

Application No: R.10-05-006
Exhibit No.: _____
Witness: Juancho Eekhout

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 10-05-006
(Filed May 6, 2010)

**PREPARED DIRECT TESTIMONY
OF JUANCHO EEKHOUT
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY**

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

March 25, 2011



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1 **PREPARED DIRECT TESTIMONY OF**
2 **JUANCHO EEKHOUT**
3 **ON BEHALF OF SDG&E**

4 **I. INTRODUCTION**

5 The purpose of my testimony is to sponsor Section II.A.5 and Appendix H of the draft
6 2012 Long-Term Procurement Plan (“2012 LTPP”) of San Diego Gas & Electric (“SDG&E”)
7 submitted in Track II of Rulemaking (“R.”) 10-05-006.

8 SDG&E has updated its currently-effective LTPP in accordance with the direction
9 provided by the Commission in the *Assigned Commissioner’s and Administrative Law Judge’s*
10 *Scoping Memo for Track II Bundled Procurement Plans*, issued January 13, 2011 in the above-
11 captioned proceeding.

12 **II. OVERVIEW**

13 The purpose of my testimony is to support the revisions and updates to Section II.A.5 and
14 Appendix H reflected in SDG&E’s 2012 LTPP. A listing of the sections that I am sponsoring
15 and a short summary of revisions compared to SDG&E’s 2006 LTPP is contained in Table JE-1,
16 set forth in Attachment 1. In addition, Attachment 2 provides a road map of the changes to the
17 organization, structure and numbering from the 2006 LTPP to the 2012 LTPP.

18 SDG&E has attempted to more closely conform its LTPP to the format utilized by the
19 other IOUs and, accordingly, has made changes to the order and structure of topics addressed in
20 the 2012 LTPP, including the addition of a high-level description of SDG&E’s separately-filed
21 Renewable Portfolio Standard (“RPS”) procurement plan (the “RPS Plan”). SDG&E’s RPS
22 Plans establishes a trajectory to meet a 33% renewable energy target by 2020, within a Least-
23 Cost/Best-Fit (“LCBF”) framework. The RPS Plan sets forth SDG&E’s RPS procurement

1 strategy, which involves soliciting long-term contracts in its RPS solicitations, considering
2 bilateral opportunities and pursuing utility ownership when economical and beneficial to
3 ratepayers. SDG&E has filed its draft RPS Plan for Commission approval in Rulemaking 08-08-
4 009, and incorporates its authorized RPS Plan into the 2012 LTPP by reference.

5 The 2012 LTPP includes no major changes to overall procurement practices relative to
6 the 2006 LTPP. SDG&E's basic assumptions under the 2012 LTPP are that: (1) procurement
7 of renewable power will continue to increase as a percent of its total retail sales over time until
8 SDG&E meets its 33% goal by 2020; (2) SDG&E will continue to issue competitive solicitations
9 for conventional and renewable resources; (3) SDG&E may continue bilaterally contracting
10 (within the parameters of its LTPP and RPS Plan) to the extent that an unsolicited bilateral offer
11 complies with SDG&E's resource needs, is competitive when compared against results from a
12 recent solicitation and provides benefits to SDG&E customers; (4) SDG&E may pursue
13 ownership opportunities (including tax equity participation) when its participation enhances the
14 viability of the project and benefits ratepayers; (5) renewable and conventional resource
15 procurement may be needed to replace expiring contracts; and (6) whether new transmission
16 facilities will be built as required to allow SDG&E to access out-of-area renewable resources is a
17 source of uncertainty at this point.

18 **A. Procurement Practices**

19 Procedures for procuring RPS Power Purchase Agreements ("PPAs") or conventional
20 resource Power Purchase Tolling Agreements ("PPTAs") that are either shortlisted in SDG&E's
21 most recent competitive solicitation or negotiated bilaterally have not materially changed from
22 those described in the 2006 LTPP.

1 There have been minor revisions to the administrative process for RPS solicitations,
2 identified in the 2009 RPS request for offers (“RFO”) process, which were designed to improve
3 efficiency and transparency, such as having SDG&E’s independent evaluator (“IE”) open, take
4 custody of, translate and anonymize bids. Other procedural improvements include, improving
5 and clarifying terms in the PPAs and PPTAs and encouraging greater public participation in
6 RFOs by, for example, holding bid meetings outside of San Diego. Other more substantive
7 revisions are described in Section II.A 5 and Appendix H, which have be updated to reflect
8 changes to SDG&E’s RPS Plans, including discussion of new products such as tradable
9 renewable energy credits (“TREC’s”), feed-in-tariffs (“FIT’s”) and utility ownership participation
10 in renewable projects.

11 In addition, new procedures have been added to support procurement practices for
12 conventional resources. These procedures are primarily related to improvements to procurement
13 processes including: (a) a new RFO instituted in 2010 which solicited additional IEs for
14 SDG&E’s IE Pool to review conventional and renewable bids; and (b) a new RFO which created
15 the CAM PRG (for conventional bids only).

16 **B. Procurement Policy**

17 The LTPP is intended to reflect SDG&E’s procurement strategy of increasing its
18 renewables portfolio while maintaining reliability as needed with a variety of conventional
19 products. Due to the “lumpiness” of major resource additions, the trajectory of SDG&E’s RPS
20 procurement activity may not reflect a smooth year-on-year increase. The exact percentages of
21 resources that will make up future portfolios cannot be known until currently contracted projects
22 under development come on line and additional procurement is undertaken.

1 In order to fulfill its goal of increasing RPS-eligible generation, SDG&E will need to
2 procure incremental renewable supplies. Incremental supplies do not necessarily need to come
3 from new resources, however. SDG&E will have a number of contracts expiring between now
4 and 2020. SDG&E may re-sign or replace these contracts with existing resources in addition to
5 entering into renewables contracts with existing resources currently under contract to another
6 party.

7 **III. DISCUSSION OF CHANGES IN 2012 LTPP**

8 As noted above, there are no major changes to the overall practices and policies
9 employed by SDG&E and contained in the 2012 LTPP. Since the last revision to SDG&E's
10 approved 2006 LTPP, SDG&E has added a number of new conventional and renewable contracts
11 to its portfolio, and updated certain of its practices related to greater transparency and promotion
12 of public participation. The 2012 LTPP has been updated to discuss the Commission's adoption
13 of certain changes that may impact SDG&E's procurement strategy, such as (1) an emerging
14 RPS FIT market; (2) possible procurement of TRECs for RPS compliance; (3) utility ownership
15 participation in renewable projects; (4) CAM PRG; and (5) an RFO for additional IEs.

16 **A. RPS Feed-in Tariffs**

17 The Commission has adopted RPS FITs as a means of encouraging procurement of
18 renewable generation from smaller renewable resources. SDG&E currently offers two FIT
19 opportunities. The first is available to water and wastewater customers with projects sized below
20 1.5 MW that meet certain eligibility criteria (Schedule WATER); the second is available to all
21 customers with projects below 1.5 MW that meet certain eligibility criteria (Schedule CRE).
22 SDG&E may modify or replace these FITs, or add additional FITs, in the future in accordance
23 with the Commission's direction related to implementation of Senate Bill 32 and/or its recently

1 adopted Renewable Auction Mechanism (“RAM”) program. SDG&E will update its RPS Plan
2 and the LTPP, as necessary, to reflect future direction provided to SDG&E in R.08-08-009 or
3 successor proceeding.

4 **B. TREC Decision**

5 The Commission has authorized the use of renewable energy credits for compliance with
6 the RPS Program. Accordingly, SDG&E may procure and/or trade TRECs in accordance with
7 State law and Commission requirements.

8 **C. Utility Ownership or Participation in Renewable Projects**

9 SDG&E will consider utility ownership or investment when its economical and prudent
10 participation enhances the viability of the project and provides benefits to ratepayers.

11 **D. CAM PRG**

12 The Commission has developed a procurement process whereby IOUs may be required,
13 or may elect, to procure new supply capacity that will be beneficial to all transmission customers
14 of the utility (bundled and direct access [“DA”] customers). The recovery of costs related to
15 such procurement is divided among bundled and DA customers, pursuant to a Cost Allocation
16 Mechanism (“CAM”). In accordance with the Commission’s direction, SDG&E has formed its
17 CAM PRG and held its first meeting in March 2011.

18

1 **E. RFO for Additional Independent Evaluators**

2 SDG&E issued an RFO to procure additional qualified IEs to add to its existing IE Pool,
3 pursuant to Commission direction in D.07-12-052. SDG&E reviewed its short list of qualified
4 candidates with its PRG and executed a contract with two new IEs, resulting in a total of four IEs
5 in its IE Pool for the 2011-2012 period. The original IEs are continuing their involvement in
6 conventional and renewable generation projects. SDG&E will utilize this process to renew its
7 IE pool on a biennial basis per D.07-12-052.

8

1 **IV. WITNESS QUALIFICATIONS**

2 My name is Juancho Eekhout. My business address is 8315 Century Park Court, San
3 Diego, CA 92123. I have been employed by San Diego Gas & Electric Company (SDG&E)
4 since February 2011 as the Director of Procurement and Portfolio Design in the Electric and Gas
5 Procurement Department. In my current role, I lead the team that creates strategic plans for the
6 procurement of renewable energy and conventional resources beyond one year.

7 Prior to this role, I was a Director with the Mergers & Acquisitions (M&A) team of
8 Sempra Energy. Before joining Sempra, I worked for BP in a series of commercially-focused
9 international appointments, including in Strategy Development, Marketing, Trading
10 Management, Strategic Planning, Performance Management, and Business Development. Prior
11 to BP, I worked for ING Barings both in the Money Markets Trading and the Investment
12 Banking divisions.

13 I received a BA in Economics from the Catholic University in Caracas, Venezuela and a
14 Master in Public Policy from the University of Chicago.

15 This is the first time I have testified before this Commission.

16 This concludes my prepared direct testimony.

ATTACHMENT 1

Table JE-1

Section	Section Heading	Description
Section II.A.5 a	Procurement Practices and Methods for Short-term and Medium-term Transactions	<ul style="list-style-type: none">• Generally updated to improve readability.
Section II.A.5 b	Procurement Practices and Methods for Long-term Transactions	<ul style="list-style-type: none">• Generally updated to improve readability.
Section II.A.5 c	SDG&E Procurement Practices and Methods for RPS Transactions (NEW)	<ul style="list-style-type: none">• Procurement Practices and Methods for RPS-Eligible Resources, including LCBF, optimal mix of RPS, and use of compliance flexibility mechanisms
Appendix H	Description of SDG&E's Consultation Processes with its Independent Review Groups (NEW)	<ul style="list-style-type: none">• Discussion of the Independent Evaluators (IEs) , the IE pool, interaction with PRG, the IE report, etc.

ATTACHMENT 2

MAP OF CHANGES FROM 2006 TO 2012 LTPP

Legend: Section references from the 2006 LTPP are provided in the left column with changes to location or deletion from the 2012 LTPP shown in right column. Note revisions to the section headings from 2006 to 2012, are shown in redline. Descriptions of changes/updates are found in a table included in each witness' testimony.

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
I. Introduction (p.2)	Same location and title
II. Procurement Implementation Plan (p.3)	Same location and title
A. <u>SDG&E</u> Procurement Processes (p.3) Description of the Procurement Process from Planning Through Transaction, Execution, and Dispatch (p.3) The <u>Market</u> Transaction Process Flow	Same location and title First portion of discussion moved to Section II.A.2.a. Remaining discussion moved to Section II.A.2.c. Moved to Section II.A.2.c. Removed restatement of Commission decision language related to Standards of Conduct.
Description of the Proposed Procurement Products for Electric and <u>Fuel</u> Gas Procurement (p.10) Reliability-Must-Run Energy (p.13A) Must-Offer Energy (p14) <u>Spot Markets/ Spot Energy</u> (14) <u>Forward Products</u> (p.15) <u>Tolling</u> (p.15)	Table 1 moved to Section II.A.3. Description of market products moved to Section II.A.4. Deleted Deleted Re-titled and moved to Section II.A.4 Moved to Section II.A.4 Moved to Section II.A.4

¹ Page numbers will be different in the 2012 LTPP due to all the other changes, but location is the same in terms of the order presented in the 2006 LTPP.

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
Indexed Energy (p.15)	Moved to Section II.A.4
Heat Rate Call Options (p.16)	Moved to Section II.A.4
Firm Transmission Rights-(FTRs) (p.16)	Deleted
Congestion Revenue Rights (CRRs) (p.16)	Moved to Section II.A.4
FTR/CRR Locational Swaps (p.17)	Deleted
<u>CRR and Non-FTR/CRR Locational Swaps (p.18)</u>	Moved to Section II.A.4
Third-Party Transmission Capacity (p.18)	Moved to Section II.A.4
Ancillary Services (p.19)	Moved to Section II.A.4
Inter-Utility Exchanges (IUEs) (p.20)	Moved to Section II.A.4
Counterparty Sleeves (p.20)	Moved to Section II.A.4
Resource Adequacy Products (p.21)	Moved to Section II.A.4
Emission Reduction Credits (p.22)	Moved to Section II.A.4
SO2 Allowances (p.22)	Moved to Section II.A.4
RA Import Counting Rights (p.22)	Moved to Section II.A.4
Contract Duration Pre-Approval Limits (p.23)	Moved to Section II.A.5.a
Description of Proposed Market and or Selection Process for Each Procurement Related Product (p.24)	Moved to Section II.A.5.a
Bilateral Contracts (p.24)	Moved to Section II.A.4
Exchanges (p.26)	Moved to Section II.A.4
Spot Markets (p.27)	Moved to Section II.A.4
Competitive Bid Solicitations (Request for Offers (p.29)	Divided between short-medium and long term RFO process and moved to Section II.A.5.a and II.A.5.b
Utility Owned Generation (UOG) and Participation in Competitive Solicitations (p.35)	Moved to Section II.A.5.b
Code of Conduct (p.36)	Moved to Appendix H

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
Utility Ownership Proposals Outside of a Competitive Solicitation (p.37)	Moved to Section II.A.5.b
Other Markets and Processes (p.38)	Portion of discussion related to short-term procurement moved to Section II.A.4 and Section II.A.5.a
Procurement Positions (p.39)	Moved to Section II.A.5.b
Description-Application of Least-Cost Best Fit Analysis (p.39)	Moved to Section II.A.5.b
Description of the Use of the Loading Order in Procurement (p.41)	Moved to Section V.
Current/Upcoming RFOs (p.42)	Moved to Section II.A.5.b
Requests for Bids/Offers for Local and System RA (p.43)	Moved to Section II.A.5.b
Price Forecasting (p.43)	Moved to Section II.A.5.b
Description of "Ratable-Rates" (p.44)	Deleted
Description of SDG&E's Consultation Process With its Independent Review Groups (p.45)	Moved to Appendix H
The Independent Evaluator Requirement (p.45)	Moved to Appendix H
SDG&E use of the PRG Process and Consultation with PRG (p.49)	Moved to Section II.A.5.b
CAM PRG (p.51)	Moved to Section II.A.5.b
Objective (p.51)	Moved to Section II.A.5.b
Rationale for Separate Advisory Group (51)	Moved to Section II.A.5.b
When Use of the Separate Advisory is Required (p.52)	Moved to Section II.A.5.b
Triggering the Separate Advisory Group (p.52)	Moved to Section II.A.5.b
Activities of the Separate Advisory Group (p.52)	Moved to Section II.A.5.b
Access to Information (p.53)	Moved to Section II.A.5.b
Meetings of Separate Advisory Group (p.53)	Moved to Section II.A.5.b
Requirements of CAM Group Members (p.53)	Moved to Section II.A.5.b
Description of Barriers-to-Contracting- (p.55)	Deleted
B. Risk Management Policy and Strategy (p.55)	Same location and title

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
Current Risk Management Practices – SDG&E’s Hedge Plan, including Hedging Targets (p.55)	Hedging Targets moved to Appendix B. New section number added - II.B.1
5 Year Short-term Procurement Plan and Hedging Strategy (p.56)	Moved to Appendix B
Overview (p.56)	Deleted
First Rolling 12 Months and Year 1 (p.57)	Moved to Appendix B
Year 2 (p.60)	Moved to Appendix B
Intermediate Term – For Years 3 through 5 of the Rolling 5 Year Plan (p.61)	Moved to Appendix B
Long Term (Years 6 Through 10) (65)	Moved to Appendix B
Portfolio Risk Assessment – A Discussion of Forecast SDG&E Risk Positions, Risk Management Products and Selection Criteria	New section number added - II.B.2
Risk Management Products (p.70)	New section number added - II.B.5
Electricity Exposure (p.71)	New section number added - II.B.5.a
Bilateral Structured Contracts (p.71)	Deleted
Fixed-price Forward Trades for Power (p.71)	New section number added - II.B.5.b
Exchange of Risk Exposure (p.72)	New section number added - II.B.5.c
Felling Capacity Purchase (p.72)	Deleted
NYMEX Gas Futures, Options and Gas Basis Swaps (p.72)	New section number added - II.B.5.d
Gas Price Exposure (p.73)	New section number added - II.B.5.e
Risk Management Products Selection Considerations (p.74)	New section number added - II.B.6
Security Requirements (Collateral and Credit) (p.80)	Moved to Appendix B
Collateral and Credit-Related Responsibilities	Deleted
Collateral Requirements (p.81)	Moved to Appendix B
Daily Margin (p.82)	Deleted
Initial Margin (p.83)	Deleted

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
Liquidity Requirements (p.83)	Moved to Appendix B
Products that Contribute to the Need for Collateral (p.84)	Moved to Appendix B
Exchange Cleared Products (p.85)	Moved to Appendix B
ICE Traded Products (p.85)	Moved to Appendix B
Other OTC "Liquidity Demanding" Products (p.85)	Moved to Appendix B
Size-of-Requirements-for-Liquidity-Associated-with-Plan (p.86)	Deleted
SDG&E's Established Liquidity Limit (p.87)	Moved to Appendix B
Operation-of-the-Liquidity-Limit (p.88)	Deleted
Products that Do Not Contribute to the Need for Collateral (89)	Moved to Appendix B
Credit Requirements (p.92)	Combined with Recovery of Credit Related Costs and new section number added - II.B.7
Recovery of Credit-Related Costs (p.93)	Combined with Credit Requirements (Section II.B.7)
Calculation of Unsecured Credit Lines (p.93)	Moved to Appendix B
Contractual Credit Provisions (p.94)	Moved to Appendix B
Measurement (p.99)	Combined with Credit Requirements (Section II.B.7)
Credit Risk Monitoring and Mitigation Strategy (p.101)	Combined with Credit Requirements (Section II.B.7)
Customer Risk Tolerance and VaR-to-Expiration (p.103)	Moved to new section number II.B.3
VaR-to-Expiration (VtE) (p.104)	Moved to new section number II.B.4
VtE Methodology (p.104)	Deleted
C. Fuel Supply Procurement Strategy (p.107)	Moved to Appendix C
SDG&E-Owned Generation Units (p.108)	Moved to Appendix C
SDG&E-Controlled Units (Tolling Agreements) (p.109)	Moved to Appendix C
CDWR Units (p.109)	Moved to Appendix C
Natural Gas Procurement (p.112)	Moved to Appendix C
Products (p.112)	Moved to Appendix C

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
Baseload Gas (p.113)	Moved to Appendix C
Intra-month (swing) Gas (p.113)	Moved to Appendix C
Transportation Services (p.113)	Moved to Appendix C
Operational transactions (p.113)	Moved to Appendix C
Park and Loan Services (p.114)	Moved to Appendix C
Brokerage Services (p.114)	Moved to Appendix C
Sleeve Fees (p.114)	Moved to Appendix C
Sunrise (p114A)	Moved to Appendix C
Miramar Generating Facility (p.118)	Moved to Appendix C
Palomar (p.118)	Moved to Appendix C
CDWR Gas (p.120)	Moved to Appendix C
Gas Supply Plans (p.120)	Moved to Appendix C
Interaction with UEG Portfolio (p.121)	Moved to Appendix C
Natural Gas Hedging (p125)	Moved to Appendix C
Other Products/Other Fuels (p.127)	Moved to Appendix C
Nuclear Fuel (p.127)	Moved to Appendix C
Residual Fuel-Oil-and-Distillate (p.127)	Deleted
Storage and Transportation (p.127)	Moved to Appendix C
Summary (p.127)	Moved to Appendix C
Gas Pipeline Capacity (p.128)	Moved to Appendix C
Gas Storage Capacity (p.129)	Moved to Appendix C
III. Long-Term Procurement Resource Plan 2007-2016 (p.131)	Same location and title.
A. Introduction to Resource Planning and Planning Approach	Same location and title

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline) (p131)	2012 LTPP Location Changes ¹ New Section and Title
B. Load Forecast (p.131)	Same location and title
C. Supply Forecast for Existing or Planned Resources (p.132)	Same Location. Existing and committed resources are in Appendix A tables.
D. Need Determinations (p.136)	Same location and title
E. Need Determinations – Total Service Area (p.136)	Moved to Section III.G and to Appendix A.
F. Need Determination – Bundled Customer System Need (p139)	Moved to Section III.E
G. Bundled Customer Local Capacity Need (p.139)	Moved to Section III.F
H. Resource to Fill Identified Need (p.140)	Same location and title
I. Approved Resource Plan (p.141)	Deleted section. Some contents combined with Section V.
IV. Procurement Strategy by Resource (p.143)	Same location and title
A. Introduction to Resource Acquisition Strategy (p.143)	Same location and title
B. Energy Efficiency (p.143)	Same location and title
C. Demand Response (p.144)	Same location and title
D. Renewable Energy Procurement Strategy (p.146)	Moved to Section IV.E
E. Distributed Generation (California Solar Incentive and Self Served Load) (P.150)	Moved to Section IV.F
F. Other Generation Supply Resources (p.150)	Moved to Section IV.F
G. Integration of Transmission and Procurement Planning (p.151)	Deleted
Key Transmission Projects that are Critical to SDG&E's Procurement Resource Plan (p.151)	Deleted
V. Evaluation of Resource Plan (P.153)	Same location and title
Environmental Impacts (p.153)	Move to Testimony of Robert Anderson for the Required

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
	Assumptions
VI. Cost Recovery Issues (p.156)	Same location and title
Existing Cost Recover Mechanisms For Procurement Costs (p.156)	New section number - VI.A
Current Commission Guidance Related to Debt Equivalence (p.157)	New section number - VI.B
Current Commission Guidance Related to FIN 46(R) (p.158)	New section number - VI.B
Appendices	
A. SDG&E Advice Letter 1920-E (p.160)	Old Appendix A deleted and replaced with new Appendix A: Energy and Capacity Tables, System Need.
B. SDG&E Advice Letter 1926-E (p.165)	Old Appendix B deleted and replaced with new Appendix B: Electricity and Gas Hedging Plan
C. Requirements for the PRG, IE, and RFOs from D.07-12-052 (p.171)	Moved to Appendix H; New Appendix C: Gas Supply Plan
D. Glossary of Terms (p.176)	Moved to Appendix J; New Appendix D: Congestion Revenue Rights
E. Exhibits to Section II (p.184)	Old Appendix E deleted and replaced with new Appendix E: Convergence Bidding
Exhibit II - 1: Physical Procurement Positions (p.184)	Deleted
Exhibit II - 2: SDG&E's Request for Offer Evaluation Methodology Offer Processing and Evaluation (p.192)	Moved to Appendix G
Exhibit II - 3: Portfolio Financial Positions (p.196)	Deleted
Exhibit II - 4: Physical Gas Positions (p.202)	Deleted
F. Exhibits to Section III (p.209)	Old Appendix F moved to Appendix A; and replaced with new Appendix F: GHG (Placeholder)
Exhibit III - 1: SDG&E Service Area System Need (p.210)	Deleted
Exhibit III - 2: Electricity Resource Planning Capacity Resource	Moved to Appendix A

2006 LTPP Section/Page Number (denoted in black) Revisions/Deletions from 2006 LTPP (denoted in redline)	2012 LTPP Location Changes ¹ New Section and Title
Accounting Table (p.211)	
Exhibit III - 3: SDG&E Service Area High Need Detail (p.245)	Deleted
Exhibit III - 4: SDG&E Service Area Low Need Detail (p.247)	Deleted
Exhibit III - 5: Energy Tables (p.219)	Moved to Appendix A
N/A	New Appendix G. RFO Evaluation Methodology
N/A	New Appendix H. Requirements for the Independent Evaluator
N/A	New Appendix I. Glossary of Terms
N/A	New Appendix J. Acronym List
N/A	New Appendix K. Energy Procurement Organization