

Application No.: A.26-05-XXX
Exhibit No.: SDGE-5
Witness: Sheri Miller

PREPARED DIRECT TESTIMONY OF
SHERI MILLER
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

*****REDACTED - PUBLIC VERSION*****

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



May 15, 2026

TABLE OF CONTENTS

I.	PURPOSE AND OVERVIEW	1
II.	PCIA-ELIGIBLE COSTS.....	1
III.	PCIA BENCHMARKS.....	3
IV.	RESOURCE ADEQUACY AND THE RA BENCHMARKS	4
V.	RPS AND THE REC BENCHMARK.....	6
VI.	VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES	6
VII.	MARKET OFFER OF REC ATTRIBUTES.....	7
VIII.	GREEN TARIFF SHARED RENEWABLES.....	7
IX.	SALES OF RESOURCE ADEQUACY.....	8
X.	MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND ANNUAL TRUE-UP	9
XI.	OTHER COSTS RECOVERED IN PABA.....	10
XII.	SUMMARY	10
XIII.	QUALIFICATIONS	12

ATTACHMENT A – DECLARATION OF SHERI MILLER

ATTACHMENT B – DECLARATION OF AARON FRANZ REGARDING
CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT
TO D.16-08-024, *et al.*

ATTACHMENT C - FORECASTED 2027 YEAR END BALANCE OF PABA (**Confidential**)

1 The monthly resource cost includes both contract costs and costs related to Utility-Owned
2 Generation (“UOG”). The UOG operation and maintenance (“O&M”) and capital-related
3 expenses for the Palomar, Miramar, Cuyamaca, Desert Star, and Ramona Solar resources were
4 approved for recovery through the Non-Fuel Generation Balancing Account (“NGBA”)
5 mechanism in the General Rate Case (“GRC”) decision, D.24-12-074. Since above-market costs
6 are required to be recovered through the PCIA mechanism, the above-market costs for these
7 resources are recovered in PABA, and the market value of the compliance instruments that
8 SDG&E expects to use for its own compliance is recovered through NGBA.

9 In addition, SDG&E’s Modified Cost Allocation Mechanism (“MCAM”) was approved by
10 D.22-05-015. The resources subject to MCAM cost recovery follow the decision’s requirements
11 to recover MCAM costs using PCIA cost recovery in PABA vintage 2019,¹ with the exception of
12 costs that are required to be recovered in the MCAM balancing account (“MCAMBA”)² or are
13 subject to a Cost Allocation Mechanism (“CAM”) via the Local Generating Balancing Account
14 (“LGBA”).³ The PABA cost recovery treatment includes credits to PABA for the market value of
15 any MCAM resources that are forecasted to be used for SDG&E’s resource adequacy compliance
16 requirements, using the same process that is used for other resources recovered in PABA.

17 The forecasted actual costs, generation volumes and the CAISO net revenues are provided
18 by SDG&E’s witness Mr. Elias. Each of the PCIA-eligible resources is identified as belonging to
19 a specific year, called the resource’s “vintage,” which corresponds to the year in which the
20 contract was executed or the year in which the UOG resource commenced operations. In most
21 situations, the costs, generation, CAISO net revenues, sales revenues, and market value of

¹ Per D.22-05-015, Ordering Paragraph (“OP”) 4.

² *Id.* at OP 2.

³ *Id.* at OP 10.

1 attributes are assigned the vintage of the generating resource, unless they are required to have a
 2 different cost recovery per another CPUC decision. In addition, D.20-05-006 ordered a “non-
 3 vintaged” subaccount to be established in PABA for the purpose of allocating certain costs to all
 4 PCIA-eligible customers without limiting recovery to the timeline of the resource vintage. This
 5 subaccount has been included in PABA.

6 **III. PCIA BENCHMARKS**

7 Pursuant to D.22-01-023, Energy Division issues updated PCIA market price benchmarks
 8 (“MPB”) in the beginning of October. This May filing of the 2027 ERRA Forecast uses the latest
 9 available benchmarks to calculate PCIA, shown in Table 1 below, that were received from Energy
 10 Division on October 1, 2025. In October of 2026, Energy Division will issue new benchmarks,
 11 and SDG&E will submit an updated 2027 ERRA Forecast in its October Update incorporating the
 12 new benchmarks, and Table 1 below will be updated accordingly.

13 **Table 1 – 2026 SDG&E Forecast Adders**

14

Energy Index On-Peak	\$39.90 (\$/MWh)
Energy Index Off-Peak	\$48.48 (\$/MWh)
System RA	\$11.53 (\$/kW-month)
Local RA	\$11.53 (\$/kW-month)
Flexible RA	\$11.53 (\$/kW-month)
Renewable Portfolio Standard (“RPS”) adder – REC	\$62.45 (\$/MWh)

15
 16 D.23-06-006 requires SDG&E to calculate a factor to be multiplied by the Commission-
 17 provided energy benchmarks, as described in Appendix B of the decision. The factor is a measure
 18 of the difference between a three-year historical average of actual energy revenues received for
 19 PCIA resources and the actual average CAISO SP15 day ahead market prices. In accordance with
 20 D.23-06-006, SDG&E has completed its calculation of its weighting factors to be used in its 2027

1 ERRA Forecast filing, using historical data from the last three full years (2023, 2024, and 2025).
2 This calculation is provided in the file “CONFIDENTIAL SDG&E 2027 ERRA Forecast Energy
3 Index calculation workpaper”.

4 SDG&E then used the issued on-peak and off-peak forecast energy indexes together with
5 the updated energy factor to calculate the forecasted weighted average price of the energy
6 component of the contract attributes. This price is then multiplied by the forecasted hourly
7 generation for each resource to calculate the expected market value of the PCIA resource
8 generation in 2027. This expected market value represents the amount of CAISO revenue that
9 SDG&E expects to receive for its PCIA resources, including contracted resources and UOG. This
10 amount is presented in Ms. Felan’s testimony in Table 8 “PABA revenue requirement,” labeled
11 “Supply ISO Revenues.” The actual CAISO revenues will be recorded in PABA each month
12 when they are received by SDG&E, and the revenue will partially offset the costs of the PCIA
13 resources.

14 **IV. RESOURCE ADEQUACY AND THE RA BENCHMARKS**

15 SDG&E estimated its 2027 RA compliance amount for this filing based upon its 2026 RA
16 requirement, using the coincident peak hour of each month. The estimated requirement is then
17 allocated to SDG&E’s portfolio of resources, which include MCAM, PCIA, and CAM. As part of
18 the PCIA Indifference Calculation, the allocated MW for compliance that are assigned to PCIA-
19 eligible resources are determined.

20 To calculate the forecast market value of the RA attributes of these resources, each
21 resource is assigned to one of the Local, Flex, or System RA categories, based on the RA category
22 that the resource most commonly serves. Pursuant to D.18-10-019, if a resource serves more than
23 one category, Local is assigned first if applicable, then Flex, and then System. The most updated
24 monthly net qualifying capacity (“NQC”) listing is obtained from the CAISO website, and an

1 average monthly NQC value for each resource is calculated. The forecasted compliance RA
2 allocation for each resource is calculated by taking the average monthly NQC and multiplying it
3 by a ratio of compliance requirement and total capacity. The compliance allocation for that
4 resource is then multiplied by the current forecasted RA benchmark to calculate the forecasted
5 market value of the RA for 2027. The resulting forecast market value for contract resources is
6 then included in the ERRA revenue requirement as an expense, as it represents the value of the RA
7 attributes which SDG&E retained to use for the RA compliance obligations on behalf of its
8 bundled customers. The market value associated with UOG resources is excluded from ERRA
9 because it is included in NGBA, as the UOG resources were previously approved for recovery in
10 SDG&E's 2024 GRC (D.24-12-074.)

11 D.22-06-050 adopted a 24-hour slice of day ("SOD") approach to RA program
12 requirements. At the time of this May filing, no changes to the PCIA RA methodology for SOD
13 have been approved by the Commission. SDG&E is therefore making no such changes to the
14 PCIA methodology for calculating the RA market value in this filing, and the methodology is
15 consistent with prior years' filings.

16 On February 26, 2025, the Commission issued Rulemaking ("R.") 25-02-005 to reform the
17 ERRA and the PCIA policies and processes. Track 1 of the rulemaking approved changes to the
18 calculation of the RA MPB, and ordered the new calculation to be used in the October update
19 filing of the 2026 ERRA Forecast and forward. SDG&E incorporated those changes into its 2026
20 ERRA Forecast, and is including them in this 2027 ERRA Forecast as well. Track 2 of the
21 rulemaking is in process at the time of this filing, and is focused on questions related to the
22 valuation of pre-2019 RECs held by the three IOUs. If Track 2 of the proceeding results in CPUC
23 directives that impact the October Update filing of this 2027 Forecast, SDG&E will include them
24 in testimony in its October filing.

1 **V. RPS AND THE REC BENCHMARK**

2 To calculate the forecasted market value of the REC attributes of the resources, the
3 applicable REC benchmark is applied to the 2027 forecasted generation expected to provide the
4 required compliance instruments for SDG&E’s bundled customers. The resulting forecasted
5 market value for contract resources is then included in the ERRA revenue requirement as an
6 expense, as it represents the value of the REC attributes which SDG&E is forecasting to retain to
7 use for the Renewable Portfolio Standard (“RPS”) compliance obligations on behalf of its bundled
8 customers. As with the RA value discussed above, the market value associated with RECs from
9 UOG generation is excluded from ERRA and recovered in NGBA. The total of the REC and RA
10 market values for contracts is included in Ms. Felan’s testimony in Table 1 labeled “ERRA
11 Revenue Requirement,” on line 3 “non-CTC contract costs,” and also mentioned in Ms.
12 Guardado’s testimony as part of the “up-to-market” energy procurement costs recovered in ERRA.

13 At the time of this filing, SDG&E believes it will have sufficient RECs from 2027
14 renewable generation available to fulfill 100% of its 2027 RPS obligation. However, as part of its
15 compliance strategy, SDG&E may elect to purchase additional RECs in the market to cover a
16 portion of its 2027 RPS compliance obligation. If SDG&E does purchase Category PCC1, PCC2,
17 or PCC3 RECs for this purpose, the cost will be recovered from bundled customers in ERRA. At
18 the time of this filing, SDG&E has not yet finalized any contracts for purchase. If contracts are
19 signed before the October update filing in this proceeding, SDG&E will include them in its
20 October update revenue requirements.

21 **VI. VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES**

22 Pursuant to D.21-05-030, D.22-01-004, and its approved Advice Letters (“AL”) 4121-E
23 and 4257-E, SDG&E includes forecasted RPS allocations in this 2027 forecast application. These

1 allocations include short-term and long-term RPS contracts with the Load-Serving Entities
2 (“LSE”) in SDG&E’s territory that voluntarily elected to receive PCIA RPS allocations.

3 In addition, this forecast also assumes that SDG&E will take 100% of its own REC
4 allocations in 2027. Forecasts of allocations are based upon the forecasted generation of resources
5 in the allocation pool, multiplied by the percentage of load and elections for each LSE contract,
6 and applying the 2026 forecasted RPS MPB. Forecasted allocation revenues are reflected in the
7 PABA revenue requirement in this filing. Pursuant to D.22-11-021, any forecasted generation in
8 excess of SDG&E’s retained RPS that is not sold or allocated to any other LSE will not be
9 included in the market value expense forecasted in ERRA.

10 **VII. MARKET OFFER OF REC ATTRIBUTES**

11 Pursuant to D.21-05-030 and approved advice letters 3983-E, 4117-E, 4126-E, 4188-E,
12 4249-E, 4250-E, SDG&E has implemented its PCIA market offer process for RPS products that
13 were not previously allocated as part of the PCIA voluntary allocation process. SDG&E has
14 executed sales contracts for market offers, which will be active in 2027. Accordingly, SDG&E
15 has included the associated forecasted revenues in this filing, which are reflected in the PABA
16 revenue requirement.

17 **VIII. GREEN TARIFF SHARED RENEWABLES**

18 Senate Bill (“SB”) 43 was intended to expand access to renewable energy to ratepayers’
19 testimony. Until August 2022, SDG&E provided its bundled customers with the option to
20 purchase 100% renewable energy through the Green Tariff Shared Renewables (“GTSR”)
21 program, branded at SDG&E as EcoChoice. The EcoChoice option enabled customers to
22 purchase renewable energy from contracted solar resources that have been dedicated to the
23 program, which included Midway Solar and Wister Solar. The costs for these resources were to
24 be recovered in the Green Tariff Shared Renewable Balancing Account (“GTSRBA”).

1 On August 25, 2022, the CPUC issued a Ruling that granted SDG&E's request for
2 authorization to temporarily suspend its EcoChoice program.⁴ This order suspended the
3 EcoChoice option to new participants and directed SDG&E to quickly disenroll customers from
4 the EcoChoice program. Because there will be no EcoChoice participation in 2027, no contract
5 costs for GTSRBA are included in this 2027 ERRA forecast. The two dedicated resources
6 mentioned above are instead included in the standard PCIA cost allocation process.

7 SB 43 codified in Public Utilities Code Section 2833(t) states,

8 A participating utility shall, in the event of participant customer attrition or other
9 causes that reduce customer participation or electrical demand below generation
10 levels, apply the excess generation from the eligible renewable energy resources
11 procured through the utility's green tariff shared renewables program to the utility's
12 renewable portfolio standard procurement obligations or bank the excess generation
13 for future use to benefit all customers in accordance with the renewables portfolio
14 standard banking and procurement rules approved by the commission.

15 Pursuant to this mandate, SDG&E has included the forecasted generation from both of its green
16 tariff dedicated generators in the cost recovery mechanism used for its RPS eligible contracts,
17 namely ERRA and PABA, through the PCIA process.

18 **IX. SALES OF RESOURCE ADEQUACY**

19 Pursuant to D.22-05-015, SDG&E has signed bilateral sales agreements with LSEs in its
20 territory to sell resource adequacy from resources subject to MCAM cost recovery. D.23-12-014
21 further refined this directive by ordering the IOUs to revise the methodology of calculating the
22 amount of MCAM RA that was to be sold to each LSE, effectively raising the amount of RA
23 available for sale with delivery beginning on January 1, 2025. In September of 2024, SDG&E
24 filed AL 4516-E with amendments to its original MCAM RA sales contracts. The MCAM
25 volumes that are estimated to be sold for 2027 delivery pursuant to these decisions are removed

⁴ A.22-05-023, Administrative Law Judge's Ruling Granting Request for Green Tariff Suspension (August 25, 2022) at OP 1.

1 from the vintage 2019 capacity volumes in the calculation of the PCIA indifference amount. The
2 sales revenues are forecasted for cost recovery according to the MCAM methodology.

3 SDG&E will also hold solicitations to sell 2027 resource adequacy from non-MCAM
4 contracts, and as Mr. Elias states in his testimony, SDG&E is not held to any particular
5 methodology in determining the 2027 forecasted sales quantities. For this May filing, SDG&E
6 used the most recent 12 months of historical RA sales to forecast 2027 RA sales. This is meant to
7 be an approximation of how much PCIA-eligible RA will actually be sold, and these revenue
8 credits are included in this 2027 PABA forecast, with no added buffer quantity. The estimated RA
9 sales revenues from PCIA-eligible resources are incorporated into the PCIA calculation/PABA in
10 the corresponding vintages, and the estimated RA sales revenues from CAM-eligible resources are
11 included in the LGBA revenue requirement. If by the time the October update of this filing is
12 calculated SDG&E has more up to date information regarding its 2027 RA sales, it will
13 incorporate that information into the October update filing.

14 The RA sales revenues included in this May filing are subject to several assumptions. The
15 actual bilateral contracts that may be signed to sell 2027 RA may be affected by the current
16 market, weather, and other environmental factors, and therefore the actual revenues may be
17 different than in this filing. In addition, this forecast does not take into consideration the fact that
18 RA sourced from renewable resources may sell at a discount due to the intermittent nature of solar
19 and wind, and RA sourced from energy storage units may also sell at a discount because they are
20 not 24-hour resources.

21 **X. MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND**
22 **ANNUAL TRUE-UP**

23 Accruals for the estimated REC and RA market values of PCIA eligible resources are
24 recorded monthly to PABA and ERRR by SDG&E's Settlements & Systems group as part of the
25 monthly accounting close process. Pursuant to D.19-10-001, these amounts will be adjusted when

1 the final 2026 benchmarks are received from Energy Division later this year. The October Update
2 filing of my testimony will include a true-up of the REC and RA market values recorded during
3 January-August 2026, to reflect the updated benchmarks. This true-up will be included in the
4 October Update of the forecasted PABA year-end balance in my testimony.

5 **XI. OTHER COSTS RECOVERED IN PABA**

6 As SDG&E's witness Mr. Elias describes in his testimony, this forecast of the 2027 PABA
7 revenue requirement includes the natural gas fuel costs and associated Greenhouse Gas ("GHG")
8 expenses for PCIA-eligible conventional resources. These costs are included in the PCIA as part
9 of the above-market cost calculation of the gas-fired resources in their respective vintages.

10 In addition, SDG&E includes the 2026 PABA year-end projected balance of \$144.783
11 million in its 2027 Indifference Amount, pursuant to D.19-10-001 which authorized the PABA
12 prior year-end balance recovery through that mechanism. The 2026 PABA forecasted year-end
13 balance is calculated using three months of actual data and nine months of forecasted data. It is
14 presented in Attachment C to my testimony, and also mentioned by SDG&E's witnesses Ms.
15 Guardado and Ms. Felan.

16 **XII. SUMMARY**

17 A summary of the total 2027 forecasted PCIA above market cost (without franchise fees
18 and uncollectibles) is shown in Table 2 below. The CAISO revenues, fuel, GHG costs, and total
19 PABA revenue requirement shown below are also referenced in Ms. Felan's testimony.

1

Table 2 – 2027 PCIA Forecast Summary

	PCIA Components	2027 Forecast (in millions)
1.	PCIA contract costs	██████
2.	PCIA UOG costs	\$229
3.	Generation fuel cost	██████
4.	Direct GHG costs	██████
5.	Less VAMO REC market offer sales	██████
6.	Less RA sales	██████
7.	Less VAMO REC allocations	██████
8.	Less contract PCIA REC market value	(\$99)
9.	Less contract PCIA RA market value + buffer	(\$73)
10.	Less UOG PCIA RA market value	(\$66)
11.	Less CAISO supply revenues	██████
12.	= Total Indifference Amount revenue requirement	██████

2

3

This concludes my prepared direct testimony.

4

1 **XIII. QUALIFICATIONS**

2 My name is Sheri Miller. My business address is 8315 Century Park Court, San Diego,
3 CA 92123. I am employed by SDG&E as an Energy Trading Operations & Support Principal in
4 the Settlements & Systems group in the Energy Supply organization. My responsibilities include
5 writing and reviewing ERRA witness testimony and advising on regulatory and legislative matters
6 that impact SDG&E's energy and gas procurement settlements and cost recovery processes.

7 I joined SDG&E in October 2000, and since that time, I have held various positions at
8 SDG&E including Senior Accountant, Principal Accountant, and Settlements Manager. I have
9 experience with many aspects of SDG&E's accounting processes, including approving the gas and
10 electric commodity invoices and overseeing the reporting processes.

11 I received a Bachelor of Science degree in Accounting and a Masters of Business
12 Administration from National University. I am also a Certified Public Accountant licensed in the
13 state of California.

14 I have previously testified before the California Public Utilities Commission.

ATTACHMENT A

DECLARATION OF SHERI MILLER

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

**DECLARATION
OF SHERI MILLER**

A.26-05-xxx

**Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2027 Electric Procurement Revenue Requirement Forecast, 2027
Electric Sales Forecast, and GHG-Related Forecasts**

I, Sheri Miller, declare as follows:

1. I am employed as an Energy Trading Operations & Support Principal at San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2026 filing Application for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts, 2027 Electric Sales Forecast, and GHG-Related Forecasts (“Application”). Additionally, as an Energy Trading Operations & Support Principal, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. This Declaration is meant to apply to my testimony and workpapers, and also certain duplicate tabs in Ms. Guardado’s workpapers. I am providing this Declaration to demonstrate that the confidential information (“Protected Information”) in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix (“Matrix”) attached to the Commission’s Decision (“D.”) 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and

- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.¹ As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Amounts highlighted in yellow in Table 2 of testimony named “2027 PCIA Forecast Summary”	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Cells highlighted in yellow in Attachment C “Forecasted 2026 Year End PABA Balance of PABA”	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
	IV.A	Forecast of IOU Generation Resources; confidential for three years
	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years
	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL 2027 Fcst filing PCIA workpapers.xlsx”, tab ‘Utility Owned Generation’	IV.A	Forecast of IOU Generation Resources; confidential for three years

¹ In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-D. Accordingly, SDG&E seeks confidential treatment of this data under those provisions, as applicable.

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL 2027 Fcst filing PCIA workpapers.xlsx”, tab ‘Workpaper IOU TPS’	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL 2027 Fcst filing PCIA workpapers.xlsx”, tab ‘PCIA Inputs’.	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL SDG&E 2027 ERRA Fcst Update Energy Index calculation workpaper”, tabs ‘Weight calculation’ and ‘volumes and revenues’.	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)

4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. SDG&E will comply with the limitations on confidentiality specified in the Matrix for the Protected Information.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized, masked or otherwise protected in a manner that would allow further disclosure of the data while still protecting confidential information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 15th day of May 2026, in San Diego, California.

Sheri Miller

Sheri Miller
Energy Supply Operations & Support Principal

San Diego Gas & Electric Company

ATTACHMENT B

**DECLARATION OF AARON FRANZ
CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024, *et al.***

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

**DECLARATION OF AARON FRANZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024, *et al.***

I, Aaron Franz, do declare as follows:

1. I am the Manager of the Settlements & Systems department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Miguel Romero, Senior Vice President of Energy Innovation & Commercial Development. I have reviewed Sheri Miller’s Prepared Direct Testimony (“Testimony”) in support of the May filing of SDG&E’s “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”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decisions (“D.”) 14-10-003, D.16-08-024, D.17-05-035, and D.17-09-023 to demonstrate that the confidential information (“Protected Information”) provided in the Testimony is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 15th day of May, 2026, at San Diego.



Aaron Franz
Manager, Settlements & Systems

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2027 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
Table 2, line 4: Direct GHG Costs	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g). California Code of Regulations, Title 17, Section 95914(c)(1)	GHG emissions forecasts: Providing these forecasts to market participants would allow them to know SDG&E's forecasted GHG obligation, thereby compromising SDG&E's contractual bargaining power such that customer costs are likely to rise. Thus, the release of this non-public confidential information will unjustifiably allow market participants to use this information to the disadvantage of SDG&E's customers.

ATTACHMENT C

FORECASTED 2026 YEAR END BALANCE OF PABA

CONFIDENTIAL

**SAN DIEGO GAS & ELECTRIC
ATTACHMENT C
FORECASTED 2026 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES
(THOUSANDS OF DOLLARS)**

Line No.	Non-Vintage	Yin 2002	Yin 2003	Yin 2004	Yin 2005	Yin 2006	Yin 2007	Yin 2008	Yin 2009	Yin 2010	Yin 2011	Yin 2012	Yin 2013	Yin 2014	Yin 2015	Yin 2016	Yin 2017	Yin 2018	Yin 2019	Yin 2020	Yin 2021	Yin 2022	Yin 2023	Yin 2024	Yin 2025	Total	
Recorded Balances from January through March 2026																											
(a)																											
1	Beginning Balances	(783)	(1,047)	(26,306)	17,022	16,134	67,029	(6,363)	(2,439)	38,089	119,792	60,037	(7,450)	(199)	17,040	(12,017)	16,035	21,755	(4,056)	19,436	(65,202)	(36,728)	(5,378)				289,687
2	Portfolio Costs	105	-	32,864	5,087	5,747	1,651	2,232	(112.8)	12,847	26,102	12,267	411	100	162	-	(7,743)	(135)	(3,153)	-	12,141	-	1,009				101,641
3	Brown Power Market Value	-	-	-	-	-	-	-	3,017.3	1,739	-	-	-	-	-	-	6,021	-	-	-	-	-	-	-	-	-	10,837
4	Imputed REC Market Value	-	-	-	(455)	(939)	-	-	(2,892.1)	(2,127)	(6,216)	(2,085)	(104)	-	(49)	-	(1,152)	(84)	-	-	-	-	-	-	-	-	(16,092)
5	Imputed RA Market Value	-	-	(68)	(675)	(3)	(5)	(17)	(3,254.5)	(1,230)	(1,960)	(725)	(3)	(7)	-	-	(280)	(3)	-	-	-	-	(8,437)	-	-	(16,670)	
6	PCIA Billed Customer Revenue	-	295	(17,502)	(4,224)	(3,370)	(8,912)	(343)	834.9	(10,217)	(22,094)	(13,123)	1,422	(4)	(2,439)	1,399	403	(2,006)	4,728	(3,339)	885	6,339	1,148			(81,488)	
7	GRCMA Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,505	
8	O&M and Capital Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,762	-	13,555	-	-	15,318	
9	Interest	(6)	(6)	348	84	67	177	7	(35.2)	354	1,081	538	(62)	(1)	148	(103)	131	190	(28)	166	(507)	(313)	(47)			2,711	
10	Transfers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(817)	
11	activity Jan through March	98	289	-	15,641	(183)	1,502	(7,088)	1,338	(2,432)	1,426	(3,086)	(3,127)	1,664	88	(2,238)	1,896	(2,619)	(2,033)	1,546	(1,410)	4,081	19,581	2,110		20,344	
12	Balances as of March 31, 2026	(685)	(758)	-	(10,665)	16,839	17,636	53,940	(4,425)	(4,331)	39,515	116,706	56,908	(5,786)	(111)	14,802	(10,121)	13,416	15,716	(2,510)	18,085	(61,121)	(17,148)	(3,867)		310,631	
13																											
14																											
Forecasted April through December 2026 (b)																											
16	Portfolio Costs	2,150	-	-	122,618	22,348	15,387	77,166	8,674	11,580	48,881	109,826	36,181	2,214	563	659	-	1,905	(198)	11,062	-	100,320	-	10,084			584,020
17	Brown Power Market Value	(2,845)	-	-	(9,849)	(10,435)	(8,839)	(63,244)	(130)	(650)	(20,791)	(63,308)	(15,214)	(1,838)	(228)	(1,608)	-	(3,556)	(885)	-	-	(34,101)	-	(2,321)			(252,501)
18	Imputed REC Market Value	-	-	-	(739)	(3,263)	-	-	-	(7,300)	(7,518)	(27,321)	(6,748)	(391)	-	(530)	-	(3,528)	(327)	(1,360)	-	(2,794)	-	-	-	-	(61,818)
19	Imputed RA Market Value	(722)	-	-	(29,059)	(1,534)	(884)	(19,240)	(2,019)	(4,517)	(4,122)	(9,265)	(2,425)	(229)	(30)	(24)	-	(1,195)	-	(10,876)	-	(22,556)	-	(2,753)			(111,511)
20	PCIA Billed Customer Revenue	3,395	-	-	(191,124)	(24,063)	(5,752)	33,393	(21,935)	2,818	(39,078)	(22,611)	(39,331)	586	(729)	3,603	-	29,781	3,377	11,155	-	(94,560)	-	(10,568)			(379,975)
21	GRCMA Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,340
22	REC MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	RA MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	UOG RA MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	MCAM RA Sales MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	PCIA YA Sales MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	O&M and Capital Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Interest	50	(31)	-	(4,630)	133	580	3,289	(785)	(122)	708	4,213	1,213	(220)	(27)	679	(408)	1,223	872	4,410	38,010	-	-	-	-	42,419	
29	Forecasted April through December 2026 Activity	2,028	(31)	-	(112,044)	(13,830)	(2,771)	25,363	(16,195)	1,809	(21,920)	(8,466)	(26,324)	122	(446)	2,779	(408)	18,629	2,840	(2,098)	729	(18,759)	(691)	(6,555)		(165,848)	
30																											
Year-End 2026 Forecast (c = a + b)																											
32	Portfolio Costs	2,255	-	-	155,482	28,036	21,134	78,817	10,366	11,467	61,728	135,328	48,448	2,625	663	821	-	(5,838)	(333)	3,909	-	112,461	-	11,033			685,661
33	Brown Power Market Value	(2,845)	-	-	(9,849)	(10,435)	(8,839)	(63,244)	(130)	2,368	(18,992)	(63,308)	(15,214)	(1,838)	(228)	(1,608)	-	(3,536)	(885)	-	-	(34,101)	-	(2,321)			(241,664)
34	Imputed REC Market Value	-	-	-	(1,194)	(4,202)	-	-	-	(10,182)	(9,645)	(33,536)	(8,833)	(495)	-	(579)	-	(4,680)	(411)	(1,360)	-	(2,794)	-	-	-	-	(77,910)
35	Imputed RA Market Value	(722)	-	-	(29,127)	(2,269)	(888)	(19,245)	(2,037)	(7,771)	(5,352)	(11,226)	(3,149)	(232)	(37)	(24)	-	(1,476)	(3)	(10,876)	-	(30,993)	-	(2,753)			(128,182)
36	PCIA Billed Customer Revenue	3,395	295	-	(208,627)	(28,308)	(9,122)	24,451	(22,279)	3,653	(49,295)	(44,704)	(52,454)	2,009	(733)	1,104	1,399	30,184	1,371	(2,427)	(3,339)	(93,676)	6,339	(9,420)			(461,463)
37	GRCMA Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12,844
38	REC MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39	RA MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	UOG RA MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41	MCAM RA Sales MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	PCIA YA Sales MPB true up (Oct update only)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	O&M and Capital Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Interest	43	(36)	-	(4,282)	217	647	3,466	(778)	(157)	1,062	5,294	1,751	(282)	(23)	827	(511)	1,354	1,062	(207)	896	(3,586)	(1,005)	(444)		8,891	
45	Transfers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(817)
46	Total 2026 actual & fcst activity	2,126	258	-	(96,403)	(14,013)	(1,269)	18,274	(14,258)	(624)	(20,494)	(11,552)	(29,451)	1,787	(358)	541	1,488	16,010	801	(552)	(681)	(14,678)	18,889	(4,445)		144,303	
47	Beginning balance	(783)	(1,047)	-	(26,306)	17,022	16,134	67,029	(6,363)	(2,439)	38,089	119,792	60,037	(7,450)	(199)	17,040	(12,017)	16,035	21,755	(4,056)	19,436	(65,202)	(36,728)	(5,378)		289,687	
48	Total Year-End Balance Forecast	1,343	(789)	-	(122,709)	3,009	14,865	85,303	(20,621)	(3,123)	17,596	108,240	30,586	(5,664)	(557)	17,581	(10,529)	32,044	22,556	(4,608)	18,814	(79,880)	(17,839)	(10,422)	66,024	3,560	144,783