

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

Application of San Diego Gas & Electric
Company (U 902 E) for Authority to
Implement the Long-Term Maritime Rate for
the San Diego Unified Port District's Cruise
Ship Terminal Account

Application No. 20-_____
(Filed December 18, 2020)

**PREPARED DIRECT TESTIMONY OF
WILLIAM G. SAXE
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

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

December 18, 2020



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1 **PREPARED DIRECT TESTIMONY OF**

2 **WILLIAM G. SAXE**

3 **I. OVERVIEW AND PURPOSE**

4 The purpose of my prepared direct testimony is to present San Diego Gas & Electric
5 Company’s (SDG&E) proposed electric rate design to serve the San Diego Unified Port
6 District’s (District) Cruise Ship Terminal Account (Port). As directed by the California Public
7 Utilities Commission (Commission) in Decision (D.) 19-12-022, SDG&E is directed to develop
8 a long-term Maritime Rate for the Port (Maritime Rate).¹ This testimony proposes the
9 introduction of Port-specific base transmission revenue requirement (BTRR) and reliability
10 services (RS) rates based on the cost to serve the Port, as shown in Attachment A, that will result
11 in lower total rates for the Port, as shown in Attachment B. Based on historical billing
12 determinants of the Port, these lower BTRR and RS rates will result in significant bill savings for
13 the Port, as shown in Attachment C, and thus, offer a long-term cost-based rate solution for the
14 Port, as directed by the Commission in D.19-12-022 and to help achieve the legislative goal of
15 Assembly Bill (AB) 628.²

16 My testimony is organized as follows:

- 17 • **Section II – Background:** describes the adoption of the five-year discounted rate
18 plan for the Port in D.19-12-022 and the requirement of SDG&E to develop and
19 propose a long-term Maritime Rate for the Port;

¹ D.19-12-022: Decision Authorizing Five-Year Rate Plan and a Specialized Energy Efficiency Pilot Program for the San Diego Unified Port District, Ordering Paragraph (OP) 8 at 50-51.

² AB 628 (Ch. 741) is codified at Section 25990 of the California Public Resources Code (Cal. Pub. Res. Code) (recognizing the need for California harbor and port districts to reduce energy costs and air pollution emissions in their operations and to increase business development within their boundaries).

- 1 • **Section III – Port-Specific BTRR and RS Rates:** describes and presents BTRR
2 and RS rates designed specifically for the Port that will provide the Port with
3 long-term bill savings as the Commission directed SDG&E to provide;
- 4 • **Section IV – Process to Adopt Port-Specific BTRR and RS Rates:** describes
5 the process SDG&E plans to follow to propose and implement Port-specific
6 BTRR and RS rates;
- 7 • **Section V – Summary and Conclusion:** provides a summary of
8 recommendations; and
- 9 • **Section VI – Statement of Qualifications:** presents my qualifications.

10 My testimony also contains the following attachments:

- 11 • **Attachment A:** Comparison of Present and Proposed Illustrative BTRR and RS
12 Rates for the Port;
- 13 • **Attachment B:** Comparison of Present and Proposed Illustrative Total Rates for
14 the Port;
- 15 • **Attachment C:** Illustrative Bill Impacts for the Port;
- 16 • **Attachment D:** Contribution to Margin (CTM) Calculations for the Port; and
- 17 • **Attachment E:** Changes to Schedule A6-TOU Special Condition 17, Schedule
18 AL-TOU Special Condition 21, and Schedule AL-TOU2 Special Condition 18.

19 **II. BACKGROUND**

20 Until July 1, 2018, the Port qualified for SDG&E's small commercial customer class
21 rates because the applicability for small commercial rate schedules only required that
22 commercial customer's maximum demand be less than 20 kilowatts (kW) for at least one month
23 in a given year, a qualification that the Port met. On July 1, 2018, pursuant to D.17-08-030, the

1 applicability section for small commercial rates was changed so that commercial customers with
2 maximum demand that exceed 200 kW in two out of twelve consecutive months no longer
3 qualify for small commercial rates and instead must take service on SDG&E's medium/large
4 commercial & industrial (M/L C&I) customer class rates.³ This change meant that the Port
5 would be required to move from small commercial rates to M/L C&I rates, which was expected
6 to result in substantial electric bill increases for the Port because M/L C&I rates include demand
7 charges. For this reason, SDG&E filed Advice Letter (AL) 2896-E⁴ requesting Commission
8 approval to allow the Port to remain on small commercial rates until SDG&E was able to
9 propose a long-term rate for the Port that the Commission would adopt. Resolution E-4812 was
10 approved that: (a) allowed the Port to remain on small commercial rates on an interim basis as
11 requested by SDG&E in AL 2896-E (Resolution E-4812, OP 1); and (b) required SDG&E to file
12 an application proposing a long-term rate solution for the Port by October 1, 2017 that would
13 comply with AB 628's goal of providing greater stability and certainty in the cost of energy
14 services provided the Port (Resolution E-4812 at 4 and OP 2).

15 SDG&E filed Application (A.) 17-09-005 on September 13, 2017 proposing five-years of
16 discounted electric rates for the Port to help the Port avoid rate shock when they were moved to
17 M/L C&I rates. The decision issued in that proceeding rejected SDG&E's proposed discounted
18 electric rates for the Port but adopted a five-year rate plan that provided reduced rate discounts to
19 the Port that consisted of a non-coincident demand charge discount that gradually declined over

³ D.17-08-030 at 35 and OP 2 at 87-88 and OP 11 at 89, implemented effective July 1, 2018 per Advice Letter (AL) 3226-E.

⁴ AL 2896-E was filed on May 13, 2016 and approved August 15, 2017 effective August 10, 2017 per OP 1 of Resolution E-4812.

1 the five-year term of the rate plan to help the Port transition to M/L C&I rates.⁵ In addition, that
2 decision required SDG&E to coordinate with the parties in that proceeding to develop a long-
3 term Maritime Rate for the Port to be included either in SDG&E's current 2019 General Rate
4 Case (GRC) Phase 2 (A.19-03-002) or to be filed in a separate rate design application. SDG&E
5 was directed to consult with the other parties in that proceeding to determine whether it would
6 file the Maritime Rate proposal in its 2019 GRC Phase 2 or in a separate application and to
7 notify the Commission of the parties' decision.⁶ SDG&E filed a Notice of Determination on
8 January 31, 2020, indicating that all parties in the proceeding, including SDG&E, agreed that the
9 Maritime Rate for the Port should be filed in a separate application instead of being addressed in
10 SDG&E's ongoing 2019 GRC Phase 2 proceeding. For this reason, SDG&E is proposing the
11 Maritime Rate for the Port in this Application.

12 **III. PORT-SPECIFIC BTRR AND RS RATES**

13 A significant portion of the San Diego Unified Port District's Cruise Ship Terminal
14 Account's (Port's) electric bill is comprised of BTRR rates. For this reason, SDG&E examined
15 the BTRR costs to serve the Port to determine whether there was any cost basis for lowering the
16 Port's BTRR rates. BTRR costs are allocated to customer classes based on their demand
17 coincident with SDG&E's system-peak demand during the 12 months of a given year (12-CP).
18 The 12-CP revenue allocation methodology used to allocate SDG&E's BTRR costs is a five-year
19 average of the 12-CP with SDG&E's current 2020 BTRR rates based on a five-year average of
20 12-CP using 2013-2017 demand data. The 12-CP allocation methodology is used to allocate
21 both BTRR and RS rates, which are both Federal Energy Regulatory Commission (FERC) rates.

⁵ D.19-12-022, OP 1 at 48-49.

⁶ *Id.*, OP 8 at 50-51.

1 In reviewing the 12-CP for the Port it was discovered that the Port has very little demand at the
2 time of SDG&E's system peak demand. Therefore, the Port would see a significant decrease in
3 their electric bill if the BTRR and RS rates billed the Port are based on the 12-CP of the Port and
4 not based on the 12-CP of the customer class the Port is part of (M/L C&I customer class).⁷

5 SDG&E proposes that the Maritime Rate billed the Port consist of the Commission
6 adopted SDG&E rate schedule that the Port takes electric service on, currently Schedule
7 A6-TOU, with an adjustment to reflect Port-specific BTRR and RS rates. This Maritime Rate
8 reflects a long-term rate solution for the Port because the Port-specific BTRR and RS rates, rates
9 that will be updated annually along with all other BTRR and RS rates, will provide the Port with
10 significant bill savings if the Port continues to limit its demand that is coincident with SDG&E's
11 system-peak demand. In accordance with D.19-12-022 direction, the proposed Maritime Rate
12 uses the Commission's Rate Design Principles (RDPs)⁸ as guidance. The Commission's Rate
13 Design Principles are as follows:

- 14 1. Low income and medical baseline customers should have access to enough
15 electricity to ensure basic needs (such as health and comfort) are met at an
16 affordable cost;
- 17 2. Rates should be based on marginal cost;
- 18 3. Rates should be based on cost causation principles;
- 19 4. Rates should encourage conservation and energy efficiency;

⁷ As proposed, if the Port's 12-CP is used to calculate Port-specific BTRR and RS rates and not used in the calculation of BTRR and RS rates for the M/L C&I class, the M/L C&I class is projected to see a total rate increase of around 0.05%.

⁸ Adopted in several Commission decisions and specifically listed in D.19-12-022 at 13-14.

- 1 5. Rates should encourage reduction of both coincident and non-coincident peak
- 2 demand;
- 3 6. Rates should be stable and understandable and provide stability, simplicity and
- 4 customer choice;
- 5 7. Rates should generally avoid cross subsidies, unless the cross subsidies
- 6 appropriately support explicit state policy goals;
- 7 8. Incentives should be explicit and transparent;
- 8 9. Rates should encourage economically efficient decision making; and
- 9 10. Transitions to the new rate structures should emphasize customer education and
- 10 outreach that enhances customer understanding and acceptance of new rates, and
- 11 minimizes and appropriately considers the bill impacts associated with such
- 12 transitions.

13 In view of these RDPs used as a guide in setting rates for the Port, the Maritime Rate:

- 14 • is based on marginal costs (RDP #2) and cost-causation principles (RDP #3);
- 15 • will encourage the Port to reduce both coincident and non-coincident peak
- 16 demand (RDP #5); and
- 17 • does not result in discounted rates that create cross subsidies (RDP #7).

18 Attachment A provides a comparison of the current 2020 BTRR and RS rates for the M/L
19 C&I class versus the proposed 2020 BTRR and RS rates designed specifically for the Port based
20 on their 12-CP data. Attachment B provides a comparison of the current October 1, 2020
21 Commission adopted Schedule A6-TOU primary substation rates versus the Schedule A6-TOU
22 primary substation rates modified to reflect the proposed Port-specific BTRR and RS rates

1 presented in Attachment A. Attachment C presents the illustrative bill impacts based on the
2 Port's 2019 billing determinants and the rates presented in Attachment B.

3 In D.19-12-022 the Commission stated that "CTM remains a useful concept for
4 evaluating the fairness of various discount proposals."⁹ Because the proposed Port-specific
5 BTRR and RS rates reflect cost-based rates, the Maritime Rate being proposed for the Port does
6 not reflect a rate discount. For this reason, a CTM calculation for the Maritime Rate should not
7 be required. However, SDG&E understands that in A.17-09-005 parties strongly asserted that
8 the CTM should be calculated for any special rate being offered to the Port. Additionally, in
9 consultation prior to filing this Application, the California Public Advocates Office (Cal
10 Advocates) indicated that they felt the CTM calculation was necessary for the evaluation of a
11 long-term Maritime Rate. Therefore, even though a CTM calculation should not be required for
12 the proposed Maritime Rate based on the fact that no rate discount is being proposed for the Port,
13 SDG&E calculated the CTM for the Port based on the Maritime Rate proposal to demonstrate
14 the positive CTM provided under the proposed Maritime Rate, as shown in Attachment D.

15 **IV. PROCESS TO ADOPT PORT-SPECIFIC BTRR AND RS RATES**

16 SDG&E is proposing Port-specific BTRR and RS rates. The path SDG&E plans to
17 follow to propose and implement these Port-specific BTRR and RS rates is as follows:

- 18 • First, as presented in this Application and accompanying testimony, pursuant to
19 D.19-12-022, SDG&E is proposing a long-term Maritime Rate that consists of the
20 Commission adopted rate schedule rates that the Port takes electric service on,
21 currently Schedule A6-TOU, modified to reflect Port-specific BTRR and RS

⁹ D.19-12-022 at 21.

1 rates. The proposed Port-specific BTRR and RS rates are based on the Port's
2 determinants, including the Port's 12-CP data.

- 3 • Second, once a final decision is issued in this proceeding, and assuming the
4 decision adopts the change in the BTRR and RS rates for the Port, SDG&E will
5 file testimony with FERC to propose that BTRR and RS rates for the Port be
6 designed based on Port-specific costs rather than M/L C&I customer class costs,
7 as they currently are, on a going forward basis, beginning on January 1, 2022.
- 8 • Third, once a decision on this proposal is issued by FERC and assuming FERC
9 approves SDG&E's proposal to design Port-specific BTRR and RS rates, SDG&E
10 will file a Tier 1 advice letter¹⁰ to update the Port's BTRR and RS rates to be
11 Port-specific rates. In this advice letter SDG&E will propose changes to Schedule
12 A6-TOU Special Condition 17, Schedule AL-TOU Special Condition 21, and
13 Schedule AL-TOU2 Special Condition 18,¹¹ as shown in Attachment E, to present
14 a table identifying the Port-specific BTRR and RS rates instead of the current
15 table identifying the non-coincident demand discounts for the Port under the five-
16 year rate plan adopted in D.19-12-022.

17 **V. SUMMARY AND CONCLUSION**

18 SDG&E recommends that the Commission adopt the long-term Maritime Rate proposed
19 for the Port that consists of the Commission adopted SDG&E rate schedule rates that the Port
20 takes electric service on, currently Schedule A6-TOU, modified to reflect Port-specific BTRR

¹⁰ Depending on the timing of the FERC decision, the advice letter filed might be SDG&E's 2022 Consolidated Filing with an effective date of January 1, 2022.

¹¹ Although the Port currently takes electric service on Schedule A6-TOU, Schedules AL-TOU and AL-TOU2 are electric rate options available to the Port, which is why this Special Condition was also added in Schedules AL-TOU and AL-TOU2.

1 and RS rates. As stated above in Section III, this proposed Maritime Rate reflects a long-term
2 rate solution for the Port because this rate (a) will provide significant bill savings to the Port and
3 (b) uses the Commission's RDPs as guidance in designing the Port-specific BTRR and RS rates
4 that will be updated annually along with all other BTRR and RS rates. SDG&E requests that a
5 decision in this proceeding be issued by the Commission no later than July 2021 to provide
6 enough time for the Port-specific BTRR and RS rates to be filed with and adopted by FERC in
7 order for these rates to be implemented on January 1, 2022.

8 This concludes my prepared direct testimony.

1 **VI. STATEMENT OF QUALIFICATIONS**

2 My name is William G. Saxe. My business address is 8330 Century Park Court, San
3 Diego, California 92123. I am employed as the Rates & Cost Studies Project Manager in the
4 Customer Pricing Department of SDG&E. I have worked for SDG&E since February 2001.
5 Prior to joining SDG&E, I was employed by Sempra Energy, the parent company of SDG&E,
6 from April 1999 through January 2001. In addition, I was employed by the Illinois Commerce
7 Commission (ICC) from September 1990 through April 1999.

8 I received a Bachelor of Science degree in Economics from the University of Wisconsin-
9 Madison in 1985. I received a Master of Business Administration degree, with a concentration
10 in Finance, from the University of Wisconsin-Madison in 1990.

11 I have previously testified before the California Public Utilities Commission on rate
12 design, marginal cost and other issues. In addition, I have previously submitted testimony before
13 the FERC and the ICC.

ATTACHMENT A

**COMPARISON OF PRESENT AND PROPOSED ILLUSTRATIVE
BTRR AND RS RATES FOR THE PORT**

ATTACHMENT A

**SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E)
MARITIME RATE APPLICATION (A.) 20-12-XXX**

COMPARISON OF BASE TRANSMISSION REVENUE REQUIREMENT (BTRR) AND RELIABILITY SERVICES (RS) RATES

Line No.	Rate Component (A)	Schedule A6-TOU Primary Substation Rates (\$/kWh) (B)	Port Rates (\$/kWh) (C)	Rate Difference (\$/kWh) (D)
1	BTRR Rates			
2	Non-Coincident Demand Charge (\$/kW)	\$13.63	\$0.37	-\$13.26
3	Maximum Demand at Time of System Peak - Summer (\$/kW)	\$3.45	\$0.42	-\$3.03
4	Maximum Demand at Time of System Peak - Winter (\$/kW)	\$0.65	\$0.42	-\$0.23
5				
6	RS Rates			
7	Non-Coincident Demand Charge (\$/kW)	\$0.00	\$0.00	\$0.00
8	Energy Charge (\$/kWh)	\$0.00004	\$0.00003	-\$0.00001

Note: Schedule A6-TOU Primary Substation Rates are the current BTRR and RS rates effective October 1, 2020 per SDG&E Advice Letter 3619-E. Maritime Rates reflect San Diego Unified Port District Cruise Ship Terminal Account (Port) BTRR and RS rates calculated based on the Port's specific demand and energy determinants.

ATTACHMENT B

**COMPARISON OF PRESENT AND PROPOSED ILLUSTRATIVE
TOTAL RATES FOR THE PORT**

ATTACHMENT B

**SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E)
MARITIME RATE APPLICATION (A.) 20-12-XXX**

COMPARISON OF TOTAL PRESENT AND TOTAL PROPOSED RATES FOR THE SAN DIEGO UNIFIED PORT DISTRICT ACCOUNT (PORT)

Line No.	Description (A)	Units (B)	Total Present Rates for Schedule A6-TOU Primary Substation (C)		Total Proposed Rates for Maritime Rates (D)		Total Rate Difference (E = D minus C)
1	Fixed Charges						
2	Basic Service Fee	\$/Month	\$18,172.18	\$18,172.18	\$18,172.18	\$0.00	\$0.00
3	Distance Adjustment Fee	\$/Foot/Month	\$3.13	\$3.13	\$3.13	\$0.00	\$0.00
4							
5	Demand Charges						
6	Non-Coincident Demand	\$/kW	\$14.72	\$14.72	\$14.46	(\$13.26)	(\$13.26)
7	Maximum Demand at Time of System Peak: Summer	\$/kW	\$13.18	\$13.18	\$10.15	(\$3.03)	(\$3.03)
8	Maximum Demand at Time of System Peak: Winter	\$/kW	\$0.65	\$0.65	\$0.42	(\$0.23)	(\$0.23)
9							
10	Energy Charges						
11	ON-Peak Energy: Summer	\$/kWh	\$0.12837	\$0.12837	\$0.12836	(\$0.00001)	(\$0.00001)
12	Off-Peak Energy: Summer	\$/kWh	\$0.10900	\$0.10900	\$0.10899	(\$0.00001)	(\$0.00001)
13	Super Off-Peak Energy: Summer	\$/kWh	\$0.08400	\$0.08400	\$0.08399	(\$0.00001)	(\$0.00001)
14	On-Peak Energy: Winter	\$/kWh	\$0.10848	\$0.10848	\$0.10847	(\$0.00001)	(\$0.00001)
15	Off-Peak Energy: Winter	\$/kWh	\$0.09737	\$0.09737	\$0.09736	(\$0.00001)	(\$0.00001)
16	Super Off-Peak Energy: Winter	\$/kWh	\$0.08507	\$0.08507	\$0.08506	(\$0.00001)	(\$0.00001)

Notes:

- (1) Total Present Rates for Schedule A6-TOU Primary Substation are the current total rates effective October 1, 2020 per SDG&E Advice Letter 3619-E.
- (2) Total Proposed Rates for Maritime Rates are the current Schedule A6-TOU Primary Substation rates adjusted to reflect the BTRR and RS rates proposed specifically for the Port.

ATTACHMENT C

ILLUSTRATIVE BILL IMPACTS FOR THE PORT

ATTACHMENT C

SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E)
MARITIME RATE APPLICATION (A.) 20-12-XXX

ANNUAL BILL IMPACT FROM IMPLEMENTING MARITIME RATE FOR PORT
BASED ON PORT 2019 BILLING DETERMINANTS MULTIPLIED BY SCHEDULE A6-TOU PRIMARY SUBSTATION OR MARITIME RATES

Line No.	Description (A)	Units (B)	Annual Bill Impact Based on Schedule A6-TOU Primary Substation (C)	Annual Bill Impact Based on Maritime Rates (D)	Total Rate Difference (E = D minus C)
1	Fixed Charges				
2	Basic Service Fee	\$	\$218,066	\$218,066	\$0
3	Distance Adjustment Fee	\$	\$127,704	\$127,704	\$0
4					
5	Demand Charges				
6	Non-Coincident Demand	\$	\$1,225,646	\$121,565	-\$1,104,081
7	Maximum Demand at Time of System Peak	\$	\$5,845	\$3,777	-\$2,068
8					
9	Total Energy Charges	\$	\$297,739	\$297,708	-\$31
10					
11	Total Charges	\$	\$1,875,000	\$768,820	-\$1,106,180
12					
13	San Diego Franchise Fee Differential (SFFD)	%	5.78%	5.78%	\$0
14					
15	Annual Bill with SFDD but without other taxes and fees	\$	\$1,983,375	\$813,258	-\$1,170,117
16					
17	Annual 2019 Energy Usage	kWh	\$3,105,504	\$3,105,504	\$0
18					
19	Resulting Class Average Rate	\$/kWh	\$0.63866	\$0.26188	-\$0.37679

Note: Resulting Class Average Rate (\$/kWh) on Line No. 19 equals Line No. 15 divided by Line No. 17.

ATTACHMENT D

CONTRIBUTION TO MARGIN (CTM) CALCULATIONS FOR THE PORT

ATTACHMENT D

**SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E)
MARITIME RATE APPLICATION (A.) 20-12-XXX**

**CONTRIBUTION TO MARGIN (CTM) CALCULATIONS FOR MARITIME RATE
BASED ON 2-YEAR AVERAGE (2018-2019) OF DETERMINANTS FOR THE SAN DIEGO UNIFIED PORT DISTRICT ACCOUNT (PORT)**

Line No.	Description (A)	Port Average Billed Rate¹ (\$/kWh) (B)	CTM Price Floor² (\$/kWh) (C)	CTM % (%) (D = B minus C /C)
1	Scenario 1: 2016 GRC Phase 2 Marginal Costs and Current Rates	\$0.27795	\$0.22277	24.77%
2				
3	Scenario 2: 2019 GRC Phase 2 Marginal Costs and Current Rates	\$0.27795	\$0.22362	24.30%

Notes:

- (1) The Price Floor includes marginal distribution and commodity costs (MCs), Port specific base transmission revenue requirement (BTRR) and reliability services (RS) rates proposed in this application, and applicable non-bypassable charges (NBCs), as described in note (3) below, based on SDG&E's current electric rates effective October 1, 2020 per SDG&E Advice Letter 3619-E.
- (2) Contribution to Margin (CTM) calculates the percentage of price floor compared to the Maritime Rate proposal, which consists of Schedule A6-TOU primary substation rates adjusted for Port specific BTRR and RS rates as proposed.
- (3) NBCs consist of all electric rates except distribution, commodity, transmission, and RS and thus, consist of public purpose program (PPP), nuclear decommissioning (ND), ongoing competition transition charges (CTC), local generation charge (LGC), greenhouse gas (GHG), Department of Water Resources Bond Charges (DWR-BC), and Department of Water Resources Credit (DWR Credit) rate components. In addition, NBCs include the following: (a) Transmission Revenue Balancing Account Adjustment (TRBAA) and Transmission Access Charge Balancing Account Adjustment (TACBAA) credits; (b) miscellaneous costs that currently get recovered in distribution rates which consist of Vehicle Grid Integration (VGI), Distribution Generation Renewables (DGR) distribution under-collection, and Demand Response costs; and (c) miscellaneous costs that currently get recovered in commodity rates which consist of Critical Peak Pricing (CPP) and DGR commodity over-collection costs.

ATTACHMENT E

**CHANGES TO SCHEDULE A6-TOU SPECIAL CONDITION 17,
SCHEDULE AL-TOU SPECIAL CONDITION 21, AND
SCHEDULE AL-TOU2 SPECIAL CONDITION 18**

ATTACHMENT E

**SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E)
MARITIME RATE APPLICATION (A.) 20-12-XXX**

**MODIFICATION TO SPECIAL CONDITION 17 IN SCHEDULE A6-TOU,
SPECIAL CONDITION 21 IN SCHEDULE AL-TOU, AND SPECIAL
CONDITION 18 IN SCHEDULE AL-TOU2**

**SPECIAL CONDITIONS 17 OF SCHEDULE A6-TOU, SPECIAL CONDITION 21 OF
SCHEDULE AL-TOU, AND SPECIAL CONDITION 18 OF SCHEDULE AL-TOU2:**

San Diego Unified Port District's Cruise Ship Terminal Base Transmission Revenue
Requirement (BTRR) and Reliability Services (RS) Rates

The table below presents the BTRR and RS rates to be billed the San Diego Unified Port District's Cruise Ship Terminal Account pursuant to SDG&E Advice Letter 3XXX-E:

SAN DIEGO UNIFIED PORT DISTRICT'S CRUISE SHIP TERMINAL BTRR AND RS RATES		
BTRR Rates		-
	Non-Coincident Demand Charge (\$/kW)	\$X.XX
	Maximum Demand at Time of System Peak - Summer (\$/kW)	\$X.XX
	Maximum Demand at Time of System Peak - Winter (\$/kW)	\$X.XX
RS Rates		
	Non-Coincident Demand Charge (\$/kW)	\$X.XX
	Energy Charge (\$/kWh)	\$X.XXXXX