Application No.:	<u>A.23-05-XXX</u>
Exhibit No.:	
Witness:	Sheri Miller

PREPARED DIRECT TESTIMONY OF

SHERI MILLER

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

****REDACTED – PUBLIC VERSION****

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



May 15, 2023

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ATTACHMENT C - FORECASTED 2023 YEAR END BALANCE OF PABA (Confidential)

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

I. PURPOSE AND OVERVIEW

5 This testimony describes the process of forecasting San Diego Gas & Electric Company's ("SDG&E") Power Charge Indifference Adjustment ("PCIA") costs in the 2024 Energy 6 7 Resource Recovery Account ("ERRA") Forecast. The PCIA cost is equivalent to the utility's 8 total portfolio costs, less its market value and its sales revenues, in a given year. Additional 9 regulatory history of the PCIA is provided in SDG&E witness Rachelle R. Baez's testimony. 10 The forecasted PCIA costs are calculated using the modeled forecast costs and volumes 11 provided by SDG&E witness Jimmy Elias, and the final PCIA costs presented in this testimony 12 are used by SDG&E witness Brenda Hua in her testimony describing the 2024 balancing account 13 revenue requirements. This PCIA testimony also supports SDG&E witness Rachelle R. Baez's

14 development of customer rates in her testimony.

15

II. PCIA-ELIGIBLE COSTS

16 Decision ("D.")18-10-019 directed the Investor-Owned Utilities ("IOUs") to record 17 above-market costs of PCIA-eligible resources to the Portfolio Allocation Balancing Account 18 ("PABA"). The primary inputs included in the above-market cost calculations are 1) the 19 monthly resource costs, 2) net revenues received from the California Independent System 20Operator ("CAISO") for the PCIA resource's energy and ancillary services sold to CAISO, net 21 of CAISO charges, 3) the market value of the renewable energy credits ("RECs") and resource 22 adequacy ("RA") associated with the PCIA resources, and 4) any revenues forecasted to be 23 received from sales or allocations contracts.

The monthly resource cost includes both contract costs and costs related to Utility-Owned
Generation ("UOG"). The UOG operation and maintenance ("O&M") and capital-related

expenses for the Palomar, Miramar, Cuyamaca and Desert Star resources were approved for
 recovery through the Non-Fuel Generation Balancing Account ("NGBA") mechanism in the
 General Rate Case ("GRC") decision D.19-09-051. Since above-market costs are required to be
 recovered through the PCIA mechanism, the above-market costs for these resources are
 recovered in PABA, and the market value is recovered through NGBA.

6 In addition, SDG&E's Modified Cost Recovery Mechanism ("MCAM") was approved 7 by D.22-05-015. The resources subject to MCAM cost recovery will follow the decision's 8 requirements to recover MCAM costs using PCIA cost recovery in PABA vintage 2019,¹ with 9 the exception of costs that are required to be recovered in the MCAM balancing account ("MCAMBA")² or are subject to a Cost Allocation Mechanism ("CAM") via the Local 10 Generating Balancing Account ("LGBA").³ The PABA cost recovery treatment includes credits 11 12 to PABA for the market value of any MCAM resources that are forecasted to be used for 13 SDG&E's resource adequacy compliance requirements, using the same process that is used for 14 other resources recovered in PABA.

The forecasted actual costs, generation volumes and the CAISO net revenues are
provided in the direct testimony of Jimmy Elias. Each of the PCIA-eligible resources is
identified as belonging to a specific year, called the resource's "vintage," which corresponds to
the year in which the contract was executed or the year in which the UOG resource commenced
operations. The costs, generation, CAISO net revenues, and market value of attributes are
assigned the vintage of the generating resource.

- ¹ Per D.22-05-015, Ordering Paragraph ("OP") 4.
- ² Per D.22-05-015, OP 2.
- ³ Per D.22-05-015, OP 10.

1 III. PCIA BENCHMARKS

Pursuant to D.22-01-023, Energy Division issues updated PCIA market price benchmarks
("MPB") in the beginning of October. This May filing of the 2024 ERRA Forecast uses the
latest available benchmarks to calculate PCIA, shown in Table 1 below, that were received from
Energy Division on October 1, 2022. In October of 2023, Energy Division will issue new
benchmarks, and SDG&E will submit an updated 2024 ERRA Forecast in its October Update
incorporating the new benchmarks, and Table 1 below will be updated accordingly.

8 9

<u>Table 1 –</u>	2023 SDG&E I	Forecast Adders

Energy Index On-Peak	\$85.47 (\$/MWh)
Energy Index Off-Peak	\$74.17 (\$/MWh)
System RA	\$7.39 (\$/kW-month)
Local RA	\$6.98 (\$/kW-month)
Flexible RA	\$7.15 (\$/kW-month)
Renewable Portfolio Standard ("RPS") adder – REC	\$12.63 (\$/MWh)

10

11 SDG&E uses the issued on-peak and off-peak energy indexes together with on-peak and 12 off-peak load weighting factors to calculate the forecasted weighted average price of the energy 13 component of the contract attributes. This price is then multiplied by the forecasted hourly 14 generation for each resource to calculate the expected market value of the PCIA resource 15 generation in 2024. This expected market value represents the amount of CAISO revenue that 16 SDG&E expects to receive for its PCIA resources, including contracted resources and UOG. 17 This amount is presented in Ms. Hua's testimony in Table 6 "PABA revenue requirement," 18 labeled "Supply ISO Revenues." The actual CAISO revenues will be recorded in PABA each 19 month when they are received by SDG&E, and the revenue will partially offset the costs of the PCIA resources. 20

1 To calculate the forecast market value of the RA attributes of the resources, each resource 2 is assigned to one of the Local, Flex, or System RA categories, based on the RA category that the 3 resource most commonly serves, and if a resource serves more than one category, Local is assigned first if applicable, then Flex, and then System. The most updated monthly net 4 5 qualifying capacity ("NQC") listing is obtained from the CAISO website, and an average 6 monthly NQC value for each resource is calculated. The resource's NQC value is then 7 multiplied by the assigned RA benchmark to calculate the forecasted market value of the RA for 8 2024, as shown in Attachment A of this testimony. Adjustments are made for RA forecasted to 9 be sold during the year. The resulting forecast market value for contract resources is then 10 included in the ERRA revenue requirement as an expense, as it represents the value of the RA 11 attributes which SDG&E retained to use for the RA compliance obligations on behalf of its 12 bundled customers. The market value associated with UOG resources is excluded from ERRA 13 because the UOG costs are recovered in NGBA, and were previously approved for recovery in 14 D.19-09-051, which approved SDG&E's 2019 GRC application (A.17-10-007). 15 To calculate the forecasted market value of the REC attributes of the resources, the applicable REC benchmark is applied to the 2024 forecasted generation expected to provide the 16 17 required compliance instruments for SDG&E's bundled customers. The resulting forecasted 18 market value for contract resources is then included in the ERRA revenue requirement as an 19 expense, as it represents the value of the REC attributes which SDG&E retained to use for the 20Renewable Portfolio Standard ("RPS") compliance obligations on behalf of its bundled 21 customers. As with the RA value discussed above, the market value associated with RECs from 22 UOG generation is excluded from ERRA and recovered in NGBA. The total of the REC and RA 23 market values for contracts is included in Ms. Hua's testimony in Table 1 labeled "ERRA

Revenue Requirement," on line 3 "non-CTC contract costs," and also mentioned in Ms. Baez's
 testimony as part of the "up-to-market" energy procurement costs recovered in ERRA.

SDG&E anticipates having sufficient RECs from its 2024 allocations to cover RPS
obligations and is not planning on using any of its RECs that were banked and not used in prior
generation years.

6

IV. VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES

Pursuant to D.21-05-030, D.22-01-004, and its approved Advice Letter ("AL") 4121-E,
SDG&E has implemented the PCIA RPS voluntary allocation process for 2023 generation, and
includes forecasted RPS allocations in this 2024 forecast application. These allocations include
short-term and long-term RPS contracts with the Load-Serving Entities ("LSE") in SDG&E's
territory that voluntarily elected to receive PCIA RPS allocations. The contracts have been
approved in AL 4121-E.

In addition, this forecast also assumes that SDG&E will take 100% of its own REC
allocations in 2024. Forecasts of allocations are based upon the forecasted generation of
resources in the allocation pool, multiplied by the percentage of load and elections for each LSE
contract, and applying the 2023 forecasted RPS MPB. Pursuant to D.22-11-021, any forecasted
generation in excess of SDG&E's allocations to itself that is not sold or allocated to any other
LSE will not be included in the market value expense forecasted in ERRA.

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V.

MARKET OFFER OF REC ATTRIBUTES

Pursuant to D.21-05-030 and approved advice letters 3983-E, 4117-E, and 4126-E,
SDG&E has begun to implement the PCIA market offer process for RPS products that were not
previously allocated as part of the PCIA voluntary allocation process. SDG&E launched its
2023 Renewable Portfolio Standard Market Offer Request for Proposals for Short-term Sales on

January 9, 2023. The short-term contract offers that have been finalized and submitted for
 Commission approval via advice letter are included in this 2024 ERRA forecast.

SDG&E launched its 2023 Renewable Portfolio Standard Market Offer for Proposals for
Long-term Sales on March 7, 2023. At the time of this filing, no long-term contract offers have
been finalized. If by the time of the October update filing SDG&E has finalized its long-term
contracts and submitted for Commission approval via advice letter, they will be included in
update filing of this 2024 ERRA forecast at that time. Both short-term and long-term market
offer contracts included in this forecast are reflected as revenues in PABA.

9

VI.

ADDITIONAL RPS REQUEST FOR OFFERS

The Commission granted SDG&E authorization to conduct an RPS RFO in addition to
the PCIA voluntary allocations and market offers⁴. The purpose of holding such an RFO
includes selling any excess bundled or unbundled RECs in SDG&E's portfolio, so that the
resulting revenues could be included in PABA, and so that the RECs generated could be used as
Portfolio Content Category ("PCC") 1 compliance instruments. An RFO could also be held in
order to procure RPS volumes if necessary.

At this time, SDG&E does not plan to launch an additional RFO in 2023 to sell 2024
bundled or unbundled RECs, and accordingly no additional revenues are included in this 2024
forecast. If, however, an RFO is launched before the October update of this application, any
resulting contract revenue will be included in my October update testimony.

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VII. GREEN TARIFF SHARED RENEWABLES

A history of Senate Bill ("SB") 43, which was intended to expand access to renewable
energy to ratepayers, is provided in Ms. Baez's testimony. Until August 2022, SDG&E

D.22-12-030, OP 6.

provided its bundled customers with the option to purchase 100% renewable energy through the
 Green Tariff Shared Renewables ("GTSR") program, branded at SDG&E as EcoChoice and
 EcoShare. The EcoChoice option enabled customers to purchase renewable energy from
 contracted solar resources that have been dedicated to the program, which included Midway
 Solar and Wister Solar. The costs for these resources were to be recovered in the Green Tariff
 Shared Renewable Balancing Account ("GTSRBA").

On August 25, 2022, the CPUC issued a Ruling that granted SDG&E's request for
authorization to temporarily suspend its EcoChoice program.⁵ This order suspended the
EcoChoice option to new participants and directed SDG&E to quickly disenroll customers from
the EcoChoice program. Because there will be no EcoChoice participation in 2024, no contract
costs for GTSRBA are included in this 2024 ERRA forecast. The two dedicated resources
mentioned above are instead included in the standard PCIA cost allocation process.

13 SB 43 Section 2833(s) states that "a participating utility shall, in the event of participant 14 customer attrition or other causes that reduce customer participation or electrical demand below 15 generation levels, apply the excess generation from the eligible renewable energy resources 16 procured through the utility's green tariff shared renewables Program to the utility's renewable 17 portfolio standard procurement obligations or bank the excess generation for future use to benefit 18 all customers in accordance with the renewables portfolio standard banking and procurement rules approved by the commission." Pursuant to this mandate, SDG&E has included the 19 20forecasted excess generation from both of its green tariff dedicated generators in the cost 21 recovery mechanism used for its RPS eligible contracts, namely ERRA and PABA through the 22 PCIA process.

A.22-05-023.

1VIII.MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND2ANNUAL TRUE-UP

Accruals for the estimated REC and RA market values of PCIA eligible resources are recorded monthly to PABA and ERRA by SDG&E's Settlements & Systems group as part of the monthly accounting close process. Pursuant to D.19-10-001, these amounts will be adjusted when the updated 2023 benchmarks are received from Energy Division later this year. The October Update filing of my testimony will include a true-up of the REC and RA market values recorded during January-August 2023, to reflect the updated benchmarks. This true-up will be included in the October Update of the forecasted PABA year-end balance in my testimony.

10

IX.

OTHER COSTS RECOVERED IN PABA

As Mr. Elias describes in his testimony, this forecast of the 2024 PABA revenue
requirements includes the natural gas fuel costs and associated GHG expenses for PCIA-eligible
conventional resources. These costs are included in the PCIA as part of the above-market cost
calculation of the gas-fired resources in their respective vintages.

In addition, SDG&E is including the 2023 PABA year-end forecasted balance of
(\$32.305) million in its 2024 Indifference Amount, pursuant to D.19-10-001 which authorized
the PABA prior year-end balance recovery through that mechanism. The 2023 PABA forecasted
year-end balance is calculated using three months of actual data and nine months of forecasted
data. It is presented in Attachment C to my testimony, and also mentioned in Ms. Baez's
testimony.

21 X. SUMMARY

A summary of the total 2024 forecasted PCIA above market cost (without FF&U) is
shown in Table 2 below. The CAISO revenues, fuel, GHG costs, and total PABA revenue
requirement shown below are also referenced in Ms. Hua's testimony.

SM - 8

	PCIA Components	2024 Forecast (in millions)
1.	PCIA contract costs	
2.	UOG costs	\$210
3.	Generation fuel cost	
4.	Direct GHG costs	
5.	Less REC sales	
6.	Less RA sales	
7.	Less REC allocations	-
8.	Less contract REC market value	(\$24)
9.	Less contract RA market value	(\$104)
10.	Less CAISO supply revenues	(\$769)
11.	= Total Indifference Amount revenue requirement	

Table 2 – 2024 PCIA Forecast Summary

This concludes my prepared direct testimony.

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⁶ This figure consists of SDCP and CEA's REC allocations discussed in Section IV above.

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XI. QUALIFICATIONS

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

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

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

I have previously testified before the California Public Utilities Commission.

ATTACHMENT A

DECLARATION OF SHERI MILLER

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF SHERI MILLER

A.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, Sheri Miller, declare as follows:

1. I am a Principal Settlements Advisor 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 a Principal Settlements Advisor, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. This Declaration is meant to apply to my testimony and workpapers, and also certain duplicate tabs in Ms. Baez's workpapers. I am providing this Declaration to demonstrate that the confidential information ("Protected Information") in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix ("Matrix") attached to the Commission's Decision ("D.") 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-0666:

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

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

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

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Amounts highlighted in yellow in Table 2 of testimony named	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three
"2024 PCIA Forecast Summary"	II.B.4	years Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Cells highlighted in yellow in Attachment C "Forecasted 2023 Year End Balance of PABA"	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
	IV.A	Forecast of IOU Generation Resources; confidential for three years
	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years
	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2024 ERRA forecast workpapers_Miller.xlsx", tab 'Utility Owned Generation'	IV.A	Forecast of IOU Generation Resources; confidential for three years

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

Location of Protected Information Cells highlighted in yellow in the	Matrix Reference II.B.I	Reason for Confidentiality and Timing Generation Cost Forecasts of Utility
spreadsheet named "CONFIDENTIAL PCIA 2024 ERRA forecast workpapers_Miller.xlsx", tab 'Workpaper IOU TPS'		Retained Generation, confidential for three years
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2024 ERRA forecast workpapers_Miller.xlsx", tab 'IOU Total Portfolio summary'. Cells highlighted yellow in the spreadsheet named "CONFIDENTIAL-PCIA Rates Model_2024 ERRA Forecast May", tab 'IOU Total Portfolio Summary'.	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL PCIA 2024 ERRA forecast workpapers_Miller.xlsx", tab 'Indifference Amount Calc'. Cells highlighted in yellow in the spreadsheet named "CONFIDENTIAL-PCIA Rates Model_2024 ERRA Forecast May", tab 'Indifference Amount Calc'.	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three years

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

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

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

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

Executed this 15th day of May 2023, in San Diego, California.

Sheri Miller

Sheri Miller Principal Settlements Advisor San Diego Gas & Electric Company

ATTACHMENT B

DECLARATION OF AARON FRANZ

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

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

I, Aaron Franz, do declare as follows:

1. I am the Manager of the Settlements & Systems department for San Diego Gas & Electric Company ("SDG&E"). I have been delegated authority to sign this declaration by Estela de Llanos, Vice President of Energy Procurement, Sustainability & Environmental. I have reviewed Sheri Miller's Prepared Direct Testimony ("Testimony") in support of SDG&E's "Application for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts" ("Application"). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

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

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

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

Executed this 15th day of May, 2023, at San Diego.

Aaron Franz

Aaron Franz Manager, Settlements & Systems

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2024 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts

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

ATTACHMENT C FORECASTED 2023 YEAR END BALANCE OF PABA CONFIDENTIAL

SAN DIEGO GAS & ELECTRIC 2024 ERRA Forecast Workpaper FORECASTED 2023 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES (THOUSANDS OF DOLLARS)

