

Proceeding No.: A.23-05-XXX  
Exhibit No.: \_\_\_\_\_  
Witness: Rachelle R. Baez

**PREPARED DIRECT TESTIMONY OF**  
**RACHELLE R. BAEZ**  
**ON BEHALF OF**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

**\*\*REDACTED – PUBLIC VERSION\*\***

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



**May 15, 2023**

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1 impacts presented in this testimony are calculated using current effective rates,<sup>1</sup> the forecasted  
2 2024 ERRRA Forecast revenue requirements as presented in the testimony of SDG&E witness  
3 Hua, and the 2024 forecasted sales as presented in the testimony of SDG&E witness  
4 Schiermeyer.<sup>2</sup>

5 This testimony is organized as follows:

- 6 1. Section II – Cost Recovery Allocation;
- 7 2. Section III – 2024 Rate and Bill Impacts to Reflect Recovery of Updated Revenue  
8 Requirements;
- 9 3. Section IV – 2024 Climate Credit for the Return of GHG Allowance Revenues;
- 10 4. Section V – 2024 PCIA Rates;
- 11 5. Section VI – 2024 ECR Program Rates;
- 12 6. Section VII – 2024 MCAM Rates;
- 13 7. Section VIII – Summary and Relief Requested; and
- 14 8. Section IX – Qualifications.

## 15 **II. COST RECOVERY ALLOCATION**

16 SDG&E is not proposing any cost recovery allocation changes in this proceeding as cost  
17 recovery allocations are currently being litigated in SDG&E’s Test Year (“TY”) 2024 General  
18 Rate Case (“GRC”) Phase 2 Application (“A.”) 23-01-008. Consistent with current allocation  
19 methodologies, SDG&E will implement its: (1) bundled commodity rates that collect the 2024

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<sup>1</sup> “Current Effective” throughout this testimony refers to rates effective January 1, 2023 per Advice Letter (“AL”) 4129-E, approved on January 30, 2023.

<sup>2</sup> Includes System Net, Delivered, and Bundled sales.

1 commodity-related revenue requirements;<sup>3</sup> (2) Local Generation Charge (“LGC”) rates that  
2 collect LG revenue requirement and balancing account; and (3) CTC rates that collect CTC  
3 revenue requirement and balancing account using the system average percent change (“SAPC”)   
4 methodology adopted in SDG&E’s TY 2019 GRC Phase 2, Decision (“D.”) 21-07-010.<sup>4</sup> Per  
5 D.18-10-019, the PCIA allocations will be consistent with the factors used to allocate generation  
6 costs to bundled customers.<sup>5</sup> The TMNBC allocation is based on 12-month coincident peak  
7 (“12-CP”) demand, which is recovered through the Public Purpose Programs (“PPP”) rate.<sup>6</sup>  
8 SDCP’s DAC-GT / CS-GT program costs are recovered as an equal cents/kWh rate also through  
9 PPP.<sup>7</sup> Lastly, the MCAM revenues to be collected through the MCAM rates are allocated based  
10 on 12-CP energy of the specific Opt-Out Load Serving Entities (“LSEs”), pursuant to Resolution  
11 E-5241 and AL 4151-E/E-A.<sup>8</sup>

12 SDG&E presents the illustrative bundled and unbundled (*i.e.*, departed load) class  
13 average total rate and bill impacts in Section III below. Bundled refers to customers who receive  
14 their electric generation from SDG&E. Unbundled refers to customers who receive their electric  
15 generation from an Energy Service Provider (“ESP”) other than SDG&E.

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<sup>3</sup> Commodity-related revenue requirements include but are not limited to the (1) ERRRA revenue requirement, (b) bundled customers’ portion of the PABA revenue requirement, and (c) bundled customers’ portion of the ERRRA and PABA year-end balances.

<sup>4</sup> See D.21-07-010, Ordering Paragraph (“OP”) 1, and p. 18.

<sup>5</sup> See D.18-10-019, OP 4.

<sup>6</sup> See D.21-07-010, pp. 21-22.

<sup>7</sup> AL 4129-E, p.2, approved January 30, 2023 and effective January 1, 2023.

<sup>8</sup> AL 4151-E/E-A, approved April 17, 2023 and effective January 26, 2023.

1 **III. 2024 RATE AND BILL IMPACTS TO REFLECT RECOVERY OF UPDATED**  
2 **REVENUE REQUIREMENTS**

3 SDG&E requests the recovery in rates of the following 2024 revenue requirements<sup>9</sup>  
4 presented in the direct testimony of SDG&E witness Hua:

- 5 1. 2024 ERRA Revenue Requirement of \$432.5 million for recovery of the “up-to-  
6 market” energy procurement costs, which include GHG costs, associated with  
7 serving SDG&E’s bundled service customers. SDG&E also seeks recovery of the  
8 projected 2023 year-end balance recorded to ERRA of \$26.9 million;<sup>10,11</sup>
- 9 2. 2024 PABA Revenue Requirement of \$90.5 million<sup>12</sup> for recovery of the “above-  
10 market” costs and revenues associated with all generation resources that are  
11 eligible for cost recovery through PCIA rates,<sup>13</sup> and recovery of the projected  
12 2023 year-end balance recorded to PABA of (\$32.3) million;<sup>14,15</sup>
- 13 3. 2024 CTC Revenue Requirement of \$16.8 million for recovery of above-market  
14 costs associated with CTC-eligible resources from all customers;

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<sup>9</sup> The revenue requirement figures in this testimony exclude franchise fees & uncollectibles (“FF&U”) unless otherwise noted. When FF&U is included, SDG&E uses the current FF&U rates, as implemented in AL 4129-E. SDG&E’s uncollectible rates within the FF&U factors are updated annually, pursuant to D.19-09-051.

<sup>10</sup> D.22-01-023, OP 4, directed each of the Investor-Owned Utilities (“IOUs”) to modify their respective Electric Preliminary Statements governing the ERRA and PABA accounts to allow them to place year-end ERRA balances in the most-recent vintage subaccount of PABA each year.

<sup>11</sup> ERRA forecasted 2023 year-end balance split \$22.8 million to bundled customers and \$4.2 million to departed load (does not sum due to rounding).

<sup>12</sup> PABA revenue requirement split (\$5.3) million to bundled customers and \$95.8 million to departed load.

<sup>13</sup> AL 3318-E/E-A, approved May 30, 2019 and effective January 1, 2019, established the PABA.

<sup>14</sup> D.19-10-001 authorized the recovery of the PABA prior year-end balance to be recovered through the ERRA Forecast filing.

<sup>15</sup> PABA 2023 year-end balance split (\$20.4) million to bundled customers and (\$11.9) million to departed load.

- 1           4.     2024 LG Revenue Requirement of \$245.5 million for the recovery of net costs  
2                   associated with resources approved by the California Public Utilities Commission  
3                   (“Commission”) for Cost Allocation Mechanism (“CAM”) treatment for recovery  
4                   from all benefiting customers, including all bundled service, Direct Access  
5                   (“DA”) and Community Choice Aggregation (“CCA”) customers,<sup>16</sup> and the  
6                   projected 2023 year-end balance recorded to the LGBA of \$120.8 million;
- 7           5.     2024 SONGS Unit 1 Offsite Fuel Storage Revenue Requirement of \$1.3 million  
8                   for the recovery of costs associated with the spent fuel storage costs;<sup>17</sup>
- 9           6.     2024 MCAM revenue requirement of \$0.3 million for the recovery of  
10                   procurement conducted on behalf of customers of LSEs that opted out of  
11                   procurement required by D.19-11-016 and D.21-06-035, to be recovered by  
12                   customers of those LSEs;
- 13           7.     2024 SDCP DAC-GT and CS-GT program revenue requirements of \$0.4 million  
14                   and \$0.3 million, respectively, pursuant to Resolution E-5246;<sup>18,19</sup>

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<sup>16</sup> In D.13-03-029, the Commission authorized SDG&E to implement the LGC rate component, which is designed to recover new generation costs for local reliability that are deemed to be subject to the CAM policy adopted in D.06-07-029 and D.11-05-005, as a per kilowatt hour (“kWh”) non-bypassable charge from all benefiting customers including all bundled service, DA and CCA customers.

<sup>17</sup> D.15-12-032 authorized SDG&E to recover the costs of SONGS Unit 1 Offsite Spent Fuel Storage through its ERRA proceeding.

<sup>18</sup> The 2024 budgets are found in SDCP’s AL 010-E, which was approved by Resolution E-5246 (March 16, 2023).

<sup>19</sup> Per AL 4159-E filed February 1, 2023, SDG&E is not requesting any additional funding for its DAC-GT, CS-GT programs.

- 1 8. 2024 TMNBC Revenue Requirement as set forth in the testimony of SDG&E  
2 witness Hua and confidentiality declaration attached thereto for recovery of costs  
3 associated with the tree mortality related procurement costs; and
- 4 9. The amounts above projected for the ERRA, PABA and LGBA year-end balances  
5 will be updated in SDG&E's annual year-end process pursuant to Resolution E-  
6 5217 (August 4, 2022), which directs the IOUs to update projected year-end  
7 balances for each of its regulatory accounts in its annual year-end consolidated  
8 electric revenue and rate change advice letters.

9 Table 1 below compares the currently effective revenue requirements to the 2024  
10 proposed revenue requirements discussed above and the GHG Allowance revenues eligible for  
11 return to customers through electric rates discussed in more detail below in Section IV.<sup>20</sup>

12 **Table 1**  
13 **Current and Proposed Revenue Requirements (\$000)<sup>21</sup>**

Line	Description	Currently Authorized Revenue Requirement		Proposed Revenue Requirement		Change	
		w/o FF&U	w/FF&U	w/o FF&U	w/FF&U	w/FF&U	w/FF&U
1	<b>All Customers</b>						
2	CTC	10,637	10,766	16,795	16,998	6,232	57.9%
3	LG	187,573	189,849	245,518	248,497	58,648	30.9%
4	LGBA Balance	396	400	120,813	122,278	121,878	30,445.5%
5	SONGS	1,327	1,343	1,300	1,316	(27)	-2.0%
6	SDCP DAC-GT	336	336	380	380	44	12.9%
7	SDCP CS-GT	296	296	326	326	30	10.2%
8	<b>All Customers Subtotal</b>	200,563	202,989	385,130	389,794	186,805	92.0%
9	<b>Bundled</b>						
10	ERRA	538,540	545,074	432,498	437,745	(107,329)	-19.7%
11	PABA	41	41	(5,250)	(5,313)	(5,355)	-12,907.7%
12	2020 ERRA Trigger	(4,487)	(4,542)	-	-	4,542	-100.0%
13	ERRA Balance	105,281	106,559	22,780	23,057	(83,502)	-78.4%
14	PABA Balance	(7,216)	(7,304)	(20,362)	(20,609)	(13,305)	182.2%

<sup>20</sup> Table 1 excludes the TMNBC revenue requirement as it is confidential. However, the revenue requirement is included in total rate impacts.

<sup>21</sup> Totals may not equal due to rounding.



15	2020 CAPBA Trigger	(423)	(428)	-	-	428	-100.0%
16	<b>Bundled Subtotal</b>	631,736	639,401	429,667	434,880	(204,521)	-32.0%
17	<b>Departed Load (DL)<sup>22</sup></b>						
18	PABA	97,760	97,929	95,766	95,932	(1,997)	-2.0%
19	ERRA Balance/2020 Trigger	52,577	52,668	4,152	4,159	(48,509)	-92.1%
20	PABA Balance	(7,350)	(7,362)	(11,944)	(11,964)	(4,602)	62.5%
21	2020 CAPBA Trigger	(2,696)	(2,701)	-	-	2,701	-100.0%
22	Modified CAM	-	-	276	279	279	0.0%
23	<b>DL Subtotal</b>	140,292	140,534	88,251	88,407	(52,128)	-37.1%
24	<b>Total</b>	<b>972,591</b>	<b>982,924</b>	<b>903,048</b>	<b>913,081</b>	<b>(69,843)</b>	<b>-7.1%</b>
25	<i>Net Impact - Bundled (Line 8 + 16)</i>	<i>832,300</i>	<i>842,390</i>	<i>814,797</i>	<i>824,674</i>	<i>(17,716)</i>	<i>-2.1%</i>
26	<i>Net Impact - DL (Line 8 + 23)</i>	<i>340,855</i>	<i>343,523</i>	<i>473,381</i>	<i>478,201</i>	<i>134,678</i>	<i>39.2%</i>

	<b>GHG Allowance Revenue Available for Return<sup>23</sup></b>						
27	Res & Small Bus. CCC	(182,489)	(182,489)	(201,598)	(201,598)	(19,109)	10.5%
28	EITE Returns	(514)	(514)	(514)	(514)	(0)	0.0%
29	<b>Grand Total (Line 24 + 27 + 28)</b>	789,587	799,920	700,935	710,968	(88,953)	-11.1%

1 Tables 2 and 3 present the illustrative bundled and unbundled class average total rate  
2 impacts, respectively, associated with SDG&E's proposed 2024 electric sales forecast as  
3 discussed in the testimony of SDG&E witness Schiermeyer and the revenue requirements  
4 presented in Table 1. SDG&E is requesting rate recovery of those revenue requirements  
5 beginning January 1, 2024.

6 The net \$88.953 million (including FF&U) decrease from the currently effective revenue  
7 requirements, when implemented with SDG&E's 2024 sales forecast as discussed in the  
8 testimony of SDG&E witness Schiermeyer, would decrease the total bundled system average  
9 rate 3.3 cents per kWh, or -8.5 %.<sup>24</sup> Without the Residential and Small Business Semi-Annual

<sup>22</sup> Departed Load w/FF&U column contains uncollectibles only except for Modified CAM which contains franchise fees and uncollectibles.

<sup>23</sup> GHG Allowance Revenue available for return include FF&U in both columns.

<sup>24</sup> Revenue requirement decrease aligns with Table 1, which excludes TMNBC costs due to confidentiality. Rate and bill impacts include the impact of the TMNBC costs.

CCC, the total bundled system average rate would decrease by 3.2 cents per kWh, or -8.1%. For unbundled customers, SDG&E's system average delivery plus PCIA rates will decrease 0.3 cents per kWh, or -1.4%. Without the Residential and Small Business Semi-Annual CCC, SDG&E's system average delivery plus PCIA rates would decrease 0.2 cents per kWh, or -1.2%. Attachments B and C illustrate the changes resulting from the proposals in this Application by individual rate component to the class average revenues and rates, respectively.

Tables 4 and 5 below presents illustrative class bill impacts for both bundled and unbundled customers, respectively.

**Table 2**  
**Illustrative Bundled Class Average Total Rate Impacts**

Customer Classes	Current Effective Rates (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	40.375	36.737	(3.638)	-9.0%
Small Commercial	40.224	37.002	(3.222)	-8.0%
Medium and Large Commercial and Industrial	37.553	34.345	(3.208)	-8.5%
Agriculture	28.614	25.844	(2.770)	-9.7%
Streetlighting	34.644	32.022	(2.622)	-7.6%
System	38.471	35.216	(3.255)	-8.5%

**Table 3**  
**Illustrative Unbundled Class Average Rate Impacts<sup>25</sup>**

Customer Classes	Current Effective Rates (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	22.968	21.606	(1.362)	-5.9%
Small Commercial	23.640	23.213	(0.427)	-1.8%
Medium and Large Commercial and Industrial	17.702	18.027	0.325	1.8%
Agriculture	14.686	14.550	(0.136)	-0.9%
Streetlighting	22.616	21.998	(0.618)	-2.7%
System	20.076	19.800	(0.276)	-1.4%

<sup>25</sup> Includes average PCIA rates. Excludes the cost of electricity procured on the customers behalf by their ESP.

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**Table 4**  
**Illustrative Bundled Class Bill Impacts<sup>26,27</sup>**

<b>Customer Classes</b>	<b>Current Bill (\$/month)</b>	<b>Proposed Bill (\$/month)</b>	<b>Change (\$/month)</b>	<b>Change (%)</b>
Residential Non-CARE	173	158	(15)	-8.4%
Residential CARE	109	98	(11)	-9.9%
Small Commercial	408	376	(33)	-8.0%
Medium and Large Commercial and Industrial	12,381	11,323	(1,058)	-8.5%
Agriculture	1,776	1,604	(172)	-9.7%
Streetlighting	413	382	(31)	-7.6%

3  
4

**Table 5**  
**Illustrative Unbundled Class Bill Impacts<sup>28,29</sup>**

<b>Customer Classes</b>	<b>Current Bill (\$/month)</b>	<b>Proposed Bill (\$/month)</b>	<b>Change (\$/month)</b>	<b>Change (%)</b>
Residential Non-CARE	101	94	(7)	-7.2%
Residential CARE	60	55	(5)	-8.2%
Small Commercial	240	236	(4)	-1.8%
Medium and Large Commercial and Industrial	5,836	5,943	107	1.8%
Agriculture	911	903	(8)	-0.9%
Streetlighting	269	262	(7)	-2.7%

5

<sup>26</sup> Bill impacts presented for illustrative purposes only. Customers’ actual bill impacts will vary with usage per month, season and applicable rate schedule specific rate components such as climate zone, basic service fees (“BSF”), demand and per lamp charges. Includes the California Climate Credit.

<sup>27</sup> Residential bill impacts based on 400 kWh of usage per month on Schedule TOU-DR1. Non-residential bill impacts estimated based on class average rates multiplied by annual average billed 2022 usage (1,015 kWh for Small Commercial, 32,969 kWh for Medium and Large Commercial and Industrial, 6,206 kWh for Agriculture, and 1,191 for Streetlighting).

<sup>28</sup> Bill impacts presented for illustrative purposes only. Customers’ actual bill impacts will vary with usage per month, season and applicable rate schedule specific rate components such as climate zone, BSF, demand, per lamp charges and customer specific PCIA vintage rates. Includes the California Climate Credit.

<sup>29</sup> Residential bill impacts based on 400 kWh of usage per month on Schedule TOU-DR1, PCIA vintage 2021. Non-residential bill impacts estimated based on class average delivery plus PCIA rates multiplied by annual average billed 2022 usage (1,015 kWh for Small Commercial, 32,969 kWh for Medium and Large Commercial and Industrial, 6,206 kWh for Agriculture, and 1,191 for Streetlighting).

1 **IV. 2024 CLIMATE CREDIT FOR THE RETURN OF GHG ALLOWANCE**  
2 **REVENUES**

3 In compliance with D.12-12-033 and D.20-10-002, the GHG allowance revenues eligible  
4 for return to customers is based on the GHG Allowance Revenues forecast of \$203.4 million  
5 presented in the testimony of SDG&E witness Jimmy Elias, adjusted for the following:

- 6 1. Preliminary reconciliation of 2023 year-end actuals recorded in the GHG Revenue  
7 Balancing Account (“GHGRBA”) of (\$9.9) million as presented in Attachment G  
8 - Template D-1 to the instant Application, which includes the reconciliation of  
9 2022 forecasted with 2022 year-end actions recorded in GHGRBA as presented in  
10 the testimony of SDG&E witness Hua;
- 11 2. GHG expenses related to customer outreach and education and administrative  
12 costs presented in the testimony of SDG&E witness Stephen M. Elliott of \$0.08  
13 million that will be recorded in the GHG Customer Outreach and Education  
14 Memorandum Account (“GHGCOEMA”) and the GHG Administrative Costs  
15 Memorandum Account (“GHGACMA”); and
- 16 3. Solar on Multifamily Affordable Housing (“SOMAH”) Program funding<sup>30,31</sup> of  
17 \$12.0 million for 2024 and Disadvantaged Community Single-Family Solar

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<sup>30</sup> D.17-12-022 OP 4 requires the IOUs to “each shall reserve 10% of the proceeds from the sale of greenhouse gas allowances defined in Public Utilities Code Section 748.5 through its annual Energy Resource Recover Account (ERRA) proceedings for use in the Solar on Multifamily Affordable Housing program, starting with its ongoing 2018 ERRA forecast proceeding.” Furthermore, D.20-04-012 OP 6 extends SOMAH funding through June 30, 2026.

<sup>31</sup> On May 13, 2022, Southern California Edison Company (“SCE”) filed a Petition for Modification of D.17-12-022 (issued in R.14-07-002) seeking to change the allocation to 10%, not to exceed \$1 million statewide. On September 15, 2022, the Commission adopted D.22-09-009, which modified D.17-12-022 and D.20-04-012, changing the funding requirements for the SOMAH program. The IOUs are now required to set aside 10% or their proportionate share of \$100 million, whichever is less, of the proceeds from the sale of GHG allowances.

Homes (“DAC-SASH”) Program funding of \$1.1 million, as presented in the testimony of SDG&E witness Hua; and

Table 6 below provides the current authorized and proposed GHG Allowance revenues to determine the GHG Allowance revenues eligible for return to customers.

**Table 6  
GHG Allowance Revenues<sup>32</sup> Eligible for Return to Customers**

	<b>Current Authorized<sup>33</sup> (\$000)</b>	<b>Proposed (\$000)</b>	<b>Change<sup>34</sup> (\$000)</b>	<b>Change (%)</b>
GHG Allowance Revenues	(191,140)	(203,386)	(12,247)	6.4%
Interest	(740)	435	1,175	-158.7%
GHG Expenses <sup>35</sup>	28	83	55	198.8%
Clean Energy/Energy Efficiency Program Costs	16,040	13,111	(2,929)	-18.3%
FF&U	(2,112)	(2,423)	(311)	14.7%
Prior Year GHGRBA Revenue Return True-Up <sup>36</sup>	(5,080)	(9,933)	(4,853)	95.5%
<b>GHG Allowance Revenues Eligible for Return to Customers</b>	<b>(183,004)</b>	<b>(202,113)</b>	<b>(19,109)</b>	<b>10.4%</b>

OP 1 of D.12-12-033, OP 18 of D.15-07-001, OP 1 of D.20-10-002 and OP 6 of D.21-08-026 direct the IOUs to distribute GHG allowances revenues eligible for return to customers in the following manner:<sup>37,38</sup>

<sup>32</sup> All values exclude FF&U unless otherwise noted.

<sup>33</sup> Authorized by D.22-12-042 and effective January 1, 2023 per AL 4129-E.

<sup>34</sup> Differences may not equal due to rounding.

<sup>35</sup> GHG Expenses include utility outreach and administrative costs, including information technology (“IT”) billing and program management costs, as well as statewide outreach costs.

<sup>36</sup> D.14-10-033, Findings of Fact (“FOF”) 15 allows utilities to use a balancing account to maintain a record of allowance revenues.

<sup>37</sup> Consistent with D.15-07-001, OP 18, the Residential Volumetric Return is no longer applicable.

<sup>38</sup> Consistent with D.21-08-026, OP 6, the Small Business Volumetric Return is no longer applicable.

1           1.     **Emissions-Intensive and Trade-Exposed (“EITE”)** entities will receive an  
2           annual, fixed-amount on-bill credit based on Commission calculations, discussed  
3           below;

4           2.     **Small Business and Residential CCC** for the distribution of all remaining GHG  
5           Allowance revenues to small business and residential customers on an equal dollar  
6           per small business and residential account basis delivered as a semi-annual, on-bill  
7           credit and is described in more detail below.

8           **A.     EITE**

9           OP 1 of D.20-10-002 directs the IOUs to distribute GHG allowance proceeds in the same  
10          manner as previously directed in D.12-12-033, D.13-12-002, and D.14-12-037 (as modified by  
11          D.15-08-006 and D.16-07-007). D.15-01-024 states “[o]nce EITE customers have begun  
12          receiving an EITE return, the forecast return is based on the recorded prior-year revenue returned  
13          to EITE customers.”<sup>39</sup> With respect to the California Industry Assistance Credit for EITE, D.20-  
14          10-002 extended the existing formulas until the CARB begins the process of providing assistance  
15          or the Commission directs further changes.<sup>40</sup> In 2022, EITE customers received EITE returns in  
16          the amount of \$0.514 million. As such, the adjustment to GHG Allowance Revenues eligible for  
17          return to customers in 2024 reflects an assumed return to EITE customers of \$0.514 million. If  
18          the 2023 EITE returns have been disbursed by the time SDG&E files its October update,  
19          SDG&E will update this forecast to be based on 2023 actual returns.

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<sup>39</sup> D.15-01-024, Attachment D, p. 5.

<sup>40</sup> D.20-10-002, pp. 2-3 and 13-14.



- 1 • D.06-07-030, modified by D.07-01-030, established authority for the  
2 PCIA component of the Cost Responsibility Surcharge (“CRS”) to  
3 preserve bundled customer indifference by ensuring departing load  
4 customers pay their share of the cost responsibility associated with the  
5 above-market costs based on an administrative benchmark, also known as  
6 the “indifference amount,” of the utilities’ total procurement resource  
7 portfolio.<sup>44</sup>
- 8 • D.08-09-012 refined the indifference amount methodology to better  
9 protect bundled customer indifference by introducing the requirement to  
10 “vintage” departing load customers, based on their departure date, when  
11 determining the customers’ cost responsibility for the “total portfolio” of  
12 resources.<sup>45</sup> Assigning customers to a vintage ensured that departing load  
13 customers pay their share of above-market costs associated with the  
14 specific vintage portfolio of resources that were acquired to serve them  
15 prior to their departure from bundled load service in order to better protect  
16 bundled customer indifference. After departure from bundled service, the  
17 departing load customers are not required to pay for above-market costs  
18 associated with utility procurement commitments after that load departs.
- 19 • D.11-12-018 refined the indifference amount methodology by recognizing  
20 that regulatory and industry changes had impacted energy procurement  
21 practices. Changes to the Market Price Benchmark (“MPB”) methodology,  
22 used to determine the “above-market” value of electricity, now included  
23 the addition of a renewables portfolio standards adder (“RPS adder”) to  
24 better reflect the market value of renewable resources and a revised  
25 resource adequacy capacity adder (“CAP adder”), which resulted in  
26 vintage MPBs.<sup>46</sup> The vintage portfolio of resources calculation was  
27 revised to better reflect time-of-use load variations and also removed load-

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<sup>44</sup> In D.07-01-025, the Commission adopted the PCIA methodology for CCA customers.

<sup>45</sup> D.08-09-012, OP 10.

<sup>46</sup> D.11-12-018, OPs 2 and 8.



1 related costs incurred by the California Independent System Operator  
2 (“CAISO”) that are then charged to the utilities.<sup>47</sup>

- 3 • D.16-09-044 directed the Joint Utilities and CCAs<sup>48</sup> to develop a uniform  
4 workpaper template through the PCIA Working Group to “facilitate  
5 comparison and analysis of the PCIA across utilities.”<sup>49</sup> Pursuant to D.17-  
6 08-026 OP 2, SDG&E has reflected the uniform workpaper template as  
7 attached in Appendix 7 of D.06-07-030 as part of this filing.<sup>50</sup> The  
8 Commission further ordered in D.18-10-019 that PG&E, SCE and  
9 SDG&E develop a uniform common template for the calculation of each  
10 of their PCIA rates reflecting the changes ordered in the decision.<sup>51</sup>  
11 SDG&E submitted its common template to the Commission’s Energy  
12 Division and concurrently served the updated common template to the  
13 service list for its ERRA proceeding.
- 14 • D.18-10-019 modified the PCIA methodology by revising inputs to the  
15 MPB that is used to calculate the PCIA, effective January 1, 2019. In  
16 addition to the revised MPB inputs, the decision also adopted an annual  
17 true-up mechanism, as recommended by a number of parties, as well as a  
18 cap that limited the change of the PCIA rate from one year to the next.  
19 Starting in forecast year 2020, the cap level of the PCIA rate was set at 0.5  
20 cents/kWh more than the prior year’s PCIA, differentiated by system  
21 average vintage rate. AL 3436-E established the PCIA under-collection  
22 balancing account (“CAPBA”) which was used to track obligations that  
23 accrued for departing load customers by vintage subaccounts when the

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<sup>47</sup> D.11-12-018, OPs 6 and 7.

<sup>48</sup> SCE, Pacific Gas & Electric Company (“PG&E”), SDG&E companies (collectively, the Joint Utilities), CCAs, certain Electric Service Providers and other representatives of DA interests, and consumer, labor and environmental groups participated to the PCIA working group.

<sup>49</sup> D.17-08-026, p. 2.

<sup>50</sup> D.17-08-026 OP 2 orders that the workpaper template attached as Appendix A of D.17-08-026 is attached to D.06-07-030 as Appendix 7.

<sup>51</sup> D.18-10-019, OP 3.

1 PCIA cap was hit.<sup>52</sup> In AL 3318-E/E-A, the PABA was established to  
2 record the “above-market” costs and revenues associated with all PCIA  
3 eligible resources by vintage subaccounts, effective January 1, 2019.<sup>53</sup>

- 4 • D.19-10-001 further modified the PCIA methodology by revising the  
5 inputs to the billing determinants (sales) that is used to calculate the PCIA  
6 rates, effective January 1, 2020. This revision ordered SDG&E to use  
7 vintage billing determinants of those responsible for the vintage portfolio  
8 to determine PCIA rates, instead of the currently used system net billing  
9 determinants. In addition, the decision authorized any over/under-  
10 collection in the PABA vintage subaccounts in a given year to be rolled  
11 into the next year’s ERRA Forecast filing. The decision adopted the  
12 methodology for SDG&E to true-up the values in PABA for the imputed  
13 RPS and resource adequacy (“RA”) costs using the updated benchmarks  
14 provided by the Energy Division on October 1.<sup>54</sup> The true-up amounts for  
15 both RPS and RA will be booked as adjustments to PABA annually  
16 through the ERRA Forecast filing.
- 17 • D.21-03-051 granted the Joint Utilities’ uncontested Petition for  
18 Modification (“PFM”) to D.17-08-026 which updates the PCIA workpaper  
19 to remove the application of line losses to capacity volumes and utilizes  
20 energy volumes as measured at the generator meter instead of customer  
21 meter.<sup>55</sup>
- 22 • D.21-05-030 removed the PCIA cap and trigger mechanisms and required  
23 SDG&E to implement the removal of the PCIA cap in rates effective  
24 January 1, 2022.<sup>56</sup>

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<sup>52</sup> SDG&E AL 3436-E was filed on September 30, 2019, effective and approved on October 30, 2019.

<sup>53</sup> AL 3318-E/E-A, approved May 30, 2019 and effective January 1, 2019.

<sup>54</sup> D.22-01-023 OP 1 modified the PCIA market price benchmark release date from November 1 to October 1 each year, beginning with the 2022 benchmark.

<sup>55</sup> D.21-03-051, OP 1.

<sup>56</sup> D.21-05-030, OP 1.

- D.22-01-023 directed each of the IOUs to modify their respective Electric Preliminary Statements governing the ERRA and PABA accounts to allow them to place year-end ERRA balances in the most-recent vintage subaccount of PABA each year.<sup>57</sup> The modifications clarify that disposition of the year-end balance in the ERRA account shall be to the PABA upon submission (where a Tier 1 advice letter is currently required) or approval (where a Tier 2 advice letter is currently required) by the Commission of the applicable compliance advice letter addressing such balance.

**A. Indifference Methodology**

Under applicable laws and rules,<sup>58</sup> departing load customers are responsible for their fair share of above-market costs, or an indifference amount, incurred by the utility on behalf of those customers when electric generation costs exceed the current market price, or market price benchmark. To maintain bundled customers' indifference to the departure of SDG&E's customers to non-utility service, SDG&E calculates the indifference amount to determine the cost responsibility for DA, CCA and other departing load, specifically:

$$\text{Indifference Amount} = \text{CTC} + \text{PCIA}$$

The above-market costs for both the CTC and PCIA are determined using the MPB, a calculated proxy for the market value of electricity. This methodology is consistent with Commission directives, specifically D.11-12-018 and Resolution E-4475. CTC revenue requirements are addressed in the testimony of SDG&E witness Hua with rate impacts discussed above.

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<sup>57</sup> D.22-01-023, OP 4. SDG&E AL 3976-E was approved by Energy Division on May 4, 2022.

<sup>58</sup> California Public Utilities Code Section 365.2.

1 In this Application, SDG&E is proposing to update the currently effective vintage PCIA  
2 rates and to include the new vintage 2024 PCIA rates to account for customers' departing load in  
3 the second half of 2024. With respect to this 2024 ERRA proceeding, SDG&E's portfolio of  
4 resources, used to calculate the vintage 2024 indifference amounts and the resulting 2024 PCIA  
5 rates, will include applicable costs from SDG&E's:

- 6 • Forecasted 2024 PABA, and CTC revenue requirements;
- 7 • Projected 2023 PABA year-end balance;
- 8 • Projected 2023 ERRA year-end balance; and
- 9 • SDG&E's authorized 2023 Non-Fuel Generation Balancing Account  
10 ("NGBA") revenue requirement.<sup>59</sup>

11 Generally, SDG&E would update the NGBA revenue requirement to the same forecast  
12 year being requested (*i.e.*, 2024), however, the NGBA revenue requirement is still being litigated  
13 in SDG&E's Test Year ("TY") 2024 General Rate Case ("GRC") and is not anticipated to be  
14 approved before 2024.<sup>60</sup> As such, SDG&E will hold the currently approved 2023 NGBA  
15 revenue requirements constant.

16 Additionally, the vintage 2024 MPBs are not available at the time of this filing and  
17 therefore, the current MPBs<sup>61</sup> were used in the preliminary calculation of the vintage 2024 PCIA  
18 rates in this testimony and will be updated in SDG&E's October Update filing in this proceeding.

#### 19 **B. Treatment of SONGS-related Costs**

20 On July 26, 2018, the Commission approved D.18-07-037, adopting the majority of the  
21 2018 Revised Settlement Agreement ("Agreement"), which stated, in part, that SDG&E would

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<sup>59</sup> Effective January 1, 2023 per AL 4129-E.

<sup>60</sup> A proposed decision is expected Q2 2024.

<sup>61</sup> Per SDG&E's 2023 ERRA Forecast Application, October update (A.22-05-025) and D.22-12-042.

1 cease collecting in rates the revenue requirement authorized to be recovered related to the  
2 SONGS regulatory asset.

3 SDG&E's PCIA rates therefore no longer include SONGS-related Regulatory Asset  
4 costs.<sup>62</sup> The only remaining SONGS-related costs included in PCIA rates are non-fuel related  
5 costs authorized in SDG&E's 2019 General Rate Case (D.19-09-051 and D.21-05-003) since  
6 SDG&E's TY2024 GRC is pending, which are included in the PCIA rates in Attachment D.

### 7 **C. 2020 CAPBA Trigger and 2020 ERRA Trigger Roll-off**

8 The 2024 PCIA rates include the roll-off of the 2020 CAPBA Trigger and the 2020  
9 ERRA Trigger, both of which were amortized in rates through December 31, 2023 as authorized  
10 in D.22-12-042. As discussed in the testimony of SDG&E witness Hua, SDG&E is requesting to  
11 transfer any remaining balances in the CAPBA subaccounts to the corresponding PABA vintage  
12 subaccounts and close the CAPBA preliminary statement.

### 13 **D. Illustrative 2024 PCIA Rates**

14 Tables 8 and 9 below provide a comparison of the current effective PCIA rates as  
15 implemented on January 1, 2023 via AL 4129-E and the illustrative 2024 PCIA rates by vintage  
16 based on the 2024 ERRA Forecast inputs discussed above. The 2024 PCIA rates can also be  
17 found in Attachment D. Per Resolution E-5217, SDG&E will update the PCIA rates as part of  
18 its year-end consolidated electric rate change process with updated projected year-end PABA  
19 and ERRA balances.

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<sup>62</sup> In the Order Instituting Investigation on the Commission's Own Motion in the Rates, Operations, Practices, Services and Facilities of SCE and SDG&E Associated with the San Onofre Nuclear Generating Station Units 2 and 3 (I. 12-10-013), a Joint Motion for Adoption of Settlement Agreement was approved by the Commission in D.18-07-037.

**Table 8 – 2023 Current Effective Vintage PCIA Rates (\$/kWh)**

Rate Group	PCIA 2001 Vintage	PCIA 2002 Vintage	PCIA 2003 Vintage	PCIA 2004 Vintage	PCIA 2005 Vintage	PCIA 2006 Vintage	PCIA 2007 Vintage	PCIA 2008 Vintage	PCIA 2009 Vintage	PCIA 2010 Vintage	PCIA 2011 Vintage
Residential	0.00013	0.00000	0.00000	0.00299	0.00310	0.00474	0.00670	0.00942	0.00821	0.01097	0.00767
Small Commercial	0.00008	0.00000	0.00000	0.00183	0.00190	0.00290	0.00409	0.00576	0.00501	0.00670	0.00467
Medium & Large C&I	0.00006	(0.00002)	(0.00002)	0.00178	0.00185	0.00284	0.00403	0.00567	0.00493	0.00664	0.00451
Agriculture	0.00007	(0.00000)	(0.00000)	0.00154	0.00160	0.00245	0.00346	0.00487	0.00424	0.00566	0.00390
Streetlighting	0.00008	0.00000	0.00000	0.00180	0.00187	0.00285	0.00403	0.00567	0.00494	0.00660	0.00461
System Total	0.00009	(0.00002)	(0.00002)	0.00228	0.00236	0.00362	0.00512	0.00721	0.00628	0.00841	0.00580

Rate Group	PCIA 2012 Vintage	PCIA 2013 Vintage	PCIA 2014 Vintage	PCIA 2015 Vintage	PCIA 2016 Vintage	PCIA 2017 Vintage	PCIA 2018 Vintage	PCIA 2019 Vintage	PCIA 2020 Vintage	PCIA 2021 Vintage	PCIA 2022 Vintage	PCIA 2023 Vintage
Residential	0.00373	0.01159	0.01137	0.00299	0.01110	0.00395	0.00203	0.00775	(0.00116)	0.01687	0.04437	0.04439
Small Commercial	0.00215	0.00698	0.00684	0.00169	0.00669	0.00229	0.00110	0.00468	(0.00081)	0.02584	0.04774	0.04775
Medium & Large C&I	0.00181	0.00702	0.00687	0.00132	0.00682	0.00197	0.00065	0.00478	(0.00162)	0.02871	0.05483	0.05485
Agriculture	0.00167	0.00587	0.00575	0.00128	0.00561	0.00179	0.00077	0.00384	(0.00081)	0.02264	0.04184	0.04185
Streetlighting	0.00213	0.00686	0.00673	0.00169	0.00657	0.00227	0.00112	0.00457	(0.00070)	0.02099	0.03873	0.03875
System Total	0.00261	0.00888	0.00870	0.00202	0.00855	0.00279	0.00124	0.00597	(0.00137)	0.02048	0.04657	0.04659

**Table 9 – 2024 Illustrative Proposed Vintage PCIA Rates (\$/kWh)**

Rate Group	PCIA 2001 Vintage	PCIA 2002 Vintage	PCIA 2003 Vintage	PCIA 2004 Vintage	PCIA 2005 Vintage	PCIA 2006 Vintage	PCIA 2007 Vintage	PCIA 2008 Vintage	PCIA 2009 Vintage	PCIA 2010 Vintage	PCIA 2011 Vintage	PCIA 2012 Vintage
Residential	0.00010	0.00005	0.00005	0.00211	0.00199	0.00275	(0.00140)	0.00066	0.00255	0.00550	0.00272	0.00101
Small Commercial	0.00008	0.00004	0.00004	0.00163	0.00154	0.00213	(0.00108)	0.00051	0.00198	0.00426	0.00210	0.00076
Medium & Large C&I	0.00007	0.00002	0.00002	0.00200	0.00188	0.00262	(0.00137)	0.00061	0.00243	0.00533	0.00250	0.00071
Agriculture	0.00007	0.00003	0.00003	0.00143	0.00135	0.00186	(0.00095)	0.00044	0.00173	0.00373	0.00177	0.00056
Streetlighting	0.00006	0.00003	0.00003	0.00122	0.00115	0.00159	(0.00081)	0.00038	0.00147	0.00317	0.00157	0.00058
System Total	0.00008	0.00003	0.00003	0.00197	0.00186	0.00257	(0.00133)	0.00060	0.00239	0.00519	0.00251	0.00083

Rate Group	PCIA 2013 Vintage	PCIA 2014 Vintage	PCIA 2015 Vintage	PCIA 2016 Vintage	PCIA 2017 Vintage	PCIA 2018 Vintage	PCIA 2019 Vintage	PCIA 2020 Vintage	PCIA 2021 Vintage	PCIA 2022 Vintage	PCIA 2023 Vintage	PCIA 2024 Vintage
Residential	0.00521	0.00518	0.00063	0.00510	(0.00037)	0.00001	0.00299	(0.00566)	(0.00394)	0.03398	0.04031	0.04031
Small Commercial	0.00404	0.00401	0.00047	0.00396	(0.00031)	(0.00001)	0.00234	(0.00450)	(0.00152)	0.03364	0.03892	0.03892
Medium & Large C&I	0.00510	0.00506	0.00032	0.00508	(0.00075)	(0.00034)	0.00301	(0.00682)	(0.00272)	0.04748	0.05410	0.05410
Agriculture	0.00353	0.00351	0.00029	0.00345	(0.00041)	(0.00015)	0.00196	(0.00414)	(0.00224)	0.02011	0.02536	0.02536
Streetlighting	0.00300	0.00299	0.00037	0.00294	(0.00021)	0.00001	0.00172	(0.00325)	(0.00108)	0.02450	0.02860	0.02860
System Total	0.00494	0.00491	0.00046	0.00487	(0.00052)	(0.00015)	0.00286	(0.00590)	(0.00340)	0.03820	0.04447	0.04447

**VI. 2024 ENHANCED COMMUNITY RENEWABLES (“ECR”) PROGRAM RATES**

In D.15-01-051, the Commission began the implementation of Senate Bill (“SB”) 43, which set a formal requirement for the three California IOUs to implement the Green Tariff Shared Renewables (“GTSR”) Program, which included the Green Tariff (“GT” or “EcoChoice”) and Enhanced Community Renewables (“ECR” or “EcoShare”) tariffs. SB 43 was signed into law by Governor Brown on September 28, 2013. The GTSR Program is intended to (1) expand access to “all eligible renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation,” and (2) “create a mechanism

1 whereby institutional customers...commercial customers...and groups of individuals...can meet  
2 their needs with the electrical generation from eligible renewable energy resources.”<sup>63</sup>

3 On May 31, 2022, SDG&E filed Application (“A.”) 22-05-023<sup>64</sup> requesting the  
4 Commission suspend its GTSR programs to protect program participants from high program  
5 rates that could not be overcome through program design changes.

6 On August 25, 2022, Administrative Law Judges Petersen and Pulsifer issued a ruling in  
7 A.22-05-022 et al. immediately suspending SDG&E’s EcoChoice, Green Tariff program and  
8 directed SDG&E to “quickly disenroll customers from its Green Tariff option who will remain  
9 on their otherwise applicable rate.”<sup>65</sup> The ruling declined to suspend SDG&E’s EcoShare,  
10 Enhanced Community Renewables program; therefore, SDG&E presents ECR 2024 rates  
11 below.<sup>66</sup>

12 The ECR program provides customers with the ability to purchase renewable energy  
13 from community-based projects directly through the developers of those projects (“Developer”).  
14 To date, no developers have currently executed PPAs with SDG&E to support the program, and  
15 since no such facilities have interconnected, there have been no enrollees.<sup>67</sup>

16 The rate components for the ECR rates<sup>68</sup> associated with these programs are as follows:

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<sup>63</sup> California Public Utilities Code Section 2831 (b) and (f).

<sup>64</sup> A.22-05-023 was consolidated with the other IOU applications to review the Green Access programs into a single proceeding, PG&E’s A.22-05-022 and SCE’s A.22-05-024.

<sup>65</sup> August 25, 2022, Administrative Law Judge’s Ruling Granting Request for Green Tariff Suspension, OP 1.

<sup>66</sup> D.15-01-051 authorizes updates to the GTSR program tariffs within the annual ERRRA forecast proceeding.

<sup>67</sup> A.22-05-023, p. 10-11.

<sup>68</sup> All ECR rate components exclude FF&U unless otherwise noted.

- 1           1.     **Renewable Energy Commodity Price**<sup>69</sup> is equal to the portion of the renewable  
2           generating facility’s output that the customer has subscribed to, multiplied by the  
3           amount per kWh that the Utility has agreed to pay the developer ("Renewable  
4           Energy Commodity Price"). These values are part of the contract agreement with  
5           the Developers and therefore not addressed in this proceeding.
- 6           2.     **Renewable Energy Value Adjustment**<sup>70</sup> calculates the relative value of energy  
7           and capacity for the solar resources supporting the program compared to the  
8           Utility’s current portfolio of resources serving all bundled load. The 2024  
9           Renewable Energy Value Adjustment is \$0.00000/kWh as described in the direct  
10          testimony of SDG&E witness Elias.
- 11          3.     **Administrative Costs** include incremental costs such as labor and non-labor for  
12          program management and policy support, Green-e certification, and IT costs.  
13          Because SDG&E does not forecast any customers on ECR, SDG&E’s 2024  
14          charge for administrative costs is \$0.00000/kWh.
- 15          4.     **Marketing Costs** include incremental costs needed to implement the marketing  
16          plan. These costs are composed of labor (spent for planning, managing to the  
17          marketing plan, and community outreach) and non-labor tactical implementation  
18          (*i.e.*, creative design, production, translation and mailing fees). Because SDG&E  
19          does not forecast any customers on ECR, SDG&E’s 2024 marketing charge is  
20          \$0.00000/kWh.
- 21          5.     **Renewable Energy Commodity Credit**<sup>71</sup> assumes the customer has already  
22          purchased the rights to this output from the developer and the Utility concurrently  
23          assigns a credit to the customer equal to Renewable Energy Commodity Price  
24          (“Renewable Energy Commodity Credit”). These values are part of the contract  
25          agreement with the Developers and therefore not addressed in this proceeding.
- 26          6.     **SDG&E’s Average Commodity Cost Adjustment** is intended to approximate  
27          the avoided commodity costs and is based on SDG&E’s forecasted 2024 class  
28          average commodity rates, which is credited to the customer and is discussed in  
29          more detail below.
- 30          7.     **Western Renewable Energy Generation Information System (“WREGIS”)**  
31          may include, but is not limited to, the annual WREGIS fee and a per MWh  
32          certificate fee that is charged as Renewable Energy Credits (“RECs”) are retired.

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<sup>69</sup> Formerly the Solar Commodity Price.

<sup>70</sup> D.16-05-006, p. 27 changed the name from Value of Solar Energy and Capacity Adjustment to Renewable Energy Value Adjustment to reflect the ability of multiple renewable technology types to participate in the GTSR Program.

<sup>71</sup> Formerly known as Solar Commodity Credit.



As discussed in the direct testimony of SDG&E witness Elias, the 2024 WREGIS costs are \$0.00400/MWh, or \$0.00000/kWh.

8. **CAISO Grid Management Charges (“GMC”)** include CAISO charges associated with GMCs and energy scheduling. The 2024 CAISO GMC costs, as described in the direct testimony of Jimmy Elias, are \$0.92/MWh, or \$0.00092/kWh.<sup>72</sup>
9. **Renewable Integration Costs (“RIC”)** quantify the costs of renewables integration, such as: 1) variable costs for ancillary services and flexible ramping to integrate intermittent renewables into the grid and 2) fixed costs of long-term solutions to the increased need for flexible capacity. The RIC charge is currently set at \$0/kWh as a placeholder.<sup>73</sup> A RIC Charge that is greater than \$0/kWh may be imposed in the future on a going-forward basis only to all customers served under this Schedule, unless otherwise directed by the Commission.
10. **PCIA** is intended to serve as a reasonable proxy for the customer indifference charge and is discussed further below.

**Table 10**  
**ECR Illustrative Rate Components<sup>74</sup>**

	ECR Illustrative Rate Components (\$/kWh)	
	Current Authorized <sup>75</sup>	2024 Rates
Renewable Energy Commodity Price <sup>76</sup>	Refer to Contract	
Renewable Energy Value Adjustment <sup>77</sup>	\$0.00000	\$0.00000
Administrative Costs	\$0.00000	\$0.00000
Marketing Costs	\$0.00000	\$0.00000
Renewable Energy Commodity Credit <sup>78</sup>	Refer to Contract	
SDG&E's Average Commodity Cost Adjustment	See Table 11 below	

<sup>72</sup> CAISO GMC costs including FF&U are \$0.00093/kWh.

<sup>73</sup> D.15-01-051 recognized that “[b]ecause GTSR is made up of renewable resources, the cost of renewables integration is of particular importance” (p. 115). D.15-01-051 further directed the IOUs to set a RIC charge of \$0 as a placeholder. Within 60 days of a decision setting a RIC charge for ratepayers, the IOUs must file a Tier 3 Advice Letter setting forth how the RIC charge will be allocated to customers (both new and existing). *Id.*, p. 119.

<sup>74</sup> ECR Rate components include FF&U except PCIA which includes uncollectibles only.

<sup>75</sup> Effective January 1, 2023 per AL 4129-E.

<sup>76</sup> Formerly known as Solar Commodity Price.

<sup>77</sup> Formerly known as Value of Solar Energy and Capacity Adjustment per SDG&E AL 3006-E.

<sup>78</sup> Formerly known as Solar Commodity Credit.

	<b>ECR Illustrative Rate Components (\$/kWh)</b>	
	<b>Current Authorized<sup>75</sup></b>	<b>2024 Rates</b>
WREGIS	\$0.00000	\$0.00000
CAISO GMC	\$0.00000	\$0.00093
Renewable Integration Cost	\$0.00000	\$0.00000
PCIA	See Attachment D	

SDG&E’s Average Commodity Cost Adjustment is used as a proxy to reflect SDG&E’s avoided commodity costs, which ideally would be reflected in the average commodity rate by customer class. To better reflect the avoided commodity cost, the average commodity rate is adjusted for ERRA- and PABA-related balances requested in this application to better approximate avoided costs, as authorized in D.15-01-051. SDG&E’s illustrative 2024 adjusted class average commodity rate is based on the proposed average commodity rate by customer class as proposed in this testimony,<sup>79</sup> shown in the Table 11 below. These adjustment rates will be updated upon implementation to reflect the actual class average commodity rates at that time.

**Table 11**  
**ECR Rate Component –**  
**Illustrative Class Average Commodity Adjustment Rates (\$/kWh)**

	<b>Current Authorized<sup>80</sup></b>	<b>Proposed</b>
<b>Residential</b>	(0.19421)	(0.18370)
<b>Small Commercial</b>	(0.16608)	(0.16295)
<b>M/L C&amp;I</b>	(0.18763)	(0.18938)
<b>Agricultural</b>	(0.14973)	(0.13641)
<b>Streetlighting</b>	(0.12733)	(0.11990)

The PCIA component of the ECR rates comprises the indifference adjustment or the above-market cost of the Utility’s existing procurement portfolio and is calculated annually.

<sup>79</sup> As discussed in Section III.

<sup>80</sup> Effective January 1, 2023 per AL 4129-E.

1 D.15-01-051 FOF 100 states, “[t]he PCIA calculated for DA and CCA customers provides a  
2 reasonable proxy for the GTSR customer indifference charge.” Accordingly, the utilities were  
3 directed to use vintaged PCIA as a proxy for the indifference adjustment.<sup>81</sup> This is a cost that is  
4 ultimately borne by all customers for resources that were procured on their behalf. ECR  
5 customers’ PCIA rates will be billed by customer class and customer specific vintage using the  
6 proposed 2024 PCIA rates discussed above and identified in Attachment D.

7 The detailed components of the 2024 ECR rates and the total illustrative 2024 ECR rates  
8 are presented in Attachment E of this testimony.

## 9 **VII. 2024 MCAM RATES**

10 In D.19-11-016, the Commission directed the IOUs to procure additional resource  
11 generation capacity on behalf of non-IOU LSEs in their respective service territories that (a)  
12 elected to opt out of self-procuring to meet procurement obligations established in the decision  
13 (opt-out procurement); or (b) failed to acquire their share of required capacity after initially  
14 electing to do so (backstop procurement). Pursuant to this requirement, SDG&E was obligated  
15 to procure an additional 8.4 MWs to account for LSEs that opted out of their portion of  
16 procurement ordered in D.19-11-016. SDG&E is currently unaware of any LSEs in its service  
17 territory that are deficient in their procurement obligations related to D.19-11-016 and/or D.21-  
18 06-035.

19 D.22-05-015 authorizes the use of non-bypassable customer charges, MCAM rates, to  
20 ensure that the net costs of electric resource procurement obligations mandated in D.19-11-016  
21 and D.21-06-035 are allocated and recovered in a fair, economical, and legally compliant  
22 manner.

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<sup>81</sup> D.15-01-051, p. 103.

1 SDG&E filed AL 4043-E with its implementation plan, which was approved with  
2 modifications by Resolution E-5241. SDG&E subsequently filed AL 4151-E and 4151-E-A to  
3 address the modifications required by Resolution E-5241. In accordance with the ALs listed  
4 above and Resolution E-5241, SDG&E will recover the costs of procurement associated with  
5 D.19-11-016 and D.21-06-035 in the following manner:

6 **A. Bundled Service Customers**

7 The MCAM charge is applicable only to opt-out and backstop procurement LSE  
8 customers. Accordingly, costs of SDG&E procurement associated with D.19-11-016 and D.21-  
9 06-035 on behalf of bundled service customers will be recovered through the Portfolio  
10 Allocation Balancing Account (PABA) and included in bundled service customer commodity  
11 rates. For bundled service customers who depart bundled service after the effective date of  
12 D.22-05-015, above-market costs for procurement associated with D.19-11-016 and D.21-06-035  
13 requirements will be assigned a 2019 vintage and be collected through the Power Charge  
14 Indifference Adjustment (PCIA) charge.<sup>82</sup>

15 **B. Opt-Out LSEs**

16 For customers of LSEs that opted out of self-providing capacity required by D.19-11-016,  
17 the opt-out costs and offsetting benefits shall be aggregated into a single bucket for procurement  
18 and a single bucket for administrative costs.<sup>83</sup> All of the procurement-related costs, including  
19 incremental administrative costs, shall be recorded in the MCAMBA, offset by any net energy or

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<sup>82</sup> On February 13, 2023, SDG&E filed a Petition for Modification of Resolution E-5241 requesting the Commission acknowledge the vintage for above-market costs for procurement associated with D.21-06-035 should be assigned a 2021 vintage.

<sup>83</sup> D.22-05-015, OP 5

1 other revenues received from the contracts. The remaining net capacity costs will be recovered  
2 from all customers of all opt-out LSEs via the MCAM.<sup>84</sup>

3 **C. Deficient LSEs (Backstop Procurement)**

4 For customers of LSEs that fail to provide the capacity required by D.19-11-016 and/or  
5 D.21-06-035 and the Commission has required backstop procurement, the associated costs and  
6 offsetting benefits shall be aggregated into a single bucket for procurement and a single bucket  
7 for administrative costs. All of the procurement-related costs, including incremental  
8 administrative costs, shall be recorded in the MCAMBA or sub-account specific to the MCAM.  
9 These costs are offset by any net energy or other revenues received from the contracts. The net  
10 capacity costs will be recovered from the customers of the deficient LSEs via the MCAM.

11 SDG&E does not currently have any backstop procurement for LSEs pursuant to D.19-  
12 11-016 or D.21-06-035, as described by D.20-12-044, in its service territory. However, in the  
13 event SDG&E is required to procure resources as a backstop where MCAM is applicable,  
14 SDG&E will calculate the MCAM charges specific to the deficient LSE using the methodology  
15 described above and will not be pooled with other opt-out costs/revenue requirements.

16 **D. Opt-Out LSEs no Longer Serving Customers**

17 For a non-IOU LSE that declares bankruptcy or ceases providing retail service in  
18 California and yet has a capacity obligation under D.19-11-016 or D.21-06-035, and their retail  
19 customers are paying for capacity under the MCAM adopted in D.22-05-015, the capacity shall  
20 revert to SDG&E, with the costs of the associated procurement allocated thereafter using the  
21 Cost Allocation Mechanism (CAM) established under Public Utilities Code Section 365.1(c).<sup>85</sup>

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<sup>84</sup> Resolution E-5241, OP 1.

<sup>85</sup> D.22-05-015, OP 10.

1 The costs of procurement related to one energy service provider (ESP) in SDG&E's  
2 service territory that has left the market since D.19-11-016 will be recovered through the CAM,  
3 in accordance with COL 16 of D.22-05-015.

4 Because Solana Energy Alliance (SEA) opted out of procurement ordered by D.19-11-  
5 016, SDG&E procured resources associated with D.19-11-016 on its behalf; however, since that  
6 time, Solana Energy Alliance merged with Clean Energy Alliance, and former SEA customers  
7 are now served by Clean Energy Alliance. Pursuant to OP 14 of D.22-05-015, the opt-out  
8 procurement costs incurred by SDG&E on behalf of Solana Energy Alliance shall be recovered via  
9 the non-bypassable MCAM charge structure.

10 **E. Proposed 2024 MCAM Rates**

11 Table 12 below presents the proposed 2024 MCAM rates.

12 **Table 12 – Proposed 2024 MCAM Rates (\$/kWh)**

Customer Class MCAM-CRS	Opt-Out ESPs	Backstop ESPs
Residential	0.00006	-
Small Commercial	0.00010	-
Medium/Large Commercial & Industrial	0.00012	-
Agricultural	0.00007	-
Streetlighting	0.00004	-

13 These rates will be charged to all customers of the opt-out LSEs, listed below.

- 14 • 3 Phase Renewables LLC
- 15 • Solana Energy Alliance (now Clean Energy Alliance)<sup>86</sup>
- 16 • Commercial Energy of California
- 17 • Constellation NewEnergy Inc.
- 18 • EDF Industrial Power Services (CA) LLC
- 19

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<sup>86</sup> Solana Energy Alliance (SEA) merged with Clean Energy Alliance (CEA) after D.19-11-016 was adopted. Pursuant to D.22-05-015, the opt-out procurement costs incurred by SDG&E on behalf of SEA shall be recovered via the non-bypassable MCAM charge structure from the customers of CEA.

- Pilot Power Group Inc.

Upon implementation of these rates, SDG&E will update Special Condition 6 in its tariff Schedule CCA-CRS and Special Condition 3 in its tariff Schedule DA-CRS with the 2024 MCAM rates and the list of opt out LSEs.

### VIII. SUMMARY AND RELIEF REQUESTED

Consistent with the rate recovery proposed in this testimony, SDG&E requests that the Commission authorize the following relief in its forthcoming decision in this proceeding:

1. Approve for recovery in rates: (1) the 2024 ERRA revenue requirement of \$432.5 million; (2) the projected 2023 ERRA year-end balance of \$26.9 million; (3) the 2024 PABA revenue requirement of \$90.5 million; (4) the projected 2023 PABA year-end balance of (\$32.3) million; (5) the 2024 CTC revenue requirement of \$16.8 million; (6) the 2024 LG revenue requirement of \$245.5 million; (7) the projected 2023 LGBA year-end balance of \$120.8 million; (8) the SONGS revenue requirement of \$1.3 million; (9) the 2024 MCAM revenue requirement of \$0.3 million; (10) 2024 SDCP DAC-GT and CS-GT program revenue requirements of \$0.4 million and \$0.3 million, respectively; and (11) the TMNBC revenue requirement as set forth in the testimony of SDG&E witness Hua and confidentiality declaration attached thereto;<sup>87</sup>
2. The amounts above projected for the ERRA, PABA and LGBA year-end balances will be updated in SDG&E's annual year-end process pursuant to Resolution E-5217;

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<sup>87</sup> All values exclude FF&U.

1           3.     The amounts above exclude FF&U and the then-approved FF&U factors will be  
2                   applied at the time of implementation; and

3           4.     Approve SDG&E’s 2024 proposed rates, subject to updates as discussed in my  
4                   testimony, for:

5                   a.     GHG Allowance return to customers for the Residential and Small  
6                                Business Semi-Annual CCC of \$67.05;

7                   b.     2024 PCIA rates presented in Attachment D;

8                   c.     2024 ECR rates presented in Attachment E; and

9                   d.     2024 MCAM rates presented in Attachment F.

10           This concludes my prepared direct testimony.



1 **IX. QUALIFICATIONS**

2 My name is Rachelle R. Baez and I am the Electric Rates Manager in the Customer  
3 Pricing department of SDG&E. My business address is 8330 Century Park Court, San Diego,  
4 California 92123. I have been employed at SDG&E since June 2010 and have held various  
5 positions in Accounting Operations, Strategic & Financial Planning, and Electric Rates with  
6 increasing levels of responsibility. I received a Bachelor of Science degree in Business  
7 Administration with an emphasis in Finance from San Diego state University in 2011.

8 I have previously testified before the California Public Utilities Commission and the  
9 Federal Energy Regulatory Commission.

**ATTACHMENT A**

**DECLARATION OF RACHELLE R. BAEZ**

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

**DECLARATION  
OF RACHELLE R. BAEZ**

**A.23-05-XXX**

**Application of San Diego Gas & Electric Company (U 902-E)  
for Approval of Its 2024 Electric Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts**

I, Rachelle R. Baez, declare as follows:

1. I am the Electric Rates Manager for San Diego Gas & Electric Company (“SDG&E”). I included my prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2023 Application for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as the Electric Rates Manager, 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. 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), as modified by D.07-05-032, D.08-04-023, and D.16-08-024. In addition, the Commission has made clear that information must be protected where “it matches a Matrix category exactly . . . or consists of information from which that information may be easily derived.”<sup>1</sup> 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

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<sup>1</sup> See *Administrative Law Judge’s Ruling on San Diego Gas & Electric Company’s April 3, 2007 Motion to File Data Under Seal*, issued May 4, 2007 in R.06-05-027, p. 2.

- 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.<sup>2</sup> As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

Confidential Information	Matrix Reference	Reason for Confidentiality and Timing
Cells highlighted in yellow in Attachment C.1 and C.2 to my testimony.	V.C	<p>LSE Total Energy Forecast – Bundled Customer, confidential for the front three years.</p> <p>SDG&amp;E’s Bundled Sales are confidential and protected from disclosure pursuant to section V.C. of the IOU Confidentiality Matrix, adopted as Appendix 1 of CPUC Decision D.06-06-066. However, Attachments C.1 and C.2 also includes additional rate components such as Commodity Average Rates, Total UDC Average Rates, etc. which can be used to derive confidential Bundled Sales. In order to protect against the inadvertent disclosure of Bundled Sales, other rate components contained in Attachments C.1 and C.2 that can be used to derive Bundled Sales have also been designated confidential.</p>

4. I am not aware of any instances where SDG&E’s confidential Bundled Sales have been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed the Bundled Sales reflected in my Testimony.

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<sup>2</sup> In addition to the details addressed herein, SDG&E believes that the information being furnished 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.

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, 2023, at San Diego, California.

/s/ *Rachelle R. Baez*  
Rachelle R. Baez  
Electric Rates Manager  
San Diego Gas & Electric Company

**ATTACHMENT B.1**

**ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY  
RATE COMPONENT**

**BUNDLED CUSTOMERS**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT**  
**2024 ERRR FORECAST APPLICATION**  
**ATTACHMENT B.1**  
**ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY RATE COMPONENT**  
**BUNDLED CUSTOMERS<sup>88</sup>**

Line No.		Distribution Revenues (\$)	Transmission Revenues (\$)	Public Goods Revenues (\$)	Nuc Decom Revenues (\$)	On Going CTC Revenues (\$)	LGC Revenues (\$)	RS Revenues (\$)	TRAC Revenues (\$)	GHG Revenues (\$)	Total UDC Revenues (\$)	WF NBC Revenues (\$)	DWR BC Revenues (\$)	Commodity Revenues (\$)	Total Revenues (\$)	Line No.
<b>PRESENT 1/1/2023</b>																
1	Residential	700,048,556	426,389,345	183,372,398	526,530	11,052,908	81,949,029	177,809	1,000,000	(166,469,456)	1,238,047,119	29,143,070	0	415,307,185	1,682,497,374	1
2	Small Comm.	280,903,158	92,704,668	60,114,306	147,389	3,016,108	19,075,688	59,161	0	(15,237,069)	440,783,409	10,613,483	0	88,098,998	539,495,890	2
3	Med & Lg C&I	740,015,123	380,265,569	260,831,621	659,157	12,259,220	86,673,750	263,169	0	(402,055)	1,480,565,554	33,538,358	0	266,747,869	1,780,851,781	3
4	Agriculture	27,439,520	5,869,203	9,231,812	25,110	295,608	1,822,198	9,681	0	(380,690)	44,312,442	1,754,771	0	11,689,316	57,756,529	4
5	Lighting	13,137,481	2,627,159	138,404	5,727	8,313	728,309	2,350	0	0	16,647,743	415,122	0	3,295,003	20,357,868	5
6	System Total	1,761,543,838	907,855,944	513,688,541	1,363,913	26,632,157	190,248,974	512,170	1,000,000	(182,489,270)	3,220,356,267	75,464,804	0	785,138,371	4,080,959,442	6
<b>PROPOSED 2024 May ERRR Application</b>																
7	Residential	662,590,139	434,352,870	180,087,442	493,935	13,059,999	153,277,398	181,775	1,000,000	(185,832,154)	1,259,211,404	27,733,328	0	233,635,289	1,520,580,021	7
8	Small Comm.	309,867,087	109,169,685	64,501,379	159,531	4,111,958	41,099,464	69,668	0	(15,079,723)	513,899,049	12,453,253	0	72,905,017	599,257,319	8
9	Med & Lg C&I	749,737,968	443,009,167	265,272,705	654,019	15,320,908	171,571,113	284,732	0	(305,623)	1,645,544,989	37,537,321	0	263,278,030	1,946,360,340	9
10	Agriculture	27,214,267	5,918,451	9,259,063	24,430	362,262	3,530,044	10,251	0	(380,989)	45,937,779	1,869,107	0	9,118,707	56,925,993	10
11	Lighting	11,980,073	2,557,628	144,292	5,143	9,403	1,297,245	2,288	0	0	15,996,072	402,310	0	1,680,347	18,078,729	11
12	System Total	1,761,389,534	995,007,801	519,264,881	1,337,058	32,864,530	370,775,264	548,714	1,000,000	(201,598,489)	3,480,589,293	79,995,319	0	580,617,390	4,141,202,002	12
<b>REVENUE CHANGE SUMMARY</b>																
13	Residential	(37,458,417)	7,963,525	(3,284,956)	(32,595)	2,007,091	71,328,369	3,966	0	(19,362,698)	21,164,285	(1,409,742)	0	(181,671,896)	(161,917,353)	13
14	Small Comm.	28,963,929	16,465,017	4,387,073	12,142	1,095,850	22,023,776	10,507	0	157,346	73,115,640	1,839,770	0	(15,193,981)	59,761,429	14
15	Med & Lg C&I	9,722,845	62,743,598	4,441,084	(5,138)	3,061,688	84,897,363	21,563	0	96,432	164,979,435	3,998,963	0	(3,469,839)	165,508,559	15
16	Agriculture	(225,253)	49,248	27,251	(680)	66,654	1,707,846	570	0	(299)	1,625,337	114,336	0	(2,570,609)	(830,936)	16
17	Lighting	(1,157,408)	(69,531)	5,888	(584)	1,090	568,936	(62)	0	0	(651,671)	(12,812)	0	(1,614,656)	(2,279,138)	17
18	System Total	(154,304)	87,151,857	5,576,340	(26,855)	6,232,373	180,526,290	36,544	0	(19,109,219)	260,233,026	4,530,515	0	(204,520,981)	60,242,560	18
<b>AVERAGE % CHANGE SUMMARY</b>																
19	Residential	5.35%	1.87%	1.79%	6.19%	18.16%	87.04%	2.23%	0.00%	11.63%	1.71%	4.84%	0.00%	43.74%	9.62%	19
20	Small Comm.	10.31%	17.76%	7.30%	8.24%	36.33%	115.45%	17.76%	0.00%	1.03%	16.59%	17.33%	0.00%	17.25%	11.08%	20
21	Med & Lg C&I	1.31%	16.50%	1.70%	0.78%	24.97%	97.95%	8.19%	0.00%	23.98%	11.14%	11.92%	0.00%	1.30%	9.29%	21
22	Agriculture	0.82%	0.84%	0.30%	2.71%	22.55%	93.72%	5.89%	0.00%	0.08%	3.67%	6.52%	0.00%	21.99%	1.44%	22
23	Lighting	8.81%	2.65%	4.25%	10.20%	13.11%	78.12%	2.64%	0.00%	0.00%	3.91%	3.09%	0.00%	49.00%	11.20%	23
24	System Total	0.01%	9.60%	1.09%	1.97%	23.40%	94.89%	7.14%	0.00%	10.47%	8.08%	6.00%	0.00%	26.05%	1.48%	24

<sup>88</sup> The illustrative class average revenues presented are calculated by taking the rates multiplied by sales forecast. The authorized rates for Transmission, RS and WF-NBC are not changing with this proceeding. However, the calculated class revenues are changing as a result of the requested change to sales forecast.

**ATTACHMENT B.2**

**ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY  
RATE COMPONENT**

**UNBUNDLED CUSTOMERS**



**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT**  
**2024 ERRR FORECAST APPLICATION**  
**ATTACHMENT B.2**  
**ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY RATE COMPONENT**  
**UNBUNDLED CUSTOMERS<sup>89</sup>**

Line No.		Distribution Revenues (\$)	Transmission Revenues (\$)	Public Goods Revenues (\$)	Nuc Decom Revenues (\$)	On Going CTC Revenues (\$)	LGC Revenues (\$)	RS Revenues (\$)	TRAC Revenues (\$)	GHG Revenues (\$)	Total UDC Revenues (\$)	WF NBC Revenues (\$)	DWR BC Revenues (\$)	PCIA Revenues (\$)	Total Revenues (\$)	Line No.
<b>PRESENT 1/1/2023</b>																
1	Residential	700,048,556	426,389,345	183,372,398	526,530	11,052,908	81,949,029	177,809	1,000,000	(166,469,456)	1,238,047,119	29,143,070	0	86,258,092	1,353,448,281	1
2	Small Comm.	280,903,158	92,704,668	60,114,306	147,389	3,016,108	19,075,688	59,161	0	(15,237,069)	440,783,409	10,613,483	0	12,213,567	463,610,489	2
3	Med & Lg C&I	740,015,123	380,265,569	260,831,621	659,157	12,259,220	86,673,750	263,169	0	(402,055)	1,480,565,554	33,538,358	0	40,113,339	1,554,217,251	3
4	Agriculture	27,439,520	5,869,203	9,231,812	25,110	295,608	1,822,198	9,681	0	(380,690)	44,312,442	1,754,771	0	1,507,673	47,574,886	4
5	Lighting	13,137,481	2,627,159	138,404	5,727	8,313	728,309	2,350	0	0	16,647,743	415,122	0	438,694	17,501,559	5
6	System Total	1,761,543,838	907,855,944	513,688,541	1,363,913	26,632,157	190,248,974	512,170	1,000,000	(182,489,270)	3,220,356,267	75,464,804	0	140,531,364	3,436,352,435	6
<b>PROPOSED 2024 May ERRR Application</b>																
7	Residential	662,690,139	434,352,870	180,087,442	493,935	13,059,999	153,277,398	181,775	1,000,000	(185,832,154)	1,259,211,404	27,733,328	0	45,914,583	1,332,859,315	7
8	Small Comm.	309,867,087	109,169,685	64,501,379	159,531	4,111,958	41,099,464	69,668	0	(15,079,723)	513,899,049	12,453,253	0	11,095,699	537,448,001	8
9	Med & Lg C&I	749,737,968	443,009,167	265,272,705	654,019	15,320,908	171,571,113	284,732	0	(305,623)	1,645,544,989	37,537,321	0	28,808,906	1,711,891,216	9
10	Agriculture	27,214,267	5,918,451	9,259,063	24,430	362,262	3,530,044	10,251	0	(380,989)	45,937,779	1,869,107	0	2,009,947	49,816,833	10
11	Lighting	11,980,073	2,557,628	144,292	5,143	9,403	1,297,245	2,288	0	0	15,996,072	402,310	0	298,064	16,696,446	11
12	System Total	1,761,369,534	995,007,801	519,264,881	1,337,058	32,864,530	370,775,264	548,714	1,000,000	(201,598,489)	3,480,589,293	79,995,319	0	88,127,200	3,648,711,812	12
<b>REVENUE CHANGE SUMMARY</b>																
13	Residential	(37,458,417)	7,963,525	(3,284,956)	(32,595)	2,007,091	71,328,369	3,966	0	(19,362,698)	21,164,285	(1,409,742)	0	(40,343,508)	(20,588,965)	13
14	Small Comm.	28,963,929	16,465,017	4,387,073	12,142	1,095,850	22,023,776	10,507	0	157,346	73,115,640	1,839,770	0	(1,117,868)	73,837,542	14
15	Med & Lg C&I	9,722,845	62,743,598	4,441,084	(5,138)	3,061,688	84,897,363	21,563	0	96,432	164,979,435	3,998,963	0	(11,304,433)	157,673,965	15
16	Agriculture	(225,253)	49,248	27,251	(680)	66,654	1,707,846	570	0	(299)	1,625,337	114,336	0	502,275	2,241,948	16
17	Lighting	(1,157,408)	(69,531)	5,888	(584)	1,090	568,936	(62)	0	0	(651,671)	(12,812)	0	(140,630)	(805,113)	17
18	System Total	(154,304)	87,151,857	5,576,340	(26,855)	6,232,373	180,526,290	36,544	0	(19,109,219)	260,233,026	4,530,515	0	(52,404,164)	212,359,377	18
<b>AVERAGE % CHANGE SUMMARY</b>																
19	Residential	5.35%	1.87%	1.79%	6.19%	18.16%	87.04%	2.23%	0.00%	11.63%	1.71%	4.84%	0.00%	46.77%	1.52%	19
20	Small Comm.	10.31%	17.76%	7.30%	8.24%	36.33%	115.45%	17.76%	0.00%	1.03%	16.59%	17.33%	0.00%	9.15%	15.93%	20
21	Med & Lg C&I	1.31%	16.50%	1.70%	0.78%	24.97%	97.95%	8.19%	0.00%	23.98%	11.14%	11.92%	0.00%	28.18%	10.14%	21
22	Agriculture	0.82%	0.84%	0.30%	2.71%	22.55%	93.72%	5.89%	0.00%	0.06%	3.67%	6.52%	0.00%	33.31%	4.71%	22
23	Lighting	8.81%	2.65%	4.25%	10.20%	13.11%	78.12%	2.64%	0.00%	0.00%	3.91%	3.09%	0.00%	32.06%	4.60%	23
24	System Total	0.01%	9.60%	1.09%	1.97%	23.40%	94.89%	7.14%	0.00%	10.47%	8.08%	6.00%	0.00%	37.29%	6.18%	24

<sup>89</sup> The illustrative class average revenues presented are calculated by taking the rates multiplied by sales forecast. The authorized rates for Transmission, RS and WF-NBC are not changing with this proceeding. However, the calculated class revenues are changing as a result of the requested change to sales forecast.

**ATTACHMENT C.1**

**ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE  
COMPONENT**

**BUNDLED CUSTOMERS**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT**  
**2024 ERRR FORECAST APPLICATION**  
**ATTACHMENT C.1**  
**ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE COMPONENT**  
**BUNDLED CUSTOMERS<sup>90</sup>**

Line No.		Determinants System Net (kWh)	Determinants System Delivered (kWh)	Determinants Bundled (kWh)	Distribution Avg Rate (¢/kWh)	Transmission Avg Rate (¢/kWh)	Public Goods Avg Rate (¢/kWh)	Nuc Decom Avg Rate (¢/kWh)	On-Going CTC Avg Rate (¢/kWh)	LGC Avg Rate (¢/kWh)	RS Avg Rate (¢/kWh)	TRAC Avg Rate (¢/kWh)	GHG Avg Rate (¢/kWh)	Total UDC Avg Rate (¢/kWh)	WF-NBC Avg Rate (¢/kWh)	DWR-BC Avg Rate (¢/kWh)	Commodity Avg Rate (¢/kWh)	Total Avg Rate (¢/kWh)	Line No.
<u>PRESENT 1/1/2023</u>																			
1	Residential	5,926,982,238			11.811	7.194				1.383	0.003	0.017	(2.809)					40.375	1
2	Small Comm.	1,972,020,174			14.244	4.701				0.967	0.003	0.000	(0.773)					40.224	2
3	Med & Lg C&I	8,772,306,237			8.436	4.335				0.988	0.003	0.000	(0.005)					37.553	3
4	Agriculture	322,711,431			8.503	1.819				0.565	0.003	0.000	(0.118)					28.614	4
5	Lighting	78,329,120			16.772	3.354				0.930	0.003	0.000	0.000					34.644	5
6	System Total	17,072,349,198			10.318	5.318				1.114	0.003	0.006	(1.069)					38.471	6
<u>PROPOSED 2024 May ERRR Application</u>																			
7	Residential	6,059,160,276			10.935	7.169				2.530	0.003	0.017	(3.067)					36.737	7
8	Small Comm.	2,322,265,148			13.343	4.701				1.770	0.003	0.000	(0.649)					37.002	8
9	Med & Lg C&I	9,491,063,403			7.899	4.668				1.808	0.003	0.000	(0.003)					34.345	9
10	Agriculture	341,698,843			7.964	1.732				1.033	0.003	0.000	(0.111)					25.844	10
11	Lighting	76,256,047			15.710	3.354				1.701	0.003	0.000	0.000					32.022	11
12	System Total	18,290,443,717			9.630	5.440				2.027	0.003	0.005	(1.102)					35.216	12
<u>RATE CHANGE SUMMARY</u>																			
13	Residential				(0.876)	(0.025)				1.147	0.000	0.000	(0.258)					(3.638)	13
14	Small Comm.				(0.901)	0.000				0.803	0.000	0.000	0.124					(3.222)	14
15	Med & Lg C&I				(0.537)	0.333				0.820	0.000	0.000	0.002					(3.208)	15
16	Agriculture				(0.539)	(0.087)				0.468	0.000	0.000	0.007					(2.770)	16
17	Lighting				(1.062)	0.000				0.771	0.000	0.000	0.000					(2.622)	17
18	System Total				(0.688)	0.122				0.913	0.000	(0.001)	(0.033)					(3.255)	18
<u>AVERAGE % CHANGE SUMMARY</u>																			
19	Residential				-7.42%	-0.35%	-3.42%	0.00%	16.34%	82.94%	0.00%	0.00%	-9.18%	-0.36%	-6.42%	0.00%	-17.99%	-9.01%	19
20	Small Comm.				-6.33%	0.00%	-8.55%	0.00%	16.00%	83.04%	0.00%	0.00%	16.04%	-0.92%	0.00%	0.00%	-17.32%	-8.01%	20
21	Med & Lg C&I				-6.37%	7.68%	-5.43%	0.00%	16.18%	83.00%	0.00%	0.00%	40.00%	2.88%	4.03%	0.00%	-18.18%	-8.54%	21
22	Agriculture				-6.34%	-4.78%	-4.91%	0.00%	16.28%	82.83%	0.00%	0.00%	5.93%	-1.98%	0.98%	0.00%	-17.22%	-9.68%	22
23	Lighting				-6.33%	0.00%	6.78%	0.00%	9.09%	82.90%	0.00%	0.00%	0.00%	-1.31%	-0.38%	0.00%	-18.21%	-7.57%	23
24	System Total				-6.67%	2.29%	-4.90%	0.00%	16.08%	81.96%	0.00%	-16.67%	-3.09%	1.08%	-0.25%	0.00%	-17.74%	-8.46%	24

<sup>90</sup> Various rate components and determinants have been designated confidential to prevent the disclosure of Bundled Sales. See Confidentiality Declaration of Rachelle R. Baez attached herewith.

**ATTACHMENT C.2**

**ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE  
COMPONENT**

**UNBUNDLED CUSTOMERS**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT**  
**2024 ERRR FORECAST APPLICATION**  
**ATTACHMENT C.2**  
**ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE COMPONENT**  
**UNBUNDLED CUSTOMERS<sup>91</sup>**

Line No.	Determinants System Net (kWh)	Determinants System Delivered (kWh)	Determinants Departed Load (kWh)	Distribution Avg Rate (\$/kWh)	Transmission Avg Rate (\$/kWh)	Public Goods Avg Rate (\$/kWh)	Nuc Decom Avg Rate (\$/kWh)	On-Going CTC Avg Rate (\$/kWh)	LGC Avg Rate (\$/kWh)	RS Avg Rate (\$/kWh)	TRAC Avg Rate (\$/kWh)	GHG Avg Rate (\$/kWh)	Total UDC Avg Rate (\$/kWh)	WF-NBC Avg Rate (\$/kWh)	DWR-BC Avg Rate (\$/kWh)	PCIA Avg Rate (\$/kWh)	Total Avg Rate (\$/kWh)	Line No.
<b>PRESENT 1/1/2023</b>																		
1	Residential	5,926,982,238		11.811	7.194				1.383	0.003	0.017	(2.809)					22.968	1
2	Small Comm.	1,972,020,174		14.244	4.701				0.967	0.003	0.000	(0.773)					23.640	2
3	Med & Lg C&I	8,772,306,237		8.436	4.335				0.988	0.003	0.000	(0.005)					17.702	3
4	Agriculture	322,711,431		8.503	1.819				0.565	0.003	0.000	(0.118)					14.686	4
5	Lighting	78,329,120		16.772	3.354				0.930	0.003	0.000	0.000					22.616	5
6	System Total	17,072,349,198		10.318	5.318				1.114	0.003	0.006	(1.069)					20.076	6
<b>PROPOSED 2024 May ERRR Application</b>																		
7	Residential	6,059,160,276		10.935	7.169				2.530	0.003	0.017	(3.067)					21.606	7
8	Small Comm.	2,322,265,148		13.343	4.701				1.770	0.003	0.000	(0.649)					23.213	8
9	Med & Lg C&I	9,491,063,403		7.899	4.668				1.808	0.003	0.000	(0.003)					18.027	9
10	Agriculture	341,698,843		7.964	1.732				1.033	0.003	0.000	(0.111)					14.550	10
11	Lighting	76,256,047		15.710	3.354				1.701	0.003	0.000	0.000					21.998	11
12	System Total	18,290,443,717		9.630	5.440				2.027	0.003	0.005	(1.102)					19.800	12
<b>RATE CHANGE SUMMARY</b>																		
13	Residential			(0.876)	(0.025)				1.147	0.000	0.000	(0.258)					(1.362)	13
14	Small Comm.			(0.901)	0.000				0.803	0.000	0.000	0.124					(0.427)	14
15	Med & Lg C&I			(0.537)	0.333				0.820	0.000	0.000	0.002					0.325	15
16	Agriculture			(0.539)	(0.087)				0.468	0.000	0.000	0.007					(0.136)	16
17	Lighting			(1.062)	0.000				0.771	0.000	0.000	0.000					(0.618)	17
18	System Total			(0.688)	0.122				0.913	0.000	(0.001)	(0.033)					(0.276)	18
<b>AVERAGE % CHANGE SUMMARY</b>																		
19	Residential			-7.42%	-0.35%	-3.42%	0.00%	16.34%	82.94%	0.00%	0.00%	-9.18%	-0.36%	-6.42%	0.00%	-55.89%	-5.93%	19
20	Small Comm.			-6.33%	0.00%	-8.55%	0.00%	16.00%	83.04%	0.00%	0.00%	16.04%	-0.92%	0.00%	0.00%	-26.65%	-1.81%	20
21	Med & Lg C&I			-6.37%	7.68%	-5.43%	0.00%	16.18%	83.00%	0.00%	0.00%	40.00%	2.88%	4.03%	0.00%	-32.22%	1.84%	21
22	Agriculture			-6.34%	-4.78%	-4.91%	0.00%	16.28%	82.83%	0.00%	0.00%	5.93%	-1.98%	0.98%	0.00%	20.58%	-0.93%	22
23	Lighting			-6.33%	0.00%	6.78%	0.00%	9.09%	82.90%	0.00%	0.00%	0.00%	-1.31%	-0.38%	0.00%	-40.63%	-2.73%	23
24	System Total			-6.67%	2.29%	-4.90%	0.00%	16.08%	81.96%	0.00%	-16.67%	-3.09%	1.08%	-0.25%	0.00%	-44.20%	-1.37%	24

<sup>91</sup> Various rate components and determinants have been designated confidential to prevent the disclosure of Bundled Sales. See Confidentiality Declaration of Rachelle R. Baez attached herewith.

**ATTACHMENT D**  
**2024 ILLUSTRATIVE PCIA RATES**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT  
2024 ERRA FORECAST APPLICATION**

**ATTACHMENT D**

**ILLUSTRATIVE POWER CHARGE INDIFFERENCE ADJUSTMENT (PCIA) RATES FOR DIRECT ACCESS AND COMMUNITY  
CHOICE AGGREGATION CUSTOMERS<sup>92,93</sup>**

(\$/kWh)

<b>Rate Group</b>	<b>PCIA 2001 Vintage</b>	<b>PCIA 2002 Vintage</b>	<b>PCIA 2003 Vintage</b>	<b>PCIA 2004 Vintage</b>	<b>PCIA 2005 Vintage</b>	<b>PCIA 2006 Vintage</b>	<b>PCIA 2007 Vintage</b>	<b>PCIA 2008 Vintage</b>	<b>PCIA 2009 Vintage</b>	<b>PCIA 2010 Vintage</b>	<b>PCIA 2011 Vintage</b>	<b>PCIA 2012 Vintage</b>
Residential	0.00010	0.00005	0.00005	0.00211	0.00199	0.00275	(0.00140)	0.00066	0.00255	0.00550	0.00272	0.00101
Small Commercial	0.00008	0.00004	0.00004	0.00163	0.00154	0.00213	(0.00108)	0.00051	0.00198	0.00426	0.00210	0.00076
Medium & Large C&I	0.00007	0.00002	0.00002	0.00200	0.00188	0.00262	(0.00137)	0.00061	0.00243	0.00533	0.00250	0.00071
Agriculture	0.00007	0.00003	0.00003	0.00143	0.00135	0.00186	(0.00095)	0.00044	0.00173	0.00373	0.00177	0.00056
Streetlighting	0.00006	0.00003	0.00003	0.00122	0.00115	0.00159	(0.00081)	0.00038	0.00147	0.00317	0.00157	0.00058
System Total	0.00008	0.00003	0.00003	0.00197	0.00186	0.00257	(0.00133)	0.00060	0.00239	0.00519	0.00251	0.00083
<b>Rate Group</b>	<b>PCIA 2013 Vintage</b>	<b>PCIA 2014 Vintage</b>	<b>PCIA 2015 Vintage</b>	<b>PCIA 2016 Vintage</b>	<b>PCIA 2017 Vintage</b>	<b>PCIA 2018 Vintage</b>	<b>PCIA 2019 Vintage</b>	<b>PCIA 2020 Vintage</b>	<b>PCIA 2021 Vintage</b>	<b>PCIA 2022 Vintage</b>	<b>PCIA 2023 Vintage</b>	<b>PCIA 2024 Vintage</b>
Residential	0.00521	0.00518	0.00063	0.00510	(0.00037)	0.00001	0.00299	(0.00566)	(0.00394)	0.03398	0.04031	0.04031
Small Commercial	0.00404	0.00401	0.00047	0.00396	(0.00031)	(0.00001)	0.00234	(0.00450)	(0.00152)	0.03364	0.03892	0.03892
Medium & Large C&I	0.00510	0.00506	0.00032	0.00508	(0.00075)	(0.00034)	0.00301	(0.00682)	(0.00272)	0.04748	0.05410	0.05410
Agriculture	0.00353	0.00351	0.00029	0.00345	(0.00041)	(0.00015)	0.00196	(0.00414)	(0.00224)	0.02011	0.02536	0.02536
Streetlighting	0.00300	0.00299	0.00037	0.00294	(0.00021)	0.00001	0.00172	(0.00325)	(0.00108)	0.02450	0.02860	0.02860
System Total	0.00494	0.00491	0.00046	0.00487	(0.00052)	(0.00015)	0.00286	(0.00590)	(0.00340)	0.03820	0.04447	0.04447

<sup>92</sup> As noted in Section V, SDG&E has implemented the common workpapers for PCIA rates, which do not distinguish between Continuous and Non-Continuous customers. SDG&E’s PCIA rates are applicable to both DA and CCA customers.

<sup>93</sup> The PCIA rates will be updated with updated ERRA and PABA forecasted year-end balances in SDG&E’s year-end consolidated electric rates advice letter pursuant to Resolution E-5217.

**ATTACHMENT E**

**ILLUSTRATIVE 2024 ECR COMPONENTS**



**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT**  
**2024 ERRR FORECAST APPLICATION**  
**ATTACHMENT E**  
**ILLUSTRATIVE 2024 ENHANCED COMMUNITY RENEWABLES (ECR) RATE COMPONENTS<sup>94</sup>**

<b>Description</b>	<b>\$/kWh</b>	<b>\$/kWh</b>	<b>\$/kWh</b>	<b>\$/kWh</b>	<b>\$/kWh</b>
	<b>Residential</b>	<b>Sm Commercial</b>	<b>M/L C&amp;I</b>	<b>Agriculture</b>	<b>Streetlighting</b>
Renewable Energy Commodity Price	Refer to Contract				
Value of Solar Energy and Capacity Adjustment	0.00000	0.00000	0.00000	0.00000	0.00000
Administrative Costs	0.00000	0.00000	0.00000	0.00000	0.00000
Marketing Costs	0.00000	0.00000	0.00000	0.00000	0.00000
Renewable Energy Commodity Credit	Refer to Contract				
SDG&E's Average Commodity Cost Adjustment	(0.18370)	(0.16295)	(0.18938)	(0.13641)	(0.11990)
WREGIS	0.00000	0.00000	0.00000	0.00000	0.00000
CAISO GMC	0.00093	0.00093	0.00093	0.00093	0.00093
Renewable Integration Cost	0.00000	0.00000	0.00000	0.00000	0.00000
<b>ECR Differential</b>	<b>(0.18276)</b>	<b>(0.16201)</b>	<b>(0.18844)</b>	<b>(0.13547)</b>	<b>(0.11896)</b>
PCIA	See Attachment D				

<sup>94</sup> The Average Commodity Cost Adjustment will be updated upon implementation to reflect the actual class average commodity rates at that time.

**ATTACHMENT F**  
**2024 MCAM RATES**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT  
 2024 ERRR FORECAST APPLICATION  
 ATTACHMENT F  
 2024 MCAM RATES**

Modified Cost Allocation Mechanism  
 (MCAM) (\$/kWh)

Customer Class MCAM-CRS	Opt-Out ESPs	Backstop ESPs
Residential	0.00006	
Small Commercial	0.00010	
Med/Large C&I	0.00012	
Agricultural	0.00007	
Lighting	0.00004	