

Application No.: A.21-04-010
Exhibit No.: _____
Witness: Coreen G. Salcido

AMENDED PREPARED DIRECT TESTIMONY OF
COREEN G. SALCIDO
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

*****REDACTED – PUBLIC VERSION*****

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



May 10, 2021

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1 **AMENDED PREPARED DIRECT TESTIMONY OF**
2 **COREEN G. SALCIDO**
3 **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

4 **I. INTRODUCTION**

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

- 9 • Describes SDG&E's ERRA, Transition Cost Balancing Account ("TCBA"),
10 Local Generating Balancing Account ("LGBA"), Tree Mortality Non-
11 Bypassable Charge Balancing Account ("TMNBCBA"), Solar on
12 Multifamily Affordable Housing ("SOMAH") Program funding,
13 Disadvantaged Communities Single Family Solar Homes program ("DAC-
14 SASH"), Portfolio Allocation Balancing Account ("PABA"), and Power
15 Charge Indifference Adjustment ("PCIA") Undercollection Balancing
16 Account ("CAPBA"); and,
17 • Sets forth SDG&E's forecasted 2022 ERRA, CTC, LG, TMNBC, PABA and
18 CAPBA revenue requirements, and describes SDG&E's request for
19 authorization from the Commission to return the overcollected 2018 LGBA
20 recorded activity of \$(91.08) million as requested in A.19-05-007 and the
21 overcollected 2019 LGBA recorded activity of \$(0.888) million as requested
22 in A.20-06-001.¹

23 In addition, my amended testimony presents the comparison between the recorded 2020
24 year-end balances with the actual 2020 year-end balances in the GHG allowance revenues and

¹ A.20-06-001 is pending Commission approval.

1 expenses balancing accounts. My amended testimony also requests authorization of the revenue
2 requirement of the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel
3 Storage costs as described in Section XII below.

4 Finally, I am submitting this amended testimony to correct the PABA balancing account for
5 vintage year 2020, which was overstated in my previous testimony. The total, unamortized, amount
6 of the previously approved ERRA and PCIA Undercollection Balancing Account (“CAPBA”)
7 triggers² was incorrectly included in the 2021 year-end forecasted PABA balance, which was used
8 to develop the 2022 rates, as shown in the testimony of SDG&E witness Stacy Fuhrer. However,
9 the ERRA and CAPBA trigger amounts for forecast year 2022 and 2023 (where applicable) need to
10 be excluded since they will be recovered in rates in 2022 or 2023 and tracked in the 2022 and 2023
11 year-end forecasted PABA balance, and thus, should not have been included in the 2021 PABA
12 year-end forecasted balance. The 2021 PABA year-end forecasted balance correctly includes the
13 2021 amortization of approved ERRA and CAPBA triggers in rates as SDG&E’s PABA year-end
14 forecast also includes offsetting customer revenues meant to net out that transfer/expense.
15 Attachment C of this amended testimony reflects this correction.

16 **II. BACKGROUND**

17 Pursuant to California Public Utilities Commission (“Commission”) Decisions
18 (“D.”) 02-10-062 and D.02-12-074, the purpose of the ERRA balancing account is to provide full
19 recovery of SDG&E’s energy procurement costs associated with serving SDG&E’s bundled service
20 customers. Energy procurement costs include expenses associated with the California Independent
21 System Operator (“CAISO”) such as energy and ancillary services load charges, CAISO revenues
22 from utility generation and supply contracts, contract costs, generation fuel costs, CAISO-related
23 costs, and hedging costs. The ERRA records revenues from SDG&E’s Electric Energy Commodity

² Pursuant to D.21-02-014 and D.20-12-028 respectively.

1 Cost (“EECC”) rate schedule, adjusted to exclude commodity revenues assigned to the Non-Fuel
 2 Generation Balancing Account (“NGBA”),³ and other Commission approved adjustments.

3 The purpose of the TCBA is to accrue all CTC revenues and recover all CTC-eligible
 4 generation-related costs. Pursuant to D.02-12-074 and D.02-11-022, payments to Qualifying
 5 Facilities (“QFs”) that are above the market benchmark proxy are charged to the TCBA. Eligible
 6 CTC expenses⁴ reflect the difference between the market proxy and the contract price of costs
 7 associated with certain QF contracts.

8 The purpose of the LGBA is to record the revenues and costs of generation and other energy
 9 sources where the Commission has determined that the resource is subject to the Cost Allocation
 10 Mechanism (“CAM”). Such generation may take the form of purchase power agreements,
 11 company-owned generation units associated with new generation resources, and any other resources
 12 approved by the Commission for CAM treatment.

13 **III. 2022 ERRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS**

14 As shown in Table 1 below, SDG&E’s 2022 ERRA revenue requirement forecast is
 15 \$495.901 million, including forecasted GHG costs as well as franchise fees and uncollectibles
 16 (“FF&U”). The direct testimony of SDG&E witness Mr. Stefan Covic provides a detailed
 17 discussion of the Greenhouse Gas (“GHG”) costs.

18 **TABLE 1**
 19 **ERRA REVENUE REQUIREMENT**
 20 **(\$Millions of Dollars)**

No.	Component	2022 Forecast		2021 Forecast		Change from Prior Year	
1.	Load ISO Charges		██████		██████		██████
2.	Supply ISO Revenues	-		-		-	
3.	Contract Costs (non-CTC)	██████		██████		██████	

³ In compliance with D.03-12-063, the NGBA became effective January 1, 2004.

⁴ Expenses eligible for CTC recovery are defined by Assembly Bill (“AB”) 1890.

4.	Contract Costs (CTC up to market)					
5.	Generation Fuel	-		-		-
6.	Net Supply ISO Revenues					
7.	CAISO Misc. Costs					-
8.	Hedging Costs					
9.	GHG Costs					
10.	Subtotal		489.956		655.482	(165.526)
11.	FF&U ⁵		5.945		7.953	(2.008)
12.	TOTAL⁶		495.901		663.435	(167.534)

The forecasted cost components set forth in the line items contained in Table 1 above, and the reasons for the \$(167.534) million decrease in the 2022 ERRA revenue requirement forecast – as compared to the 2021 ERRA revenue requirement (as submitted in the 2021 Forecast) – are addressed in Mr. Covic’s testimony.

As shown in Table 2 below, SDG&E’s 2022 CTC revenue requirement forecast is \$11.696 million, including FF&U.

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

No.	Component	2022 Forecast	2021 Forecast	Change from Prior Year
1.	QF Contracts	11.556	11.265	0.291
2.	FF&U ⁷	0.140	0.137	0.004
3.	TOTAL	11.696	11.401	0.295

For CTC-eligible purchase power contracts, the power purchased is recorded to the ERRA at the market proxy of ████████ MWh. The difference between the actual contract price and the

⁵ The 2021 Forecasts reflect the franchise fee and uncollectible factor of 1.0121448. The 2022 Forecasts reflect the franchise fee and uncollectible factor of 1.012133

⁶ Sums may not equal due to rounding.

⁷ *Id.*

1 market proxy is included in the 2022 CTC forecast and recorded to the TCBA. SDG&E witness
 2 Mr. Covic discusses the market proxy in greater detail in his testimony.

3 As shown in Table 3 below, SDG&E’s 2022 Local Generation (“LG”) revenue requirement
 4 forecast is \$143.125 million, including FF&U.

5 **TABLE 3**
 6 **LG REVENUE REQUIREMENT**
 7 **(\$Millions of Dollars)**

No.	Component	2022 Forecast	2021 Forecast	Change from Prior Year
1.	Combined Heat & Power			
2.	Energy Storage			
3.	Peakers & Resource Adequacy			
4.	Local Generation GHG	-	-	-
5.	SUBTOTAL	141.409	138.817	2.592
6.	FF&U ⁸	1.716	1.686	0.030
7.	TOTAL⁹	143.125	140.503	2.622

8 The LGBA was authorized in D.13-03-029. The LGBA records the LG costs and the
 9 revenues received from SDG&E’s LG rate. On a monthly basis, the LGBA compares the LG costs
 10 with the revenues received. Interest is applied to any over- or under-collected balance at the three-
 11 month Commercial Paper rate. The LGBA utilizes sub-accounts for each generation resource.
 12

13 **IV. RETURN OF THE OVERCOLLECTED 2018 AND 2019 LGBA RECORDED**
 14 **ACTIVITY**

15 D.21-01-017 approved SDG&E’s request not to seek the return of the over-collected 2018
 16 LGBA recorded activity of \$(91.084) million in its 2021 ERRA Forecast application and to seek the
 17 return of those funds as part of its 2022 Energy Resource Recovery Account forecast application.¹⁰

18 In SDG&E’s 2019 ERRA Compliance Application, which is pending approval in A.20-06-
 19 001, SDG&E presented a monthly summary of accounting entries recorded to the LGBA during

8 *Id.*

9 Sums may not equal due to rounding.

10 D.21-01-017 at OP 5.

2019, totaling \$(0.888) million. In that application, SDG&E proposed to return the overcollected 2019 recorded activity of \$(0.888) million in this 2022 ERRA Forecast Application.

Therefore, SDG&E is seeking authorization to return the over-collected 2018 and 2019 LGBA recorded activity of \$(91.084) million and \$(0.888) million, respectively, in this Application, pending the approval of A.20-06-001.

V. COMPARISON OF 2020 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS

In accordance with Finding of Fact (“FOF”) 13 of D.14-10-033, utilities must reconcile forecast amounts with recorded amounts until all actuals are available for the forecast year. Consistent with this methodology, SDG&E provides a comparison of the 2020 year-end recorded/forecasted balances with the 2020 year-end actual balances in three GHG balancing accounts in Table 4 below. More specifically, (1) GHG allowance revenues are recorded in the GHG Revenue Balancing Account (“GHGRBA”); (2) expenses are recorded in the GHG Customer Outreach and Education Memorandum Account (“GHGCOEMA”); and (3) expenses are recorded in the GHG Administrative Costs Memorandum Account (“GHGACMA”).

**TABLE 4
COMPARISON OF 2020 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS**

Line	Description	2020 Recorded ¹ (\$)	2020 Actual (\$)	Difference
	(1) GHGRBA			
1	Beginning Balance 1/1/2020	325,486	325,486	-
2	Allowance Revenue	(106,782,171)	(104,691,923)	2,090,248
3	Revenue returned to customers	89,277,438	91,416,125	2,138,687
4	Franchise Fees and Uncollectibles	(1,070,218)	(1,095,856)	(25,638)
5	Transfer to GHGCOEMA and GHGACMA ^{2,3}	29,021	29,021	-
6	Allowance Set Aside for Multi-Family Program ⁴	18,222,844	18,222,844	-
7	Allowance Set Aside for DAC-SASH ⁵	1,030,000	1,030,000	-
8	Allowance Set Aside for DAC-GT ⁶	866,297	866,297	-
9	Allowance Set Aside for CSGT ⁷	1,242,248	1,242,248	-
10	Interest	31,992	32,549	557
11	Ending Balance 12/31/2020	3,172,937	7,376,791	4,203,854
	(2) GHGCOEMA			
12	Beginning Balance 1/1/2020	18,505	18,505	-
13	Transfer from GHGRBA ²	350	350	-
14	Expenses	(18,811)	31,996	50,808

15	Interest	133	139	6
16	Ending Balance 12/31/2020	177	50,991	50,813
	(3) GHGACMA			
17	Beginning Balance 1/1/2020	(45,171)	(45,171)	-
18	Transfer from GHGRBA ³	(29,371)	(29,371)	-
19	Expenses	60,865	10,057	(50,808)
20	Interest	(367)	(372)	(5)
21	Ending Balance 12/31/2020	(14,044)	(64,856)	(50,812)

¹Per A.20-04-014 (2021 ERRR Forecast Update November 7, 2020) 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 2020 and forecasted amounts from October through December 2020.

²Transfer per D.20-01-005 from GHGRBA to GHGCOEMA. This represents the 1/1/20 projected overcollected balance of (\$350).

³Transfer per D.20-01-005 from GHGRBA to GHGACMA. This represents the 1/1/20 projected overcollected balance of (\$29,629), plus 2020 forecasted expenses of \$59,000.

⁴Transfer per D.20-01-005 from GHGRBA to SOMAH. This represents Jan-Jun 2020 program funding of \$5,618,639 plus 2016-2019 undercollection of \$12,604,205.

⁵Transfer per D.20-01-005 from GHGRBA to DAC-SASH. This represents the program funding for 2020.

⁶Transfer per D.20-01-005 from GHGRBA to DAC-GT. This represents the program funding for 2020.

⁷Transfer per D.20-01-005 from GHGRBA to CSGT. This represents the program funding for 2020.

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

Per D.15-01-051, SDG&E established the GTSRBA¹¹ to record the difference between the revenues collected from individual customers electing to participate in the GTSR program and the incremental costs incurred to serve customers participating in that program. The GTSR program consists of both a Green Tariff (“GT”) component and an Enhanced Community Renewables (“ECR”) component which are recorded in separate subaccounts with the GTSRBA. SDG&E’s GTSR program began in 2016 and recorded activity through 2020 as described in SDG&E’s Annual GTSR Program Progress Report filed on March 15, 2021 (A.12-01-008). SDG&E is requesting recovery of the undercollected GTSRBA 2019 recorded activity \$2.0193 million, pending the approval of A.20-06-001, in this instant application.¹² In addition, SDG&E is requesting recovery of the undercollected GTSRBA 2018 ending balance of \$0.125 million pursuant to D.21-01-017.¹³

¹¹ See SDG&E Advice Letter (“AL”) 2889-E, approved June 23, 2016 and effective May 28, 2016.

¹² A.20-06-001 is pending Commission approval.

¹³ D.21-01-017 at OP 4.

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

3 Per D.18-12-003, SDG&E filed AL 3343-E¹⁴ established the TMNBCBA to record the tree
4 mortality related procurement costs. As noted in D.18-12-003, Ordering Paragraph (“OP”) 9, the
5 TMNBCBA cost will be recovered through the public purpose programs (“PPP”) charge.

6 SDG&E’s 2022 TMNBC revenue requirement forecast is \$ [REDACTED] million (\$ [REDACTED]
7 including FF&U), which is described in Mr. Covic’s testimony.

8 **VIII. SOLAR ON MULTIFAMILY AFFORDABLE HOUSING (“SOMAH”) PROGRAM**

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

15 In Template D-1: Annual Allowance Revenue Receipts and Customer Returns in
16 Attachment G to this Application, SDG&E presents the SOMAH Program prior year true-up
17 funding for October through December 2020 request of \$(0.209) (\$0.212 million including
18 FF&U).¹⁵ The true-up is also presented in the amended testimony of SDG&E witness Ms. Fuhrer.

19 **IX. DAC-SASHBA**

20 The purpose of the DAC-SASHBA is to balance allocated greenhouse gas (“GHG”)
21 allowance revenues and program costs. The DAC-SASH Balancing Account was established in

¹⁴ Two supplemental ALs were filed for AL 3343. AL 3343-B was submitted on May 31, 2019 and approved on July 19, 2019 with a July 2, 2019 effective date. AL 3343-E was approved on July 19, 2019 with an effective date of July 2, 2019.

¹⁵ AL 3704-E filed March 1, 2021. The January through September 2021 SOMAH true-up will be included in the November Update.

1 2019 in Commission Decision 18-06-027 and Advice Letter 3410-E. D.18-06-027 OP 8 states that
2 the DACSASH program will be funded with GHG allowance proceeds if available and recovered
3 through the PPP mechanism if GHG allowance proceeds are unavailable.

4 In the 2022 ERRRA direct testimony of SDG&E Witness Mr. Covic, he states the total DAC-
5 SASH program funding is estimated to be \$1.030 million. The forecasted 2022 GHG allowance
6 revenues available for clean energy and energy efficiency programs as set forth in the direct
7 testimony of Mr. Covic will be sufficient to cover the entire \$1.030 million after setting aside
8 funding for the Solar on Multifamily Affordable Housing (“SOMAH”) Program.

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

10 Pursuant to Commission Decision 18-10-019 and Advice Letter 3318-E,¹⁶ the purpose of the
11 PABA is to record the “above-market” costs and revenues associated with all generation resources
12 that are eligible for cost recovery through the PCIA rates, including SDG&E’s Utility-Owned
13 Generation (“UOG”). Costs recorded in each vintage subaccount will include, but are not limited
14 to, fuel, GHG costs, third party power purchase contracts costs, and UOG’s revenue requirement.
15 The above-market costs of all generation resources that are eligible for cost recovery through the
16 PCIA rates, including SDG&E’s UOG, are also recorded in the PABA.

17 SDG&E’s 2022 PABA revenue requirement forecast includes the fuel costs for its electric
18 generation facilities, including Miramar Energy Facility I (“Miramar I”), Miramar Energy Facility
19 II (“Miramar II”), Palomar Energy Center (“Palomar”), Desert Star Energy Center (“Desert Star”),
20 and the Cuyamaca Peak Energy Plant (“Cuyamaca”). The actual fuel costs of Miramar I, Miramar
21 II, Palomar, Desert Star, and Cuyamaca are recorded in the PABA for recovery through commodity
22 rates.

¹⁶ See SDG&E AL 3318-E, filed on December 10, 2018, and approved on May 30, 2019.

TABLE 5
PABA REVENUE REQUIREMENT
(\$Millions of Dollars)

No.	Component	2022 Forecast ¹⁷	2021 Forecast ¹⁸	Change from Prior Year
1.	Supply ISO Revenues			
2.	Contract Costs (non-CTC)			
3.	Generation Fuel			
4.	GHG Costs			
5.	Subtotal	337.612	328.484	9.128
6.	FF&U	4.096	3.985	0.111
7.	TOTAL	341.708	332.469	9.239

As Table 5 indicates, SDG&E’s 2022 PABA revenue requirement forecast is \$341.708 million, including FF&U. In addition, D.19-10-001 authorized the recovery of the PABA prior year-end balance to be recovered through the ERRA Forecast filing. SDG&E requests authorization to return the projected 2021 year-end overcollected balances, excluding previously authorized trigger amounts recorded to PABA of \$(157.677) million (\$(159.590) including FF&U), as shown in Attachment C. The proposed 2021 PABA year-end balance is projected based on two months of actuals (January and February of 2021) and ten months of forecasted expenses and revenues. The forecasted year-end balance will be updated in SDG&E’s November Update filing and will include actual recorded entries from January through September.

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

Pursuant to Commission Decision 18-10-019 and Advice Letter 3436-E,¹⁹ the purpose of the CAPBA is to record the obligation that accrues for departing load (“DL”) customers in the event that the half-cent per kWh PCIA rate cap is reached. The CAPBA is comprised of a subaccount for

¹⁷ Table 5 does not include the 2021 Year End Forecasted PABA balance of \$(159.590) million, including FF&U and excluding remaining trigger amounts, as shown in attachment C.

¹⁸ The Updated November 2021 Forecast, included the 2020 forecasted year-end PABA under collected balance of \$123.812 million, including FF&U (not shown in Table 5 above).

¹⁹ See SDG&E AL 3436-E, filed on September 30, 2019, and approved on October 30, 2019.

1 each customer vintage, as well as a specific bundled subaccount, which capture the shortfall amount
2 that is financed by bundled customers for DL customers when the DL PCIA rate is capped, and the
3 repayment amount from DL customers to bundled customers. In addition, pursuant to OP 10,
4 SDG&E has established the trigger mechanism for CAPBA. In her amended testimony, SDG&E
5 witness Ms. Fuhrer discusses the CAPBA in greater detail.

6 **XII. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE**

7 This section of my amended testimony requests authorization of the SONGS Unit 1 Offsite
8 Spent Fuel Storage costs revenue requirement of \$1.09 million (\$1.11 million including FF&U) for
9 2022, which are described in Mr. Covic's testimony. The authorized revenue requirement is tracked
10 in SDG&E's Nuclear Decommissioning Adjustment Mechanism account.

11 **XIII. SUMMARY**

12 My amended testimony presents the following revenue requirements for which SDG&E
13 seeks recovery in this 2022 ERRA Forecast Application:

- 14 • the 2022 ERRA revenue requirement forecast of \$495.90 million (which
15 includes forecasted GHG costs);
- 16 • the 2022 CTC revenue requirement forecast of \$11.696 million;
- 17 • the 2022 LG revenue requirement forecast of \$143.125 million;
- 18 • the 2022 TMNBC revenue requirement forecast of \$ [REDACTED] million;
- 19 • the 2022 PABA revenue requirement forecast of \$341.708 million; and
- 20 • the 2021 year-end forecasted overcollected balance, excluding previously
21 authorized trigger amounts recorded to PABA of \$(159.590) million.

22 Each of these amounts include FF&U.

23 SDG&E is requesting authorization from the Commission to return the overcollected 2018
24 and 2019 recorded LGBA activity of \$(91.084) million and \$(0.888) million, respectively. SDG&E

1 is also requesting recovery of the undercollected 2018 GTSRBA ending balance of \$0.125 million
2 and the undercollected 2019 recorded activity of \$2.0193 million.

3 In addition, my amended testimony also presents the comparison of the 2020
4 recorded/forecasted vs. actual year-end balances in the GHG allowance revenues and expenses
5 balancing accounts.

6 Finally, SDG&E requests that the Commission approve the 2022 revenue requirement of
7 \$1.09 million (\$1.10 million including FF&U) for the forecasted SONGS Unit 1 Offsite Spent Fuel
8 Storage costs.

9 This concludes my amended prepared direct testimony.

1 **XIV. QUALIFICATIONS**

2 My name is Coreen G. Salcido. I am employed by SDG&E as the Validation & Analysis
3 Manager in the Settlements & Systems Department. My business address is 8315 Century Park
4 Court, San Diego, California 92123. My current responsibilities include approving the gas and
5 electric commodity invoices and overseeing the reporting processes. I began working in
6 Settlements & Systems as the Validation & Analysis Manager in April 2019.

7 I joined SDG&E in April 2019, prior to that I have held various positions with the Sempra
8 Energy Subsidiaries; Sempra Renewables, Sempra Energy and Sempra Global including Asset
9 Manager, Senior Compensation Advisor and Compensation Analyst.

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

ATTACHMENT A

DECLARATION OF COREEN G. SALCIDO

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

**DECLARATION
OF COREEN G. SALCIDO**

A.21-04-010

Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

I, Coreen G. Salcido, declare as follows:

1. I am the Validation and Analysis Manager for San Diego Gas & Electric Company (“SDG&E”). I included my Amended Prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 10, 2021 Amended Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Validation and Analysis Manager, I am thoroughly familiar with the facts and representations in this Declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

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

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and
- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

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

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

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

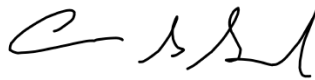
4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

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

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

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

Executed this 10th day of May, 2021, at San Diego, California.



Coreen G. Salcido
Validation & Analysis Manager
San Diego Gas & Electric Company

ATTACHMENT B

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

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

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

I, James Magill, do declare as follows:

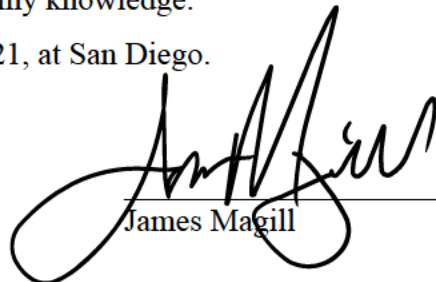
1. I am the Manager of the Settlements & Systems department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Miguel Romero, Vice President of Energy Supply. I have reviewed Coreen G. Salcido’s Amended Prepared Direct Testimony (“Testimony”) in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

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

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

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

Executed this 10th day of May, 2021, at San Diego.



James Magill

ATTACHMENT A

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

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

ATTACHMENT C

FORECASTED 2021 YEAR END BALANCE OF PABA

SAN DIEGO GAS & ELECTRIC
AMENDED ATTACHMENT C
FORECASTED 2021 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	
<u>Recorded Balances from January to February 2021 (a)</u>																					
1	Beginning Balances	(1,935)	(20,690)	254	12,720	(25,696)	(841)	(3,368)	33,897	49,291	(3,816)	(2,332)	(221)	383	0	1,771	23,340	(3,825)	(15,190)	0	43,742
2	Portfolio Costs	0	15,409	2,677	4,804	293	3,866	4,893	11,643	22,842	4,617	(165)	153	0	0	3,767	0	4,832	0	79,632	
3	Brown Power Market Value	0	490	0	0	0	0	2,194	904	0	0	0	0	0	0	0	0	0	0	3,588	
4	Imputed REC Market Value	0	(201)	(810)	(381)	0	(1,420)	(1,696)	(2,135)	(4,491)	(1,750)	(111)	(68)	0	0	0	0	0	0	(13,064)	
5	Imputed RA Market Value	0	(461)	(198)	(48)	0	0	(853)	(560)	(700)	(239)	(13)	(19)	0	0	(2,846)	0	(4,923)	0	(10,861)	
6	PCIA B Iled Customer Revenue	982	(21,044)	(4,441)	(5,521)	(2,582)	(5,252)	(9,202)	(16,160)	(40,974)	(12,586)	(544)	(355)	(1,212)	0	401	0	873	(2,570)	(120,187)	
7	CAPBA Amortiza ion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	203	203	
8	Interest	0	(4)	(1)	(1)	(1)	(1)	(1)	6	7	(2)	(1)	(0)	(0)	0	5	(1)	(4)	0	2	
9	Transfers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	115,238	0	115,238	
10	Recorded Balances from January to February 2021	(952)	(26,502)	(2,518)	11,573	(27,986)	(3,648)	(8,034)	27,584	25,975	(13,775)	(3,165)	(510)	(829)	0	2,173	24,265	(2,953)	(17,652)	0	98,293
11																					
12	<u>Forecast from March to December 2021 (b)</u>																				
13	Portfolio Costs																				
14	PCIA B Iled Customer Revenue																				
15	Brown Power Market Value																				
16	Imputed REC Market Value																				
17	Imputed RA Market Value																				
18	REC MPB true up																				
19	RA MPB true up																				
20	CAPBA Amortiza ion																				
21	Interest																				
22	Forecast Balances from October to December 2021																				
23																					
24	<u>Year-End 2021 Forecast (c = a - b)</u>																				
25	Portfolio Costs	0	189,337	36,364	39,759	45,708	25,948	51,033	105,791	299,991	93,123	4,840	2,728	0	0	25,943	28,229	4,832	0	953,626	
26	PCIA B Iled Customer Revenue	4,848	(103,904)	(21,927)	(27,259)	(12,751)	(25,933)	(57,455)	(120,130)	(273,312)	(57,816)	(3,845)	972	(8,292)	0	2,846	0	6,238	71,904	(100,688)	(726,505)
27	Brown Power Market Value	0	(66,399)	(14,778)	(11,514)	(30,005)	(1,753)	(2,062)	(27,373)	(89,826)	(34,539)	(3,324)	(1,073)	0	0	0	0	0	0	(282,646)	
28	Imputed REC Market Value	0	(1,257)	(3,925)	(2,808)	0	(6,355)	(7,464)	(7,878)	(23,226)	(9,031)	(812)	(294)	0	0	0	0	0	0	(63,050)	
29	Imputed RA Value	0	(37,361)	(1,836)	(1,155)	(14,207)	(2,460)	(6,337)	(5,729)	(14,843)	(3,188)	(326)	(156)	0	0	(18,672)	(27,615)	(4,923)	0	(138,808)	
30	CAPBA Amortiza ion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,238	2,238	
31	Interest	0	(2)	(1)	(1)	(0)	(1)	0	8	13	(1)	(0)	(0)	0	0	5	(1)	(6)	2	17	
32	Transfers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	115,238	0	115,238	
33	Year-End Balance Forecast	2,914	(40,276)	(5,849)	9,743	(36,951)	(11,395)	(25,653)	(21,414)	(51,913)	(15,268)	(5,799)	1,957	(7,909)	0	4,618	30,616	3,026	174,093	(100,686)	(96,149)
34	ERRA Trigger Adjust ment for Trigger Amount Remaining in Year-End Balance																				
35	CAPBA Trigger Adjustment for Trigger Amount Remaining in Year-End Balance																				
36	Total Year-End Balance Forecast with no adders	2,914	(40,276)	(5,849)	9,743	(36,951)	(11,395)	(25,653)	(21,414)	(51,913)	(15,268)	(5,799)	1,957	(7,909)	-	4,618	30,616	3,026	112,565	(100,686)	(157,677)
37	FF&U @ 0.012133	35	(469)	(71)	118	(448)	(138)	(311)	(260)	(630)	(185)	(70)	24	(96)	-	56	371	37	1,366	(1,222)	(1,913)
38	Total Year-End Balance Forecast with FF&U and no adders	2,949	(40,765)	(5,920)	9,861	(37,400)	(11,533)	(25,965)	(21,674)	(52,543)	(15,454)	(5,870)	1,981	(8,005)	0	4,674	30,987	3,063	113,931	(101,907)	(159,590)