section 95111(b)(1). See Section 95852(c) in ARB, *Article 5: California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms*, at 116, available at https://www.arb.ca.gov/cc/capandtrade/capandtrade/ct_reg_2018_unofficialv2.pdf;

¹⁵ See Section 95852(b)(1) of ARB’s Final Regulation Order for the calculation of the RPS Adjustment. ARB, *Article 5: California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms*, at 115, Section 95852(b)(1), available at https://www.arb.ca.gov/cc/capandtrade/capandtrade/ct_reg_2018_unofficialv2.pdf.

1 Adjustment in 2015. SDG&E was planning to claim undelivered portions of the 2015-2017
 2 contractually purchased renewable energy applicable to the RPS Adjustment provision in recent
 3 GHG reports to ARB. However, the data for the 2015-2017 RPS Adjustment was unavailable,
 4 thus SDG&E necessarily claimed zero RPS Adjustment for the RPS generated in years 2015-
 5 2017.¹⁶ If, as expected, the 2015, 2016 and/or 2017 RPS Adjustment data becomes available in the
 6 future, SDG&E will incorporate that benefit in an upcoming annual ARB Electric Power Entity
 7 (“EPE”) report. SDG&E is continuing to request delivered/undelivered volumes and expects to
 8 receive the 2017 RPS Adjustment data in 2019 in time to utilize that benefit in the upcoming 2018
 9 EPE Report. The estimated 2018 RPS Adjustment claims are shown below. Both the estimated
 10 2018 unspecified imports and the RPS Adjustments claimed for 2018 are subject to change and
 11 those changes will be reflected in future testimony. The 2018 estimated emissions for SDG&E’s
 12 unspecified imports and RPS adjustment claims are as follows:

Jan-Dec 2018 Unspecified Imports & 2017 RPS Adjustment	Unspecified Import Estimates (in MWh)	Unspecified Emission Factor	Transmission Loss Factor	Emissions Estimate (in MT)
Unspecified Imports		0.428	1.02	
RPS Adjustment		0.428	1.00	
Total				

13

14 Based on the above, SDG&E’s 2018 estimated direct compliance obligations are:

¹⁶ SDG&E’s ability to utilize the non-imported portion of its Glacier and RimRock contracts for the RPS Adjustment is dependent on receipt of Glacier and Rim Rock import volumes from Morgan Stanley. SDG&E has, thus far, not received this information for the 2015-2018 generation years. SDG&E continues to have discussions with Morgan Stanley and Open Access Technology International, Inc. (“OATI”) about obtaining this data and expects to receive it in the future at which point SDG&E can apply the prior RPS Adjustment volumes to the next compliance year’s report.

Jan-Dec 2018 Direct Compliance Obligations	Emissions Estimate (in MT)
California UOG Plants	
California Tolling	
Specified Imports	
Unspecified Imports	
RPS Adjustment	
Total	

B. Indirect Greenhouse Gas Emissions

SDG&E, along with all other purchasers of wholesale electricity, is subject to indirect GHG compliance costs that generators incur and pass on to their buyers. This additional cost of GHG compliance is embedded in the market price of electricity procured in the wholesale market from third parties, thereby increasing SDG&E’s cost to purchase wholesale electricity, as well as from suppliers under contracts that include market-based prices. The cost of GHG affects both market purchases and contracts based on the price of energy (such as combined heat and power [“CHP”] facilities); because the price of energy changes in tandem with the change in the GHG allowance prices, sellers of electricity demand higher revenues to offset the costs related to their cap-and-trade obligations. The 2018 indirect GHG volumes are estimated, for both net market purchases and CHP contracts, as the MWh of electricity production multiplied by the ARB default rate for unspecified electricity of 0.428 MT/MWh. The forecasted 2018 MWh and emissions of SDG&E’s indirect purchases are as follows:

2018 Forecasted Indirect Volumes in MWh and MT	
Total INDIRECTS (MWh)	
Unspecified Emissions Factor (MT/MWh)	0.428
Total INDIRECTS (MT)	

1 **C. GHG Costs**

2 Using the prices from Section III above, I estimate the 2018 direct GHG costs to be as
3 follows:

2018 GHG Direct Cost Estimates	Emissions Estimate (in MT)	WAC / ICE Price (in \$/MT)	Estimated Direct Cost
Jan-Dec 2018 (emissions estimate)			
Total			

4
5 Combining indirect volumes and the CAISO GHG allowance price indices,¹⁷ the 2018
6 estimated GHG indirect costs are as follows:

2018 Forecasted Indirect Volumes & Cost	
Total INDIRECTS (MT)	
CAISO GHG Price (Jan-Dec '18) (\$/MT)	\$15.31
Total Indirect Cost	

7
8 Thus, the 2018 Direct and Indirect estimate/forecast blended cost is \$36.83 million
9 (rounded).

10 **V. ACTUAL AND ESTIMATED GHG REVENUES**

11 SDG&E received 6,288,321 MT of vintage 2018 allowances to sell at 2018 auctions.
12 SDG&E's annual allocated allowances are required to be consigned at that year's quarterly
13 auctions; however, SDG&E has full discretion on how to distribute its allowances across the four
14 quarterly auctions. The tables below show the volumes sold at each 2018 auction along with
15 associated revenues.

¹⁷ Per D.14-10-033, indirect costs are calculated using a proxy price equal to the average of the published CAISO prices.

2018 GHG Revenues			
Auction	Settlement Price (\$/MT)	Sold Volume (MT)	Revenue
Feb-18	\$14.61		
May-18	\$14.65		
Aug-18	\$15.05		
Nov-18	\$15.31		
Total	\$14.91	6,288,321	\$93,727,554.51

1

2 This concludes my prepared direct testimony.

3

1 **VI. QUALIFICATIONS**

2 My name is Ana Garza-Beutz. My business address is 8315 Century Park Court, San
3 Diego, CA 92123. I am employed by SDG&E as a Principal Energy Administrator in the
4 Electric & Fuel Procurement Department. My responsibilities include managing SDG&E's
5 GHG portfolio, which includes development of GHG procurement and hedging strategies.

6 I joined SDG&E in November 2003 and have held various positions with increasing
7 levels of responsibility within the Electric & Fuels Procurement Department. Prior to joining
8 SDG&E, I worked as a Risk Analyst with Sempra Energy.

9 I received a Bachelor of Science degree in Mathematics from the California Polytechnic
10 State University San Luis Obispo and a Master of Arts in Mathematics from the University of
11 California Santa Barbara.

12 I have previously testified before the Commission.

Apr-18	4/1/2018	Surrender Event			
Apr-18					
Apr-18					
Apr-18					
Apr-18					
Apr-18	4/30/2018	Monthly Recording to ERRA			
May-18	5/1/2018	Surrender Event			
May-18					
May-18					
May-18					
May-18					
May-18					
May-18	5/31/2018	Monthly Recording to ERRA			
Jun-18	6/1/2018	Surrender Event			
Jun-18					
Jun-18					
Jun-18					
Jun-18					
Jun-18	6/30/2018	Monthly Recording to ERRA			
Jul-18	7/1/2018	Surrender Event			
Jul-18					
Jul-18					
Jul-18					
Jul-18					
Jul-18					
Jul-18	7/31/2018	Monthly Recording to ERRA			
Aug-18	8/1/2018	Surrender Event			
Aug-18					
Aug-18					
Aug-18					
Aug-18					
Aug-18	8/31/2018	Monthly Recording to ERRA			

Sep-18	9/1/2018	Surrender Event			
Sep-18					
Sep-18					
Sep-18					
Sep-18					
Sep-18					
Sep-18	9/30/2018	Monthly Recording to ERRA			
Oct-18	10/1/2018	Surrender Event			
Oct-18					
Oct-18					
Oct-18					
Oct-18					
Oct-18					
Oct-18	10/31/2018	Monthly Recording to ERRA			
Nov-18	11/2/2018	Surrender Event			
Nov-18					
Nov-18					
Nov-18					
Nov-18					
Nov-18					
Nov-18	11/30/2018	Monthly Recording to ERRA			
Dec-18	12/1/2018	Surrender Event			
Dec-18					
Dec-18					
Dec-18					
Dec-18					
Dec-18					
Dec-18	12/31/2018	Monthly Recording to ERRA			

GLOSSARY

Acronym	Definition
AB	Assembly Bill
ARB	California Air Resources Board
CAISO	California Independent System Operator
CAM	Cost Allocation Mechanism
CARB	California Air Resources Board
CEMS	Continuous Emissions Monitoring System
CO ₂ e	Carbon Dioxide Equivalent
CUYAMACA	Cuyamaca Peak Energy Plant
CYCG	Czamecki-Yester Consulting Group LLC
DESERT STAR	Desert Star Energy Center
EEC	Escondido Energy Center
EECC	Electric Energy Commodity Cost
ENVOY	ENVOY is dashboard-styled web interface for managing natural gas supplies
EPE	Electric Power Entity; The EPE Report contains all import/RPS Adjustment Data submitted to ARB
ERRA	Energy Resource Recovery Account
GHG	Greenhouse Gas
IOU	Investor Owned Utility
MIRAMAR	Miramar Energy Facility I & Miramar Energy Facility II
MIRAMAR I	Miramar Energy Facility I
MIRAMAR II	Miramar Energy Facility II
MT	Metric Ton
MWh	Megawatt hour
OAL	Office of Administrative Law
OMAR	Operational Meter Analysis and Reporting (CAISO Online Metering System)
OMEC	Otay Mesa Energy Center
ORANGE GROVE	Orange Grove Energy Center
PALOMAR	Palomar Energy Center
PPA	Power Purchase Agreement
QA/QC	Quality Assurance/Quality Control
QFs	Qualifying Facilities
RPS	Renewable Portfolio Standard
SDG&E	San Diego Gas & Electric Company
UOG	Utility Owned Generation
WAC	Weighted Average Cost
YCA	Yuma Cogeneration Associates

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

**DECLARATION OF RYAN A. MILLER
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-24, *et al.***

I, Ryan A. Miller, do declare as follows:

1. I am the Manager- Energy Supply & Dispatch in the Electric and Fuel Procurement department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Kendall K. Helm, Vice President of Energy Supply. I have reviewed Ana Garza-Beutz’s and Monica Chihwaro’s Prepared Direct Testimonies (“Ana Garza-Beutz Testimony and Monica Chihwaro Testimony”) in support of SDG&E’s April 15, 2019 “Application ... for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts and GHG Related-Forecasts” (“Application”). I am personally familiar with the facts 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.”) D.16-08-024, D.17-05-035 and D.17-09-023 to demonstrate that the confidential information (“Protected Information”) provided in Ms. Garza-Beutz’s Testimony and Ms. Chihwaro’s Testimony is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachment A, 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, 2019, at San Diego.

A handwritten signature in black ink, appearing to read "Ryan A. Miller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ryan A. Miller
Manager – Energy Supply & Dispatch

ATTACHMENT A

SDG&E Request for Confidentiality on the following information contained in Ana Garza-Beutz’s and Monica Chihwaro’s Testimonies in support of SDG&E’s Application

Location of Protected Information	Legal Citations	Narrative Justification
<p><i>1. SDG&E WAC prices and WAC calculations</i></p> <p><i>(The 2018 WAC price appears in Ana Garza-Beutz’s Testimony; the 2013-2018 WAC calculations are utilized in tab “D-2” of Attachment G and the 2018 Monthly WAC prices and calculations appear in Attachment A of Ana Garza-Beutz’s Testimony)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024</p> <p>The Matrix makes the following confidential: “Weighted Average Cost (WAC) of compliance instruments, and the calculation of WAC”</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p><i>2. Historical/Recorded UOG Emissions</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023,</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p>

<p><i>(The 2018 Historical UOG Emissions appear in Ana Garza-Beutz's Testimony and the 2013-2018 Recorded UOG Emissions in Attachment G of this Application.)</i></p>	<p>Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded UOG emissions as confidential</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>3.</p> <p><i>Historical/Recorded California Tolling Agreement Emissions</i></p> <p><i>(The 2018 Historical Tolling Agreement Emissions appear in Ana Garza-Beutz's Testimony and the 2013-2018 Recorded California Tolling Agreement Emissions appear in Attachment G</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Tolling Agreements emissions as confidential</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>

<p><i>of this Application.)</i></p>	<p>Code §3426 et seq.</p>	
<p>4. Historical/Recorded Specified Imported MWh and calculated Emissions</p> <p><i>(The 2018 Historical Specified Imported MWh and calculated Emissions appear in Ana Garza-Beutz’s Testimony and the 2013-2018 Recorded Specified Imported Emissions appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Energy Imports (Specified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>5. Historical/Recorded Unspecified Imported MWh and calculated Emissions</p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p>

<p><i>(The 2018 Historical Unspecified Imported MWh and calculated Emissions appear in Ana Garza-Beutz’s Testimony and the 2013-2018 Recorded Unspecified Imported Emissions appear in Attachment G of this Application.)</i></p>	<p>Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>6. Historical RPS Adjustment eligible MWh and calculated Emissions</p> <p><i>(The Historical RPS Adjustment eligible MWh and calculated Emissions for 2018 appear in Ana Garza-Beutz’s Testimony and the 2013-2018 Recorded RPS Adjustment Emissions appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions, which includes any applicable RPS Adjustments as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>

<p>7. Total Direct Compliance Obligation</p> <p><i>(The 2018 Total Direct Compliance Obligation appears in Ana Garza-Beutz's Testimony, the 2013-2018 Recorded Total Direct Compliance Obligation appear in Attachment G of this Application, the 2018 recorded ERRA Direct GHG Costs in Monica Chihwaro's Testimony and the 2013-2018 Accrual and Recorded Direct GHG Costs.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order ("GO") 66-D</p> <p>17 CCR § 95914(c) (the "ARB Confidentiality Regulations")</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Direct GHG Emissions Subtotal as confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>8. Indirect Purchases in MWh and calculated Emissions</p> <p><i>(The 2018 forecasted Indirect Purchases in MWh and calculated Emissions appear in Ana Garza-Beutz's Testimony and the 2013-2018 Recorded calculated Indirect</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order ("GO") 66-D</p> <p>17 CCR § 95914(c) (the "ARB Confidentiality Regulations")</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."</p>

<p><i>Emissions appear in Attachment G of this Application.)</i></p>	<p>Indirect GHG Emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus, the MWh are also confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>9. Direct GHG Costs</p> <p><i>(The 2018 Direct GHG Costs appear in Ana Garza-Beutz's Testimony and the 2013-2018 Recorded Direct GHG Costs appear in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order ("GO") 66-D</p> <p>17 CCR § 95914(c) (the "ARB Confidentiality Regulations")</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Direct GHG Costs as confidential.</p> <p>Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it."</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>10. Estimated Indirect GHG Costs</p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order ("GO") 66-D</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related</p>

<p><i>(The 2018 estimated Indirect GHG Costs appear in Ana Garza-Beutz’s Testimony and the 2013-2018 Recorded estimated Indirect GHG Costs appear in Attachment G of this Application.)</i></p>	<p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024</p> <p>Template D-2 designates forecasted and recorded Indirect GHG Costs as confidential.</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>
<p>11. GHG Quarterly Auction Revenue</p> <p><i>(The 2018 GHG Quarterly Auction Revenue appear in Ana Garza-Beutz’s Testimony.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>1a. of Attachment A of D.14-10-033 and revised in D.15-01-024</p> <p>1a. makes the following confidential: “AB 32 GHG auction participation.” Although Annual Auction Revenues are public, Quarterly Auction Revenues must be confidential since public auction settlement prices and Quarterly Auction Revenues would reveal SDG&E’s quarterly auction participation as a consigner</p> <p>Gov’t Code §§6254(k),</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>

	6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	
<p>12. Emissions Intensities</p> <p><i>(The 2018-2020 forecasted Emissions Intensities appears in Attachment G of this Application.)</i></p>	<p>D.08-04-023</p> <p>D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)</p> <p>General Order (“GO”) 66-D</p> <p>17 CCR § 95914(c) (the “ARB Confidentiality Regulations”)</p> <p>The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024</p> <p>The Matrix makes the following confidential: “Forecast of GHG Emissions Intensity”</p> <p>Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.</p>	<p>The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.</p> <p>Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.</p> <p>In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential.</p> <p>Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.”</p> <p>Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.</p>