

Proceeding No.: A.24-05-XXX  
Exhibit No.: SDGE-1  
Witness: Erica Wissman

**PREPARED DIRECT TESTIMONY OF  
ERICA WISSMAN  
ON BEHALF OF  
SAN DIEGO GAS & ELECTRIC COMPANY**

**\*\**REDACTED – PUBLIC VERSION*\*\***

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



**May 15, 2024**

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**PREPARED DIRECT TESTIMONY OF  
ERICA WISSMAN  
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**I. OVERVIEW AND PURPOSE**

The purpose of this testimony is to present San Diego Gas & Electric Company’s (“SDG&E”) rate recovery proposals for its application for approval of its 2025 forecasts of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs, and projected year-end balance in ERRA; (2) the Portfolio Allocation Balancing Account (“PABA”) revenue requirement and projected year-end balance in PABA; (3) the Competition Transition Charge (“CTC”) revenue requirement; (4) the Local Generation (“LG”) revenue requirement and projected year-end balance in the LG balancing account (“LGBA”); (5) the San Onofre Nuclear Generation Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement; (6) the Modified Cost Allocation Methodology (“MCAM”) revenue requirement; (7) San Diego Community Power’s (“SDCP”) Disadvantaged Communities – Green Tariff (“DAC-GT”) and Community Solar – Green Tariff (“CS-GT”) revenue requirements; and (8) the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement as presented in the testimony of SDG&E witness Ms. Felan.<sup>1</sup>

This testimony also presents SDG&E’s 2025 proposed rates for: (1) the 2025 electric sales forecast; (2) GHG Allowance return to customers, specifically the Small Business and Residential California Climate Credit (“CCC”); (3) the vintage Power Charge Indifference Adjustment (“PCIA”) rates; (4) 2025 rate components for the Enhanced Community Renewables (“ECR”)

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<sup>1</sup> Note that Ms. Felan’s testimony also includes a description of the BioMat Non-Bypassable Charge Balancing Account (“BNBCBA”). However, as of this time of the May filing, there are no costs recorded to this account and therefore, to avoid confusion, the revenue requirement associated with this account is excluded from this testimony. If costs are subsequently recorded and approved by the Commission, SDG&E plans to include Commission approved BioMat costs in the October Update and, if so, I will also include the cost recovery for these costs in my updated testimony in October.

1 program; and (5) 2025 MCAM rates. The illustrative rates, rate impacts and bill impacts  
2 presented in this testimony are calculated using current effective rates,<sup>2</sup> the forecasted 2025 ERRRA  
3 Forecast revenue requirements as presented in the testimony of SDG&E witness Ms. Felan, and  
4 the 2025 forecasted sales as presented in the testimony of SDG&E witness Mr. Simmerman.<sup>3</sup>

5 This testimony is organized as follows:

- 6 1. Section II – Cost Recovery Allocation;
- 7 2. Section III – 2025 Rate and Bill Impacts to Reflect Recovery of Updated Revenue  
8 Requirements;
- 9 3. Section IV – 2025 Climate Credit for the Return of GHG Allowance Revenues;
- 10 4. Section V – 2025 PCIA Rates;
- 11 5. Section VI – 2025 ECR Program Rates;
- 12 6. Section VII – 2025 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 2025  
20 commodity-related revenue requirements;<sup>4</sup> (2) Local Generation Charge (“LGC”) rates that collect  
21 LG revenue requirement and balancing account; and (3) CTC rates that collect CTC revenue  
22 requirement and balancing account using the System Average Percent Change (“SAPC”)

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<sup>2</sup> “Current Effective” throughout this testimony refers to rates effective March 1, 2024 per Advice Letter (“AL”) 4366-E, approved on April 9, 2024 and effective March 1, 2024.

<sup>3</sup> Includes System Net, Delivered, and Bundled sales.

<sup>4</sup> Commodity-related revenue requirements include but are not limited to the (a) 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.

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

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

13 **III. 2025 RATE AND BILL IMPACTS TO REFLECT RECOVERY OF UPDATED**  
14 **REVENUE REQUIREMENTS**

15 SDG&E requests the recovery in rates of the following 2025 revenue requirements<sup>10</sup>  
16 presented in the direct testimony of SDG&E witness Ms. Felan<sup>11</sup>:

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<sup>5</sup> See D.21-07-010, Ordering Paragraph (“OP”) 1, and p. 18.

<sup>6</sup> See D.18-10-019, OP 4.

<sup>7</sup> See D.21-07-010, pp. 21-22.

<sup>8</sup> AL 4129-E, p. 2, approved January 30, 2023 and effective January 1, 2023.

<sup>9</sup> AL 4151-E/E-A, approved April 17, 2023 and effective January 26, 2023.

<sup>10</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 4344-E. SDG&E’s uncollectible rates within the FF&U factors are updated annually, pursuant to D.19-09-051.

<sup>11</sup> The direct testimony of SDG&E witness Ms. Felan does not address the requested funding for the 2025 SDCP DAC-GT and CS-GT programs.

- 1           1.     2025 ERRA Revenue Requirement of \$432.3 million for recovery of the “up-to-  
2           market” energy procurement costs, which include GHG costs, associated with  
3           serving SDG&E’s bundled service customers. SDG&E also seeks recovery of the  
4           projected 2024 year-end balance recorded to ERRA of \$34.1 million;<sup>12</sup>
- 5           2.     2025 PABA Revenue Requirement of \$251.0 million for recovery of the “above-  
6           market” costs and revenues associated with all generation resources that are eligible  
7           for cost recovery through PCIA rates,<sup>13,14</sup> and recovery of the projected 2024 year-  
8           end balance recorded to PABA of (\$107.1) million.<sup>15</sup> As discussed further in the  
9           direct testimony of SDG&E witness Ms. Felan, the forecasted PABA year-end  
10          balance includes the estimated Investment Tax Credits (ITCs) that SDG&E is  
11          eligible to claim for its energy storage and microgrid projects that came online in  
12          2023. SDG&E is proposing to amortize these credits in rates over a two-year period  
13          starting in 2025 in order to help A) smooth out rate changes over this time period,  
14          and B) avoid potential rate-shock to customers that could result from a larger, one-  
15          time amortization of the ITC benefit, and the related roll-off of the benefit in rates  
16          the following year;
- 17          3.     2025 CTC Revenue Requirement of \$2.1 million for recovery of above-market  
18          costs associated with CTC-eligible resources from all customers;
- 19          4.     2025 LG Revenue Requirement of \$214.4 million for the recovery of net costs  
20          associated with resources approved by the California Public Utilities Commission  
21          (“Commission”) for Cost Allocation Mechanism (“CAM”) treatment for recovery  
22          from all benefiting customers, including all bundled service, Direct Access (“DA”)

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<sup>12</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>13</sup> AL 3318-E/E-A, approved May 30, 2019 and effective January 1, 2019, established the PABA.

<sup>14</sup> The PABA revenue requirement figure in this testimony differs from that presented in the direct testimony of SDG&E witness Ms. Felan because the PABA revenue requirement in this testimony reflects the amount that will be collected through rates, which includes the above-market costs of utility owned generation (“UOG”) that will be transferred to PABA. UOG costs are approved in SDG&E’s GRC proceedings and therefore SDG&E is not requesting any changes to the total UOG costs in this ERRA Forecast Application. These above-market costs of UOG are not included in SDG&E witness Ms. Felan’s testimony figures.

<sup>15</sup> D.19-10-001 authorized the recovery of the PABA prior year-end balance to be recovered through the ERRA Forecast filing.

1 and Community Choice Aggregation (“CCA”) customers,<sup>16</sup> and the projected 2024  
2 year-end balance recorded to the LGBA of (\$51.6) million. Similar to the projected  
3 PABA year-end balance, the LGBA includes SDG&E’s eligible ITCs, and SDG&E  
4 is proposing to amortize these credits over two years in order to help prevent  
5 potential rate-shock that could result from the roll-off of the ITC benefits in rates in  
6 later years;

- 7 5. 2025 SONGS Unit 1 Offsite Fuel Storage Revenue Requirement of \$1.3 million for  
8 the recovery of costs associated with the spent fuel storage costs. As Southern  
9 California Edison’s 2025 budget is not available yet, SDG&E is proposing to hold  
10 this revenue requirement constant from current, but plans to update this value in its  
11 October Update when the 2025 budget is expected to be available;<sup>17</sup>
- 12 6. 2025 MCAM revenue requirement of \$0.3 million for the recovery of procurement  
13 conducted on behalf of customers of LSEs that opted out of procurement required  
14 by D.19-11-016 and D.21-06-035, to be recovered by customers of those LSEs;
- 15 7. 2025 SDCP DAC-GT and CS-GT program revenue requirements of \$0.4 million  
16 and \$0.3 million, respectively.<sup>18</sup> At the time of this application, SDCP’s 2025  
17 program funding has not yet been approved. Therefore, SDG&E is proposing to  
18 keep the program funding constant at the 2024 amount for purposes of the May  
19 application.<sup>19,20</sup> If SDCP’s DAC-GT and CS-GT funding amount is approved  
20 before SDG&E files its October Update, SDG&E will update the funding amount  
21 in its October Update;

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

<sup>19</sup> The 2024 budgets are found in SDCP’s AL 010-E, which was approved by Resolution E-5246 (March 16, 2023).

<sup>20</sup> Pursuant to Resolution E-5246, the 2025 SDCP DAC-GT and CS-GT funding will be approved through its 2025 Annual Budget Advice Letter.

8. 2025 TMNBC Revenue Requirement as set forth in the testimony of SDG&E witness Ms. Felan and confidentiality declaration attached thereto for recovery of costs associated with the tree mortality related procurement costs; and

9. 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 (August 4, 2022), which directs the IOUs to update projected year-end balances for each of its regulatory accounts in its annual year-end consolidated electric revenue and rate change advice letters.

Table 1 below compares the currently effective revenue requirements to the 2025 proposed revenue requirements discussed above and the GHG Allowance revenues eligible for return to customers through electric rates, which are discussed in more detail below in Section IV.<sup>21</sup>

**Table 1  
Current and Proposed Revenue Requirements (\$000)<sup>22</sup>**

| Line   | Description     | Currently Authorized Revenue Requirement |          | Proposed Revenue Requirement |           | Change from Current | Change (%) |
|--|-----------------|--|----------|------------------------------|-----------|---------------------|------------|
|  |                 | w/o FF&U                                 | w/FF&U   | w/o FF&U                     | w/FF&U    | w/FF&U              | w/FF&U     |
| 1  | ERRA            | 481,194                                  | 487,032  | 432,300                      | 437,544   | (49,488)            | -10.2%     |
| 2  | ERRA Balance    | (91,225)                                 | (92,186) | 34,093                       | 34,486    | 126,672             | -137.4%    |
| 3  | PABA            | 122,614                                  | 123,448  | 250,967                      | 251,358   | 127,910             | 103.6%     |
| 4  | PABA Balance    | 103,230                                  | 103,932  | (107,061)                    | (107,228) | (211,160)           | 203.2%     |
| 5  | CTC             | 4,918                                    | 4,978    | 2,113                        | 2,139     | (2,839)             | -57.0%     |
| 6  | LG              | 205,052                                  | 207,540  | 214,369                      | 216,970   | 9,430               | 4.5%       |
| 7  | LGBA Balance    | 159,297                                  | 161,230  | (51,643)                     | (52,269)  | (213,499)           | -132.4%    |
| 8  | SONGS           | 1,285                                    | 1,301    | 1,285                        | 1,301     | -                   | 0.0%       |
| 9  | Modified CAM    | 413                                      | 418      | 312                          | 316       | (102)               | -24.4%     |
| 10   | SDCP DAC-GT     | 380                                      | 380      | 380                          | 380       | -                   | 0.0%       |
| 11   | SDCP CS-GT      | 326                                      | 326      | 326                          | 326       | -                   | 0.0%       |
| 12   | <b>Subtotal</b> | 987,484                                  | 998,398  | 777,441                      | 785,323   | (213,075)           | -21.3%     |
| <b>GHG Allowance Revenue Available for Return<sup>23</sup></b> |                 |  |          |                              |           |                     |            |

<sup>21</sup> Table 1 excludes the TMNBC revenue requirement as it is confidential. However, the revenue requirement is included in total rate impacts.

<sup>22</sup> Totals may not equal due to rounding.

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



| Line | Description                      | Currently Authorized Revenue Requirement |           | Proposed Revenue Requirement |           | Change from Current | Change (%) |
|------|----------------------------------|--|-----------|------------------------------|-----------|---------------------|------------|
| 13   | Residential & Small Business CCC | (232,594)                                | (232,594) | (305,546)                    | (305,546) | (72,952)            | 31.4%      |
| 14   | EITE Returns                     | (514)                                    | (514)     | (2,457)                      | (2,457)   | (1,942)             | 377.6%     |
| 15   | <b>Total</b>                     | 754,376                                  | 765,290   | 469,438                      | 477,320   | (287,970)           | -37.6%     |

1  
2 Tables 2 and 3 present the illustrative bundled and unbundled class average total rate  
3 impacts, respectively, associated with SDG&E's proposed 2025 electric sales forecast as discussed  
4 in the testimony of SDG&E witness Mr. Simmerman and the revenue requirements presented in  
5 Table 1. SDG&E is requesting rate recovery of those revenue requirements beginning January 1,  
6 2025.

7 The net \$288.0 million (including FF&U) decrease from the currently effective revenue  
8 requirements, when implemented with SDG&E's 2025 sales forecast as discussed in the testimony  
9 of SDG&E witness Mr. Simmerman, would decrease the total bundled system average rate 3.3  
10 cents per kWh, or -9.9%.<sup>24</sup> Without the Residential and Small Business Semi-Annual CCC, the  
11 total bundled system average rate would decrease by 2.9 cents per kWh, or -8.3%. For unbundled  
12 customers, SDG&E's system average delivery plus PCIA rates will decrease 1.4 cents per kWh, or  
13 -7.7%. Without the Residential and Small Business Semi-Annual CCC, SDG&E's system average  
14 delivery plus PCIA rates would decrease 1.0 cents per kWh, or -5.2%. Attachments B and C  
15 illustrate the changes resulting from the proposals in this Application by individual rate  
16 component to the class average revenues and rates, respectively.

17 Tables 4 and 5 below presents illustrative class bill impacts, including the CCC, for both  
18 bundled and unbundled customers, respectively.

<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.

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

| <b>Customer Classes</b>                    | <b>Current Effective Rates (¢/kWh)</b> | <b>Proposed Rates (¢/kWh)</b> | <b>Change (¢/kWh)</b> | <b>Change (%)</b> |
|--|--|-------------------------------|-----------------------|-------------------|
| Residential                                | 34.666                                 | 30.463                        | (4.203)               | -12.1%            |
| Small Commercial                           | 34.766                                 | 32.062                        | (2.704)               | -7.8%             |
| Medium and Large Commercial and Industrial | 32.168                                 | 29.207                        | (2.961)               | -9.2%             |
| Agriculture                                | 25.107                                 | 22.964                        | (2.143)               | -8.5%             |
| Streetlighting                             | 32.820                                 | 30.847                        | (1.973)               | -6.0%             |
| System                                     | 33.098                                 | 29.831                        | (3.267)               | -9.9%             |

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

| <b>Customer Classes</b>                    | <b>Current Effective Rates (¢/kWh)</b> | <b>Proposed Rates (¢/kWh)</b> | <b>Change (¢/kWh)</b> | <b>Change (%)</b> |
|--|--|-------------------------------|-----------------------|-------------------|
| Residential                                | 20.636                                 | 18.248                        | (2.389)               | -11.6%            |
| Small Commercial                           | 22.535                                 | 21.358                        | (1.177)               | -5.2%             |
| Medium and Large Commercial and Industrial | 16.814                                 | 15.807                        | (1.008)               | -6.0%             |
| Agriculture                                | 14.660                                 | 13.984                        | (0.676)               | -4.6%             |
| Streetlighting                             | 23.382                                 | 22.768                        | (0.614)               | -2.6%             |
| System                                     | 18.776                                 | 17.332                        | (1.444)               | -7.7%             |

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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  | 152                            | 132                             | (20)                     | -13.3%            |
| Residential - CARE      | 93                             | 79                              | (14)                     | -15.1%            |

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

<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 2023 usage (1,033 kWh for Small Commercial, 46,298 kWh for Medium and Large Commercial and Industrial, 6,351 kWh for Agriculture, and 1,241 kWh for Streetlighting).

| Customer Classes                           | Current Bill (\$/month) | Proposed Bill (\$/month) | Change (\$/month) | Change (%) |
|--|-------------------------|--------------------------|-------------------|------------|
| Small Commercial                           | 359                     | 331                      | (28)              | -7.8%      |
| Medium and Large Commercial and Industrial | 14,893                  | 13,522                   | (1,371)           | -9.2%      |
| Agriculture                                | 1,595                   | 1,459                    | (136)             | -8.5%      |
| Streetlighting                             | 407                     | 383                      | (24)              | -6.0%      |

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

| Customer Classes                           | Current Bill (\$/month) | Proposed Bill (\$/month) | Change (\$/month) | Change (%) |
|--|-------------------------|--------------------------|-------------------|------------|
| Residential - Non-CARE                     | 96                      | 85                       | (11)              | -11.3%     |
| Residential - CARE                         | 56                      | 48                       | (8)               | -14.8%     |
| Small Commercial                           | 233                     | 221                      | (12)              | -5.2%      |
| Medium and Large Commercial and Industrial | 7,785                   | 7,318                    | (466)             | -6.0%      |
| Agriculture                                | 931                     | 888                      | (43)              | -4.6%      |
| Streetlighting                             | 290                     | 283                      | (8)               | -2.6%      |

**IV. 2025 CLIMATE CREDIT FOR THE RETURN OF GHG ALLOWANCE REVENUES**

In compliance with D.12-12-033 and D.20-10-002, the GHG allowance revenues eligible for return to customers is based on the GHG Allowance Revenues forecast of \$(271.3) million presented in the testimony of SDG&E witness Mr. Elias, adjusted for the following:

1. Preliminary reconciliation of 2024 year-end actuals recorded in the GHG Revenue Balancing Account (“GHGRBA”) of (\$47.4) million as presented in Attachment G - Template D-1 to the instant Application, which includes the reconciliation of

<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 2023 usage (1,033 kWh for Small Commercial, 46,298 kWh for Medium and Large Commercial and Industrial, 6,351 kWh for Agriculture, and 1,241 kWh for Streetlighting).

2023 forecasted with 2023 year-end actions recorded in GHGRBA as presented in the testimony of SDG&E witness Ms. Felan;

2. GHG expenses related to customer outreach and education and administrative costs presented in the testimony of SDG&E witness Mr. Elliott of \$0.1 million that will be recorded in the GHG Customer Outreach and Education Memorandum Account (“GHGCOEMA”) and the GHG Administrative Costs Memorandum Account (“GHGACMA”); and
3. Solar on Multifamily Affordable Housing (“SOMAH”) Program funding<sup>30,31</sup> of \$12.0 million for 2025 and Disadvantaged Community Single-Family Solar Homes (“DAC-SASH”) Program funding of \$1.1 million, as presented in the testimony of SDG&E witness Ms. Felan, adjusted for the prior year’s SOMAH true-up; 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><br/>(\$000)</b> | <b>Proposed<br/>(\$000)</b> | <b>Change<sup>34</sup><br/>(\$000)</b> | <b>Change<br/>(%)</b> |
|------------------------|--|-----------------------------|--|-----------------------|
| GHG Allowance Revenues | (246,235)  | (271,311)                   | (25,076)                               | 10.2%                 |
| Interest               | 856  | (431)                       | (1,287)                                | -150.4%               |

<sup>30</sup> D.17-12-022 at 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 at 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.

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

<sup>33</sup> Authorized by D.23-12-021 and effective January 1, 2024 per AL 4344-E.

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

|  | <b>Current<br/>Authorized<sup>33</sup><br/>(\$000)</b> | <b>Proposed<br/>(\$000)</b> | <b>Change<sup>34</sup><br/>(\$000)</b> | <b>Change<br/>(%)</b> |
|--|--|-----------------------------|--|-----------------------|
| GHG Expenses <sup>35</sup>   | 6  | 83                          | 77                                     | 1,266.2%              |
| Clean Energy/Energy<br>Efficiency Program Costs <sup>36</sup>      | 14,463   | 14,726                      | 263                                    | 1.8%                  |
| FF&U   | (2,805)  | (3,687)                     | (882)                                  | 31.5%                 |
| Prior Year GHGRBA Revenue<br>Return True-Up <sup>37</sup>          | 606  | (47,382)                    | (47,988)                               | -7,916.1%             |
| <b>GHG Allowance Revenues<br/>Eligible for Return to Customers</b> | (233,108)  | (308,003)                   | (74,895)                               | 32.1%                 |

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>38,39</sup>

1. **Emissions-Intensive and Trade-Exposed (“EITE”)** entities will receive an annual, fixed-amount on-bill credit based on Commission calculations, discussed below;
2. **Small Business and Residential CCC** for the distribution of all remaining GHG Allowance revenues to small business and residential customers on an equal dollar per small business and residential account basis delivered as a semi-annual, on-bill credit and is described in more detail below.

**A. EITE**

OP 1 of D.20-10-002 directs the IOUs to distribute GHG allowance proceeds in the same manner as previously directed in D.12-12-033, D.13-12-002, and D.14-12-037 (as modified by

<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> Net of SOMAH true-up costs of \$1.6 million.

<sup>37</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>38</sup> Consistent with D.15-07-001, OP 18, the Residential Volumetric Return is no longer applicable.

<sup>39</sup> Consistent with D.21-08-026, OP 6, the Small Business Volumetric Return is no longer applicable.

1 D.15-08-006 and D.16-07-007). D.15-01-024 states “[o]nce EITE customers have begun  
2 receiving an EITE return, the forecast return is based on the recorded prior-year revenue returned  
3 to EITE customers.”<sup>40</sup> With respect to the California Industry Assistance Credit for EITE, D.20-  
4 10-002 extended the existing formulas until the CARB begins the process of providing assistance  
5 or the Commission directs further changes.<sup>41</sup> In April 2024, EITE customers began receiving  
6 EITE returns in the amount of \$2.5 million. As such, the adjustment to GHG Allowance Revenues  
7 eligible for return to customers in 2025 reflects an assumed return to EITE customers of \$2.5  
8 million. Although the 2024 EITE return may not be fully dispersed to customers or recorded at  
9 the time of this filing, the amount to be returned to customers in 2024 is final. The 2024 EITE  
10 return is much larger than the amount returned to customers in 2023,<sup>42</sup> the most recent recorded  
11 prior-year revenue returned to EITE customers, because there was an increase in eligible customer  
12 attestations. As such, the 2024 EITE return is a more accurate forecast of the 2025 return to  
13 customers. In the unlikely scenario that the 2024 EITE return differs from the amount put forth in  
14 this testimony by the time SDG&E files its October update, SDG&E will update this forecast.

15 **B. Small Business and Residential CCC**

16 The remaining GHG Allowance revenues eligible for return to customers will be allocated  
17 to all qualifying small business and residential customers on an equal dollar-per-account basis,  
18 which will be credited to customers semi-annually as a bill credit, also known as the Small  
19 Business and Residential Semi-Annual CCC. Table 7 below presents the remaining GHG  
20 Allowance revenues available for return through the Small Business and Residential CCC of  
21 \$305.5 million, which results in a semi-annual Small Business and Residential CCC of \$100.75.

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<sup>40</sup> D.15-01-024, Attachment D at 5.

<sup>41</sup> D.20-10-002, pp. 2-3 and 13-14.

<sup>42</sup> The recorded 2023 EITE return is \$743,942.

**Table 7**  
**GHG Allowance Revenues<sup>43</sup> Eligible for Return through Residential CCC**

|  | <b>Current Authorized (\$000)<sup>44</sup></b> | <b>Proposed (\$000)</b> | <b>Change<sup>45</sup> (\$000)</b> | <b>Change (%)</b> |
|--|--|-------------------------|------------------------------------|-------------------|
| <b>GHG Allowance Revenues Eligible for Return</b>                      | (233,108)                                      | (308,003)               | (74,895)                           | 32.1%             |
| <b>EITE Customer Return Revenues</b>                                   | 514  | 2,457                   | 1,942                              | 377.6%            |
| <b>Small Business and Residential CCC Revenues</b>                     | 232,594  | 305,546                 | 72,952                             | 31.4%             |
| <b>Small Business and Residential Semi-Annual CCC (\$/semi-annual)</b> | 78.22  | 100.75                  | 22.53                              | 28.8%             |

**V. 2025 PCIA RATES**

The methodologies adopted to develop the PCIA rate calculations have evolved over time.

The following is a timeline of Commission decisions that have impacted the calculation of the PCIA rates, which SDG&E has complied with in the development of its 2025 PCIA rates:

- D.06-07-030, modified by D.07-01-030, established authority for the PCIA component of the Cost Responsibility Surcharge (“CRS”) to preserve bundled customer indifference by ensuring departing load customers pay their share of the cost responsibility associated with the above-market costs based on an administrative benchmark, also known as the “indifference amount,” of the utilities’ total procurement resource portfolio.<sup>46</sup>
- D.08-09-012 refined the indifference amount methodology to better protect bundled customer indifference by introducing the requirement to “vintage” departing load customers, based on their departure date, when determining the customers’ cost responsibility for the “total portfolio” of resources.<sup>47</sup> Assigning customers to a vintage ensured that departing load customers pay their share of above-market costs associated with the specific vintage

<sup>43</sup> Includes FF&U.

<sup>44</sup> Authorized by D.23-12-021 and effective January 1, 2024 per AL 4344-E.

<sup>45</sup> Difference may not equal due to rounding.

<sup>46</sup> In D.07-01-025, the Commission adopted the PCIA methodology for CCA customers.

<sup>47</sup> D.08-09-012, OP 10.

1 portfolio of resources that were acquired to serve them prior to their  
2 departure from bundled load service in order to better protect bundled  
3 customer indifference. After departure from bundled service, the departing  
4 load customers are not required to pay for above-market costs associated  
5 with utility procurement commitments after that load departs.

- 6 • D.11-12-018 refined the indifference amount methodology by recognizing  
7 that regulatory and industry changes had impacted energy procurement  
8 practices. Changes to the Market Price Benchmark (“MPB”) methodology,  
9 used to determine the “above-market” value of electricity, now included the  
10 addition of a renewables portfolio standards adder (“RPS adder”) to better  
11 reflect the market value of renewable resources and a revised resource  
12 adequacy capacity adder (“CAP adder”), which resulted in vintage MPBs.<sup>48</sup>  
13 The vintage portfolio of resources calculation was revised to better reflect  
14 time-of-use load variations and also removed load-related costs incurred by  
15 the California Independent System Operator (“CAISO”) that are then  
16 charged to the utilities.<sup>49</sup>
- 17 • D.16-09-044 directed the Joint Utilities and CCAs<sup>50</sup> to develop a uniform  
18 workpaper template through the PCIA Working Group to “facilitate  
19 comparison and analysis of the PCIA across utilities.”<sup>51</sup> Pursuant to D.17-  
20 08-026 OP 2, SDG&E has reflected the uniform workpaper template as  
21 attached in Appendix 7 of D.06-07-030 as part of this filing.<sup>52</sup> The  
22 Commission further ordered in D.18-10-019 that PG&E, SCE and SDG&E  
23 develop a uniform common template for the calculation of each of their

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<sup>48</sup> D.11-12-018, OPs 2 and 8.

<sup>49</sup> D.11-12-018, OPs 6 and 7.

<sup>50</sup> SCE, Pacific Gas & Electric Company (“PG&E”), SDG&E (collectively, the Joint Utilities), CCAs, certain Electric Service Providers and other representatives of DA interests, and consumer, labor and environmental groups participated in the PCIA working group.

<sup>51</sup> D.17-08-026, p. 2.

<sup>52</sup> D.17-08-026, OP 2 states that the workpaper template attached as Appendix A of D.17-08-026 is attached to D.06-07-030 as Appendix 7.



1 PCIA rates reflecting the changes ordered in the decision.<sup>53</sup> SDG&E  
2 submitted its common template to the Commission’s Energy Division and  
3 concurrently served the updated common template to the service list for its  
4 ERRA proceeding.

- 5 • D.18-10-019 modified the PCIA methodology by revising inputs to the  
6 MPB that is used to calculate the PCIA, effective January 1, 2019. In  
7 addition to the revised MPB inputs, the decision also adopted an annual  
8 true-up mechanism, as recommended by a number of parties, as well as a  
9 cap that limited the change of the PCIA rate from one year to the next.  
10 Starting in forecast year 2020, the cap level of the PCIA rate was set at 0.5  
11 cents/kWh more than the prior year’s PCIA, differentiated by system  
12 average vintage rate. AL 3436-E established the PCIA under-collection  
13 balancing account (“CAPBA”) which was used to track obligations that  
14 accrued for departing load customers by vintage subaccounts when the  
15 PCIA cap was hit.<sup>54</sup> In AL 3318-E/E-A, the PABA was established to  
16 record the “above-market” costs and revenues associated with all PCIA  
17 eligible resources by vintage subaccounts, effective January 1, 2019.<sup>55</sup>
- 18 • D.19-10-001 further modified the PCIA methodology by revising the inputs  
19 to the billing determinants (sales) that is used to calculate the PCIA rates,  
20 effective January 1, 2020. This revision ordered SDG&E to use vintage  
21 billing determinants of those responsible for the vintage portfolio to  
22 determine PCIA rates, instead of the currently used system net billing  
23 determinants. In addition, the decision authorized any over/under-  
24 collection in the PABA vintage subaccounts in a given year to be rolled into  
25 the next year’s ERRA Forecast filing. The decision adopted the  
26 methodology for SDG&E to true-up the values in PABA for the imputed  
27 RPS and resource adequacy (“RA”) costs using the updated benchmarks

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<sup>53</sup> D.18-10-019, OP 3.

<sup>54</sup> SDG&E AL 3436-E was filed on September 30, 2019, effective and approved on October 30, 2019.

<sup>55</sup> AL 3318-E/E-A, approved May 30, 2019 and effective January 1, 2019.

1 provided by the Energy Division on October 1.<sup>56</sup> The true-up amounts for  
2 both RPS and RA will be booked as adjustments to PABA annually through  
3 the ERRA Forecast filing.

- 4 • D.20-05-006 directed the IOUs to open a new “non-vintaged” PABA  
5 subaccount to allocate certain costs to all PCIA-eligible customers without  
6 respect to when the customer departed.
- 7 • D.21-03-051 granted the Joint Utilities’ uncontested Petition for  
8 Modification (“PFM”) to D.17-08-026 which updates the PCIA workpaper  
9 to remove the application of line losses to capacity volumes and utilizes  
10 energy volumes as measured at the generator meter instead of customer  
11 meter.<sup>57</sup>
- 12 • D.21-05-030 removed the PCIA cap and trigger mechanisms and required  
13 SDG&E to implement the removal of the PCIA cap in rates effective  
14 January 1, 2022.<sup>58</sup>
- 15 • D.22-01-023 directed each of the IOUs to modify their respective Electric  
16 Preliminary Statements governing the ERRA and PABA accounts to allow  
17 them to place year-end ERRA balances in the most-recent vintage  
18 subaccount of PABA each year.<sup>59</sup> The modifications clarify that disposition  
19 of the year-end balance in the ERRA account shall be to the PABA upon  
20 submission (where a Tier 1 advice letter is currently required) or approval  
21 (where a Tier 2 advice letter is currently required) by the Commission of the  
22 applicable compliance advice letter addressing such balance.
- 23 • D.23-06-006 refined the calculation of the Energy Index MPB to improve  
24 accuracy and transparency by calculating a factor to be multiplied by the  
25 Commission-provided energy benchmarks. The factor is a measure of the  
26 ratio between a three-year historical average of electric prices based on

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<sup>56</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>57</sup> D.21-03-051, OP 1.

<sup>58</sup> D.21-05-030, OP 1.

<sup>59</sup> D.22-01-023, OP 4. SDG&E AL 3976-E was approved by Energy Division on May 4, 2022.

1 actual energy revenues received for PCIA resources and the actual average  
2 CAISO SP15 day ahead market prices. In addition, it modified the ratio of  
3 on-peak to off-peak prices with a method based on time weightings rather  
4 than bundled load weightings.<sup>60</sup>

5 **A. Indifference Methodology**

6 Under applicable laws and rules,<sup>61</sup> departing load customers are responsible for their fair  
7 share of above-market costs, or an indifference amount, incurred by the utility on behalf of those  
8 customers when electric generation costs exceed the current market price, or market price  
9 benchmark. To maintain bundled customers' indifference to the departure of SDG&E's customers  
10 to non-utility service, SDG&E calculates the indifference amount to determine the cost  
11 responsibility for DA, CCA and other departing load, specifically:

12 **Indifference Amount = CTC + PCIA**

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

18 In this Application, SDG&E is proposing to update the currently effective vintage PCIA  
19 rates and to include the new vintage 2025 PCIA rates to account for customers' departing load in  
20 the second half of 2025. With respect to this 2025 ERRA proceeding, SDG&E's portfolio of  
21 resources, used to calculate the vintage 2025 indifference amounts and the resulting 2025 PCIA  
22 rates, will include applicable costs from SDG&E's:

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<sup>60</sup> D.23-06-006, OP 6; Additionally, D.23-06-006 established a new MPB and allocation mechanism to address the "greenhouse gas-free" incremental value of large hydroelectric energy resources above fossil fuel resources, however, SDG&E does not have any GHG-free resources.

<sup>61</sup> California Public Utilities Code Section 365.2.

- 1 • Forecasted 2025 PABA, and CTC revenue requirements;
- 2 • Projected 2024 PABA year-end balance;
- 3 • Projected 2024 ERRRA year-end balance; and
- 4 • SDG&E’s authorized 2024 Non-Fuel Generation Balancing Account
- 5 (“NGBA”) revenue requirement.<sup>62</sup>

6 Generally, SDG&E would update the NGBA revenue requirement to the same forecast  
7 year being requested (*i.e.*, 2025), however, the NGBA revenue requirement is still being litigated  
8 in SDG&E’s TY 2024 GRC and is not anticipated to be approved by the time of this filing.<sup>63</sup> As  
9 such, SDG&E will hold the currently approved 2024 NGBA revenue requirements constant. If a  
10 TY 2024 GRC Decision is adopted by the time SDG&E files its October update, SDG&E will  
11 update this revenue requirement accordingly.

12 Additionally, the vintage 2025 MPBs are not available at the time of this filing and  
13 therefore, the current MPBs<sup>64</sup> were used in the preliminary calculation of the vintage 2025 PCIA  
14 rates in this testimony and will be updated in SDG&E’s October Update filing in this proceeding.

15 **B. Treatment of SONGS-related Costs**

16 On July 26, 2018, the Commission approved D.18-07-037, adopting the majority of the  
17 2018 Revised Settlement Agreement (“Agreement”), which stated, in part, that SDG&E would  
18 cease collecting in rates the revenue requirement authorized to be recovered related to the SONGS  
19 regulatory asset.

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<sup>62</sup> Effective March 1, 2024 per AL 4366-E.

<sup>63</sup> A proposed decision is expected Q2 2024.

<sup>64</sup> Per SDG&E’s 2024 ERRRA Forecast Application, October update (A.23-05-013) and D.23-12-021.

SDG&E's PCIA rates therefore no longer include SONGS-related Regulatory Asset costs.<sup>65</sup> The only remaining SONGS-related costs included in PCIA rates are non-fuel related costs authorized in SDG&E's 2019 General Rate Case (D.19-09-051 and D.21-05-003) since SDG&E's TY2024 GRC is pending, which are included in the PCIA rates in Attachment D.

**C. Illustrative 2025 PCIA Rates**

Tables 8 and 9 below provide a comparison of the current effective PCIA rates as implemented on March 1, 2024 via AL 4366-E and the illustrative 2025 PCIA rates by vintage based on the 2025 ERRA Forecast inputs discussed above. The 2025 PCIA rates can also be found in Attachment D. Per Resolution E-5217, SDG&E will update the PCIA rates as part of its year-end consolidated electric rate change process with updated projected year-end PABA and ERRA balances.

**Table 8 – 2024 Current Effective Vintage PCIA Rates (\$/kWh)**

| Rate Group         | PCIA 2001<br>Vintage | PCIA 2002<br>Vintage | PCIA 2003<br>Vintage | PCIA 2004<br>Vintage | PCIA 2005<br>Vintage | PCIA 2006<br>Vintage | PCIA 2007<br>Vintage | PCIA 2008<br>Vintage | PCIA 2009<br>Vintage | PCIA 2010<br>Vintage | PCIA 2011<br>Vintage | PCIA 2012<br>Vintage |
|--------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Residential        | 0.00010              | 0.00000              | 0.00000              | 0.00609              | 0.00602              | 0.00751              | 0.00233              | 0.00371              | 0.00237              | 0.00775              | 0.00989              | 0.00925              |
| Small Commercial   | 0.00008              | 0.00000              | 0.00000              | 0.00472              | 0.00466              | 0.00582              | 0.00180              | 0.00287              | 0.00183              | 0.00600              | 0.00766              | 0.00717              |
| Medium & Large C&I | 0.00007              | (0.00002)            | (0.00002)            | 0.00583              | 0.00576              | 0.00720              | 0.00221              | 0.00354              | 0.00225              | 0.00756              | 0.00973              | 0.00907              |
| Agriculture        | 0.00007              | (0.00000)            | (0.00000)            | 0.00413              | 0.00408              | 0.00509              | 0.00158              | 0.00251              | 0.00160              | 0.00526              | 0.00676              | 0.00631              |
| Streetlighting     | 0.00006              | 0.00000              | 0.00000              | 0.00352              | 0.00348              | 0.00434              | 0.00134              | 0.00214              | 0.00137              | 0.00447              | 0.00571              | 0.00534              |
| System Total       | 0.00008              | (0.00001)            | (0.00001)            | 0.00572              | 0.00565              | 0.00706              | 0.00218              | 0.00348              | 0.00221              | 0.00734              | 0.00940              | 0.00878              |

| PCIA 2013<br>Vintage | PCIA 2014<br>Vintage | PCIA 2015<br>Vintage | PCIA 2016<br>Vintage | PCIA 2017<br>Vintage | PCIA 2018<br>Vintage | PCIA 2019<br>Vintage | PCIA 2020<br>Vintage | PCIA 2021<br>Vintage | PCIA 2022<br>Vintage | PCIA 2023<br>Vintage | PCIA 2024<br>Vintage |
|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| 0.01349              | 0.01360              | 0.00873              | 0.01323              | 0.00733              | 0.00330              | 0.00554              | (0.00026)            | 0.00726              | 0.02358              | 0.00207              | 0.00207              |
| 0.01047              | 0.01056              | 0.00676              | 0.01027              | 0.00567              | 0.00251              | 0.00427              | (0.00031)            | 0.01275              | 0.02788              | 0.00994              | 0.00994              |
| 0.01349              | 0.01361              | 0.00852              | 0.01332              | 0.00703              | 0.00266              | 0.00518              | (0.00141)            | 0.01659              | 0.03818              | 0.01569              | 0.01569              |
| 0.00931              | 0.00939              | 0.00594              | 0.00912              | 0.00495              | 0.00211              | 0.00369              | (0.00040)            | 0.00794              | 0.01755              | (0.00027)            | (0.00027)            |
| 0.00778              | 0.00784              | 0.00504              | 0.00763              | 0.00423              | 0.00192              | 0.00321              | (0.00012)            | 0.00941              | 0.02041              | 0.00649              | 0.00649              |
| 0.01292              | 0.01303              | 0.00826              | 0.01270              | 0.00689              | 0.00288              | 0.00514              | (0.00073)            | 0.01025              | 0.02815              | 0.00684              | 0.00684              |

<sup>65</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 9 – 2025 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        | 0.00060           | 0.00050           | 0.00050           | 0.00744           | 0.00754           | 0.00902           | 0.00443           | 0.00436           | 0.00222           | 0.00726           | 0.01210           | 0.01293           |
| Small Commercial   | 0.00042           | 0.00035           | 0.00035           | 0.00525           | 0.00532           | 0.00636           | 0.00313           | 0.00307           | 0.00156           | 0.00512           | 0.00856           | 0.00914           |
| Medium & Large C&I | 0.00045           | 0.00035           | 0.00035           | 0.00757           | 0.00767           | 0.00921           | 0.00444           | 0.00436           | 0.00213           | 0.00751           | 0.01285           | 0.01378           |
| Agriculture        | 0.00045           | 0.00038           | 0.00038           | 0.00579           | 0.00586           | 0.00702           | 0.00344           | 0.00338           | 0.00171           | 0.00565           | 0.00960           | 0.01028           |
| Streetlighting     | 0.00041           | 0.00035           | 0.00035           | 0.00512           | 0.00518           | 0.00620           | 0.00305           | 0.00300           | 0.00152           | 0.00499           | 0.00832           | 0.00889           |
| System Total       | 0.00049           | 0.00040           | 0.00040           | 0.00710           | 0.00719           | 0.00862           | 0.00420           | 0.00413           | 0.00206           | 0.00698           | 0.01178           | 0.01261           |

| 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 | PCIA 2025 Vintage |
|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| 0.01542           | 0.01558           | 0.01298           | 0.01555           | 0.01213           | 0.01280           | 0.01297           | 0.00997           | 0.01482           | 0.02084           | (0.00487)         | 0.00418           | 0.00418           |
| 0.01092           | 0.01103           | 0.00918           | 0.01101           | 0.00858           | 0.00906           | 0.00918           | 0.00701           | 0.01434           | 0.01942           | (0.00116)         | 0.00648           | 0.00648           |
| 0.01659           | 0.01677           | 0.01384           | 0.01679           | 0.01286           | 0.01365           | 0.01384           | 0.01022           | 0.02003           | 0.02771           | 0.00333           | 0.01129           | 0.01129           |
| 0.01233           | 0.01246           | 0.01032           | 0.01243           | 0.00963           | 0.01018           | 0.01031           | 0.00785           | 0.01418           | 0.01850           | (0.00303)         | 0.00342           | 0.00342           |
| 0.01060           | 0.01071           | 0.00893           | 0.01069           | 0.00834           | 0.00880           | 0.00892           | 0.00686           | 0.01346           | 0.01784           | 0.00092           | 0.00685           | 0.00685           |
| 0.01511           | 0.01527           | 0.01266           | 0.01525           | 0.01181           | 0.01249           | 0.01266           | 0.00956           | 0.01628           | 0.02276           | (0.00152)         | 0.00676           | 0.00676           |

**VI. 2025 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 whereby institutional customers...commercial customers...and groups of individuals...can meet their needs with the electrical generation from eligible renewable energy resources.”<sup>66</sup>

On May 31, 2022, SDG&E filed Application (“A.”) 22-05-023<sup>67</sup> requesting the Commission suspend its GTSR programs to protect program participants from high program rates that could not be overcome through program design changes.

<sup>66</sup> California Public Utilities Code Section 2831 (b) and (f).

<sup>67</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.

1 On August 25, 2022, Administrative Law Judges Petersen and Pulsifer issued a ruling in  
2 A.22-05-022 *et al.* immediately suspending SDG&E’s EcoChoice, Green Tariff program and  
3 directed SDG&E to “quickly disenroll customers from its Green Tariff option who will remain on  
4 their otherwise applicable rate.”<sup>68</sup> The ruling declined to suspend SDG&E’s EcoShare, Enhanced  
5 Community Renewables program; therefore, SDG&E presents ECR 2025 rates below.<sup>69</sup>

6 However, a Proposed Decision to A.22-05-022 was issued on March 3, 2024 that would, if  
7 adopted, discontinue the ECR program to new projects. SDG&E does not currently have any ECR  
8 projects, and so this requirement would effectively terminate SDG&E’s ECR program. SDG&E  
9 will continue to monitor this proceeding and if the Proposed Decision gets adopted, will make the  
10 appropriate updates in its ERRA October update filing.

11 The ECR program provides customers with the ability to purchase renewable energy from  
12 community-based projects directly through the developers of those projects (“Developer”). To  
13 date, no developers have currently executed PPAs with SDG&E to support the program, and since  
14 no such facilities have interconnected, there have been no enrollees.<sup>70</sup>

15 The rate components for the ECR rates<sup>71</sup> associated with these programs are as follows:

- 16 1. **Renewable Energy Commodity Price**<sup>72</sup> is equal to the portion of the renewable  
17 generating facility’s output that the customer has subscribed to, multiplied by the  
18 amount per kWh that the Utility has agreed to pay the developer (“Renewable  
19 Energy Commodity Price”). These values are part of the contract agreement with  
20 the Developers and therefore not addressed in this proceeding.

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<sup>68</sup> A.22-05-022 *et al.*, August 25, 2022, Administrative Law Judge’s Ruling Granting Request for Green Tariff Suspension, OP 1.

<sup>69</sup> D.15-01-051 authorizes updates to the GTSR program tariffs within the annual ERRA forecast proceeding.

<sup>70</sup> A.22-05-022 *et al.*, Application of San Diego Gas & Electric Company to Review Green Access Programs Pursuant to Decisions 18-06-027 and 21-12-036 (May 31, 2022) at 10-11.

<sup>71</sup> All ECR rate components exclude FF&U unless otherwise noted.

<sup>72</sup> Formerly the Solar Commodity Price.

- 1           2.     **Renewable Energy Value Adjustment**<sup>73</sup> calculates the relative value of energy  
2           and capacity for the solar resources supporting the program compared to the  
3           Utility’s current portfolio of resources serving all bundled load. The 2025  
4           Renewable Energy Value Adjustment is \$0.00000/kWh as described in the direct  
5           testimony of SDG&E witness Ms. Elias.
- 6           3.     **Administrative Costs** include incremental costs such as labor and non-labor for  
7           program management and policy support, Green-e certification, and IT costs.  
8           Because SDG&E does not forecast any customers on ECR, SDG&E’s 2025 charge  
9           for administrative costs is \$0.00000/kWh.
- 10          4.     **Marketing Costs** include incremental costs needed to implement the marketing  
11          plan. These costs are composed of labor (spent for planning, managing to the  
12          marketing plan, and community outreach) and non-labor tactical implementation  
13          (*i.e.*, creative design, production, translation and mailing fees). Because SDG&E  
14          does not forecast any customers on ECR, SDG&E’s 2025 marketing charge is  
15          \$0.00000/kWh.
- 16          5.     **Renewable Energy Commodity Credit**<sup>74</sup> assumes the customer has already  
17          purchased the rights to this output from the developer and the Utility concurrently  
18          assigns a credit to the customer equal to Renewable Energy Commodity Price  
19          (“Renewable Energy Commodity Credit”). These values are part of the contract  
20          agreement with the Developers and therefore not addressed in this proceeding.
- 21          6.     **SDG&E’s Average Commodity Cost Adjustment** is intended to approximate the  
22          avoided commodity costs and is based on SDG&E’s forecasted 2025 class average  
23          commodity rates, which is credited to the customer and is discussed in more detail  
24          below.
- 25          7.     **Western Renewable Energy Generation Information System (“WREGIS”)**  
26          may include, but is not limited to, the annual WREGIS fee and a per MWh  
27          certificate fee that is charged as Renewable Energy Credits (“RECs”) are retired.  
28          As discussed in the direct testimony of SDG&E witness Mr. Elias, the 2025  
29          WREGIS costs are \$0.00400/MWh, or \$0.00000/kWh.
- 30          8.     **CAISO Grid Management Charges (“GMC”)** include CAISO charges  
31          associated with GMCs and energy scheduling. The 2025 CAISO GMC costs, as  
32          described in the direct testimony of Jimmy Elias, are \$1.12/MWh, or  
33          \$0.00112/kWh.<sup>75</sup>

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<sup>73</sup> D.16-05-006, p. 27, n.38, 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>74</sup> Formerly known as Solar Commodity Credit.

<sup>75</sup> CAISO GMC costs including FF&U are \$0.00113/kWh.





1 customer class. To better reflect the avoided commodity cost, the average commodity rate is  
 2 adjusted for ERRA- and PABA-related balances requested in this application to better  
 3 approximate avoided costs, as authorized in D.15-01-051. SDG&E’s illustrative 2025 adjusted  
 4 class average commodity rate is based on the proposed average commodity rate by customer class  
 5 as proposed in this testimony,<sup>82</sup> shown in the Table 11 below. These adjustment rates will be  
 6 updated upon implementation to reflect the actual class average commodity rates at that time.

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

|                         | <b>Current<br/>Authorized<sup>83</sup></b> | <b>Proposed</b> |
|-------------------------|--|-----------------|
| <b>Residential</b>      | (0.17250)                                  | (0.14029)       |
| <b>Small Commercial</b> | (0.14614)                                  | (0.11896)       |
| <b>M/L C&amp;I</b>      | (0.17903)                                  | (0.14609)       |
| <b>Agricultural</b>     | (0.12708)                                  | (0.10330)       |
| <b>Streetlighting</b>   | (0.11299)                                  | (0.09186)       |

10 The PCIA component of the ECR rates comprises the indifference adjustment or the  
 11 above-market cost of the Utility’s existing procurement portfolio and is calculated annually.  
 12 D.15-01-051, FOF 100 states, “[t]he PCIA calculated for DA and CCA customers provides a  
 13 reasonable proxy for the GTSR customer indifference charge.” Accordingly, the utilities were  
 14 directed to use vintaged PCIA as a proxy for the indifference adjustment.<sup>84</sup> This is a cost that is  
 15 ultimately borne by all customers for resources that were procured on their behalf. ECR  
 16 customers’ PCIA rates will be billed by customer class and customer specific vintage using the  
 17 proposed 2025 PCIA rates discussed above and identified in Attachment D.

<sup>82</sup> As discussed in Section III.

<sup>83</sup> Effective January 1, 2024 per AL 4344-E.

<sup>84</sup> D.15-01-051, p. 103.

1 The detailed components of the 2025 ECR rates and the total illustrative 2025 ECR rates  
2 are presented in Attachment E of this testimony.

3 **VII. 2025 MCAM RATES**

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

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

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

20 **A. Bundled Service Customers**

21 The MCAM charge is applicable only to opt-out and backstop procurement LSE  
22 customers. Accordingly, costs of SDG&E procurement associated with D.19-11-016 and D.21-  
23 06-035 on behalf of bundled service customers will be recovered through the Portfolio Allocation  
24 Balancing Account (PABA) and included in bundled service customer commodity rates. For

1 bundled service customers who depart bundled service after the effective date of D.22-05-015,  
2 above-market costs for procurement associated with D.19-11-016 and D.21-06-035 requirements  
3 will be assigned a 2019 vintage and be collected through the PCIA charge.<sup>85</sup>

#### 4 **B. Opt-Out LSEs**

5 For customers of LSEs that opted out of self-providing capacity required by D.19-11-016,  
6 the opt-out costs and offsetting benefits shall be aggregated into a single bucket for procurement  
7 and a single bucket for administrative costs.<sup>86</sup> All of the procurement-related costs, including  
8 incremental administrative costs, shall be recorded in the MCAMBA, offset by any net energy or  
9 other revenues received from the contracts. The remaining net capacity costs will be recovered  
10 from all customers of all opt-out LSEs via the MCAM.<sup>87</sup>

#### 11 **C. Deficient LSEs (Backstop Procurement)**

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

19 SDG&E does not currently have any backstop procurement for LSEs pursuant to D.19-11-  
20 016 or D.21-06-035, as described by D.20-12-044, in its service territory. However, in the event  
21 SDG&E is required to procure resources as a backstop where MCAM is applicable, SDG&E will

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<sup>85</sup> D.22-05-015, OP 4.

<sup>86</sup> D.22-05-015, OP 5.

<sup>87</sup> Resolution E-5241, OP 1.

1 calculate the MCAM charges specific to the deficient LSE using the methodology described above  
2 and will not be pooled with other opt-out costs/revenue requirements.

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

4 For a non-IOU LSE that declares bankruptcy or ceases providing retail service in  
5 California and yet has a capacity obligation under D.19-11-016 or D.21-06-035, and their retail  
6 customers are paying for capacity under the MCAM adopted in D.22-05-015, the capacity shall  
7 revert to SDG&E, with the costs of the associated procurement allocated thereafter using the CAM  
8 established under Public Utilities Code Section 365.1(c)(2).<sup>88</sup>

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

12 Because Solana Energy Alliance ("SEA") opted out of procurement ordered by D.19-11-  
13 016, SDG&E procured resources associated with D.19-11-016 on its behalf; however, since that  
14 time, Solana Energy Alliance merged with Clean Energy Alliance, and former SEA customers are  
15 now served by Clean Energy Alliance ("CEA"). Pursuant to OP 14 of D.22-05-015, the opt-out  
16 procurement costs incurred by SDG&E on behalf of Solana Energy Alliance shall recovered via  
17 the non-bypassable MCAM charge structure.

18 **E. Proposed 2025 MCAM Rates**

19 Table 12 below presents the proposed 2025 MCAM rates.  
20

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<sup>88</sup> D.22-05-015, OP 10.

**Table 12 – Proposed 2025 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                         | 0.00006      | -             |
| Streetlighting                       | 0.00004      | -             |

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

- 3 Phase Renewables LLC
- Solana Energy Alliance (now Clean Energy Alliance)<sup>89</sup>
- Commercial Energy of California
- Constellation NewEnergy Inc.
- BP Energy Retail Company California LLC<sup>90</sup>
- 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 2025 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 2025 ERRR revenue requirement of \$432.3 million; (2) the projected 2024 ERRR year-end balance of \$34.1 million; (3) the 2025 PABA revenue requirement of \$251.0 million; (4) the

<sup>89</sup> SEA merged with 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.

<sup>90</sup> Previously “EDF Industrial Power Services (CA) LLC.”

1 projected 2024 PABA year-end balance of (\$107.1) million; (5) the 2025  
2 CTC revenue requirement of \$2.1 million; (6) the 2025 LG revenue  
3 requirement of \$214.4 million; (7) the projected 2024 LGBA year-end  
4 balance of (\$51.6) million; (8) the 2025 SONGS Unit 1 Offsite Fuel  
5 revenue requirement of \$1.3 million; (9) the 2025 MCAM revenue  
6 requirement of \$0.3 million; (10) 2025 SDCP DAC-GT and CS-GT  
7 program revenue requirements of \$0.4 million and \$0.3 million,  
8 respectively; and (11) the TMNBC revenue requirement as set forth in the  
9 testimony of SDG&E witness Ms. Felan and confidentiality declaration  
10 attached thereto;<sup>91</sup>

- 11 2. The amounts above projected for the ERRA, PABA and LGBA year-end  
12 balances will be updated in SDG&E's annual year-end process pursuant to  
13 Resolution E-5217;
- 14 3. The amounts above exclude FF&U and the then-approved FF&U factors  
15 will be applied at the time of implementation; and
- 16 4. Approve SDG&E's 2025 proposed rates, subject to updates as discussed in  
17 my testimony, for:
  - 18 a. GHG Allowance return to customers for the Residential and Small  
19 Business Semi-Annual CCC of \$100.75;
  - 20 b. 2025 PCIA rates presented in Attachment D;
  - 21 c. 2025 ECR rates presented in Attachment E; and
  - 22 d. 2025 MCAM rates presented in Attachment F.

23 This concludes my prepared direct testimony.

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<sup>91</sup> All values exclude FF&U.

1 **IX. QUALIFICATIONS**

2 My name is Erica Wissman. My business address is 8330 Century Park Court, San Diego,  
3 California 92123.

4 I have been employed as Rate Strategy Project Manager in the Rate Strategy & Design  
5 group in the Customer Pricing Department of San Diego Gas & Electric Company since  
6 December 2023. In my current role, one of my responsibilities is to analyze and develop rate  
7 design for SDG&E in proceedings before the Commission. I began work at SDG&E in 2020 as a  
8 Business/Economics Analyst in the Rate Strategy & Design group of the Customer Pricing  
9 Department.

10 I received a Bachelor of Science in Statistics and a Minor in Mathematical Sciences from  
11 the University of California, Santa Barbara in 2017.

12 I have previously submitted testimony before the California Public Utilities Commission  
13 and the Federal Energy Regulatory Commission.



**ATTACHMENT A**

**DECLARATION OF ERICA WISSMAN**

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

**DECLARATION  
OF ERICA WISSMAN**

**A.24-05-XXX**

**Application of San Diego Gas & Electric Company (U 902-E)  
for Approval of Its 2025 Electric Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts**

I, Erica Wissman declare as follows:

1. I am a Rate Strategy Project Manager for San Diego Gas & Electric Company (“SDG&E”). I included my prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2024 Application for Approval of its 2025 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Rate Strategy Project 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 Attachments B.1, B.2, 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 B.1, B.2, 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 B.1, B.2, 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, 2024, at San Diego, California.

/s/ Erica Wissman  
Erica Wissman  
Rate Strategy Project 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**  
**2025 ERRR FORECAST APPLICATION**  
**ATTACHMENT B.1**  
**ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY RATE COMPONENT**  
**BUNDLED CUSTOMERS<sup>92</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 3/1/2024</b>               |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                         |                     |          |
| 1                                     | Residential  | 766,062,344                | 345,588,659                |                            |                         |                            | 152,448,115       | 60,592           | 9,000,000          | (217,855,590)     |                         |                      |                      |                         | 1,427,474,931       | 1        |
| 2                                     | Small Comm.  | 360,552,797                | 63,458,951                 |                            |                         |                            | 40,877,102        | 23,223           | 0                  | (14,283,840)      |                         |                      |                      |                         | 574,928,552         | 2        |
| 3                                     | Med & Lg C&I | 874,804,343                | 298,861,333                |                            |                         |                            | 170,642,855       | 94,911           | 0                  | (335,097)         |                         |                      |                      |                         | 1,806,831,802       | 3        |
| 4                                     | Agriculture  | 31,637,624                 | 4,445,705                  |                            |                         |                            | 3,510,945         | 3,417            | 0                  | (119,364)         |                         |                      |                      |                         | 56,416,752          | 4        |
| 5                                     | Lighting     | 13,932,609                 | 1,890,387                  |                            |                         |                            | 1,290,226         | 763              | 0                  | 0                 |                         |                      |                      |                         | 19,041,270          | 5        |
| 6                                     | System Total | 2,047,050,917              | 720,245,035                |                            |                         |                            | 368,769,243       | 182,906          | 9,000,000          | (232,593,891)     |                         |                      |                      |                         | 3,884,693,307       | 6        |
| <b>PROPOSED 2025 ERRR Application</b> |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                         |                     |          |
| 7                                     | Residential  | 762,831,470                | 336,537,413                |                            |                         |                            | 68,114,410        | 60,592           | 9,000,000          | (281,292,468)     |                         |                      |                      |                         | 1,260,845,683       | 7        |
| 8                                     | Small Comm.  | 375,880,435                | 72,630,131                 |                            |                         |                            | 19,097,902        | 24,283           | 0                  | (23,316,800)      |                         |                      |                      |                         | 556,483,650         | 8        |
| 9                                     | Med & Lg C&I | 860,991,856                | 266,688,120                |                            |                         |                            | 75,250,849        | 93,674           | 0                  | (376,396)         |                         |                      |                      |                         | 1,655,790,887       | 9        |
| 10                                    | Agriculture  | 32,864,846                 | 3,904,292                  |                            |                         |                            | 1,631,172         | 3,553            | 0                  | (560,564)         |                         |                      |                      |                         | 55,524,327          | 10       |
| 11                                    | Lighting     | 14,616,356                 | 1,989,238                  |                            |                         |                            | 606,623           | 802              | 0                  | 0                 |                         |                      |                      |                         | 19,462,039          | 11       |
| 12                                    | System Total | 2,047,184,963              | 681,749,194                |                            |                         |                            | 164,700,956       | 182,904          | 9,000,000          | (305,546,228)     |                         |                      |                      |                         | 3,548,106,586       | 12       |
| <b>REVENUE CHANGE SUMMARY</b>         |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                         |                     |          |
| 13                                    | Residential  | (3,231,474)                | (9,051,246)                |                            |                         |                            | (84,333,705)      | 0                | 0                  | (63,436,878)      |                         |                      |                      |                         | (166,629,248)       | 13       |
| 14                                    | Small Comm.  | 15,327,638                 | 3,171,180                  |                            |                         |                            | (21,779,200)      | 1,060            | 0                  | (9,032,960)       |                         |                      |                      |                         | (18,444,902)        | 14       |
| 15                                    | Med & Lg C&I | (13,813,087)               | (32,173,213)               |                            |                         |                            | (95,392,006)      | (1,237)          | 0                  | (41,299)          |                         |                      |                      |                         | (151,040,915)       | 15       |
| 16                                    | Agriculture  | 1,167,222                  | (541,413)                  |                            |                         |                            | (1,879,773)       | 136              | 0                  | (441,200)         |                         |                      |                      |                         | (892,425)           | 16       |
| 17                                    | Lighting     | 683,747                    | 98,851                     |                            |                         |                            | (683,603)         | 39               | 0                  | 0                 |                         |                      |                      |                         | 420,769             | 17       |
| 18                                    | System Total | 134,046                    | (38,495,841)               |                            |                         |                            | (204,068,287)     | (2)              | 0                  | (72,952,337)      |                         |                      |                      |                         | (336,586,721)       | 18       |
| <b>AVERAGE % CHANGE SUMMARY</b>       |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                         |                     |          |
| 19                                    | Residential  | 0.42%                      | 2.62%                      |                            |                         |                            | 55.32%            | 0.00%            | 0.00%              | 29.12%            |                         |                      |                      |                         | 11.67%              | 19       |
| 20                                    | Small Comm.  | 4.25%                      | 4.57%                      |                            |                         |                            | 53.28%            | 4.56%            | 0.00%              | 63.24%            |                         |                      |                      |                         | 3.21%               | 20       |
| 21                                    | Med & Lg C&I | 1.58%                      | 10.77%                     |                            |                         |                            | 55.90%            | 1.30%            | 0.00%              | 12.32%            |                         |                      |                      |                         | 8.36%               | 21       |
| 22                                    | Agriculture  | 3.68%                      | 12.18%                     |                            |                         |                            | 53.54%            | 3.98%            | 0.00%              | 369.63%           |                         |                      |                      |                         | 1.58%               | 22       |
| 23                                    | Lighting     | 4.91%                      | 5.23%                      |                            |                         |                            | 52.98%            | 5.11%            | 0.00%              | 0.00%             |                         |                      |                      |                         | 2.21%               | 23       |
| 24                                    | System Total | 0.01%                      | 5.34%                      |                            |                         |                            | 55.34%            | 0.00%            | 0.00%              | 31.36%            |                         |                      |                      |                         | 8.66%               | 24       |

<sup>92</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 -  
2025 ERRa FORECAST APPLICATION  
ATTACHMENT B.2  
ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY RATE COMPONENT  
UNBUNDLED CUSTOMERS<sup>93</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 3/1/2024</b>               |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                    |                     |          |
| 1                                     | Residential  | 766,062,944                | 345,588,659                |                            |                         |                            | 152,448,115       | 60,592           | 9,000,000          | (217,855,590)     |                         |                      |                      |                    | 1,260,142,481       | 1        |
| 2                                     | Small Comm.  | 360,552,797                | 69,458,951                 |                            |                         |                            | 40,877,102        | 23,223           | 0                  | (14,283,840)      |                         |                      |                      |                    | 521,166,872         | 2        |
| 3                                     | Med & Lg C&I | 874,804,943                | 298,861,333                |                            |                         |                            | 170,642,855       | 94,911           | 0                  | (335,097)         |                         |                      |                      |                    | 1,593,233,441       | 3        |
| 4                                     | Agriculture  | 31,697,624                 | 4,445,705                  |                            |                         |                            | 3,510,945         | 3,417            | 0                  | (119,364)         |                         |                      |                      |                    | 49,999,277          | 4        |
| 5                                     | Lighting     | 13,932,609                 | 1,890,387                  |                            |                         |                            | 1,290,226         | 763              | 0                  | 0                 |                         |                      |                      |                    | 17,751,648          | 5        |
| 6                                     | System Total | 2,047,050,917              | 720,245,035                |                            |                         |                            | 368,769,243       | 182,906          | 9,000,000          | (232,593,891)     |                         |                      |                      |                    | 3,442,293,719       | 6        |
| <b>PROPOSED 2025 ERRa Application</b> |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                    |                     |          |
| 7                                     | Residential  | 762,831,470                | 336,537,413                |                            |                         |                            | 68,114,410        | 60,592           | 9,000,000          | (281,292,468)     |                         |                      |                      |                    | 1,119,225,962       | 7        |
| 8                                     | Small Comm.  | 375,880,435                | 72,630,131                 |                            |                         |                            | 19,097,902        | 24,283           | 0                  | (23,316,800)      |                         |                      |                      |                    | 515,101,753         | 8        |
| 9                                     | Med & Lg C&I | 860,991,856                | 266,688,120                |                            |                         |                            | 75,250,849        | 93,674           | 0                  | (376,396)         |                         |                      |                      |                    | 1,470,630,030       | 9        |
| 10                                    | Agriculture  | 32,864,846                 | 3,904,292                  |                            |                         |                            | 1,631,172         | 3,553            | 0                  | (560,564)         |                         |                      |                      |                    | 48,933,424          | 10       |
| 11                                    | Lighting     | 14,616,356                 | 1,989,238                  |                            |                         |                            | 606,623           | 802              | 0                  | 0                 |                         |                      |                      |                    | 18,088,592          | 11       |
| 12                                    | System Total | 2,047,184,963              | 681,749,194                |                            |                         |                            | 164,700,956       | 182,904          | 9,000,000          | (305,546,228)     |                         |                      |                      |                    | 3,171,979,762       | 12       |
| <b>REVENUE CHANGE SUMMARY</b>         |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                    |                     |          |
| 13                                    | Residential  | (3,231,474)                | (9,051,246)                |                            |                         |                            | (84,333,705)      | 0                | 0                  | (63,436,878)      |                         |                      |                      |                    | (140,916,519)       | 13       |
| 14                                    | Small Comm.  | 15,327,638                 | 3,171,180                  |                            |                         |                            | (21,779,200)      | 1,060            | 0                  | (9,032,960)       |                         |                      |                      |                    | (6,065,119)         | 14       |
| 15                                    | Med & Lg C&I | (13,813,087)               | (32,173,213)               |                            |                         |                            | (95,392,006)      | (1,237)          | 0                  | (41,299)          |                         |                      |                      |                    | (122,603,411)       | 15       |
| 16                                    | Agriculture  | 1,167,222                  | (541,413)                  |                            |                         |                            | (1,879,773)       | 136              | 0                  | (441,200)         |                         |                      |                      |                    | (1,065,853)         | 16       |
| 17                                    | Lighting     | 683,747                    | 98,851                     |                            |                         |                            | (683,603)         | 39               | 0                  | 0                 |                         |                      |                      |                    | 336,945             | 17       |
| 18                                    | System Total | 134,046                    | (38,495,841)               |                            |                         |                            | (204,068,287)     | (2)              | 0                  | (72,952,337)      |                         |                      |                      |                    | (270,313,957)       | 18       |
| <b>AVERAGE % CHANGE SUMMARY</b>       |              |                            |                            |                            |                         |                            |                   |                  |                    |                   |                         |                      |                      |                    |                     |          |
| 19                                    | Residential  | 0.42%                      | 2.62%                      |                            |                         |                            | 55.32%            | 0.00%            | 0.00%              | 29.12%            |                         |                      |                      |                    | 11.18%              | 19       |
| 20                                    | Small Comm.  | 4.25%                      | 4.57%                      |                            |                         |                            | 53.28%            | 4.56%            | 0.00%              | 63.24%            |                         |                      |                      |                    | 1.16%               | 20       |
| 21                                    | Med & Lg C&I | 1.58%                      | 10.77%                     |                            |                         |                            | 55.90%            | 1.30%            | 0.00%              | 12.32%            |                         |                      |                      |                    | 7.70%               | 21       |
| 22                                    | Agriculture  | 3.68%                      | 12.18%                     |                            |                         |                            | 53.54%            | 3.98%            | 0.00%              | 369.63%           |                         |                      |                      |                    | 2.13%               | 22       |
| 23                                    | Lighting     | 4.91%                      | 5.23%                      |                            |                         |                            | 52.98%            | 5.11%            | 0.00%              | 0.00%             |                         |                      |                      |                    | 1.90%               | 23       |
| 24                                    | System Total | 0.01%                      | 5.34%                      |                            |                         |                            | 55.34%            | 0.00%            | 0.00%              | 31.36%            |                         |                      |                      |                    | 7.85%               | 24       |

<sup>93</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**  
**2025 ERRa FORECAST APPLICATION**  
**ATTACHMENT C.1**  
**ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE COMPONENT**  
**BUNDLED CUSTOMERS<sup>94</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) | Nuclear Decommissioning Avg Rate (¢/kWh) | Non-Going CT 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 3/1/2024</u>               |              |                               |                                     |                            |                               |                               |                               |  |                               |                      |                     |                       |                      |                            |                         |                         |                            |                        |          |
| 1                                     | Residential  | 6,059,160,276                 |                                     |                            | 12.643                        | 5.704                         | 1.620                         | 0.007                                    | 0.054                         | 2.516                | 0.001               | 0.149                 | (3.595)              | 19.099                     | 0.401                   | 0.000                   | 15.166                     | 34.666                 | 1        |
| 2                                     | Small Comm.  | 2,322,265,148                 |                                     |                            | 15.526                        | 2.991                         | 1.633                         | 0.007                                    | 0.052                         | 1.760                | 0.001               | 0.000                 | (0.615)              | 21.355                     | 0.557                   | 0.000                   | 12.854                     | 34.766                 | 2        |
| 3                                     | Med & Lg C&I | 9,491,063,403                 |                                     |                            | 9.217                         | 3.149                         | 1.735                         | 0.007                                    | 0.048                         | 1.798                | 0.001               | 0.000                 | (0.004)              | 15.951                     | 0.410                   | 0.000                   | 15.807                     | 32.168                 | 3        |
| 4                                     | Agriculture  | 341,698,843                   |                                     |                            | 9.276                         | 1.301                         | 1.730                         | 0.007                                    | 0.030                         | 1.027                | 0.001               | 0.000                 | (0.035)              | 13.337                     | 0.546                   | 0.000                   | 11.224                     | 25.107                 | 4        |
| 5                                     | Lighting     | 76,256,047                    |                                     |                            | 18.271                        | 2.479                         | (0.123)                       | 0.007                                    | 0.004                         | 1.692                | 0.001               | 0.000                 | 0.000                | 22.331                     | 0.558                   | 0.000                   | 9.931                      | 32.820                 | 5        |
| 6                                     | System Total | 18,290,443,717                |                                     |                            | 11.192                        | 3.938                         | 1.673                         | 0.007                                    | 0.050                         | 2.016                | 0.001               | 0.049                 | (1.272)              | 17.654                     | 0.427                   | 0.000                   | 15.017                     | 33.098                 | 6        |
| <u>PROPOSED 2025 ERRa Application</u> |              |                               |                                     |                            |                               |                               |                               |  |                               |                      |                     |                       |                      |                            |                         |                         |                            |                        |          |
| 7                                     | Residential  | 6,059,160,276                 |                                     |                            | 12.590                        | 5.554                         | 1.585                         | 0.007                                    | 0.037                         | 1.124                | 0.001               | 0.149                 | (4.642)              | 16.405                     | 0.407                   | 0.000                   | 13.651                     | 30.463                 | 7        |
| 8                                     | Small Comm.  | 2,428,289,241                 |                                     |                            | 15.479                        | 2.991                         | 1.593                         | 0.007                                    | 0.036                         | 0.786                | 0.001               | 0.000                 | (0.960)              | 19.933                     | 0.553                   | 0.000                   | 11.576                     | 32.062                 | 8        |
| 9                                     | Med & Lg C&I | 9,367,446,739                 |                                     |                            | 9.191                         | 2.847                         | 1.695                         | 0.007                                    | 0.033                         | 0.803                | 0.001               | 0.000                 | (0.004)              | 14.573                     | 0.405                   | 0.000                   | 14.229                     | 29.207                 | 9        |
| 10                                    | Agriculture  | 355,305,819                   |                                     |                            | 9.250                         | 1.099                         | 1.686                         | 0.007                                    | 0.021                         | 0.459                | 0.001               | 0.000                 | (0.158)              | 12.365                     | 0.538                   | 0.000                   | 10.061                     | 22.964                 | 10       |
| 11                                    | Lighting     | 80,243,577                    |                                     |                            | 18.215                        | 2.479                         | (0.111)                       | 0.007                                    | 0.003                         | 0.756                | 0.001               | 0.000                 | 0.000                | 21.350                     | 0.559                   | 0.000                   | 8.938                      | 30.847                 | 11       |
| 12                                    | System Total | 18,290,445,653                |                                     |                            | 11.193                        | 3.727                         | 1.633                         | 0.007                                    | 0.035                         | 0.900                | 0.001               | 0.049                 | (1.671)              | 15.874                     | 0.427                   | 0.000                   | 13.530                     | 29.831                 | 12       |
| <u>RATE CHANGE SUMMARY</u>            |              |                               |                                     |                            |                               |                               |                               |  |                               |                      |                     |                       |                      |                            |                         |                         |                            |                        |          |
| 13                                    | Residential  |                               |                                     |                            | (0.053)                       | (0.150)                       | (0.035)                       | 0.000                                    | (0.017)                       | (1.392)              | 0.000               | 0.000                 | (1.047)              | (2.694)                    | 0.006                   | 0.000                   | (1.515)                    | (4.203)                | 13       |
| 14                                    | Small Comm.  |                               |                                     |                            | (0.047)                       | 0.000                         | (0.040)                       | 0.000                                    | (0.016)                       | (0.974)              | 0.000               | 0.000                 | (0.345)              | (1.422)                    | (0.004)                 | 0.000                   | (1.278)                    | (2.704)                | 14       |
| 15                                    | Med & Lg C&I |                               |                                     |                            | (0.026)                       | (0.302)                       | (0.040)                       | 0.000                                    | (0.015)                       | (0.995)              | 0.000               | 0.000                 | 0.000                | (1.378)                    | (0.005)                 | 0.000                   | (1.578)                    | (2.961)                | 15       |
| 16                                    | Agriculture  |                               |                                     |                            | (0.026)                       | (0.202)                       | (0.044)                       | 0.000                                    | (0.009)                       | (0.568)              | 0.000               | 0.000                 | (0.123)              | (0.972)                    | (0.008)                 | 0.000                   | (1.163)                    | (2.143)                | 16       |
| 17                                    | Lighting     |                               |                                     |                            | (0.056)                       | 0.000                         | 0.012                         | 0.000                                    | (0.001)                       | (0.936)              | 0.000               | 0.000                 | 0.000                | (0.981)                    | 0.001                   | 0.000                   | (0.993)                    | (1.973)                | 17       |
| 18                                    | System Total |                               |                                     |                            | 0.001                         | (0.211)                       | (0.040)                       | 0.000                                    | (0.015)                       | (1.116)              | 0.000               | 0.000                 | (0.399)              | (1.780)                    | 0.000                   | 0.000                   | (1.487)                    | (3.267)                | 18       |
| <u>AVERAGE % CHANGE SUMMARY</u>       |              |                               |                                     |                            |                               |                               |                               |  |                               |                      |                     |                       |                      |                            |                         |                         |                            |                        |          |
| 19                                    | Residential  |                               |                                     |                            | -0.42%                        | -2.63%                        | -2.16%                        | 0.00%                                    | -31.48%                       | -55.33%              | 0.00%               | 0.00%                 | -29.12%              | -14.11%                    | 1.50%                   | 0.00%                   | -9.99%                     | -12.12%                | 19       |
| 20                                    | Small Comm.  |                               |                                     |                            | -0.30%                        | 0.00%                         | -2.45%                        | 0.00%                                    | -30.77%                       | -55.34%              | 0.00%               | 0.00%                 | -56.10%              | -6.66%                     | -0.72%                  | 0.00%                   | -9.94%                     | -7.78%                 | 20       |
| 21                                    | Med & Lg C&I |                               |                                     |                            | -0.28%                        | -9.59%                        | -2.31%                        | 0.00%                                    | -31.25%                       | -55.34%              | 0.00%               | 0.00%                 | 0.00%                | -8.64%                     | -1.22%                  | 0.00%                   | -9.98%                     | -9.20%                 | 21       |
| 22                                    | Agriculture  |                               |                                     |                            | -0.28%                        | -15.53%                       | -2.54%                        | 0.00%                                    | -30.00%                       | -55.31%              | 0.00%               | 0.00%                 | -351.43%             | -7.29%                     | -1.47%                  | 0.00%                   | -10.36%                    | -8.54%                 | 22       |
| 23                                    | Lighting     |                               |                                     |                            | -0.31%                        | 0.00%                         | 9.76%                         | 0.00%                                    | -25.00%                       | -55.32%              | 0.00%               | 0.00%                 | 0.00%                | -4.39%                     | 0.18%                   | 0.00%                   | -10.00%                    | -6.01%                 | 23       |
| 24                                    | System Total |                               |                                     |                            | 0.01%                         | -5.36%                        | -2.39%                        | 0.00%                                    | -30.00%                       | -55.36%              | 0.00%               | 0.00%                 | -31.37%              | -10.08%                    | 0.00%                   | 0.00%                   | -9.90%                     | -9.87%                 | 24       |

<sup>94</sup> Various rate components and determinants have been designated confidential to prevent the disclosure of Bundled Sales. See Confidentiality Declaration of Erica Wissman attached herewith.

**ATTACHMENT C.2**

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

**UNBUNDLED CUSTOMERS**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT**  
**2025 ERRR FORECAST APPLICATION**  
**ATTACHMENT C.2**  
**ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE COMPONENT**  
**UNBUNDLED CUSTOMERS<sup>95</sup>**

| Line No.                              |              | Determinants System Net (kWh) | Determinants System Delivered (kWh) | Determinants Separated Load (kWh) | Distribution Avg Rate (¢/kWh) | Transmission Avg Rate (¢/kWh) | Public Goods Avg Rate (¢/kWh) | Nuclear Decommissioning Avg Rate (¢/kWh) | On-Going CT 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 3/1/2024</b>               |              |                               |                                     |                                   |                               |                               |                               |  |                              |                      |                     |                       |                      |                            |                         |                         |                       |                        |          |
| 1                                     | Residential  | 6,059,160,276                 |                                     |                                   | 12.643                        | 5.704                         | 1.620                         | 0.007                                    | 0.054                        | 2.516                | 0.001               | 0.149                 | (3.595)              | 19.099                     | 0.401                   | 0.000                   | 1.136                 | 20.636                 | 1        |
| 2                                     | Small Comm.  | 2,322,265,148                 |                                     |                                   | 15.526                        | 2.991                         | 1.633                         | 0.007                                    | 0.052                        | 1.760                | 0.001               | 0.000                 | (0.615)              | 21.355                     | 0.557                   | 0.000                   | 0.623                 | 22.535                 | 2        |
| 3                                     | Med & Lg C&I | 9,491,063,403                 |                                     |                                   | 9.217                         | 3.149                         | 1.735                         | 0.007                                    | 0.048                        | 1.798                | 0.001               | 0.000                 | (0.004)              | 15.951                     | 0.410                   | 0.000                   | 0.453                 | 16.814                 | 3        |
| 4                                     | Agriculture  | 341,698,843                   |                                     |                                   | 9.276                         | 1.301                         | 1.730                         | 0.007                                    | 0.030                        | 1.027                | 0.001               | 0.000                 | (0.035)              | 13.337                     | 0.546                   | 0.000                   | 0.777                 | 14.660                 | 4        |
| 5                                     | Lighting     | 76,256,047                    |                                     |                                   | 18.271                        | 2.479                         | (0.123)                       | 0.007                                    | 0.004                        | 1.692                | 0.001               | 0.000                 | 0.000                | 22.331                     | 0.558                   | 0.000                   | 0.493                 | 23.382                 | 5        |
| 6                                     | System Total | 18,290,443,717                |                                     |                                   | 11.192                        | 3.938                         | 1.673                         | 0.007                                    | 0.050                        | 2.016                | 0.001               | 0.049                 | (1.272)              | 17.654                     | 0.427                   | 0.000                   | 0.695                 | 18.776                 | 6        |
| <b>PROPOSED 2025 ERRR Application</b> |              |                               |                                     |                                   |                               |                               |                               |  |                              |                      |                     |                       |                      |                            |                         |                         |                       |                        |          |
| 7                                     | Residential  | 6,059,160,276                 |                                     |                                   | 12.590                        | 5.554                         | 1.585                         | 0.007                                    | 0.037                        | 1.124                | 0.001               | 0.149                 | (4.642)              | 16.405                     | 0.407                   | 0.000                   | 1.436                 | 18.248                 | 7        |
| 8                                     | Small Comm.  | 2,428,289,241                 |                                     |                                   | 15.479                        | 2.991                         | 1.593                         | 0.007                                    | 0.036                        | 0.786                | 0.001               | 0.000                 | (0.960)              | 19.933                     | 0.553                   | 0.000                   | 0.872                 | 21.358                 | 8        |
| 9                                     | Med & Lg C&I | 9,367,446,739                 |                                     |                                   | 9.191                         | 2.847                         | 1.695                         | 0.007                                    | 0.033                        | 0.803                | 0.001               | 0.000                 | (0.004)              | 14.573                     | 0.405                   | 0.000                   | 0.829                 | 15.807                 | 9        |
| 10                                    | Agriculture  | 355,305,819                   |                                     |                                   | 9.250                         | 1.099                         | 1.686                         | 0.007                                    | 0.021                        | 0.459                | 0.001               | 0.000                 | (0.158)              | 12.365                     | 0.538                   | 0.000                   | 1.081                 | 13.984                 | 10       |
| 11                                    | Lighting     | 80,243,577                    |                                     |                                   | 18.215                        | 2.479                         | (0.111)                       | 0.007                                    | 0.003                        | 0.756                | 0.001               | 0.000                 | 0.000                | 21.350                     | 0.559                   | 0.000                   | 0.859                 | 22.768                 | 11       |
| 12                                    | System Total | 18,290,445,653                |                                     |                                   | 11.193                        | 3.727                         | 1.633                         | 0.007                                    | 0.035                        | 0.900                | 0.001               | 0.049                 | (1.671)              | 15.874                     | 0.427                   | 0.000                   | 1.031                 | 17.332                 | 12       |
| <b>RATE CHANGE SUMMARY</b>            |              |                               |                                     |                                   |                               |                               |                               |  |                              |                      |                     |                       |                      |                            |                         |                         |                       |                        |          |
| 13                                    | Residential  |                               |                                     |                                   | (0.053)                       | (0.150)                       | (0.035)                       | 0.000                                    | (0.017)                      | (1.392)              | 0.000               | 0.000                 | (1.047)              | (2.694)                    | 0.006                   | 0.000                   | 0.300                 | (2.388)                | 13       |
| 14                                    | Small Comm.  |                               |                                     |                                   | (0.047)                       | 0.000                         | (0.040)                       | 0.000                                    | (0.016)                      | (0.974)              | 0.000               | 0.000                 | (0.345)              | (1.422)                    | (0.004)                 | 0.000                   | 0.249                 | (1.177)                | 14       |
| 15                                    | Med & Lg C&I |                               |                                     |                                   | (0.026)                       | (0.302)                       | (0.040)                       | 0.000                                    | (0.015)                      | (0.995)              | 0.000               | 0.000                 | 0.000                | (1.378)                    | (0.005)                 | 0.000                   | 0.376                 | (1.007)                | 15       |
| 16                                    | Agriculture  |                               |                                     |                                   | (0.026)                       | (0.202)                       | (0.044)                       | 0.000                                    | (0.009)                      | (0.568)              | 0.000               | 0.000                 | (0.123)              | (0.972)                    | (0.008)                 | 0.000                   | 0.304                 | (0.676)                | 16       |
| 17                                    | Lighting     |                               |                                     |                                   | (0.056)                       | 0.000                         | 0.012                         | 0.000                                    | (0.001)                      | (0.936)              | 0.000               | 0.000                 | 0.000                | (0.981)                    | 0.001                   | 0.000                   | 0.366                 | (0.614)                | 17       |
| 18                                    | System Total |                               |                                     |                                   | 0.001                         | (0.211)                       | (0.040)                       | 0.000                                    | (0.015)                      | (1.116)              | 0.000               | 0.000                 | (0.399)              | (1.780)                    | 0.000                   | 0.000                   | 0.336                 | (1.444)                | 18       |
| <b>AVERAGE % CHANGE SUMMARY</b>       |              |                               |                                     |                                   |                               |                               |                               |  |                              |                      |                     |                       |                      |                            |                         |                         |                       |                        |          |
| 19                                    | Residential  |                               |                                     |                                   | -0.42%                        | -2.63%                        | -2.16%                        | 0.00%                                    | -31.48%                      | -55.33%              | 0.00%               | 0.00%                 | -29.12%              | -14.11%                    | 1.50%                   | 0.00%                   | 26.41%                | -11.57%                | 19       |
| 20                                    | Small Comm.  |                               |                                     |                                   | -0.30%                        | 0.00%                         | -2.45%                        | 0.00%                                    | -30.77%                      | -55.34%              | 0.00%               | 0.00%                 | -56.10%              | -6.66%                     | -0.72%                  | 0.00%                   | 39.97%                | -5.22%                 | 20       |
| 21                                    | Med & Lg C&I |                               |                                     |                                   | -0.28%                        | -9.59%                        | -2.31%                        | 0.00%                                    | -31.25%                      | -55.34%              | 0.00%               | 0.00%                 | 0.00%                | -8.64%                     | -1.22%                  | 0.00%                   | 83.00%                | -5.99%                 | 21       |
| 22                                    | Agriculture  |                               |                                     |                                   | -0.28%                        | -15.53%                       | -2.54%                        | 0.00%                                    | -30.00%                      | -55.31%              | 0.00%               | 0.00%                 | -351.43%             | -7.29%                     | -1.47%                  | 0.00%                   | 39.12%                | -4.61%                 | 22       |
| 23                                    | Lighting     |                               |                                     |                                   | -0.31%                        | 0.00%                         | 9.76%                         | 0.00%                                    | -25.00%                      | -55.32%              | 0.00%               | 0.00%                 | 0.00%                | -4.39%                     | 0.18%                   | 0.00%                   | 74.24%                | -2.63%                 | 23       |
| 24                                    | System Total |                               |                                     |                                   | 0.01%                         | -5.36%                        | -2.39%                        | 0.00%                                    | -30.00%                      | -55.36%              | 0.00%               | 0.00%                 | -31.37%              | -10.08%                    | 0.00%                   | 0.00%                   | 48.35%                | -7.69%                 | 24       |

<sup>95</sup> Various rate components and determinants have been designated confidential to prevent the disclosure of Bundled Sales. See Confidentiality Declaration of Erica Wissman attached herewith.

**ATTACHMENT D**

**2025 ILLUSTRATIVE PCIA RATES**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT  
2025 ERRA FORECAST APPLICATION**

**ATTACHMENT D**

**ILLUSTRATIVE POWER CHARGE INDIFFERENCE ADJUSTMENT (PCIA) RATES FOR DIRECT ACCESS AND COMMUNITY  
CHOICE AGGREGATION CUSTOMERS<sup>96,97</sup>**

(\$/kWh)

| Rate Group           | PCIA 2001<br>Vintage | PCIA 2002<br>Vintage | PCIA 2003<br>Vintage | PCIA 2004<br>Vintage | PCIA 2005<br>Vintage | PCIA 2006<br>Vintage | PCIA 2007<br>Vintage | PCIA 2008<br>Vintage | PCIA 2009<br>Vintage | PCIA 2010<br>Vintage | PCIA 2011<br>Vintage | PCIA 2012<br>Vintage |
|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Residential          | 0.00060              | 0.00050              | 0.00050              | 0.00744              | 0.00754              | 0.00902              | 0.00443              | 0.00436              | 0.00222              | 0.00726              | 0.01210              | 0.01293              |
| Small Commercial     | 0.00042              | 0.00035              | 0.00035              | 0.00525              | 0.00532              | 0.00636              | 0.00313              | 0.00307              | 0.00156              | 0.00512              | 0.00856              | 0.00914              |
| Medium & Large C&I   | 0.00045              | 0.00035              | 0.00035              | 0.00757              | 0.00767              | 0.00921              | 0.00444              | 0.00436              | 0.00213              | 0.00751              | 0.01285              | 0.01378              |
| Agriculture          | 0.00045              | 0.00038              | 0.00038              | 0.00579              | 0.00586              | 0.00702              | 0.00344              | 0.00338              | 0.00171              | 0.00565              | 0.00960              | 0.01028              |
| Streetlighting       | 0.00041              | 0.00035              | 0.00035              | 0.00512              | 0.00518              | 0.00620              | 0.00305              | 0.00300              | 0.00152              | 0.00499              | 0.00832              | 0.00889              |
| System Total         | 0.00049              | 0.00040              | 0.00040              | 0.00710              | 0.00719              | 0.00862              | 0.00420              | 0.00413              | 0.00206              | 0.00698              | 0.01178              | 0.01261              |
| PCIA 2013<br>Vintage | PCIA 2014<br>Vintage | PCIA 2015<br>Vintage | PCIA 2016<br>Vintage | PCIA 2017<br>Vintage | PCIA 2018<br>Vintage | PCIA 2019<br>Vintage | PCIA 2020<br>Vintage | PCIA 2021<br>Vintage | PCIA 2022<br>Vintage | PCIA 2023<br>Vintage | PCIA 2024<br>Vintage | PCIA 2025<br>Vintage |
| 0.01542              | 0.01558              | 0.01298              | 0.01555              | 0.01213              | 0.01280              | 0.01297              | 0.00997              | 0.01482              | 0.02084              | (0.00487)            | 0.00418              | 0.00418              |
| 0.01092              | 0.01103              | 0.00918              | 0.01101              | 0.00858              | 0.00906              | 0.00918              | 0.00701              | 0.01434              | 0.01942              | (0.00116)            | 0.00648              | 0.00648              |
| 0.01659              | 0.01677              | 0.01384              | 0.01679              | 0.01286              | 0.01365              | 0.01384              | 0.01022              | 0.02003              | 0.02771              | 0.00333              | 0.01129              | 0.01129              |
| 0.01233              | 0.01246              | 0.01032              | 0.01243              | 0.00963              | 0.01018              | 0.01031              | 0.00785              | 0.01418              | 0.01850              | (0.00303)            | 0.00342              | 0.00342              |
| 0.01060              | 0.01071              | 0.00893              | 0.01069              | 0.00834              | 0.00880              | 0.00892              | 0.00686              | 0.01346              | 0.01784              | 0.00092              | 0.00685              | 0.00685              |
| 0.01511              | 0.01527              | 0.01266              | 0.01525              | 0.01181              | 0.01249              | 0.01266              | 0.00956              | 0.01628              | 0.02276              | (0.00152)            | 0.00676              | 0.00676              |

<sup>96</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>97</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 2025 ECR COMPONENTS**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT  
2025 ERRR FORECAST APPLICATION  
ATTACHMENT E  
ILLUSTRATIVE 2025 ENHANCED COMMUNITY RENEWABLES (ECR) RATE COMPONENTS<sup>98</sup>**

|   | \$/kWh             | \$/kWh               | \$/kWh             | \$/kWh    | \$/kWh                |
|---|--------------------|----------------------|--------------------|-----------|-----------------------|
| <u>Description</u>                            | <b>Residential</b> | <b>Sm Commercial</b> | <b>M/L C&amp;I</b> | <b>Ag</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     | (0.14029)          | (0.11896)            | (0.14609)          | (0.10330) | (0.09186)             |
| WREGIS  | 0.00000            | 0.00000              | 0.00000            | 0.00000   | 0.00000               |
| CAISO GMC                                     | 0.00113            | 0.00113              | 0.00113            | 0.00113   | 0.00113               |
| Renewable Integration Cost                    | 0.00000            | 0.00000              | 0.00000            | 0.00000   | 0.00000               |
| <b><i>ECR Differential</i></b>                | (0.13916)          | (0.11782)            | (0.14496)          | (0.10217) | (0.09073)             |
| PCIA  | See Attachment D   |                      |                    |           |                       |

<sup>98</sup> The Average Commodity Cost Adjustment will be updated upon implementation to reflect the actual class average commodity rates at that time.



**ATTACHMENT F**  
**2025 MCAM RATES**

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT  
2025 ERRR FORECAST APPLICATION  
ATTACHMENT F  
2025 MCAM RATES**

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

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