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November 2, 2020

The Hon. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: San Diego Gas & Electric Company, 2021 Annual TRBAA Rate Revision,  
Docket No. ER21-\_\_\_\_-000**

Dear Secretary Bose:

Pursuant to Section 205(d) of the Federal Power Act,<sup>1</sup> and Section 35.13 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations,<sup>2</sup> San Diego Gas & Electric Company ("SDG&E") submits an adjustment to the rate and revenue requirement under its Transmission Owner ("TO") Tariff, FERC Electric Tariff Volume No. 11. This adjustment, made pursuant to SDG&E's TO Tariff, is SDG&E's annual update to the Transmission Revenue Balancing Account Adjustment ("TRBAA").<sup>3</sup>

This filing updates the TRBAA rate for retail End-Use customers ("retail") and the TRBAA to be used by the California Independent System Operator Corporation ("CAISO") in calculating CAISO's Transmission Access Charge ("TAC") ("CAISO wholesale"). The requested effective date for this adjustment is January 1, 2021.<sup>4</sup>

## **I. REVISIONS TO THE TRBAA AND TRBAA RATE**

The TRBAA is the ratemaking mechanism designed to ensure that Transmission Revenue Credits flow through to transmission customers. Section 5.5 of SDG&E's TO Tariff identifies the items subject to the Transmission Revenue Balancing Account Adjustment and sets forth

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<sup>1</sup> 16 U.S.C. §824d.

<sup>2</sup> 18 C.F.R. §35.13.

<sup>3</sup> Unless otherwise indicated, words with initial capitalization are used as defined in SDG&E's TO Tariff or in the CAISO's FERC tariff.

<sup>4</sup> SDG&E's most recent annual TRBAA update filing was accepted by the Commission effective January 1, 2020, in Docket No. ER20-524-000, by delegation letter order dated January 8, 2020.

how the TRBAA rate is to be revised annually. This annual revision is based on the recorded balance in:

- The TRBAA as of September 30 of the current year;
- A forecast of the expected Transmission Revenue Credit to be received in the following year; and
- Franchise Fees/Uncollectibles.

The retail and CAISO wholesale TRBAA are shown in Statement BK-1 and Statement BK-2, respectively. The final 2021 retail and CAISO wholesale TRBAA is a revenue credit of approximately \$21.6 million.<sup>5</sup> Below is a summary of the TRBAA and the primary reason(s) for the change in TRBAA.

TRBAA Balance @ 9/30/2020	=	\$(5,041,424)
Revenue Credits Forecast	=	\$(16,368,948)
Franchise Fees & Uncollectibles	=	<u>\$(256,175)</u>
Total Retail TRBAA	=	\$(21,666,547)
Less: Uncollectible Adjustment	=	<u>\$(36,184)</u>
Total Wholesale TRBAA	=	<u>\$(21,630,364)</u>

The change is roughly \$2.2 million more than the 2020 retail and CAISO wholesale TRBAA of approximately \$19.4 million.<sup>6</sup> The difference is primarily attributable to the following:

- 1) In the 2020 TRBAA filing, the 09/30/19 balance was an over-collection of approximately \$3.8 million. As noted above, the 09/30/20 balance is an over-collection of approximately \$5.0 million, a difference of \$1.2 million.
- 2) The 2021 net transmission revenue credit forecast is approximately \$1.0 million greater than the 2020 forecast, mainly because of an anticipated higher level of wheeling activities for 2021.

The revised TRBAA Rate is (\$0.00123) per kWh, compared to the current rate of (\$0.00108) per kWh.

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<sup>5</sup> Wholesale rates reflecting the proposed wholesale TRBAA will be contained in SDG&E's TO5 Cycle 3 formula rate informational filing, which will be submitted by December 1, 2020 under its TO Tariff Appendix VIII, Attachment 1.

<sup>6</sup> As approved in Docket No. ER20-524-000. See n. 3, *supra*.

## **II. REVISED TO TARIFF**

The revised TRBAA and change to the TRBAA Rate applicable to End-Users described above are reflected in the revised Appendices I and III to SDG&E's TO Tariff submitted in this filing.

## **III. EFFECTIVE DATE**

SDG&E's TO Tariff provides that TRBAA revisions become effective January 1, 2021. SDG&E respectfully requests the Commission assign the TRBAA revisions an effective date of January 1, 2021.

## **IV. OTHER MATTERS**

No expenses or costs included in these rates have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

SDG&E believes that the provided information contained provides a sufficient basis to accept this filing, and that the filing conforms to any and all rules of general applicability and to any Commission order. SDG&E has served electronic copies to the official service list in Docket No, ER19-221 (SDG&E's TO5 formula rate filing), and the CAISO.

## **V. DOCUMENTS SUBMITTED**

The documents submitted with this electronic filing are this transmittal letter and the following attachments:

- A. Revised TO Tariff sections<sup>7</sup>
- B. Revised TO Tariff sections in redline
- C. TRBAA Cost Statements and Related Work Papers

## **VI. SERVICE**

Electronic copies are being served on the Docket No. ER19-221 service list. Electronic copies are also being served on the California Public Utilities Commission, the CAISO, and Participating Transmission Owners that have transferred operational control over their transmission facilities and entitlements to the CAISO.

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<sup>7</sup> SDG&E has revised the format of Appendix I and III to its TO Tariff in this filing. The non-substantive format changes were applied to the TACBAA section of Appendix III. But the actual rate is not changed in this filing. Revisions to SDG&E's TACBAA rate will be made in a separate 2020 filing.

## VII. CORRESPONDENCE

SDG&E requests that all correspondence, pleadings and other communications concerning this filing be served upon the following individuals:

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## VIII. CONCLUSION

SDG&E respectfully requests that the Commission accept and approve SDG&E's proposed TRBAA and TRBAA rate changes, effective January 1, 2021.

Respectfully submitted,

*/s/ Ross R. Fulton*

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Ross R. Fulton

Attorney For

SAN DIEGO GAS & ELECTRIC COMPANY