

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2027
Electric Procurement Revenue Requirement
Forecasts, 2027 Electric Sales Forecast, and GHG-
Related Forecasts

Application 26-05-009
(Filed May 15, 2026)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E)
OCTOBER UPDATE TO APPLICATION**

****REDACTED – PUBLIC VERSION****

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October 15, 2026

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND	1
III.	SUMMARY OF UPDATES TO THE APPLICATION	3
IV.	FACTORS IMPACTING CHANGE IN REVENUE REQUIREMENTS	5
V.	SUPPORTING TESTIMONY	6
A.	Mindy Guardado	6
B.	Jimmy Elias.....	7
C.	LaRee Felan	7
D.	Stephen M. Elliot	7
E.	Sheri Miller	8
VI.	CONFIDENTIALITY.....	8
VII.	CONCLUSION.....	8

Attachment G: GHG Revenue And Reconciliation Form (Attachment D Of Decisions D.14-10-033
And D.15-01-024 As Modified By AL 4587-E-C)

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I. INTRODUCTION

On May 15, 2026, San Diego Gas & Electric Company (“SDG&E”) submitted its Application for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts, 2027 Electric Sales Forecast, and GHG-Related Forecasts (“Application”). In the fall of each year, SDG&E updates certain information in the testimony supporting its forecast application using data that was not available at the time it submitted its application (*i.e.*, the “October Update”). Consistent with that practice, and per the Assigned Commissioner’s Scoping Memo and Ruling dated July 22, 2026 (“Scoping Memo”), SDG&E hereby submits its October Update, which consists of updated information sponsored by several SDG&E witnesses.

In addition, Section III below summarizes the key changes between the October Update and the May filing, including an explanation for any significant changes in the revenue requirements proposed.

II. BACKGROUND

In the Application, SDG&E requested approval of its 2027 forecast of: (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Portfolio Allocation Balancing Account (“PABA”) revenue requirement; (3) the Competition Transition Charge (“CTC”) revenue requirement tracked in the Transition

Cost Balancing Account (“TCBA”); (4) the Local Generation (“LG”) revenue requirement tracked in the Local Generating Balancing Account (“LGBA”); (5) the Modified Cost Allocation Methodology (“MCAM”) revenue requirement; (6) San Diego Community Power’s (“SDCP”) Disadvantaged Communities – Green Tariff (“DAC-GT”); (7) the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement; (8) the BioMAT Non-Bypassable Charge Balancing Account (“BNBCBA”) revenue requirement; and, (9) the GHG allowance revenues and return allocations. By its Application, SDG&E also seeks Commission approval of its 2027 electric sales forecast as directed by D.22-03-003. Additionally, SDG&E requested approval for its proposed 2027: (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) MCAM rates. SDG&E’s Application was supported by the testimony of seven witnesses.

The October Update has traditionally served to update testimony regarding the CTC Market Price Benchmark (“MPB”) and the PCIA benchmarks. This information is provided to SDG&E by the Commission’s Energy Division, which compiles and provides updated input assumptions to the investor-owned utilities (“IOUs”) so that the MPB can be calculated. These assumptions typically do not become available until early fall, as they include forward price curves for all the trading days in September.¹

Updates to the ERRA testimony are warranted since approximately five months have passed since the filing of the May Application, and various input assumptions have changed, some of which include the following:

¹ D.22-01-023, Ordering Paragraph (“OP”) 1 changed the release of the Market Price Benchmarks from November 1st to October 1st of each year to allow for the update process to take place in October instead of November.

As noted above, the ERRA testimony has been updated to include the updated MPBs, which saw a decrease across the board compared to the forecasted MPBs.²

In addition, projected 2026 year-end ERRA and PABA account balances have been revised to reflect actuals through August 2026.

SDG&E has also made updates based on Commission decisions that require certain updates to be included in the October Update and/or other relevant information that has become available since the submission of the Application.

III. SUMMARY OF UPDATES TO THE APPLICATION

In its Application, SDG&E sought approval of a total 2027 forecasted revenue requirement of \$893.0 million. In its October Update, SDG&E seeks approval of its *updated* total 2027 forecasted revenue requirement of \$1,440.7 million, which is comprised of several forecasts of specific items.³ Table 1 below reflects SDG&E's proposed changes to the forecasts set forth in the Application:

² Annual MPB updates were received from the Commission on October 1, 2026. This October Update reflects the final 2026 Renewable Energy Credits ("RECs") and Resource Adequacy ("RA") benchmarks, and also the forecasted 2027 Energy Index, RECs, and RA benchmarks.

³ This forecasted revenue requirement excludes Franchise Fees and Uncollectibles ("FF&U") and the 2027 TMNBC revenue requirement due to confidentiality concerns.

TABLE 1
Proposed Revenue Requirements (\$M)

Line	Description	Currently Authorized Revenue Requirement	2027 Revenue Requirement May Filing		2027 Revenue Requirement t October Update	Updated Change from Current	Updated Change (%) from Current
		w/out FF&U	w/out FF&U		w/out FF&U	w/out FF&U	w/out FF&U
1	ERRA		392.4	379.3	282.0	(110.4)	-28.1%
2	ERRA Year-end Balance		(2.2)	(45.0)	(92.1)	(89.9)	4095.7%
3	PABA		176.4	301.4	623.0	446.6	253.1%
4	PABA Year-end Balance		296.7	144.8	425.6	128.9	43.5%
5	CTC		0.5	0.1	0.1	(0.4)	-72.7%
6	LG		247.1	285.4	306.0	58.8	23.8%
7	LGBA Year-end Balance		(78.4)	(34.0)	0.7	79.1	-100.8%
8	Modified CAM		0.3	0.4	0.5	0.2	67.3%
9	SDCP DAC-GT		-	1.1	1.6	1.6	0.0%
10	BNBCBA (BioMAT)		-	0.1	0.1	0.1	0.0%
11	GHG Revenues for Return ⁴		(152.7)	(140.6)	(106.7)	46.1	-30.2%
12	Total⁵		880.1	893	1,440.7	560.6	63.7%

Based on this October Update, SDG&E projects a combined total increase in revenue requirement of the net \$564.1 million (including FF&U) compared to the currently effective revenue requirements. In total, these changes, when implemented with SDG&E's 2027 sales forecast, would decrease the total bundled system average rate ~(0.9) cents per kWh, or -2.3%.⁶ Without the Residential and Small Business Semi-Annual California Climate Credit ("CCC"), the total bundled system average rate would decrease by ~(1.2) cents per kWh, or -2.9%. For unbundled customers, SDG&E's system average delivery plus PCIA rates will increase ~4.1 cents per kWh, or 17.7%. Without the Residential and Small Business Semi-Annual CCC,

⁴ The GHG Revenues for Return figures include FF&U.

⁵ Sums may not equal due to rounding.

⁶ Revenue requirement increase aligns with Table 1, which excludes TMNBC costs due to confidentiality. Rate and bill impacts include the impact of the TMNBC costs.

SDG&E's system average delivery plus PCIA rates would increase ~3.9 cents per kWh, or 16.0%.

A typical bundled non-California Alternative Rates for Energy ("CARE") residential customer using 400 kilowatt-hours ("kWh") could see a monthly bill increase of 2.3%, or \$47 (from \$183 to \$187). A typical bundled CARE residential customer using 400 kWh could see a monthly bill increase of 3.0%, or \$3 (from \$101 to \$104).⁸ A typical unbundled non-CARE residential customer using 400 kWh could see a monthly bill increase of 22.1%, or \$27 (from \$123 to \$150). A typical unbundled CARE residential customer using 400 kWh could see a monthly bill increase of 28.4%, or \$18 (from \$64 to \$82).⁹

IV. FACTORS IMPACTING CHANGE IN REVENUE REQUIREMENTS

SDG&E's 2027 ERRR revenue requirement decreased by approximately \$97.3 million due to lower compliance costs resulting from the lower 2027 Forecast RA and RPS MPBs compared to the 2026 Forecast MPBs used in SDG&E's May Application. ERRR's projected 2026 year-end balance overcollection increased (\$47.1 million) as a result of the true-up of the REC and RA market values to the 2026 Final MPBs, partially offset by undercollections due to lower actual sales than authorized in January-August. Conversely, SDG&E's 2027 PABA revenue requirement increased by approximately \$321.5 million from the May Application as a result of higher above-market costs for PCIA-eligible resources due to the lower 2027 MPBs. The updated MPB resulted in a notable decrease in forecasted REC sales revenues, which was a

⁷ Differences may not equal due to rounding.

⁸ Customers' actual bill impacts will vary with usage per month, by season and by climate zone. Please refer to the testimony of SDG&E witness Guardado for additional details on rate and bill impacts.

⁹ Customers' actual bill impacts will vary with usage per month, by season and climate zone and when a customer became an unbundled customer (Power Charge Indifference Adjustment ("PCIA")) vintage. Please refer to the testimony of SDG&E witness Guardado for additional details on rate and bill impacts.

significant factor in the increased PABA revenue requirement, as well as lower CAISO supply revenues as a result of lower Energy Index MPBs. PABA's projected year-end balance similarly increased significantly to \$280.8 million as a result of (1) the decreased credits in PABA for the market value of SDG&E's retained RECs and RA as a result of the true-up to the decreased 2026 Final MPBs, (2) the decreased RPS voluntary allocation and MCAM RA sales revenues as a result of the true-up to the decreased 2026 Final MPBs and (3) lower than authorized customer revenues during January – August, which contributed to an undercollection.

V. SUPPORTING TESTIMONY

This October Update includes the testimony of five SDG&E witnesses.¹⁰ Each witness has prepared a markup (served concurrently herewith) of their original direct testimony, in which updates are reflected in a redline format. Those witnesses (and summaries of the updates they performed) are as follows:

A. Mindy Guardado

Based on the updated revenue requirements provided by Ms. Felan, Ms. Guardado updates the rate impacts associated with the ERRA, PABA, CTC, LG, MCAM, SDCP'S DAC GT, and TMNBC revenue requirements as well as the GHG allowance revenue return and projected year-end balances in the ERRA, PABA, LGBA, and BNBCBA. Based on 2027 Energy Division input factors that recently became available, Ms. Guardado updates the CTC and PCIA rates. Ms. Guardado also updates the allowance revenue return based on updated information provided by Mr. Elias. Ms. Guardado also updates the 2027 MCAM rates.

¹⁰ The direct prepared testimonies of James Simmerman and Daniel Skopec were not updated.

B. Jimmy Elias

Mr. Elias updates SDG&E's 2027 forecast of the procurement costs that it expects to record to the ERRA, TCBA, PABA and LGBA, as well as procurement costs related to renewable energy contracts. Mr. Elias also updates SDG&E's forecast of 2027 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which Ms. Felan uses in her 2027 forecast of the ERRA revenue requirement. Additionally, Mr. Elias provides an updated forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2027. Mr. Elias also provides an updated forecast of Tree Mortality Non-Bypassable Charge Balancing Account ("TMNBC") costs. Lastly, Mr. Elias's updated testimony supports Ms. Guardado's development of the GHG allowance revenue return allocation and the volumetric revenue return for small business and residential customers, and the PCIA.

C. LaRee Felan

Based on updated forecasts provided by Mr. Elias, Ms. Felan updates SDG&E's 2027 forecast of (1) the ERRA revenue requirement and the projected 2026 ERRA year-end balance, which includes GHG costs; (2) the CTC revenue requirement; (3) the LG revenue requirement; (4) TMNBC revenue requirement; (5) PABA revenue requirement and the projected 2026 PABA year-end balance; and (6) the MCAMBA revenue requirement.

D. Stephen M. Elliot

Mr. Stephen Elliott's testimony updates revenues and costs for GHG compliance instruments to satisfy SDG&E's 2025-2026 compliance obligations under the cap-and-trade program. Mr. Elliott's testimony also includes SDG&E's 2025-2026 revenues related to the sale of its allowance allocation.

E. Sheri Miller

Ms. Sheri Miller's testimony updates the PCIA costs to include the updated PCIA MPBs issued by the Energy Division the beginning of October.

VI. CONFIDENTIALITY

Along with its original Prepared Direct Testimony, SDG&E submitted declarations attesting to the confidentiality of data presented therein. SDG&E requested that the confidential information in its Prepared Direct Testimony be kept confidential pursuant to Public Utilities Code §§ 583, 454.5(g), D.06-06-066, D.08-04-023, and D.14-10-033, as identified in SDG&E's confidentiality matrix. This October Update contains confidential information that is identified in SDG&E's confidentiality matrix and covered by declarations, which are being submitted with the respective Updated Prepared Direct Testimony. SDG&E requests that the same confidential treatment requested with the original filing apply to the information marked confidential in this October Update.

VII. CONCLUSION

SDG&E respectfully requests that the Commission approve the forecasts and proposals in its Application, subject to the updates contained in the October Update.

Respectfully submitted,

/s/ Krista deBoer

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UPDATED ATTACHMENT G

GHG REVENUE AND RECONCILIATION FORM (ATTACHMENT D OF DECISIONS D.14-10-033 AND D.15-01-024 as modified by AL 4587-E-C)

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	Year 2021		Year 2022		Year 2023		Year 2024		Year 2025		Year 2026		Year 2027	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	17.12	23.15	28.86	29.48	29.02	\$	38.26	\$	38.10	N/A	33.48		34.40	
2 Allocated Allowances (MT)	6,765,147	6,732,862	6,737,256	6,651,508	6,586,708		6,435,664	6,345,211	6,279,487	6,196,720	6,208,750		4,312,349	
3 Revenues (\$)	3,177,937													
4 Prior Balance		7,376,791	(15,086,698)	(19,307,155)	(5,109,732)	(1,132,447)	606,214	(18,481,272)	(33,945,829)	(314,981)	46,699,335	72,132,061	35,536,593	
5 Allowance Revenue	(115,836,437)	(161,825,442)	(194,403,522)	(189,236,214)	(191,139,679)	(214,387,613)	(246,234,500)	(223,553,623)	(227,092,414)	(173,849,170)	(207,952,428)	(188,752,947)	(148,326,837)	
6 Interest	2,372	13,171	(16,300)	(286,178)	(740,443)	350,661	856,139	(722,938)	(130,781)	1,511,155	1,641,714	2,009,149	133,165	
7 Franchise Fees and Uncollectibles	(1,189,180)	(1,176,322)	(2,112,270)	(2,301,661)	(2,111,339)	(2,209,861)	(2,804,571)	(2,370,594)	(2,988,533)	(3,121,701)	(1,943,870)	(2,173,896)	(1,672,464)	
8 Subtotal Revenues	(113,850,308)	(155,612,202)	(211,618,790)	(211,131,208)	(199,101,193)	(217,379,260)	(247,577,158)	(245,628,424)	(264,157,558)	(175,774,697)	(161,456,249)	(116,795,633)	(114,329,543)	
9 Expenses (\$)														
10 Outreach and Administrative Expenses (from Template D3) ²	45,133	104,357	59,799	27,778	27,778	83,000	6,075	(9,956)	(9,956)	-	17,653	17,653	27,706	
11 Franchise Fees and Uncollectibles	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 Interest	-	(25)	-	-	-	-	-	-	-	-	-	-	-	
13 Subtotal Expenses	45,133	104,332	59,799	27,778	27,778	83,000	6,075	(9,956)	(9,956)	-	17,653	17,653	27,706	
14 Total Allowance Revenue Approved for Programmatic Use (\$) (Sum of Lines 14a through 14h)	17,773,708	38,035,035	20,361,326	16,039,939	16,039,939	14,462,722	14,462,722	5,851,346	14,725,635	-	8,711,908	13,493,812	7,642,231	
14a SOMAH (Current Year's Request)	11,583,644	31,023,596	19,440,352	12,015,972	12,015,972	12,015,972	12,015,972	12,015,972	12,015,972	-	6,007,506	6,007,506	225,869	
14d Prior Year SOMAH True-up ³	100,486	(108,540)	(209,026)	2,933,967	2,933,967	1,351,750	1,351,750	(5,827,543)	1,614,663	-	1,583,922	1,583,922	-	
14e DAC SASH	1,030,000	2,060,000	1,030,000	1,090,000	1,090,000	1,095,000	1,095,000	1,095,000	1,095,000	-	1,120,000	813,944	-	
14f DAC-GT	-	-	-	-	-	-	-	10,218	-	-	-	-	-	
14g CS-GT	-	-	-	-	-	-	-	(1,642,301)	-	-	-	-	-	
14h State Transmission Accelerator	-	-	-	-	-	-	-	-	-	-	-	5,087,760	7,416,342	
15 Net GHG Revenues (\$) (Line 8 + Line 13 + Line 14)	(96,031,467)	(117,472,135)	(191,297,664)	(195,063,491)	(183,033,476)	(202,833,538)	(233,108,361)	(239,787,035)	(249,441,878)	(175,774,697)	(152,726,688)	(103,274,368)	(106,659,807)	
16 GHG Revenues to be Distributed in Future Years	-	-	-	-	-	-	-	-	-	-	-	-	-	
17 Net GHG Revenues Available for Customers in Forecasted Year (\$) (Line 16 + Line 15)	-	-	-	-	-	-	-	-	-	-	-	-	-	
18 GHG Revenue Returned to Eligible EITE Customers (\$)														
19 EITE Customer Return ⁴	2,495,128	3,311,910	389,295	514,470	514,470	743,942	514,470	2,909,649	2,909,649	5,225,721	3,618,140	2,855,691	2,855,691	
20 Semi-Annual Climate Credit														
21 Number of Eligible Residential Bundled Households	1,351,533	1,319,172	1,307,609	631,782	668,860	429,449	430,348	391,273	292,726	288,153	289,376	268,937	288,608	
22 Number of Eligible Residential Unbundled Households	-	51,339	54,259	748,759	702,461	955,869	962,326	1,006,130	1,106,940	1,091,617	1,120,379	1,011,716	1,135,846	
23 Number of Eligible Small Business Customers	-	-	125,715	126,523	131,966	126,941	94,210	114,748	113,083	111,316	100,517	96,393	101,350	
24 Total Customers Eligible for Climate Credit	1,351,533	1,370,711	1,487,583	1,507,064	1,503,287	1,512,259	1,486,784	1,512,151	1,514,749	1,491,086	1,510,272	1,377,047	1,525,804	
25 Per-Customer Semi-Annual Climate Credit (-0.5 x (Line 15 + 19) ÷ Line 24)	34.60	34.60	64.17	64.17	60.71	60.71	78.22	78.22	81.38	81.38	48.36	48.36	34.02	
26 Total Revenue Distributed for the Climate Credit (\$) (2 x Line 24 x Line 25)	93,536,339	94,853,170	190,908,370	193,416,573	182,519,006	183,608,321	237,593,891	236,562,405	246,532,229	242,681,037	149,108,548	135,955,270	103,803,916	
27 Revenue Balance (\$) (Line 15 + Line 19 + Line 26)	N/A	(19,397,155)	N/A	(1,132,447)	N/A	(18,481,272)	N/A	(314,981)	N/A	72,132,061	N/A	35,536,593	N/A	

¹ Current amounts reflect January through August 2026 actuals with September through December 2026 forecasts.

² Forecasted Outreach & Administrative Expenses are the forecasted expenses (from Template D-3) adjusted for any forecasted prior year's under/over-collection in the GHGCOEMA and GHGCOA.

³ Joint OUI Advice Letter 4807-E was filed on 2/27/2026 for the 2025 SOMAH True-Up Funding of \$225,889. SOG&E's final proportional share of the \$100 million cap in the annual SOMAH Funding.

⁴ The Allocated Allowances reflect the currently approved California Air Resources Board ("CARB") regulation.

⁵ Line 19 "EITE Customer Return" includes the Small Business Volumetric Return for 2021 Forecast and 2021 Recorded of \$1,656,571 and \$2,922,616, respectively.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	Year 2021		Year 2022		Year 2023		Year 2024		Year 2025		Year 2026		Year 2027	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ²	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)														
2	Utility Owned Generation (UOG)														
3	Tolling Agreements														
4	Energy Imports (Specified)														
5	Energy Imports (Unspecified)														
6	Qualifying Facility (QF) Contracts														
7	Contracts with Financial Settlement														
8	Subtotal														
9	Total Emissions (MTCO2e)														
10	Proxy GHG Price (\$/MT)	\$ 17.12	\$ 23.15	\$ 28.86	\$ 29.02	\$ 34.06	\$ 38.26	\$ 538.10	\$ 36.16	\$ 29.89	\$ 33.48	\$		\$ 34.40	
11	GHG Costs (\$)														
12	Direct GHG Costs														
13	Direct GHG Costs - Financial Settlement														
14															
15	Total Costs														
16	Forecast Variance (\$)														

CONFIDENTIAL INFORMATION

¹ Also reflects adjustment for shift in regulatory accounting from cash to accrual
² Recorded data is equal to forecast and will be updated with the October Update filing.

Template D-3: Detail of Outreach and Administrative Expenses

		2025		2026		2027	
Line	Description	Forecast	Recorded²	Forecast	Recorded¹	Forecast	Recorded
1	Utility Outreach Expenses (\$)						
2a	SMB Communications	(25,560)	-	(9,646)	(9,646)	4,091	
2b	Other (Consultant)						
3	Subtotal Outreach	(25,560)	-	(9,646)	(9,646)	4,091	
4	Utility Administrative Expenses (\$)						
5	Marketing - SDG&E (email, bill insert)	15,604	-	27,299	27,299	23,615	
6	Subtotal Administrative	15,604	-	27,299	27,299	23,615	
7	Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	(9,956)	-	17,653	17,653	27,706	
8	Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-	-	
9	Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	(9,956)	-	17,653	17,653	27,706	

TARF Reporting

San Diego Gas & Electric

Electric & Fuel Procurement

Verification of Quarterly TARF Remittances Pursuant to 748.5 (d)(1) and D.26-04-036

From July 1, 2026 to July 1, 2031

Auction proceeds and TARF remittance amounts are recorded in GHGRBA

Auction Date	Electric GHG Auction Proceeds	5% remittance amount	Remittance Date
8/19/2026	\$		9/30/2026
11/18/2026		\$ -	
Feb-27		\$ -	
May-27		\$ -	
Aug-27		\$ -	
Nov-27		\$ -	
Feb-28		\$ -	
May-28		\$ -	
Aug-28		\$ -	
Nov-28		\$ -	
Feb-29		\$ -	
May-29		\$ -	
Aug-29		\$ -	
Nov-29		\$ -	
Feb-30		\$ -	
May-30		\$ -	
Aug-30		\$ -	
Nov-30		\$ -	
Feb-31		\$ -	
May-31		\$ -	
YTD Total	\$		

OP 6(c) – CTARF Fund Status

	Encumbered	Unencumbered
Prior Period Transfers	\$ -	\$ -
Current Period Cap-and-Invest Auction Transf	\$ -	\$
Cumulative Transfers	\$ -	\$

Source: California Infrastructure and Economic Development Bank confirmation dated October 6, 2026