

Application No.: A.17-04-016
Exhibit No.: _____
Witness: Sheri S. Miller

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

*****redacted, public version*****

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

~~April 14~~November 9, 2017



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1 PREPARED DIRECT TESTIMONY OF

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5 I. INTRODUCTION

6 The purpose of my testimony is to address cost recovery related to San Diego Gas &
7 Electric Company's ("SDG&E's") Energy Resource Recovery Account ("ERRA"), Competition
8 Transition Charge ("CTC"), and Local Generation ("LG") revenue requirements. More
9 specifically, my testimony:

- 10 ■ describes SDG&E's ERRA, Transition Cost Balancing Account ("TCBA"), and
11 Local Generating Balancing Account ("LGBA");
- 12 ■ sets forth SDG&E's forecasted 2018 ERRA, CTC, and LG revenue requirements;
13 and
- 14 ■ requests recovery of the December 31, 2015 LGBA undercollected activity of —
15 \$0.491 million, as approved in the 2015 ERRA Compliance application in D.17-
16 03-016.

17 In addition, my testimony presents the comparison between the recorded 2016 year-end
18 balances with the actual 2016 year-end balances in the GHG allowance revenues and expenses
19 balancing accounts, as well as a reconciliation of the 2017 GHG Allowance Revenue & Expenses.

20 Finally, my testimony requests authorization of the revenue requirement of the San Onofre Nuclear
21 Generating Station ("SONGS") Unit 1 Offsite Spent Fuel Storage costs as described in Section VII
22 below.

1 **II. BACKGROUND**

2 Pursuant to California Public Utilities Commission (“Commission”) Decisions
3 (“D.”) 02-10-062 and D.02-12-074, the purpose of the ERRA balancing account is to provide full
4 recovery of SDG&E’s energy procurement costs associated with serving SDG&E’s bundled
5 service customers. Energy procurement costs include expenses associated with the California
6 Independent System Operator (“CAISO”) such as energy and ancillary services load charges,
7 CAISO revenues from utility generation and supply contracts, contract costs, generation fuel costs,
8 CAISO-related costs, hedging costs, and previously approved equity re-balancing costs related to
9 the financial statement consolidation under Accounting Standards Codification 810 (“ASC 810”)¹
10 of the Otay Mesa Energy Center (“OMEC”). The ERRA records revenues from SDG&E’s
11 Electric Energy Commodity Cost (“EECC”) rate schedule, adjusted to exclude commodity
12 revenues assigned to the Non-Fuel Generation Balancing Account (“NGBA”),² and other
13 Commission approved adjustments.

14 The purpose of the TCBA is to accrue all CTC revenues and recover all CTC-eligible
15 generation-related costs. Pursuant to D.02-12-074 and D.02-11-022, payments to Qualifying
16 Facilities (“QFs”) that are above the market benchmark proxy are charged to the TCBA. Eligible
17 CTC expenses³ reflect the difference between the market proxy and the contract price of costs
18 associated with certain QF contracts.

19 The purpose of the LGBA is to record the revenues and costs of generation and other
20 energy sources where the Commission has determined that the resource is subject to the Cost
21 Allocation Mechanism (“CAM”). Such generation may take the form of purchase power

¹ ASC 810, effective January 1, 2010, amended Financial Accounting Standards Board (“FASB”) Interpretation No. 46(R).

² In compliance with D.03-12-063, the NGBA became effective January 1, 2004.

³ Expenses eligible for CTC recovery are defined by Assembly Bill (“AB”) 1890.

1 agreements, company-owned generation units associated with new generation resources, and any
 2 other resources approved by the Commission for CAM treatment.

3 **III. 2018 ERRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS**

4 As shown in Table 1 below, SDG&E’s 2018 ERRA revenue requirement forecast is
 5 \$1,~~371.168~~ ~~\$1,297.546~~ million, including forecasted GHG costs as well as franchise fees and
 6 uncollectibles (“FF&U”). The direct testimony of SDG&E witness Ms. Montanez provides a
 7 detailed discussion of the Greenhouse Gas (“GHG”) costs.

8 **TABLE 1 - ERRA REVENUE REQUIREMENT**
 9 **(\$Millions of Dollars)**

No.	Component	2018 Forecast		2017 Forecast		Change from Prior Year	
1.	Load ISO Charges						
2.	Supply ISO Revenues						
3.	Contract Costs (non-CTC)						
4.	Contract Costs (CTC up to market)						
5.	Generation Fuel						
6.	Net Supply ISO Revenues						
7.	Equity Re-balancing Costs						
8.	CAISO Misc. Costs						
9.	Hedging Costs						
10.	Direct and Indirect GHG Costs						
11.	Subtotal		<u>1,354.715</u> 1,281.976		1,340.912	<u>13.803</u> (58.935)	
12.	FF&U ⁴		<u>16.453</u> 15.570		16.285	<u>.168</u> (.715)	

⁴ The 2018 and 2017 Forecasts reflect the franchise fee and uncollectible factor of 1.0121448.

No.	Component	2018 Forecast		2017 Forecast		Change from Prior Year	
13.	TOTAL⁵		<u>1,371.168</u> 1,297.546		1,357.197		<u>13.971</u> (59.650)

1 While the GHG Forecast was formerly filed in a separate application, SDG&E began
2 including the GHG Forecast within the ERRA Forecast beginning in 2016 (Application 15-04-
3 014), in accordance with D.14-10-033. Consistent with that approach, the 2018 GHG Forecast is
4 included in this ERRA Forecast Application.

5 The forecasted cost components set forth in the line items contained in Table 1 above,
6 and the reasons for the \$13.971 ~~\$59.650~~ million increase ~~decrease~~ in the 2018 ERRA revenue
7 requirement forecast – as compared to the 2017 ERRA revenue requirement (as submitted in the
8 2017 Forecast) – are addressed in Ms. Montanez’s testimony.

9 SDG&E’s 2018 ERRA revenue requirement forecast includes the fuel costs for its
10 electric generation facilities, including Miramar Energy Facility I (“Miramar I”), Miramar
11 Energy Facility II (“Miramar II”), Palomar Energy Center (“Palomar”), Desert Star Energy
12 Center (“Desert Star”), and the Cuyamaca Peak Energy Plant (“Cuyamaca”). The actual fuel
13 costs of Miramar I, Miramar II, Palomar, Desert Star, and Cuyamaca are recorded in the ERRA
14 for recovery through commodity rates. SDG&E’s non-fuel costs for these facilities are recorded
15 in the NGBA and also recovered through SDG&E’s commodity rates.

16 As shown in Table 2 below, SDG&E’s 2018 CTC revenue requirement forecast is
17 \$24.291 ~~\$16.329~~ million, including FF&U.

⁵ Sums may not equal due to rounding.

**TABLE 2 - CTC REVENUE REQUIREMENT
(\$Millions of Dollars)**

No.	Component	2018 Forecast	2017 Forecast	Change from Prior Year
1.	QF Contracts	<u>24.000</u> 16.133	23.397	<u>.603</u> (7.264)
2.	FF&U ⁶	<u>.291</u> .196	0.284	<u>.007</u> (.088)
3.	TOTAL	<u>24.291</u> 16.329	23.681	<u>.610</u> (7.352)

For CTC-eligible purchase power contracts, the power purchased is recorded to the ERRA at the market proxy of \$46.58 ~~\$48.78~~/MWh. The difference between the actual contract price and the market proxy is included in the 2018 CTC forecast and recorded to the TCBA. SDG&E witness Ms. Montanez discusses the market proxy of \$46.58 ~~\$48.78~~/MWh in greater detail.

As shown in Table 3 below, SDG&E’s 2018 LG revenue requirement forecast is \$159.338 ~~\$169.424~~ million, including FF&U.

**TABLE 3 - LG REVENUE REQUIREMENT
(\$Millions of Dollars)**

No.	Component	2018 Forecast	2017 Forecast	Change from Prior Year
1.	New Generation PPAs			<u>55.924</u> 66.167
2.	Combined Heat & Power			<u>0.010</u> 0.008
3.	Peakers			<u>52.975</u> 56.049
4.	Local Generation GHG			<u>5.527</u> 2.178
5.	SUBTOTAL	<u>157.426</u> 167.391	42.989	<u>114.437</u> 124.402
6.	FF&U ⁷	<u>1.912</u> 2.033	0.522	<u>1.390</u> 1.511
7.	TOTAL	<u>159.338</u> 169.424	43.511	<u>115.826</u> 125.913

The LGBA was authorized in D.13-03-029. The LGBA records the LG costs and the revenues received from SDG&E’s Local Generation (“LG”) rate. On a monthly basis, the

⁶*Ibid.*

⁷*Ibid.*

1 LGBA compares the LG costs with the revenues received. Interest is applied to any over- or
2 under-collected balance at the three-month Commercial Paper rate. The LGBA utilizes sub-
3 accounts for each generation resource. As shown on Table 3 and discussed in Ms. Montanez’s
4 testimony, the 2017 and 2018 costs for two new energy storage units will be included in LGBA.

5 **IV. COST RECOVERY OF LGBA UNDERCOLLECTION**

6 In SDG&E’s 2015 ERRa Compliance Application (A. 16-06-002), SDG&E presented a
7 monthly summary of accounting entries recorded to the LGBA during 2015, totaling \$0.491
8 million. In that application, SDG&E proposed to request cost recovery in this 2018 ERRa
9 Forecast Application. Accordingly, SDG&E seeks recovery of the 2015 activity, as approved in
10 the 2015 ERRa Compliance Application (D.17-03-016).

11 **V. COMPARISON OF 2016 RECORDED VS ACTUAL YEAR-END BALANCES IN** 12 **GHG BALANCING ACCOUNTS**

13 In accordance with Finding of Fact (“FOF”) 13 of D.14-10-033, utilities must reconcile
14 forecast amounts with recorded amounts until all actuals are available for the forecast year.
15 Consistent with this methodology, SDG&E provides a comparison of the 2016 year-end
16 recorded/forecasted balances with the 2016 year-end actual balances in three GHG balancing
17 accounts in Table 4 below. More specifically, (1) GHG allowance revenues are recorded in the
18 GHG Revenue Balancing Account (“GHGRBA”); (2) expenses are recorded in the GHG
19 Customer Outreach and Education Memorandum Account (“GHGCOEMA”); and (3) expenses
20 are recorded in the GHG Administrative Costs Memorandum Account (“GHGACMA”).

TABLE 4 - COMPARISON OF 2016 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS

Line	Description	2016 Recorded ¹ (\$)	2016 Actual (\$)	Difference
	(1) GHGRBA			-
1	Beginning Balance 1/1/2016	31,892,368	31,892,368	-
2	Allowance Revenue	(82,588,399)	(81,558,628)	1,029,771
3	Revenue returned to customers	54,271,415	54,431,061	159,646
4	Franchise Fees and Uncollectibles	(659,957)	(661,789)	(1,832)
5	Transfer to GHGCOEMA and GHGACMA ^{2,3}	80,036	80,036	-
5	Allowance Set Aside for Multi-Family Program ⁴	630,910	-	(630,910)
6	Interest	148,936	151,893	2,957
7	Ending Balance 12/31/2016	3,775,309	4,334,941	559,632
	(2) GHGCOEMA			
8	Beginning Balance 1/1/2016	(139,984)	(139,984)	-
9	Transfer from GHGRBA ²	(14)	(14)	-
10	Expenses	-	-	0
11	Interest	(669)	(692)	(23)
12	Ending Balance 12/31/2016	(140,667)	(140,690)	(23)
	(3) GHGACMA			
13	Beginning Balance 1/1/2016	(24,610)	(24,610)	-
14	Transfer from GHGRBA ³	(80,022)	(80,022)	-
15	Expenses	56,000	56,424	424
16	Interest	(264)	(266)	(2)
17	Ending Balance 12/31/2016	(48,896)	(48,474)	422

¹Per A.16-04-018 (2017 ERRA Forecast Update November 7, 2016) Attachment G. Template D-1: Annual Allowance Revenue Receipts and Customer Returns; and Template D-3: Detail of Outreach and Administrative Expenses. Recorded amounts represent actual recorded activity from January through September 2016 and forecasted amounts from October through December 2016.

²Transfer per D.15-12-032 (page 17) from GHGRBA to GHGCOEMA. This represents 1/1/16 projected overcollected balance of (\$139,986), plus 2016 forecasted expenses of \$140,000.

³Transfer per D.15-12-032 (page 17) from GHGRBA to GHGACMA. This represents 1/1/16 projected undercollected balance of \$32,522, plus 2016 forecasted expenses of \$47,500.

⁴The 2016 Allowance Set Aside for Multi-Family Program of \$630,910 was not used/transferred from GHGRBA since no Multi-Family Program was approved in 2016.

VI. RECONCILIATION OF 2017 GHG ALLOWANCE REVENUE AND EXPENSES

Pursuant to OP 11 of D.14-10-033, SDG&E is providing a fourth quarter update by presenting its 2017 GHG Allowance Revenue and Expense Reconciliation. This process consists

1 of updating the 2017 recorded amounts to determine the 12/31/2017 true-up balances for the
2 GHGRBA, GHGCOEMA and GHGACMA.

3 In Template D-1: Annual Allowance Revenue Receipts and Customer Returns in
4 Attachment G to this Application SDG&E presents a 12/31/2017 recorded GHGRBA balance of
5 (\$4.295) million. This reflects activity recorded through 9/30/17 and forecasted for the last three
6 months of 2017, including amounts of \$0.002 million of revenue transferred from GHGACMA
7 and GHGCOEMA. \$1.282 million for multi-family solar as described in the testimony of witness
8 Cynthia Fang.

9 In Template D-3: Detail of Outreach and Administrative Expenses, SDG&E presents
10 \$0.050 million for total 2017 expenses. This reflects activity recorded through 9/30/17, and
11 forecasted for the last three months of 2017 for GHGCOEMA and GHGACMA. Table 5 below
12 shows a summary of all activity recorded in these accounts.

13 The 12/31/2017 GHGRBA true-up balance is (\$4.295) million as shown on Template D-1
14 and the combined 12/31/2017 GHGCOEMA and GHGACMA expense true-up balance is (\$0.139)
15 million as presented in Table 5, line 11. The total prior year true-up for the revenue and expense
16 reconciliation is (\$4.434) million.

TABLE 5 - GHGCOEMA and GHGACMA Recorded Under/(Over) Collection and Expense True-Up

Line	Description	2017 Recorded ¹ (\$)
1	Beginning 1/1/2017 GHGCOEMA Balance	(140,690)
2	Transfer from GHGRBA ²	667
3	Expenses	-
4	Interest	(1,462)
5	Ending 12/31/2017 GHGCOEMA Balance	(141,485)
6	Beginning 1/1/2017 GHGACMA Balance	(48,474)
7	Transfer from GHGRBA ²	1,396
8	Expenses	49,770
9	Interest	(244)
10	Ending 12/31/2017 GHGACMA Balance	2,448
11	12/31/2017 Expense True-Up (Line 5 + Line 10)	(139,037)

¹The 2017 recorded amounts reflect actual data for January to September 2017 (through the third quarter) and updated forecasted data for October to December 2017 (fourth quarter).

²Per D.16-12-053, Section 4.7 Summary of GHG Allowance Proceeds, Page 22, allocation of revenue proceeds for outreach and administrative expenses total: (\$2,063)

1
2

VII. GREEN TARIFF SHARED RENEWABLE BALANCING ACCOUNT (GTSRBA)

4 Per D.15-01-051, SDG&E established the GTSRBA (AL 2889-E, approved June 23,
5 2016) to record the difference between the revenues collected from individual customers electing
6 to participate in the GTSR program and the incremental costs incurred to serve customers
7 participating in that program. The GTSR program consists of both a Green Tariff (GT) component
8 and an Enhanced Community Renewables (ECR) component which are recorded in separate
9 subaccounts with the GTSRBA. SDG&E's GTSR program began in 2016 and recorded minimal
10 activity during the year as described in SDG&E's Annual GTSR Program Progress Report filed on

1 March 15, 2017 (A.12-01-008). SDG&E's ECR program has not yet begun. SDG&E is not
2 requesting recovery in this instant application.

~~VIII.~~ **VIII. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE**

4 This section of my testimony requests authorization of the SONGS Unit 1 Offsite Spent
5 Fuel Storage costs revenue requirement of \$1.075 ~~\$1.073~~ million (\$1.088 ~~\$1.086~~ million
6 including FF&U) for 2018, which are described in Ms. Montanez's testimony. The authorized
7 revenue requirement is tracked in SDG&E's Nuclear Decommissioning Adjustment Mechanism
8 account.

~~IX.~~ **IX. SUMMARY**

10 In my testimony, SDG&E requests that the Commission:

- 11 ■ approve SDG&E's 2018 ERRR revenue requirement forecast (which includes
12 forecasted GHG costs) of \$1,371,168 ~~\$1,297,546~~ million;
- 13 ■ approve SDG&E's 2018 CTC revenue requirement forecast of \$24.291 ~~\$16.329~~
14 million; and
- 15 ■ approve SDG&E's 2018 LG revenue requirement forecast of \$159.338 ~~\$169.424~~
16 million.

17 Each of these amounts include FF&U.

18 My testimony also requests recovery of the December 31, 2015 LGBA activity of \$0.491
19 million.

20 In addition, my testimony also presents the comparison of the 2016 recorded/forecasted
21 vs. actual year-end balances in the GHG allowance revenues and expenses balancing accounts,
22 as well as a reconciliation of the 2017 GHG Allowances Revenue & Expenses.

1 Finally, my testimony requests that the Commission approve the 2018 revenue
2 requirement of \$1.075 ~~\$1.073~~ million (\$1.088 ~~\$1.086~~ million including FF&U) for the forecasted
3 SONGS Unit 1 Offsite Spent Fuel Storage costs.

4 This concludes my testimony.

5

1 ~~H.X.~~ **QUALIFICATIONS**

2 My name is Sheri S. Miller. I am employed by SDG&E as the Settlements Manager in the
3 Settlements & Systems Department. My business address is 8315 Century Park Court, San Diego,
4 California 92123. My current responsibilities include managing the payment, recovery, and
5 regulatory reporting processes for SDG&E's procurement activities. I began working in
6 Settlements & Systems as a Principal Supervisor in September 2014.

7 I have been employed by SDG&E since October of 2000. In addition to my current role in
8 Settlements & Systems, I have worked in four other departments at SDG&E in positions of
9 increasing responsibility. From December 2009 to July 2013, I was employed in the Regulatory
10 Reporting group and prepared filings of financial data to the CPUC and FERC, and I also closed
11 and analyzed the balancing accounts each month. From August 2013 to September 2014, I worked
12 in the Regulatory Accounts group. My responsibilities included the development, implementation
13 and analysis of regulatory balancing and memorandum accounts.

14 I have previously testified before this Commission.

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

**DECLARATION
OF SHERI S. MILLER**

A.17-04-016

Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2018 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

I, Sheri S. Miller, declare as follows:

1. I am a Settlements Manager for San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s November 8, 2017 Application for Approval of its 2018 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Settlements 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). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

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

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

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

Confidential Information	Matrix Reference	Reason for Confidentiality
Table 1, line 1: Load ISO Charges	II.A.2 V.C	Utility Electric Price Forecasts; confidential for 3 years. LSE Total Energy Forecast; confidential for the front 3 years.
Table 1, lines 2 and 6: Supply ISO Revenues	II.A.2 II.B.1 II.B.3 II.B.4	Utility Electric Price Forecasts; confidential for 3 years. Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, lines 3 and 7: Contract Costs (non-CTC) & Equity Re-balancing Costs	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 4: Contract Costs (CTC up to market)	II.B.3 II.B.4	Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 5: Generation Fuel	II.B.1 II.B.4	Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 1, line 8: CAISO Misc. Costs	II.A.2	Utility Electric Price Forecasts; confidential for 3 years.
Table 1, line 9: Hedging Costs	I.A.4	Long-term Fuel (gas) Buying and Hedging Plans; confidential for 3 years.
Table 1, line 10: Direct and Indirect GHG Costs	IV.A IV.B	Forecast of IOU Generation Resources; confidential for three years Forecast of Qualifying Facility Generation; confidential for three years

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

Confidential Information	Matrix Reference	Reason for Confidentiality
Table 3, line 1: New Generation PPAs	II.A.2 II.B.1 II.B.4	Utility Electric Price Forecasts; confidential for 3 years. Generation Cost Forecasts of Utility Retained Generation; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 3, line 2: Combined Heat & Power	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for 3 years.
Table 3, line 3: Peakers	II.B.3 II.B.4	Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Table 3, line 4: Local Generation GHG	IV.B II.B.4	Forecast of Qualifying Facility Generation; confidential for three years Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.

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

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

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

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

Executed this 7th day of November, 2017, at San Diego, California.

Sheri Miller

Sheri S. Miller
Settlements Manager
San Diego Gas & Electric Company