

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2019 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 18-04-004
(Filed April 13, 2018)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
TO OFFER PREPARED TESTIMONY AND APPENDICES INTO EVIDENCE**

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November 7, 2018

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**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
TO OFFER PREPARED TESTIMONY AND APPENDICES INTO EVIDENCE**

Pursuant to Rule 13.8(c) of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) respectfully submits this motion to offer prepared testimony and appendices into evidence in this proceeding.

On April 13, 2018, SDG&E submitted its Application for Approval of its 2019 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Accompanying the Application were the prepared direct testimony of six SDG&E witnesses: Ms. Jennifer Montanez, Ms. Khoang Ngo, Ms. Ana Garza-Beutz, Ms. Monica V. Chihwaro, Ms. Jenell McKay, and Mr. Roland Mollen. On November 7, 2018, SDG&E submitted its November Update to the Application (“November Update”). Accompanying the November Update were updated versions of the direct testimony of SDG&E’s witnesses. Since the filing of the Application in April, SDG&E has substituted two witnesses – Mr. Kellen Gill has adopted Ms. McKay’s direct testimony and has prepared the update to that testimony, and Ms. Eunice Tanjuaquio has adopted Mr. Mollen’s direct testimony and has prepared the update to that testimony.

Certain information in the testimony submitted in April and November was confidential, and contemporaneously with both the Application and the November Update, SDG&E filed a

Motion for Leave to File Confidential Materials Under Seal, Confidential Materials Attached and Filed Under Seal. In addition, each witness who sponsored confidential material included a confidentiality declaration with their testimony and appropriately marked the confidential material.¹ Separate public versions (with confidential materials redacted) were also prepared. To ensure confidential treatment of this testimony, SDG&E is filing a motion to seal a portion of the evidentiary record under Rule 11.5(b) (“Motion to Seal”) concurrently with this motion.

SDG&E hereby moves the Commission to receive the following prepared testimony, inclusive of any attachments and appendices, and related declarations (attached hereto) into evidence in this proceeding:

Public/Redacted Version

1. Exhibit SDG&E-1 – Direct Testimony of Jennifer Montanez;
2. Exhibit SDG&E-2 – Direct Testimony of Khoang Ngo;
3. Exhibit SDG&E-3 – Direct Testimony of Ana Garza-Beutz;
4. Exhibit SDG&E-4 – Direct Testimony of Monica V. Chihwaro;
5. Exhibit SDG&E-5 – Direct Testimony of Jenell McKay;
6. Exhibit SDG&E-6 – Direct Testimony of Roland Mollen; and
7. Exhibit SDG&E-7 – SDG&E 2018 ERRR/GHG Updated Prepared Direct Testimony (Montanez, Ngo, Garza-Beutz, Chihwaro, Gill, and Tanjuaquio)

Confidential Version

8. Exhibit SDG&E-1C – Direct Testimony of Jennifer Montanez - Confidential;
9. Exhibit SDG&E-2C – Direct Testimony of Khoang Ngo - Confidential;

¹ Those witnesses were Ms. Vazquez Chihwaro, Ms. Garza-Beutz, Ms. Montanez, and Ms. Ngo. In addition, Appendix G (the GHG Revenue and Reconciliation Application Form) to the Application and the November Update contained confidential information, which was also covered by confidentiality declarations.

10. Exhibit SDG&E-3C – Direct Testimony of Ana Garza-Beutz - Confidential;
11. Exhibit SDG&E-4C – Direct Testimony of Monica V. Chihwaro- Confidential;
and
12. Exhibit SDG&E-5C – SDG&E 2018 ERRRA/GHG November Updated Prepared
Testimony – Confidential (Montanez, Ngo, Garza-Beutz, and Chihwaro)

Respectfully submitted,

By: /s/ Christopher M. Lyons
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DECLARATIONS

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**DECLARATION OF JENNIFER MONTANEZ IN SUPPORT OF PREPARED
TESTIMONY**

I, Jennifer Montanez, do hereby declare and affirm that I sponsor Exhibits 1 and 1-C, entitled “Prepared Direct Testimony of Jennifer Montanez,” and portions of Exhibits 7 and 5-C, entitled “Updated Prepared Direct Testimony of Jennifer Montanez.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Jennifer Montanez whose witness qualifications are set forth in Exhibits 1 and 1-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 7th day of November, 2018 at San Diego,
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/s/ Jennifer Montanez

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DECLARATION OF KHOANG NGO IN SUPPORT OF PREPARED TESTIMONY

I, Khoang Ngo, do hereby declare and affirm that I sponsor Exhibits 2 and 2-C, entitled “Prepared Direct Testimony of Khoang Ngo,” and portions of Exhibits 7 and 5-C, entitled “Updated Prepared Direct Testimony of Khoang Ngo.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Khoang Ngo whose witness qualifications are set forth in Exhibits 2 and 2-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 7th day of November, 2018 at San Diego,
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/s/ Khoang Ngo

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**DECLARATION OF ANA GARZA-BEUTZ IN SUPPORT OF PREPARED
TESTIMONY**

I, Ana Garza-Beutz, do hereby declare and affirm that I sponsor Exhibits 3 and 3-C, entitled “Prepared Direct Testimony of Ana Garza-Beutz,” and portions of Exhibits 7 and 5-C, entitled “Updated Prepared Direct Testimony of Ana Garza-Beutz.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Ana Garza-Beutz whose witness qualifications are set forth in Exhibits 3 and 3-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 7th day of November, 2018 at San Diego,
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/s/ Ana Garza-Beutz

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**DECLARATION OF MONICA V. CHIHWARO IN SUPPORT OF PREPARED
TESTIMONY**

I, Monica V. Chihwaro, do hereby declare and affirm that I sponsor Exhibits 4 and 4-C, entitled “Prepared Direct Testimony of Monica V. Chihwaro,” and portions of Exhibits 7 and 5-C, entitled “Updated Prepared Direct Testimony of Monica V. Chihwaro.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Monica V. Chihwaro whose witness qualifications are set forth in Exhibits 4 and 4-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 7th day of November, 2018 at San Diego,
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/s/ Monica V. Chihwaro

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DECLARATION OF KELLEN GILL IN SUPPORT OF PREPARED TESTIMONY

I, Kellen Gill, do hereby declare and affirm that I sponsor Exhibit 5, entitled “Prepared Direct Testimony of Jenell McKay,” and portions of Exhibit 7, entitled “Updated Prepared Direct Testimony of Kellen Gill.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Kellen Gill whose witness qualifications are set forth in my updated direct testimony in this proceeding. My qualifications to offer this testimony are set forth in that exhibit.

Sworn to under penalty of perjury this 7th day of November, 2018 at San Diego,
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/s/ Kellen C. Gill

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**DECLARATION OF EUNICE TANJUAQUIO IN SUPPORT OF PREPARED
TESTIMONY**

I, Eunice Tanjuaquio, do hereby declare and affirm that I sponsor Exhibit 6, entitled “Prepared Direct Testimony of Roland Mollen,” and portions of Exhibit 7, entitled “Updated Prepared Direct Testimony of Eunice Tanjuaquio.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Eunice Tanjuaquio whose witness qualifications are set forth in my updated direct testimony in this proceeding. My qualifications to offer this testimony are set forth in that exhibit.

Sworn to under penalty of perjury this 7th day of November, 2018 at San Diego,
California.

/s/ Eunice Tanjuaquio