APPENDIX X

ATTACHMENT

1

CITIZENS BORDER EAST PROTOCOLS

A. INTRODUCTION

This Attachment sets forth details with respect to the determination each year of San Diego Gas & Electric Company's ("SDG&E") Border East Line Rate used to derive the charges assessed by SDG&E to Citizens Sunrise Transmission LLC ("Citizens").

SDG&E's Appendix X Formula rate mechanism consists of SDG&E's TO Tariff and two attachments: the Citizens Border East Protocols ("Protocols") (Attachment 1) and the Formula Rate Spreadsheet (Attachment 2). Capitalized terms shall have the meaning ascribed to them herein or in Appendix X of SDG&E's TO Tariff.

The Border East Line Rate for each Rate Effective Period will consist of the following six parts:

(i) the Direct Maintenance Expense Cost Component;

(ii) the Non-Direct Expense Cost Component;

(iii) the Cost Component Containing Other Specific Expenses;

(iv) the True-Up Adjustment Cost Component;

(v) the Interest True-Up Adjustment Cost Component; and

(vi) Other Adjustments.

These cost components shall be designed to quantify SDG&E's cost to operate and maintain the segment of the Border East transmission line leased to Citizens.

The Border East Line Rate will be an annual calculation based on the previous calendar year's data as shown in SDG&E's Federal Energy Regulatory Commission

("FERC" or the "Commission") Form No. 1: Annual Report of Major Electric Utilities, Licensees, and Others ("Form 1") for that year and underlying ledger accounts. SDG&E shall make available the data reflected in the underlying ledger accounts used to determine SDG&E's Border East Line Rate in the Annual Informational Filing described below.

SDG&E shall calculate its Border East Line Rate using the formula methodology that is presented in the Citizens Border East Formula Rate Spreadsheet. The Formula Rate Spreadsheet contains fixed formulae that are described in Appendix X. If there is any conflict between the provisions of Appendix X and the Formula Rate Spreadsheet, the Formula Rate Spreadsheet shall control. The fixed formulae in the Formula Rate Spreadsheet are subject to change only pursuant to Sections 205 and 206 of the Federal Power Act ("FPA") and will be populated with data from SDG&E's annual FERC Form 1 filing or SDG&E's underlying ledger accounts. Information in the reference sections and footnotes of the Formula Rate Spreadsheet may, however, be changed without a Section 205 or Section 206 filing. The sources of the data used in the Citizens Border East Line Rate formula ("Appendix X Formula") will be: (a) identified in the Formula Rate Spreadsheet by fixed references to specific locations in FERC Form 1, or (b) provided by SDG&E in accordance with Section C of these Protocols.

B. TERM OF SDG&E'S APPENDIX X FORMULA

The Border East Line Rate shall become effective on January 1, 2027 and shall be re-calculated annually thereafter in accordance with these Protocols and the Appendix X Formula.

The Appendix X Formula shall be in effect from January 1, 2027 and each year

thereafter, unless the Commission modifies or replaces SDG&E's Transmission Owner ("TO") Formula. The costing methodology utilized in the Appendix X Formula reflects the same methodologies reflected in SDG&E's approved TO6 Formula. Citizens and SDG&E agree that if the costing methodology for the approved TO6 Formula or any subsequent TO Formula (ex: TO7) is modified and filed, the Appendix X Formula will be modified accordingly.

After termination of the Appendix X Formula, SDG&E shall calculate a Final True-Up Adjustment, which will cover the period end date from the most recent true-up and ending on the date the Appendix X Formula terminated. The Final True-Up Adjustment shall be calculated using the methodology set forth in the Appendix X Formula in existence during that base period.

C. PROCEDURES FOR UPDATING THE BORDER EAST LINE RATE

SDG&E shall update its Border East Line Rate in each cycle according to the timelines described below:

Events	Date
Post of Draft Informational Filing	July 15
Informational Requests	July 15 – October 15
Draft Informational Filing Meeting	On or before August 30
Annual Informational Filing	On or before October 31

Appendix X Cycle 15

Rate Effective Period	January 1, 2027 – December 31, 2027
Base Period	12 Months ended December 31, 2025
True-Up Adjustment	2025 calendar year applicable to Cycle 13
Interest True-Up Adjustment	January 1, 2025 – December 31, 2026

Appendix X Cycle 16

Rate Effective Period	January 1, 2028 – December 31, 2028
Base Period	12 Months ended December 31, 2026
True-Up Adjustment	2026 calendar year applicable to Cycle 14
Interest True-Up Adjustment	January 1, 2026 – December 31, 2027

Appendix X Cycle 17

Rate Effective Period	January 1, 2029 – December 31, 2029
Base Period	12 Months ended December 31, 2027
True-Up Adjustment	2027 calendar year applicable to Cycle 15
Interest True-Up Adjustment	January 1, 2027 – December 31, 2028

Appendix X Cycle 18

Rate Effective Period	January 1, 2030 – December 31, 2030
Base Period	12 Months ended December 31, 2028
True-Up Adjustment	2028 calendar year applicable to Cycle 16
Interest True-Up Adjustment	January 1, 2028 – December 31, 2029

After Cycle 18, successive Appendix X Formula cycles will be consistent with Cycle 18 with regards to timing and the length of the Base Period, True-Up Period, and Rate Effective Period. If a deadline falls on a weekend or holiday recognized by the Commission, the deadline will be extended to the next business day.

1. Draft Informational Filing

On or before July 15 (the "Posting Date") of each year, SDG&E shall post on its website a draft of the Informational Filing (the "Draft Informational Filing") for review, comment and discussion prior to filing the Annual Informational Filing at FERC on or before October 31. SDG&E will provide electronic notice of its posting via email to the Service List.[1] If the date for making the Draft Informational Filing posting should fall on a weekend or holiday recognized by the FERC, then the posting shall be made on the next business day.

The Draft Informational Filing shall include the following:

a. The populated version of the Formula Rate Spreadsheet.

b. Workpapers supporting all inputs that are not supported by the FERC Form 1.

c. Identification and explanation of any accounting changes that affect

[1] The "Service List" includes: (1) the service list compiled by FERC in ER25-270 and (2) the service list compiled by FERC in any docket created by an SDG&E Annual Informational Filing.

the inputs.

d. Identification and explanation of any aspects of the Appendix X Formula Rate Spreadsheet or its inputs that are the subject of an ongoing dispute in any FERC proceeding on a prior Informational Filing.

The Draft Informational Filing shall be subject to review and challenge in accordance with the procedures set forth in these Protocols; provided, however, that with respect to the prudence of any costs and expenditures included for recovery in the Annual Informational Filing, nothing in these Protocols is intended to modify the Commission's applicable precedent with respect to the burden of going forward or burden of proof under formula rates in such prudence challenges.

2. Draft Informational Filing Meeting

SDG&E will provide notice to Interested Parties of a one-day meeting to take place on or before August 30 of each year to discuss any details or questions regarding SDG&E's Draft Informational Filing at least fifteen (15) business days prior to the meeting. Interested Parties are encouraged to provide a list of topics they would like to address at least seven (7) business days before the meeting and SDG&E will make available subject matter experts to the extent possible to assure that the issues are addressed during the meeting. By mutual agreement of SDG&E and Interested Parties, such meeting may take place in-person, via telephone, or video conference. Additional meetings to discuss the Draft Informational Filing shall be scheduled as SDG&E and the Interested Parties may mutually agree.

3. Review Procedures

Each Draft Informational Filing provided for in Appendix X shall be subject to the following review procedures:

a. Interested Parties shall have until October 15 to review the calculations and to notify SDG&E in writing of any specific challenges, including but not limited to challenges related to accounting changes or to the Draft Informational Filing ("Preliminary Challenge"). SDG&E shall contemporaneously provide copies of all Preliminary Challenges to all parties on the Service List that have indicated to SDG&E that they wish to receive such copies. SDG&E shall respond in writing to a Preliminary Challenge within twenty (20) business days of receipt, and its response shall notify the challenging party of the extent to which SDG&E agrees or disagrees with the challenge. If SDG&E disagrees with the Preliminary Challenge, its response shall include supporting documentation. SDG&E shall provide copies of responses to all Preliminary Challenges to all parties on the Service List that have indicated to SDG&E that they wish to receive such copies.

b. Interested Parties may submit reasonable information requests to SDG&E regarding all issues that may be necessary to determine: (1) the extent or effect of an Accounting Change; (2) whether the Draft Informational Filing fails to include data properly recorded in accordance with the Formula Rate Protocols; (3) the proper application of the Formula Rate Spreadsheet and/or procedures in the Protocols; (4) the accuracy of data and consistency with the Appendix X Formula; (5) the prudence of actual costs and expenditures; and (6) the effect of any change to the underlying Uniform System of Accounts or applicable form; or (7) any other information that may reasonably have substantive effect on the calculation pursuant to Appendix X and this

Attachment 1. The information and document requests shall not otherwise be directed to ascertaining whether the formula rate is just and reasonable.

c. SDG&E shall make a good faith effort to respond to information requests in writing within 10 business days of receipt, or sooner depending on the timing of the information requests. SDG&E shall contemporaneously provide copies of all responses to all parties on the service list for the Appendix X Formula. SDG&E and the Interested Party serving the information request on SDG&E will work cooperatively and in good faith to resolve any questions, objections, or disputes relating to the information requests.

d. Responses to information requests shall not be designated as settlement communications or produced under the Commission's rules and regulations governing settlements, unless provided as a privileged settlement communication in a Commission proceeding being conducted under the Commission's settlement rules. SDG&E may mark materials provided in response to an information request as Protected Materials in accordance with any applicable Protective Order adopted in the FERC proceedings concerning SDG&E's Appendix X Formula ("Protective Order"). Interested Parties will have all rights provided to them under the Protective Order to protest SDG&E's classification of any materials as Protected Materials. To the extent an information request response calls for production of Protected Materials, SDG&E will provide such materials only to the parties that have signed non-disclosure certificates agreeing to abide by the terms of the Protective Order.

e. To the extent SDG&E and any Interested Party are unable to resolve disputes related to information requests submitted in accordance with these Protocols,

SDG&E or any Interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master after reasonable attempts to resolve the dispute have been made by SDG&E and any Interested Party. Neither SDG&E nor any Interested Party shall object to a request for a discovery master. The discovery master shall have the authority to issue binding orders to resolve discovery disputes and compel the production of discovery, if appropriate, in accordance with the Protocols and consistent with FERC's discovery rules. The discovery master's orders shall be subject to appeal to the Commission and to the courts to the same extent and under the same rules as would be applicable to an Initial Decision issued under Rule 708 of the Commission's Rules of Practice and Procedure. In the event that the Commission establishes hearing or settlement procedures for an Annual Informational Filing, the discovery master's responsibility shall be transferred to the Presiding Judge for such hearing or settlement procedures, effective upon his or her appointment.

4. Resolution of Challenges

a. Interested Parties may file a Preliminary Challenge to the Draft Informational Filing, or a challenge with the FERC ("Formal Challenge") to the Annual Informational Filing, which shall be serviced on SDG&E by electronic service on the date of such filing. Subject to any applicable confidentiality and Critical Energy Infrastructure Information

restrictions, all information and correspondence produced by SDG&E pursuant to these Protocols may be included in any Formal Challenge or other FERC proceeding related to the formula.

Interested Parties may challenge, through a Formal Challenge, the justness and reasonableness of SDG&E's implementation of the formula with respect to any issues to be raised in a Preliminary Challenge, as outlined in section C.3.b., above. Formal Challenges must be filed in the same docket as the informational filings made pursuant to these Protocols. Interested Parties shall have until thirty (30) calendar days after SDG&E submits the Annual Informational Filing described in section C.5 of these Protocols to file a Formal Challenge with the FERC (unless such date is extended with the written consent of both SDG&E and the complaining party to continue efforts to resolve the dispute).

b. Failure to raise an issue in a Preliminary Challenge shall not bar an Interested Party from raising that issue in a Formal Challenge, provided the Interested Party submitted a Preliminary Challenge during the Review Period with respect to one or more issues. Likewise, failure to make a Preliminary Challenge shall not bar an Interested Party from making a subsequent Preliminary Challenge related to a subsequent informational filing to the extent the issue affects the subsequent informational filing.

c. Any response by SDG&E to a Formal Challenge must be submitted

to the FERC within thirty (30) calendar days of the date of the filing of the Formal Challenge and shall be served on the filing party(ies) and the Appendix X Service List by electronic service on the date of such filing.

d. In any proceeding concerning a given year's informational filing (including corrections) or accounting changes, SDG&E shall bear the burden, consistent with Section 205 of the FPA, of proving the justness and reasonableness of the rate resulting from its application of the formula by demonstrating: (i) that it has reasonably and accurately calculated the informational posting by properly and reasonably applying the formula and the procedures in these Protocols; (ii) that it has reasonably adopted and applied any accounting changes; (iii) the amounts to be recovered through SDG&E's formula have been accurately stated, properly recorded and accounted for pursuant to applicable FERC accounting practices and procedures and the USofA, unless otherwise approved by FERC; (iv) its calculation methodologies are consistent with Appendix X and this Attachment 1.

e. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of SDG&E to file unilaterally, pursuant to Section 205 of the FPA and the regulations thereunder, an application seeking changes to the formula or to any of the stated value inputs requiring a Section 205 filing under these Protocols, or the right of any other party or the Commission to seek

such changes pursuant to Section 206 of the FPA and the regulations thereunder. All parties reserve the right to contest such filing(s).

5. Annual Informational Filing

a. SDG&E shall submit to the Commission on or before October 31 of each year, starting in 2026, an Annual Informational Filing showing the rates to be in effect for the Rate Effective Period of the succeeding calendar year. Each Annual Informational Filing shall be filed in a new docket at FERC. SDG&E shall provide notice of the Annual Informational Filing to the Service List the day of the filing and shall provide the new docket number to the service list no later than five (5) calendar days after the filing.

b. It is expressly intended by these Protocols that the Commission will issue public notice of the Annual Informational Filing inviting public comment, and SDG&E shall request in its Annual Informational Filing that the Commission issue public notice of the Annual Informational Filing inviting public comment.

c. The Annual Informational Filing shall not modify the Appendix X Formula set forth in Appendix X and shall not constitute a rate change under Section 205 or Section 206 of the FPA. The Annual Informational Filing shall not subject the Appendix X Formula to modification.

d. Any person may comment on or protest the Annual Informational Filing. Any person may request that FERC establish hearing and/or settlement procedures regarding an Annual Informational Filing, and all Interested Parties to the FERC proceedings concerning SDG&E's Appendix X Formula rate tariff filing reserve their rights to oppose such requests on

their merits. More particularly, any person may challenge the justness and reasonableness of SDG&E's implementation of the Appendix X Formula with respect to such matters as:

(i) whether the costs and expenditures included for recovery have been or will be prudently incurred, consistent with Commission precedent regarding prudence;

(ii) whether SDG&E has properly and reasonably applied the Appendix X Formula as described in Appendix X, the Formula Rate Spreadsheet, and these Protocols;

(iii) whether the costs to be recovered through the Border East Line Rate have been accurately stated, properly recorded and accounted for pursuant to applicable FERC accounting rules, and are consistent with the formula;

(iv) whether SDG&E's calculation methodologies are consistent with the formula;

(v) whether any accounting changes are reasonable and consistent with applicable FERC accounting rules.

e. Nothing in these Protocols shall act as a bar to a person raising an issue in comments or in protests to the Annual Informational Filing that it has not raised in a prior Annual Informational Filing proceeding (including pre-filing phases of such proceeding) or with respect to which it has not previously exercised its rights under the FPA.

f. It is expressly intended by these Protocols that FERC will issue an

order taking action, assuming any action is requested, on the Annual Informational Filing if protests and/or comments on the Annual Informational Filing are filed.

g. In any proceeding on SDG&E's Annual Informational Filing, SDG&E shall bear the burden of showing the justness and reasonableness of the implementation of its Appendix X Formula on matters set forth in subsections d. (i) through (v) above in accordance with Commission precedent.

h. SDG&E will make any revisions to the Border East Line Rate and associated rates that are required by a final[2] Commission order with respect to each Annual Informational Filing. Unless otherwise ordered by the Commission, such revisions shall be effective as of the first day of the applicable rate effective year and shall be reflected, with interest calculated pursuant to the interest rates in Section 35.19a of the Commission's regulations, in the next subsequent Annual Informational Filing as a component of the True-Up Adjustment. If the term of the Appendix X Formula is ending so that there will be no future Annual Informational Filing, SDG&E shall include the Border East Line Rate difference in the Final True-Up Adjustment.

[2] All references in these Protocols to Commission orders or actions refer to the final form of such orders or actions (in accordance with the FPA and applicable Commission regulations, including without limitation Commission regulations with respect to a stay of a Commission order upon rehearing and/or an appeal), including as they may be modified as a result of a request for rehearing or Court appeal.

6. Adjustments to Reflect Correction of Errors

a. In the event SDG&E or any Interested Party identifies an error in the Appendix X Formula, in the FERC Form 1 data, in data based on SDG&E's books and records that is used as an input to the formula, or if SDG&E is required by applicable law, a court, or regulatory body to correct an error, and such error affects the True-Up Adjustment calculated in an Annual Informational Filing, SDG&E shall include in its next subsequent Annual Informational Filing a brief description of the error(s) included in its prior Annual Informational Filing that must be corrected. SDG&E's subsequent Annual Informational Filing shall:

(i) Recalculate the Border East Line Rate for all affected Prior Years;

(ii) Compare, on a monthly basis, the difference between the initial incorrect True-Up Adjustment and the revised correct True-Up; and

(iii) Determine the cumulative amount of the difference in Section C.5.a.ii, including interest calculated pursuant to the interest rate in 18 C.F.R. § 35.19a, through the date of implementation of the correction.

b. Absent an order requiring refunds outside of the True-Up process, the difference in Section C.6.a.iii shall be included as an additional component to SDG&E's True-Up Adjustment in its next Annual Informational Filing, or Final True-Up Adjustment, as a one-time

True-Up Adjustment in accordance with the Appendix X Formula.

D. TRUE-UP ADJUSTMENT

The True-Up Adjustment for each True-Up Period will be a reconciliation of the difference between:

1. SDG&E's actual cost of providing transmission service during the applicable True-Up Period; and
2. Actual revenues billed by SDG&E and paid by Citizens for transmission service during the True-Up Period, plus applicable interest.

The True-Up Adjustment shall be calculated in accordance with the Formula Rate Spreadsheet.

E. BILLING PROCEDURES

SDG&E shall bill Citizens through a monthly invoice issued by the 30th of each service month. Payments are due no later than 30 days following the issuance date of the invoice.

F. USE OF INFORMATION

Information produced pursuant to these Protocols may be used in any administrative or judicial proceeding; provided, however, that to the extent that any information provided pursuant to these Protocols has been designated and provided as Protected Materials, the use of such information shall be governed by the Protective Order. This section shall not apply to any information provided in the course of Commission-established settlement proceedings pursuant to the Commission's rules and regulations governing settlement.

G. RESERVATION OF RIGHTS

1. Nothing in these Protocols shall limit or shall be deemed to limit in any way the right of any Interested Party to file a request for relief under any applicable provision of the FPA and/or the Commission's regulations or to participate in Informational Filing proceedings.

2. Except as set forth in Section B above, nothing in these Protocols shall be deemed to limit in any way SDG&E's right to file unilaterally, pursuant to FPA Section 206 and the regulations thereunder, to seek to change or cancel the Appendix X Formula, or to submit any other request for relief under any applicable provision of the FPA and/or the Commission's regulations.