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October 29, 2026

The Hon. Debbie-Ann Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: San Diego Gas & Electric Company, 2027 Annual TRBAA Rate Revision, Docket No. ER27-___-000

Dear Secretary Reese:

Pursuant to Section 205(d) of the Federal Power Act,[1] and Section 35.13 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations,[2] 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.[3]

This filing updates the Transmission Revenue Balancing Account Adjustment ("TRBAA") rate for non California Independent System Operator Corporation (CAISO) end-use customers that SDG&E bills directly to customers ("Non-CAISO Transmission Revenue Customers") and the TRBAA to be used by CAISO in calculating CAISO's Transmission Access Charge ("TAC") for CAISO wholesale customers. The requested effective date for this adjustment is January 1, 2027.[4]

I. REVISIONS TO THE TRBAA AND TRBAA RATE

The TRBAA is SDG&E's ratemaking mechanism designed to ensure that Transmission Revenue Credits flow through to transmission customers. Section 5.5 of SDG&E's TO Tariff

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1 16 U.S.C. §824d.

2 18 C.F.R. §35.13.

3 Unless otherwise indicated, words with initial capitalization are used as defined in SDG&E's TO Tariff or in the California Independent System Operator's (CAISO) FERC tariff.

4 SDG&E's most recent annual TRBAA update filing was accepted by the Commission effective January 1, 2026, in Docket No. ER26-336-000, by delegation letter order dated January 22, 2026.

identifies the items subject to the TRBAA and sets forth how the TRBAA rate is to be revised annually.[5] 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 final 2027 Non-CAISO Transmission Revenue Customers and CAISO Wholesale TRBAA amounts are a revenue credit of approximately $56.7 million and $56.4 million, respectively, as shown in Statements BK-1 and BK-2.[6] Below is a summary of the TRBAA and the primary reasons for the change in the TRBAA.

TRBAA Balance as of 9/30/2026	=	$(6,237,733)
Revenue Credits Forecast	=	$(49,595,817)
Franchise Fees & Uncollectibles	=	$(877,536)
Total Non-CAISO End-User TRBAA	=	$(56,711,086)
Less: Uncollectible Adjustment	=	$(307,643)
Total CAISO Wholesale TRBAA	=	$(56,403,443)

The change is roughly $6.1 million more than the approximately $50.6 million 2026 Non-CAISO Transmission Revenue Customers and CAISO Wholesale TRBAAs.[7] The difference is primarily attributable to the following:

1) SDG&E's 2027 net transmission revenue credit forecast is approximately $5.5 million greater than the 2026 forecast, primarily because of an anticipated increase in other Participating Transmission Owner (PTO) related revenue credits of $7.2 million offset by a decrease in Wheeling Revenues of $1.9 million for 2027.

2) In SDG&E's 2026 TRBAA filing in ER26-336, the September 30, 2025 balance was an over-collection of approximately $5.9 million. As noted above, the

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5 SDG&E TO Tariff, Preamble Section 5.5.

6 CAISO wholesale rates reflecting the proposed CAISO wholesale TRBAA will be contained in SDG&E's Sixth Transmission Owner ("TO") Formula rate mechanism ("TO6" or "TO6 Formula"), third annual informational filing ("Cycle 3"), which will be submitted by December 1, 2026, under SDG&E's TO Tariff Appendix VIII, Attachment 1.

7 As approved in Docket No. ER26-336-000. See n. 3, *supra*.

September 30, 2026 balance is an over-collection of approximately $6.2 million, an increase of $0.3 million.

The revised TRBAA Rate is ($0.00325) per kWh, compared to the current rate of ($0.00304) per kWh.

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, 2027. SDG&E respectfully requests the Commission assign the TRBAA revisions an effective date of January 1, 2027.

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 included information 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. ER25-270 (SDG&E's formula rate case filing containing the applicable tariff), 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;[8]
B. Revised TO Tariff sections in redline; and
C. TRBAA Cost Statements and Related Work Papers

VI. SERVICE

Electronic copies are being served on the Docket No. ER25-270 service list. Electronic copies are also being served on the California Public Utilities Commission, the CAISO, and

[8] Revisions to SDG&E's TACBAA rate will be made in a separate 2026 filing for the rate year 2027.

Participating Transmission Owners that have transferred operational control over their transmission facilities and entitlements to the CAISO.

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, 2027.

Respectfully submitted,

/s/ Ross R. Fulton
Ross R. Fulton
Attorney For
SAN DIEGO GAS & ELECTRIC COMPANY