

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



Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Approval of its 2024  
Electric Procurement Revenue Requirement  
Forecasts, 2024 Electric Sales Forecast, and GHG-  
Related Forecasts

Application 23-05-013  
(Filed May 15, 2023)

**FILED**  
11/27/23  
04:59 PM  
A2305013

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

**PUBLIC VERSION**

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November 27, 2023

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

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Approval of its 2024  
Electric Procurement Revenue Requirement  
Forecasts, 2024 Electric Sales Forecast, and GHG-  
Related Forecasts

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(Filed May 15, 2023)

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

Pursuant to Administrative Law Judge Rafael Lirag’s *E-mail Ruling Requiring Additional Information* dated November 20, 2023, San Diego Gas & Electric Company (“SDG&E”) hereby submits the following corrections/revisions to the October Update:<sup>1</sup>

- (a) Attachment G, Template D-1: the climate credit calculation has been revised to align with the calculation in Exhibit SDG&E-14 Table 7; and
- (b) Attachment G, Template D-3: the forecast and recorded values for 2024 have been included.

Attached hereto is the *revised* version of **Attachment G (GHG Revenue and Reconciliation Application Form)**, reflecting these corrections.

In addition, as noted in Section III.B of SDG&E’s Reply on Comments to the October Update filed on November 3, 2023, SDG&E acknowledged various errors and adjustments identified by San Diego Community Power (“SDCP”) and Clean Energy Alliance (“CEA”) (collectively the “CCA Parties”) that impacted the (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, (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”); and (4) the Modified Cost

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<sup>1</sup> SDG&E’s October Update was filed on October 13, 2023.

Allocation Methodology (“MCAM”) revenue requirement.<sup>2</sup> For the Commission’s convenience and to facilitate the issuance of an accurate final decision, SDG&E submits the following *revised* version of Table 1 of the October Update that reflects the impacts associated with these corrections.<sup>3</sup>

<b>TABLE 1</b>					
<b><i>Revised Proposed Revenue Requirements (\$M)</i></b> <sup>4</sup>					
<b>Line</b>	<b>Description</b>	<b>2024 Revenue Requirement May Filing</b>	<b>2024 Revenue Requirement October Update</b>	<b>Change</b>	<b>Change (%)</b>
		w/out FF&U	w/out FF&U	w/out FF&U	w/out FF&U
1	ERRA	432.5	488.0	55.5	12.8%
2	ERRA Year-end Balance	26.9	23.7	(3.3)	-12.1%
3	PABA	90.5	113.0	22.5	24.9%
4	PABA Year-end Balance	(32.3)	(31.3)	1.0	-3.1%
5	CAPBA Trigger	-	-	-	0.0%
6	CTC	16.8	8.2	(8.6)	-51.4%
7	LG	245.5	207.0	(38.5)	-15.7%
8	LGBA Year-end Balance	120.8	131.8	11.0	9.1%
9	GHG Revenues for Return	(202.1)	(233.1)	(31.0)	15.3%
10	SONGS	1.3	1.3	(0.0)	-1.1%
11	Modified CAM	0.3	0.6	0.4	133.9%
12	SDCP DAC-GT/CS-GT	0.7	0.7	-	0.0%
13	<b>Total</b> <sup>5</sup>	<b>700.9</b>	<b>709.8</b>	<b>8.9</b>	<b>1.3%</b>

<sup>2</sup> SDG&E’s Reply to October Update at pp. 5-8.

<sup>3</sup> In its Reply to October Update, SDG&E attempted to capture all of the impacts associated with these corrections in its “Table 1 – Corrected 2024 Revenue Requirements” located on page 8. However, upon further review, Table 1 failed to capture one of the proposed adjustments that SDG&E had acknowledged it would correct relating to a PCIA vintage 2017 resource. This adjustment shifts \$0.9M from PABA to ERRA compared to what was presented in the Reply to October Update. The revised Table 1 herein now reflects all of the corrections and adjustments that SDG&E agreed to make as part of the October Update.

<sup>4</sup> This table reflects a consolidated summary of proposed revenue requirements for both bundled and departed load combined.

<sup>5</sup> Sums may not equal due to rounding. Sums do not include the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement.

By its October Update, SDG&E seeks approval of its *updated* total 2024 forecasted revenue requirement of \$709.8 million.<sup>6</sup>

Respectfully submitted,

*/s/ Roger A. Cerda*

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<sup>6</sup> This forecasted revenue requirement excludes Franchise Fees and Uncollectibles (“FF&U”) and the 2024 TMNBC revenue requirement due to confidentiality concerns.

***REVISED* ATTACHMENT G**

**GHG REVENUE AND RECONCILIATION APPLICATION FORM  
(Attachment D of Decisions D.14-10-033 and D.15-01-024 as modified by AL 4587-E-C)**

## GHG Revenue and Reconciliation Application Form

*Notes:*

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Attachment D of Decision 14-10-033, as amended by advice letters listed below.

Yellow shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

Advice Letter 4587-E-A/B/C

(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E-A/B/C

(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-A/B/C

(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-A/B/C

(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E-A/B/C

(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E-A/B/C

(PacifiCorp U 901 E)

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

Line Description	Year 2021			Year 2022			Year 2023			Year 2024		
	Forecast	Recorded	Forecast <sup>1</sup>	Forecast	Recorded	Forecast	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	17.12	23.15	28.86	28.86	29.48	29.02	N/A	N/A	38.26	N/A	38.26	N/A
2 Allocated Allowances (MT)	6,766,147	6,732,862	6,737,256	6,737,256	6,651,508	6,586,708	-	-	6,435,664	-	6,435,664	-
3 Revenues (\$)	3,172,937	7,376,791	(15,086,698)	(15,086,698)	(19,307,155)	(5,105,732)	(1,132,447)	(1,132,447)	606,214	(1,132,447)	606,214	-
4 Prior Balance	(115,836,437)	(161,825,842)	(194,403,522)	(194,403,522)	(189,236,214)	(191,139,679)	(189,801,672)	(189,801,672)	(246,234,940)	(189,801,672)	(246,234,940)	-
5 Allowance Revenue	2,372	13,371	(16,300)	(16,300)	(286,178)	(740,443)	(1,070,082)	(1,070,082)	856,139	(1,070,082)	856,139	-
6 Interest	(1,189,180)	(1,176,522)	(2,112,270)	(2,112,270)	(2,301,661)	(2,111,339)	(2,327,885)	(2,327,885)	(2,804,571)	(2,327,885)	(2,804,571)	-
7 Franchise Fees and Uncollectibles	(113,850,308)	(155,612,202)	(211,618,790)	(211,618,790)	(211,131,208)	(199,101,193)	(192,191,913)	(192,191,913)	(247,577,158)	(192,191,913)	(247,577,158)	-
8 Subtotal Revenues												
9 Expenses (\$)												
10 Outreach and Administrative Expenses (from	45,133	104,957	59,799	59,799	27,778	27,778	-	-	6,075	-	6,075	-
11 Franchise Fees and Uncollectibles	-	(25)	-	-	-	-	-	-	-	-	-	-
12 Interest	-	104,932	59,799	59,799	27,778	27,778	-	-	6,075	-	6,075	-
13 Subtotal Expenses	45,133	104,932	59,799	59,799	27,778	27,778	-	-	6,075	-	6,075	-
14 Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$) (Sum of Lines 14a through 14g)	17,773,708	38,035,035	20,261,326	20,261,326	16,039,939	16,039,939	(1,400,043)	(1,400,043)	14,462,722	-	14,462,722	-
14a SOMAH (Current Year's Request) <sup>3</sup>	11,583,644	31,023,996	19,440,352	19,440,352	12,015,972	12,015,972	(1,400,043)	(1,400,043)	12,015,972	-	12,015,972	-
14d Prior Year SOMAH True-up (Oct - Dec) <sup>4,5</sup>	100,486	(108,540)	(209,026)	(209,026)	2,933,967	2,933,967	-	-	1,351,750	-	1,351,750	-
14e DAC SASH	1,030,000	2,060,000	1,030,000	1,030,000	1,090,000	1,090,000	-	-	1,095,000	-	1,095,000	-
14f DAC-GT	-	-	-	-	-	-	-	-	-	-	-	-
14g CS-GT	-	-	-	-	-	-	-	-	-	-	-	-
15 Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 8 + Line 13 + Line 14)	(96,031,467)	(117,472,235)	(191,297,664)	(191,297,664)	(195,063,491)	(183,033,476)	(193,591,956)	(193,591,956)	(233,108,361)	-	(233,108,361)	-
16 GHG Revenue Returned to Eligible EITE Customers and Small Business Volumetric Customers(\$)												
17 EITE Customer Return	838,557	389,294	389,295	389,295	514,470	514,470	514,470	514,470	514,470	-	514,470	-
18 Small Business Volumetric Return	1,656,571	2,922,616	-	-	-	-	-	-	-	-	-	-
19 Semi-Annual Climate Credit												
20 Number of Eligible Residential Bundled	1,351,533	1,319,172	1,307,609	1,307,609	631,782	668,860	668,860	668,860	430,248	-	430,248	-
21 Number of Eligible Residential Unbundled	-	51,539	54,259	54,259	748,759	702,461	702,461	702,461	962,326	-	962,326	-
22 Number of Eligible Small Business Customers	-	-	125,715	125,715	126,523	131,966	124,648	124,648	94,210	-	94,210	-
23 Total Customers Eligible for Climate Credit	1,351,533	1,370,711	1,487,583	1,487,583	1,507,064	1,503,287	1,495,969	1,495,969	1,486,784	-	1,486,784	-
24 Per-Customer Semi-Annual Climate Credit (-0.5 x (Line 15 + 17 + 18) + Line 23)	34.60	34.60	64.17	64.17	64.17	60.71	60.71	60.71	78.22	-	78.22	-
25 Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)	93,536,339	94,853,170	190,908,370	190,908,370	193,416,573	182,519,006	193,683,700	193,683,700	232,593,891	-	232,593,891	-
Revenue Balance (\$)												
(Line 15 + Line 17 + Line 18 + Line 25)	N/A	(19,307,155)	N/A	N/A	(1,132,447)	N/A	606,214	606,214	N/A	-	N/A	-

**CONFIDENTIAL INFORMATION**

<sup>1</sup> Recorded data reflects actual data for January 2023 to August 2023 and updated forecasted data for September to December 2023.  
<sup>2</sup> 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 GHGACMA.  
<sup>3</sup> The IOUs' forecasted GHG proceeds exceed \$1 billion; therefore, pursuant to D.22-09-009, SDG&E has set aside the set amount of \$12,015,971.92.  
<sup>4</sup> October through December prior year SOMAH True-up is two years in arrears due to the timing of actual GHG auction revenues.  
<sup>5</sup> AL 4167-E is effective March 1, 2023. The proportions in the AL were determined in coordination with the other IOUs. Their corresponding AL numbers are: 4978-E for SCE, 6869-E for PG&E, 214-E for Liberty, and 712-E for PacifiCorp.  
<sup>6</sup> SDG&E did not present forecasted bundled vs. unbundled residential customers in 2021; therefore, the forecasted number of residential customers presented in 2021 is inclusive of bundled and unbundled customers.

**Template D-2: Annual GHG Emissions and Associated Costs**

Line	Description	Year 2021		Year 2022		Year 2023		Year 2024	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded <sup>2</sup>	Forecast	Recorded
1	<b>Direct GHG Emissions (MTCO2e)</b>								
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	<b>Subtotal</b>								
9	<b>Total Emissions (MTCO2e)</b>								
10	<b>Proxy GHG Price (\$/MT)</b>		17.12		23.15		28.86		29.48
11	<b>GHG Costs (\$)</b>								
12	Direct GHG Costs								
13	Direct GHG Costs - Financial Settlement								
14	Previous Year's Forecast Reconciliation (Line 16)								
15	<b>Total Costs</b>								
16	<b>Forecast Variance (\$)<sup>1</sup></b>								

**CONFIDENTIAL INFORMATION**

<sup>1</sup>Also reflects adjustment for shift in regulatory accounting from cash to accrual

<sup>2</sup>Recorded data is unavailable at this time



### Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2022		2023		2024	
	Forecast	Recorded	Forecast	Recorded <sup>1</sup>	Forecast	Recorded
<b>1 Utility Outreach Expenses (\$)</b>						
2a SMB Communications	23,000	13,295	23,000	(36,932)	(11,932)	
2b Other (Consultant)						
<b>3 Subtotal Outreach</b>	<b>23,000</b>	<b>13,295</b>	<b>23,000</b>	<b>(36,932)</b>	<b>25,000</b>	
<b>4 Utility Administrative Expenses (\$)</b>						
5 Marketing - SDG&E (email, bill insert)	59,000	14,483	58,000	(39,993)	58,000	
<b>6 Subtotal Administrative</b>	<b>59,000</b>	<b>14,483</b>	<b>58,000</b>	<b>(39,993)</b>	<b>58,000</b>	
<b>7 Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)</b>	<b>82,000</b>	<b>27,778</b>	<b>81,000</b>	<b>(76,925)</b>	<b>83,000</b>	
<b>8 Additional (Non-Utility) Statewide Outreach (\$)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
<b>9 Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)</b>	<b>82,000</b>	<b>27,778</b>	<b>81,000</b>	<b>(76,925)</b>	<b>83,000</b>	

<sup>1</sup> Recorded data reflects actual data for January 2023 to August 2023 and updated forecasted data for September to December 2023.