

Proceeding No.: A.24-05-~~XXX~~010
Exhibit No.: SDGE-124
Witness: Erica Wissman

UPDATED 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~~ October 215, 2024

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

I. OVERVIEW AND PURPOSE

The purpose of this updated 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.¹

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”)

¹ 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 October Update~~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,² 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.³

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.”) 23-01-008.⁴ Consistent with current allocation
19 methodologies, SDG&E will implement its: (1) bundled commodity rates that collect the 2025
20 commodity-related revenue requirements;⁵ (2) Local Generation Charge (“LGC”) rates that collect

² “Current Effective” throughout this testimony refers to rates effective ~~October~~ March 1, 2024 per
Advice Letter (“AL”) ~~4507-E4366-E, approved on April 9, 2024 and effective March 1, 2024.~~

³ Includes System Net, Delivered, and Bundled sales.

⁴ SDG&E will update the cost recovery allocations at the time of the implementation of changes approved in A.23-01-008.

⁵ 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 LG revenue requirement and balancing account; and (3) CTC rates that collect CTC revenue
2 requirement and balancing account using the System Average Percent Change (“SAPC”)
3 methodology adopted in SDG&E’s TY 2019 GRC Phase 2, Decision (“D.”) 21-07-010.⁶ Per
4 D.18-10-019, the PCIA allocations will be consistent with the factors used to allocate generation
5 costs to bundled customers.⁷ The TMNBC allocation is based on 12-month coincident peak (“12-
6 CP”) demand, which is recovered through the Public Purpose Programs (“PPP”) rate.⁸ SDCP’s
7 DAC-GT / CS-GT program costs are recovered as an equal cents/kWh rate also through PPP.⁹
8 Lastly, the MCAM revenues to be collected through the MCAM rates are allocated based on 12-
9 CP energy of the specific Opt-Out Load Serving Entities (“LSEs”), pursuant to Resolution E-5241
10 and AL 4151-E/E-A.¹⁰

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

⁶ See D.21-07-010, Ordering Paragraph (“OP”) 1, and p. 18. [This allocation will be updated with the implementation of changes approved in A.23-01-008.](#)

⁷ See D.18-10-019, OP 4.

⁸ See D.21-07-010, pp. 21-22.

⁹ AL 4129-E, p. 2, approved January 30, 2023 and effective January 1, 2023.

¹⁰ AL 4151-E/E-A, approved April 17, 2023 and effective January 26, 2023.

1 **III. 2025 RATE AND BILL IMPACTS TO REFLECT RECOVERY OF UPDATED**
2 **REVENUE REQUIREMENTS**

3 SDG&E requests the recovery in rates of the following 2025 revenue requirements¹¹
4 presented in the direct testimony of SDG&E witness Ms. Felan:¹²

- 5 1. 2025 ERRA Revenue Requirement of ~~\$461.4~~~~\$432.3~~ million for recovery of the
6 “up-to-market” energy procurement costs, which include GHG costs, associated
7 with serving SDG&E’s bundled service customers. SDG&E also seeks recovery of
8 the projected 2024 year-end balance recorded to ERRA of ~~\$130.5~~~~\$34.1~~ million;¹³
9 2. 2025 PABA Revenue Requirement of ~~(\$26.3)~~~~\$251.0~~ million for recovery of the
10 “above-market” costs and revenues associated with all generation resources that are
11 eligible for cost recovery through PCIA rates,^{14,15} and recovery of the projected
12 2024 year-end balance recorded to PABA of ~~(\$352.8)~~~~(\$107.1)~~ million.¹⁶ As
13 discussed further in the direct testimony of SDG&E witness Ms. Felan, the
14 forecasted PABA year-end balance includes the ~~estimated~~ Investment Tax Credits
15 (“ITCs”) that SDG&E is eligible to claim for its energy storage and microgrid
16 projects that came online in 2023. In its May filing, SDG&E initially proposed to

¹¹ 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, approved January 30, 2024 and effective January 1, 2024. SDG&E’s uncollectible rates within the FF&U factors are updated annually, pursuant to D.19-09-051.

¹² 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.

¹³ 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.

¹⁴ AL 3318-E/E-A, approved May 30, 2019 and effective January 1, 2019, established the PABA.

¹⁵ 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.

¹⁶ D.19-10-001, OP 3.f, authorized the recovery of the PABA prior year-end balance to be recovered through the ERRA Forecast filing.

1 amortize these credits in rates over a two-year period. Given broader rates-related
2 developments and further consideration of potential rate shock, SDG&E now
3 proposes to amortize these credits over one year, solely in 2025.¹⁷ There is the
4 potential for substantial increases in revenue requirements in 2025 resulting from a
5 delayed TY 2024 GRC Decision (A.22-05-016). SDG&E’s amended proposal to
6 include the entirety of the ITCs in rates in 2025 will help ~~SDG&E is proposing to~~
7 ~~amortize these credits in rates over a two-year period starting in 2025 in order to~~
8 ~~help A) smooth-out rate changes between 2024 and 2025 over this time period, and~~
9 ~~help to B) avoid potential rate-shock to customers that could result from increased~~
10 revenue requirements due to a delayed GRC decision. In addition, SDG&E has
11 certain projects scheduled to come online in 2024 that would be eligible for
12 additional tax credits, as discussed in further detail in the direct testimony of
13 SDG&E witness Ms. Felan. SDG&E intends to return these new project credits to
14 customers through rate reductions beginning in 2026, which would help mitigate
15 any potential rate shock resulting from the roll-off of the ITC credit applicable to
16 rates in 2025 ~~a larger, one-time amortization of the ITC benefit, and the related roll-~~
17 ~~off of the benefit in rates the following year;~~

- 18 3. 2025 CTC Revenue Requirement of ~~\$2.3~~\$2.1 million for recovery of above-market
19 costs associated with CTC-eligible resources from all customers;
- 20 4. 2025 LG Revenue Requirement of ~~\$192.1~~\$214.4 million for the recovery of net
21 costs associated with resources approved by the California Public Utilities
22 Commission (“Commission”) for Cost Allocation Mechanism (“CAM”) treatment
23 for recovery from all benefiting customers, including all bundled service, Direct
24 Access (“DA”) and Community Choice Aggregation (“CCA”) customers,¹⁸ and the

¹⁷ SDG&E reserves the right to change the amortization period of its ITC credits depending on the outcome of certain pending regulatory items, including the TY 2024 GRC Decision and issues being addressed in Administrative Law Judge Rafael Lirag’s Email Ruling Requesting Party Comments on Procedural Mechanisms (October 8, 2024), soliciting comments from parties on options for addressing the impacts of the RA MPB released by the Commission’s Energy Division.

¹⁸ 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.

1 projected 2024 year-end balance recorded to the LGBA of ~~(\$86.2)~~~~(\$51.6)~~ million.¹⁹
2 Similar to the projected PABA year-end balance, the LGBA includes SDG&E's
3 eligible ITCs, and SDG&E is proposing to amortize these credits ~~over two years in~~
4 ~~2025 order~~ to help prevent potential rate-shock that could result from ~~projected~~
5 ~~revenue requirement increases in 2025, including SDG&E's TY 2024 GRC~~ ~~the roll-~~
6 ~~off of the ITC benefits in rates in later years;~~

7 5. 2025 SONGS Unit 1 Offsite Fuel Storage Revenue Requirement of ~~\$0~~ ~~\$1.3 million~~
8 for the recovery of costs associated with the spent fuel storage costs ~~as discussed in~~
9 ~~further detail in the direct testimony of SDG&E witness Mr. Elias. As Southern~~
10 ~~California Edison's 2025 budget is not available yet, SDG&E is proposing to hold~~
11 ~~this revenue requirement constant from current, but plans to update this value in its~~
12 ~~October Update when the 2025 budget is expected to be available;~~⁻²⁰

13 6. 2025 MCAM revenue requirement of ~~\$0.1~~ ~~\$0.3~~ million for the recovery of
14 procurement conducted on behalf of customers of LSEs that opted out of
15 procurement required by D.19-11-016 and D.21-06-035, to be recovered by
16 customers of those LSEs;

17 7. 2025 SDCP DAC-GT ~~and CS-GT~~ program revenue requirements of ~~\$0.4 million~~
18 ~~and \$0.3 million, respectively.~~^{21,22} ~~Pursuant to D.24-05-065, the CSGT program is~~
19 ~~discontinued and therefore SDCP is not requesting any funding for CSGT for 2025.~~
20 At the time of this application filing, SDG&E is not aware of SDCP's 2025 program
21 funding ~~has not yet been approved~~. ~~Therefore, SDG&E is proposing to keep the~~

¹⁹ ~~The 2024 year-end balance recorded to the LGBA figure in this testimony differs from that presented in the direct testimony of SDG&E witness Ms. Felan because the projected 2024 LGBA balance in this testimony does not include the estimated ITCs that SDG&E is eligible to claim for its energy storage and microgrid projects that came online in 2024, while the figure in the direct testimony of SDG&E witness Ms. Felan does. The figure in this testimony excludes the ITCs for projects that came online in 2024 because these credits will not be included in rates in 2025.~~

²⁰ ~~D.15-12-032 authorized SDG&E to recover the costs of SONGS Unit 1 Offsite Spent Fuel Storage through its ERRA proceeding.~~

²¹ ~~Per AL 4467-E-A4159-E filed July 25, 2024, approved August 21, 2024 and effective August 7, 2024 February 1, 2023, SDG&E is not requesting any additional funding for its DAC-GT, CS-GT programs.~~

²² ~~SDCP AL 21-E at 4-5. Although SDCP is proposing a total 2025 DAC-GT budget of \$362,747, for program year ("PY") 2025, SDCP requests no remittances because its PY 2023 unspent funds exceed its total requested PY 2025 budget for DAC-GT.~~

1 program funding constant at the 2024 amount for purposes of the May
2 application.^{23,24} If SDCP's DAC-GT and CS-GT funding amount is approved
3 before SDG&E files its October Update, SDG&E will update the funding amount
4 in its October Update. However, as discussed in more detail in [SDCP's direct](#)
5 [testimony of Mr. Bencomo-Jasso's Testimony](#),²⁵; there is a precedent to include
6 [CCA-requested program funding in ERRA Forecast proceedings, regardless of](#)
7 [Commission approval. Therefore, SDG&E is proposing to include the 2025 SDCP](#)
8 [DAC-GT funding requested in SDCP's AL 21-E](#);

- 9 8. 2025 TMNBC Revenue Requirement as set forth in the testimony of SDG&E
10 witness Ms. Felan and confidentiality declaration attached thereto for recovery of
11 costs associated with the tree mortality related procurement costs; and
12 9. The amounts above projected for the ERRA, PABA and LGBA year-end balances
13 will be updated in SDG&E's annual year-end process pursuant to Resolution E-
14 5217 (August 4, 2022), which directs the IOUs to update projected year-end
15 balances for each of its regulatory accounts in its annual year-end consolidated
16 electric revenue and rate change advice letters.

17 Table 1 below compares the currently effective revenue requirements to the 2025 proposed
18 revenue requirements discussed above and the GHG Allowance revenues eligible for return to
19 customers through electric rates, which are discussed in more detail below in Section IV.²⁶

²³ ~~The 2024 budgets are found in SDCP's AL 010-E, which was approved by Resolution E-5246 (March 16, 2023).~~

²⁴ ~~Pursuant to Resolution E-5246, the 2025 SDCP DAC-GT and CS-GT funding will be approved through its 2025 Annual Budget Advice Letter.~~

²⁵ [Prepared Direct Testimony of Carlo Bencomo-Jasso on behalf of San Diego Community Power and Clean Energy Alliance \(August 19, 2024\), p. 34.](#)

²⁶ Table 1 excludes the TMNBC revenue requirement as it is confidential. However, the revenue requirement is included in total rate impacts.

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Table 1
Current and Proposed Revenue Requirements (\$000)²⁷

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	w/FF&U	w/FF&U
1	ERRA	481,194	487,032	<u>461,379</u> 432,300	<u>466,976</u> 437,544	(20,056)	(49,488)	<u>-4.1%</u>	<u>-10.2%</u>
2	ERRA Balance	(91,225)	(92,186)	<u>130,542</u> 425,34,093	<u>132,048</u> 34,486	<u>224,233</u>	<u>126,672</u>	<u>-243.2%</u>	<u>-137.4%</u>
3	PABA	122,614	123,448	<u>(26,309)</u> 250,967	<u>(26,458)</u> 251,358	<u>(149,906)</u>	<u>127,910</u>	<u>-121.4%</u>	<u>103.6%</u>
4	PABA Balance	103,230	103,932	<u>(352,818)</u> (107,061)	<u>(354,810)</u> (107,228)	<u>(458,742)</u>	<u>(211,160)</u>	<u>441.4%</u>	<u>203.2%</u>
5	CTC	4,918	4,978	<u>2,282,113</u>	<u>2,310,139</u>	<u>(2,668)</u>	<u>(2,839)</u>	<u>-53.6%</u>	<u>-57.0%</u>
6	LG	205,052	207,540	<u>192,101</u> 214,369	<u>194,431</u> 216,970	<u>(13,108)</u>	<u>9,430</u>	<u>-6.3%</u>	<u>4.5%</u>
7	LGBA Balance	159,297	161,230	<u>(86,214)</u> (51,643)	<u>(87,260)</u> (52,269)	<u>(248,490)</u>	<u>(213,499)</u>	<u>-154.1%</u>	<u>-132.4%</u>
8	SONGS	1,285	1,301	<u>-1,285</u>	<u>-1,301</u>	<u>(1,301)</u>	<u>-</u>	<u>-100%</u>	<u>0.0%</u>
9	Modified CAM	413	418	<u>132,312</u>	<u>133,316</u>	<u>(285)</u>	<u>(102)</u>	<u>-68.2%</u>	<u>-24.4%</u>
10	SDCP DAC-GT	380	380	<u>-380</u>	<u>-380</u>	<u>(380)</u>	<u>-</u>	<u>-100%</u>	<u>0.0%</u>
11	SDCP CS-GT	326	326	<u>-326</u>	<u>-326</u>	<u>(326)</u>	<u>-</u>	<u>-100%</u>	<u>0.0%</u>
12	Subtotal	987,484	998,398	<u>321,094</u> 777,441	<u>327,370</u> 785,323	<u>(671,028)</u>	<u>(213,075)</u>	<u>-67.2%</u>	<u>-21.3%</u>
GHG Allowance Revenue Available for Return²⁸									
13	Residential & Small Business CCC	(232,594)	(232,594)	<u>(246,532)</u> (305,546)	<u>(246,532)</u> (305,546)	<u>(13,938)</u>	<u>(72,952)</u>	<u>6.0%</u>	<u>31.4%</u>
14	EITE Returns	(514)	(514)	<u>(2,910)</u> (2,457)	<u>(2,910)</u> (2,457)	<u>(2,395)</u>	<u>(1,942)</u>	<u>465.6%</u>	<u>377.6%</u>
15	Total	754,376	765,290	<u>71,652</u> 469,438	<u>77,928</u> 477,320	<u>(687,361)</u>	<u>(287,970)</u>	<u>-89.8%</u>	<u>-37.6%</u>

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Tables 2 and 3 present the illustrative bundled and unbundled class average total rate impacts, respectively, associated with SDG&E's proposed 2025 electric sales forecast as discussed

²⁷ Totals may not equal due to rounding.

²⁸ GHG Allowance Revenue available for return include FF&U in both columns.

1 in the testimony of SDG&E witness Mr. Simmerman and the revenue requirements presented in
 2 Table 1. SDG&E is requesting rate recovery of those revenue requirements beginning January 1,
 3 2025.

4 The net ~~\$687.4~~~~\$288.0~~ million (including FF&U) decrease from the currently effective
 5 revenue requirements, when implemented with SDG&E’s 2025 sales forecast as discussed in the
 6 testimony of SDG&E witness Mr. Simmerman, would decrease the total bundled system average
 7 rate ~~1.73~~~~3~~ cents per kWh, or ~~-5.2%~~~~-9.9%~~.²⁹ Without the Residential and Small Business Semi-
 8 Annual CCC, the total bundled system average rate would decrease by ~~1.72~~~~9~~ cents per kWh, or ~~-~~
 9 ~~4.8%~~~~-8.3%~~. For unbundled customers, SDG&E’s system average delivery plus PCIA rates will
 10 decrease ~~4.01~~~~4~~ cents per kWh, or ~~-21.3%~~~~-7.7%~~. Without the Residential and Small Business
 11 Semi-Annual CCC, SDG&E’s system average delivery plus PCIA rates would decrease ~~4.01~~~~0~~
 12 cents per kWh, or ~~-19.6%~~~~-5.2%~~. Attachments ~~AB~~ and ~~BC~~ illustrate the changes resulting from the
 13 proposals in this Application by individual rate component to the class average revenues and rates,
 14 respectively.

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

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

Customer Classes	Current Effective Rates (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	34.918 34.666	32.752 30.463	(2.166) (4.203)	-6.2% -12.1%
Small Commercial	35.038 34.766	33.601 32.062	(1.437) (2.704)	-4.1% -7.8%
Medium and Large Commercial and Industrial	32.344 32.168	30.665 29.207	(1.679) (2.961)	-5.2% -9.2%
Agriculture	25.279 25.107	24.106 22.964	(1.173) (2.143)	-4.6% -8.5%
Streetlighting	33.067 32.820	31.849 30.847	(1.218) (1.973)	-3.7% -6.0%

²⁹ 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.

System	<u>33.310</u> 33.098	<u>31.564</u> 29.831	<u>(1.746)</u> (3.267)	<u>-5.2%</u> -9.9%
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Table 3
Illustrative Unbundled Class Average Rate Impacts³⁰

Customer Classes	Current Effective Rates (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	<u>20.888</u> 20.636	<u>15.481</u> 18.248	<u>(5.407)</u> (2.389)	<u>-25.9%</u> -11.6%
Small Commercial	<u>22.807</u> 22.535	<u>19.224</u> 21.358	<u>(3.583)</u> (1.177)	<u>-15.7%</u> -5.2%
Medium and Large Commercial and Industrial	<u>16.990</u> 16.814	<u>13.564</u> 15.807	<u>(3.426)</u> (1.008)	<u>-20.2%</u> -6.0%
Agriculture	<u>14.832</u> 14.660	<u>11.481</u> 13.984	<u>(3.351)</u> (0.676)	<u>-22.6%</u> -4.6%
Streetlighting	<u>23.629</u> 23.382	<u>20.422</u> 22.768	<u>(3.207)</u> (0.614)	<u>-13.6%</u> -2.6%
System	<u>18.988</u> 18.776	<u>14.946</u> 17.332	<u>(4.042)</u> (1.444)	<u>-21.3%</u> -7.7%

Table 4
Illustrative Bundled Class Bill Impacts^{31,32}

Customer Classes	Current Bill (\$/month)	Proposed Bill (\$/month)	Change (\$/month)	Change (%)
Residential - Non-CARE	<u>153</u> 152	<u>141</u> 132	<u>(13)</u> (20)	<u>-8.3%</u> -13.3%
Residential - CARE	<u>94</u> 93	<u>87</u> 79	<u>(8)</u> (14)	<u>-8.0%</u> -15.1%
Small Commercial	<u>362</u> 359	<u>347</u> 331	<u>(15)</u> (28)	<u>-4.1%</u> -7.8%
Medium and Large Commercial and Industrial	<u>14,975</u> 14,893	<u>14,197</u> 13,522	<u>(777)</u> (1,371)	<u>-5.2%</u> -9.2%
Agriculture	<u>1,606</u> 1,595	<u>1,531</u> 1,459	<u>(75)</u> (136)	<u>-4.6%</u> -8.5%
Streetlighting	<u>410</u> 407	<u>395</u> 383	<u>(15)</u> (24)	<u>-3.7%</u> -6.0%

³⁰ Includes average PCIA rates. Excludes the cost of electricity procured on the customers behalf by their ESP.

³¹ 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.

³² 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).

Table 5
Illustrative Unbundled Class Bill Impacts^{33,34}

Customer Classes	Current Bill (\$/month)	Proposed Bill (\$/month)	Change (\$/month)	Change (%)
Residential - Non-CARE	<u>9796</u>	<u>7485</u>	<u>(23)(41)</u>	<u>-23.6% -11.3%</u>
Residential - CARE	<u>5756</u>	<u>4148</u>	<u>(16)(8)</u>	<u>-27.5% -14.8%</u>
Small Commercial	<u>236233</u>	<u>199224</u>	<u>(37)(42)</u>	<u>-15.7% -5.2%</u>
Medium and Large Commercial and Industrial	<u>7,8667,785</u>	<u>6,2807,318</u>	<u>(1,586)(466)</u>	<u>-20.2% -6.0%</u>
Agriculture	<u>942934</u>	<u>729888</u>	<u>(213)(43)</u>	<u>-22.6% -4.6%</u>
Streetlighting	<u>293290</u>	<u>253283</u>	<u>(40)(8)</u>	<u>-13.6% -2.6%</u>

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 ~~\$(227.1)~~~~\$(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 ~~(\$33.9)~~~~(\$47.4)~~ million as presented in Attachment G - Template D-1 to the instant Application, which includes the reconciliation of 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 ~~(\$0.0)~~~~\$0.4~~ million that will be recorded in the GHG Customer Outreach and Education Memorandum

³³ 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.

³⁴ 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).

Account (“GHGCOEMA”) and the GHG Administrative Costs Memorandum Account (“GHGACMA”); and

3. Solar on Multifamily Affordable Housing (“SOMAH”) Program funding^{35,36} 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 Revenues³⁷ Eligible for Return to Customers

	Current Authorized³⁸ (\$000)	Proposed (\$000)	Change³⁹ (\$000)	Change (%)
GHG Allowance Revenues	(246,235)	(271,311) (227,092)	(25,076) 19,143	-7.8% -10.2%
Interest	856	(431) (131)	(1,287) (987)	-150.4% -115.3%
GHG Expenses ⁴⁰	6	83 (10)	77 (16)	1,266.2% = 263.9%
Clean Energy/Energy	14,463	14,726	263	1.8%

³⁵ 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.

³⁶ On May 13, 2022, Southern California Edison Company (“SCE”) filed a Petition for Modification of D.17-12-022 (issued in [Rulemaking-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.

³⁷ All values exclude FF&U unless otherwise noted.

³⁸ Authorized by D.23-12-021 and effective January 1, 2024 per AL 4344-E.

³⁹ Differences may not equal due to rounding.

⁴⁰ GHG Expenses include utility outreach and administrative costs, including information technology (“IT”) billing and program management costs, as well as statewide outreach costs.

	Current Authorized³⁸ (\$000)	Proposed (\$000)	Change³⁹ (\$000)	Change (%)
Efficiency Program Costs ⁴¹				
FF&U	(2,805)	(2,989) (3,687)	(184) (882)	6.6% 31.5%
Prior Year GHGRBA Revenue Return True-Up ⁴²	606	(33,946) (47,382)	(34,552) (47,988)	-5,699.7% 7.9% 16.1%
GHG Allowance Revenues Eligible for Return to Customers	(233,108)	(249,442) (308,003)	(16,334) (74,895)	7.0% 32.1%

1
2 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-
3 026 direct the IOUs to distribute GHG allowances revenues eligible for return to customers in the
4 following manner:^{43,44}

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

11 **A. EITE**

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

⁴¹ Net of SOMAH true-up costs of \$1.6 million.
⁴² D.14-10-033, Findings of Fact (“FOF”) 15 allows utilities to use a balancing account to maintain a record of allowance revenues.
⁴³ Consistent with D.15-07-001, OP 18, the Residential Volumetric Return is no longer applicable.
⁴⁴ 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.”⁴⁵ 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.⁴⁶ In April 2024, EITE customers began receiving
6 EITE returns in the amount of \$2.95 million. As such, the adjustment to GHG Allowance
7 Revenues eligible for return to customers in 2025 reflects an assumed return to EITE customers of
8 \$2.95 million. ~~Although the 2024 EITE return may not be fully dispersed to customers or~~
9 ~~recorded at the time of this filing, the amount to be returned to customers in 2024 is final.~~ The
10 2024 EITE return is much larger than the amount returned to customers in 2023,⁴⁷ the most recent
11 recorded prior-year revenue returned to EITE customers, because there was an increase in eligible
12 customer attestations. As such, the 2024 EITE return is a more accurate forecast of the 2025
13 return to customers. ~~In the unlikely scenario that the 2024 EITE return differs from the amount~~
14 ~~put forth in this testimony by the time SDG&E files its October update, SDG&E will update this~~
15 ~~forecast.~~

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

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

⁴⁵ D.15-01-024, Attachment D at 5.

⁴⁶ D.20-10-002, pp. 2-3 and 13-14.

⁴⁷ The recorded 2023 EITE return is \$743,942.

1 ~~\$246.5~~~~\$305.5~~ million, which results in a semi-annual Small Business and Residential CCC of
 2 ~~\$81.38~~~~\$100.75~~.⁴⁸

3 **Table 7**
 4 **GHG Allowance Revenues⁴⁹ Eligible for Return through Residential CCC**

	Current Authorized (\$000) ⁵⁰	Proposed (\$000)	Change ⁵¹ (\$000)	Change (%)
GHG Allowance Revenues Eligible for Return	(233,108)	(249,442) (308,003)	(16,334) (74,895)	7.0% 32.1%
EITE Customer Return Revenues	514	<u>2,910</u> <u>2,457</u>	<u>2,395</u> <u>1,942</u>	<u>465.6%</u> <u>377.6%</u>
Small Business and Residential CCC Revenues	232,594	<u>246,532</u> <u>305,546</u>	<u>13,938</u> <u>72,952</u>	<u>6.0%</u> <u>31.4%</u>
Small Business and Residential Semi-Annual CCC (\$/semi-annual)	78.22	<u>81.38</u> <u>100.75</u>	<u>3.16</u> <u>22.53</u>	<u>4.0%</u> <u>28.8%</u>

5
 6 **V. 2025 PCIA RATES**

7 The methodologies adopted to develop the PCIA rate calculations have evolved over time.
 8 The following is a timeline of Commission decisions that have impacted the calculation of the
 9 PCIA rates, which SDG&E has complied with in the development of its 2025 PCIA rates:

- 10 • D.06-07-030, modified by D.07-01-030, established authority for the PCIA
 11 component of the Cost Responsibility Surcharge (“CRS”) to preserve
 12 bundled customer indifference by ensuring departing load customers pay
 13 their share of the cost responsibility associated with the above-market costs

⁴⁸ On August 22, 2024, the Commission approved Resolution E-5339 that modified the eligibility criteria used by the California Investor-Owned Utilities when distributing the Small Business CCC by imposing a 100-account cap on the eligible accounts. SDG&E used this updated criterion when forecasting the number of customers eligible for the CCC for the purposes of calculating the CCC amount.

⁴⁹ Includes FF&U.

⁵⁰ Authorized by D.23-12-021 and effective January 1, 2024 per AL 4344-E.

⁵¹ Difference may not equal due to rounding.

1 based on an administrative benchmark, also known as the “indifference
2 amount,” of the utilities’ total procurement resource portfolio.⁵²

- 3 • D.08-09-012 refined the indifference amount methodology to better protect
4 bundled customer indifference by introducing the requirement to “vintage”
5 departing load customers, based on their departure date, when determining
6 the customers’ cost responsibility for the “total portfolio” of resources.⁵³

7 Assigning customers to a vintage ensured that departing load customers pay
8 their share of above-market costs associated with the specific vintage
9 portfolio of resources that were acquired to serve them prior to their
10 departure from bundled load service in order to better protect bundled
11 customer indifference. After departure from bundled service, the departing
12 load customers are not required to pay for above-market costs associated
13 with utility procurement commitments after that load departs.

- 14 • D.11-12-018 refined the indifference amount methodology by recognizing
15 that regulatory and industry changes had impacted energy procurement
16 practices. Changes to the Market Price Benchmark (“MPB”) methodology,
17 used to determine the “above-market” value of electricity, now included the
18 addition of a renewables portfolio standards adder (“RPS adder”) to better
19 reflect the market value of renewable resources and a revised resource
20 adequacy capacity adder (“CAP adder”), which resulted in vintage MPBs.⁵⁴
21 The vintage portfolio of resources calculation was revised to better reflect
22 time-of-use load variations and also removed load-related costs incurred by
23 the California Independent System Operator (“CAISO”) that are then
24 charged to the utilities.⁵⁵

⁵² In D.07-01-025, the Commission adopted the PCIA methodology for CCA customers.

⁵³ D.08-09-012, OP 10.

⁵⁴ D.11-12-018, OPs 2 and 8.

⁵⁵ D.11-12-018, OPs 6 and 7.

- 1 • D.16-09-044 directed the Joint Utilities and CCAs⁵⁶ to develop a uniform
2 workpaper template through the PCIA Working Group to “facilitate
3 comparison and analysis of the PCIA across utilities.”⁵⁷ Pursuant to D.17-
4 08-026 OP 2, SDG&E has reflected the uniform workpaper template as
5 attached in Appendix 7 of D.06-07-030 as part of this filing.⁵⁸ The
6 Commission further ordered in D.18-10-019 that PG&E, SCE and SDG&E
7 develop a uniform common template for the calculation of each of their
8 PCIA rates reflecting the changes ordered in the decision.⁵⁹ SDG&E
9 submitted its common template to the Commission’s Energy Division and
10 concurrently served the updated common template to the service list for its
11 ERRA proceeding.
- 12 • D.18-10-019 modified the PCIA methodology by revising inputs to the
13 MPB that is used to calculate the PCIA, effective January 1, 2019. In
14 addition to the revised MPB inputs, the decision also adopted an annual
15 true-up mechanism, as recommended by a number of parties, as well as a
16 cap that limited the change of the PCIA rate from one year to the next.
17 Starting in forecast year 2020, the cap level of the PCIA rate was set at 0.5
18 cents/kWh more than the prior year’s PCIA, differentiated by system
19 average vintage rate. AL 3436-E established the PCIA under-collection
20 balancing account (“CAPBA”) which was used to track obligations that
21 accrued for departing load customers by vintage subaccounts when the
22 PCIA cap was hit.⁶⁰ In AL 3318-E/E-A, the PABA was established to

⁵⁶ 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.

⁵⁷ D.17-08-026, p. 2.

⁵⁸ 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.

⁵⁹ D.18-10-019, OP 3.

⁶⁰ SDG&E AL 3436-E was filed on September 30, 2019, effective and approved on October 30, 2019.

1 record the “above-market” costs and revenues associated with all PCIA
2 eligible resources by vintage subaccounts, effective January 1, 2019.⁶¹

- 3 • D.19-10-001 further modified the PCIA methodology by revising the inputs
4 to the billing determinants (sales) that is used to calculate the PCIA rates,
5 effective January 1, 2020. This revision ordered SDG&E to use vintage
6 billing determinants of those responsible for the vintage portfolio to
7 determine PCIA rates, instead of the currently used system net billing
8 determinants. In addition, the decision authorized any over/under-
9 collection in the PABA vintage subaccounts in a given year to be rolled into
10 the next year’s ERRA Forecast filing. The decision adopted the
11 methodology for SDG&E to true-up the values in PABA for the imputed
12 RPS and resource adequacy (“RA”) costs using the updated benchmarks
13 provided by the Energy Division on October 1.⁶² The true-up amounts for
14 both RPS and RA will be booked as adjustments to PABA annually through
15 the ERRA Forecast filing.
- 16 • D.20-05-006 directed the IOUs to open a new “non-vintaged” PABA
17 subaccount to allocate certain costs to all PCIA-eligible customers without
18 respect to when the customer departed.
- 19 • D.21-03-051 granted the Joint Utilities’ uncontested Petition for
20 Modification (“PFM”) to D.17-08-026 which updates the PCIA workpaper
21 to remove the application of line losses to capacity volumes and utilizes
22 energy volumes as measured at the generator meter instead of customer
23 meter.⁶³
- 24 • D.21-05-030 removed the PCIA cap and trigger mechanisms and required
25 SDG&E to implement the removal of the PCIA cap in rates effective
26 January 1, 2022.⁶⁴

⁶¹ AL 3318-E/E-A, approved May 30, 2019 and effective January 1, 2019.

⁶² 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.

⁶³ D.21-03-051, OP 1.

⁶⁴ D.21-05-030, OP 1.

- 1 • D.22-01-023 directed each of the IOUs to modify their respective Electric
2 Preliminary Statements governing the ERRA and PABA accounts to allow
3 them to place year-end ERRA balances in the most-recent vintage
4 subaccount of PABA each year.⁶⁵ The modifications clarify that disposition
5 of the year-end balance in the ERRA account shall be to the PABA upon
6 submission (where a Tier 1 advice letter is currently required) or approval
7 (where a Tier 2 advice letter is currently required) by the Commission of the
8 applicable compliance advice letter addressing such balance.
- 9 • D.23-06-006 refined the calculation of the Energy Index MPB to improve
10 accuracy and transparency by calculating a factor to be multiplied by the
11 Commission-provided energy benchmarks. The factor is a measure of the
12 ratio between a three-year historical average of electric prices based on
13 actual energy revenues received for PCIA resources and the actual average
14 CAISO SP15 day ahead market prices. In addition, it modified the ratio of
15 on-peak to off-peak prices with a method based on time weightings rather
16 than bundled load weightings.⁶⁶

17 **A. Indifference Methodology**

18 Under applicable laws and rules,⁶⁷ departing load customers are responsible for their fair
19 share of above-market costs, or an indifference amount, incurred by the utility on behalf of those
20 customers when electric generation costs exceed the current market price, or market price
21 benchmark. To maintain bundled customers' indifference to the departure of SDG&E's customers
22 to non-utility service, SDG&E calculates the indifference amount to determine the cost
23 responsibility for DA, CCA and other departing load, specifically:

24 **Indifference Amount = CTC + PCIA**

⁶⁵ D.22-01-023, OP 4. SDG&E AL 3976-E was approved by Energy Division on May 4, 2022.

⁶⁶ 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.

⁶⁷ California Public Utilities Code Section 365.2.

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

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

- 11 • Forecasted 2025 PABA, and CTC revenue requirements;
- 12 • Projected 2024 PABA year-end balance;
- 13 • Projected 2024 ERRA year-end balance; and
- 14 • SDG&E's authorized 2024 Non-Fuel Generation Balancing Account
15 ("NGBA") revenue requirement.⁶⁸

16 Generally, SDG&E would update the NGBA revenue requirement to the same forecast
17 year being requested (*i.e.*, 2025), however, the NGBA revenue requirement is still being litigated
18 in SDG&E's TY 2024 GRC and is not anticipated to be approved by the time of this filing.⁶⁹ As
19 such, SDG&E will hold the currently approved 2024 NGBA revenue requirements constant.

20 ~~When~~ If a TY 2024 GRC Decision is adopted, ~~by the time SDG&E files its October update,~~
21 ~~SDG&E~~ will update this revenue requirement accordingly along with the implementation of the
22 other aspects of the Decision.

⁶⁸ Effective March 1, 2024 per AL 4366-E.

⁶⁹ ~~A proposed decision is expected Q2 2024.~~

1 ~~Additionally, the vintage 2025 MPBs are not available at the time of this filing and~~
2 ~~therefore, the current MPBs⁷⁰ were used in the preliminary calculation of the vintage 2025 PCIA~~
3 ~~rates in this testimony and will be updated in SDG&E's October Update filing in this proceeding.~~

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

5 On July 26, 2018, the Commission approved D.18-07-037, adopting the majority of the
6 2018 Revised Settlement Agreement (“Agreement”), which stated, in part, that SDG&E would
7 cease collecting in rates the revenue requirement authorized to be recovered related to the SONGS
8 regulatory asset.

9 SDG&E’s PCIA rates therefore no longer include SONGS-related Regulatory Asset
10 costs.⁷¹ The only remaining SONGS-related costs included in PCIA rates are non-fuel related
11 costs authorized in SDG&E’s 2019 General Rate Case (D.19-09-051 and D.21-05-003) since
12 SDG&E’s TY2024 GRC is pending, which are included in the PCIA rates in Attachment CD.

13 **C. Illustrative 2025 PCIA Rates**

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

~~⁷⁰ Per SDG&E’s 2024 ERRA Forecast Application, October update (A.23-05-013) and D.23-12-021.~~

⁷¹ 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 (Investigation, 12-10-013), a Joint Motion for Adoption of Settlement Agreement was approved by the Commission in D.18-07-037.

1

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

Rate Group	PCIA 2001 Vintage	PCIA 2002 Vintage	PCIA 2003 Vintage	PCIA 2004 Vintage	PCIA 2005 Vintage	PCIA 2006 Vintage	PCIA 2007 Vintage	PCIA 2008 Vintage	PCIA 2009 Vintage	PCIA 2010 Vintage	PCIA 2011 Vintage	PCIA 2012 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

2

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
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

3

4

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

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	0.00070	0.00061	0.00061	0.00269	0.00357	0.00486	(0.00348)	(0.00376)	(0.00828)	(0.00302)	0.00053	0.00234
Small Commercial	0.00049	0.00043	0.00043	0.00189	0.00252	0.00343	(0.00246)	(0.00266)	(0.00585)	(0.00214)	0.00039	0.00167
Medium & Large C&I	0.00053	0.00043	0.00043	0.00260	0.00351	0.00485	(0.00382)	(0.00412)	(0.00882)	(0.00322)	0.00071	0.00274
Agriculture	0.00053	0.00046	0.00046	0.00208	0.00277	0.00377	(0.00273)	(0.00295)	(0.00648)	(0.00238)	0.00053	0.00201
Streetlighting	0.00048	0.00042	0.00042	0.00185	0.00246	0.00334	(0.00239)	(0.00258)	(0.00569)	(0.00208)	0.00037	0.00161
System Total	0.00058	0.00049	0.00049	0.00250	0.00335	0.00460	(0.00346)	(0.00373)	(0.00810)	(0.00297)	0.00056	0.00237

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
0.00344	0.00360	0.00234	0.00332	0.00060	(0.01564)	(0.02050)	(0.02120)	(0.01932)	(0.01940)	(0.03814)	(0.00350)	(0.00350)
0.00245	0.00257	0.00167	0.00237	0.00043	(0.01119)	(0.01469)	(0.01519)	(0.01236)	(0.01243)	(0.02742)	0.00184	0.00184
0.00398	0.00417	0.00274	0.00386	0.00074	(0.01821)	(0.02402)	(0.02486)	(0.02107)	(0.02117)	(0.03894)	(0.00844)	(0.00844)
0.00291	0.00304	0.00201	0.00281	0.00058	(0.01271)	(0.01669)	(0.01726)	(0.01482)	(0.01487)	(0.03056)	(0.00589)	(0.00589)
0.00236	0.00247	0.00161	0.00228	0.00041	(0.01074)	(0.01407)	(0.01455)	(0.01200)	(0.01206)	(0.02439)	(0.00166)	(0.00166)
0.00347	0.00363	0.00237	0.00336	0.00061	(0.01589)	(0.02089)	(0.02161)	(0.01901)	(0.01909)	(0.03679)	(0.00510)	(0.00510)

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

1 customers...commercial customers...and groups of individuals...can meet their needs with the
2 electrical generation from eligible renewable energy resources.”⁷²

3 On May 31, 2022, SDG&E filed Application (“A.”) 22-05-023⁷³ requesting the
4 Commission suspend its GTSR programs to protect program participants from high program rates
5 that could not be overcome through program design changes.

6 On August 25, 2022, Administrative Law Judges Petersen and Pulsifer issued a ruling in
7 A.22-05-022 *et al.* immediately suspending SDG&E’s EcoChoice, Green Tariff program and
8 directed SDG&E to “quickly disenroll customers from its Green Tariff option who will remain on
9 their otherwise applicable rate.”⁷⁴ The ruling declined to suspend SDG&E’s EcoShare, Enhanced
10 Community Renewables program; therefore, SDG&E presents ECR 2025 rates below.⁷⁵

11 However, on May 30, 2024, the Commission approved D.24-05-065 that discontinues the
12 ECR program to new projects. However, a Proposed Decision to A.22-05-022 was issued on
13 March 3, 2024 that would, if adopted, discontinue the ECR program to new projects. SDG&E
14 does not currently have any ECR projects, and so this requirement would effectively terminates
15 SDG&E’s ECR program. SDG&E filed a Tier 2 AL on September 27, 2024 to close its ECR
16 program,⁷⁶ and will continue to monitor its status~~this proceeding and if the Proposed Decision~~
17 ~~gets adopted, will make the appropriate updates in its ERRA October update filing.~~

⁷² California Public Utilities Code Section 2831 (b) and (f).

⁷³ 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.

⁷⁴ A.22-05-022 *et al.*, August 25, 2022, Administrative Law Judge’s Ruling Granting Request for Green Tariff Suspension, OP 1.

⁷⁵ D.15-01-051 authorizes updates to the GTSR program tariffs within the annual ERRA forecast proceeding.

⁷⁶ AL 4522-E.

1 In addition, the Decision establishes a modified Green Tariff program that adopts a
2 “topped-off” approach, whereby subscribed customers remain on their otherwise applicable rate
3 and are “topped-off” to achieve 100 percent clean energy. On September 5, 2024, the Commission
4 granted an extension for SDG&E’s AL that would, if approved, update the modified GT
5 program.⁷⁷ The Tier 2 AL updating the GT program is now due 90 days after the effective date of
6 the Decision resolving issues identified in the June 5, 2024 Ruling in A.22-05-002. SDG&E will
7 continue to monitor this proceeding and will file its modified GT AL with proposed rates and
8 process for updating rates in the future under the new Commission-approved deadline.

9 The ECR program provides customers with the ability to purchase renewable energy from
10 community-based projects directly through the developers of those projects (“Developer”). To
11 date, no developers have currently executed PPAs with SDG&E to support the program, and since
12 no such facilities have interconnected, there have been no enrollees.⁷⁸

13 The rate components for the ECR rates⁷⁹ associated with these programs are as follows:

- 14 1. **Renewable Energy Commodity Price⁸⁰** is equal to the portion of the renewable
15 generating facility’s output that the customer has subscribed to, multiplied by the
16 amount per kWh that the Utility has agreed to pay the developer (“Renewable
17 Energy Commodity Price”). These values are part of the contract agreement with
18 the Developers and therefore not addressed in this proceeding.
- 19 2. **Renewable Energy Value Adjustment⁸¹** calculates the relative value of energy
20 and capacity for the solar resources supporting the program compared to the

⁷⁷ September 5, 2024 letter from CPUC Executive Director Rachel Peterson to Southern California Edison Regulatory Relations Director Adam R. Smith regarding Request for Extension of Time to File Green Tariff Schedule Modifications as Ordered in OP 9 of D.24-05-065.

⁷⁸ A.22-05-022 *et al.*, Application of San Diego Gas & Electric Company to Review Green Access Programs Pursuant to Decisions D.18-06-027 and D.21-12-036 (May 31, 2022) at 10-11.

⁷⁹ All ECR rate components exclude FF&U unless otherwise noted.

⁸⁰ Formerly the Solar Commodity Price.

⁸¹ 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.

1 Utility's current portfolio of resources serving all bundled load. The 2025
2 Renewable Energy Value Adjustment is \$0.00000/kWh as described in the direct
3 testimony of SDG&E witness Ms. Elias.

- 4 3. **Administrative Costs** include incremental costs such as labor and non-labor for
5 program management and policy support, Green-e certification, and IT costs.
6 Because SDG&E does not forecast any customers on ECR, SDG&E's 2025 charge
7 for administrative costs is \$0.00000/kWh.
- 8 4. **Marketing Costs** include incremental costs needed to implement the marketing
9 plan. These costs are composed of labor (spent for planning, managing to the
10 marketing plan, and community outreach) and non-labor tactical implementation
11 (*i.e.*, creative design, production, translation and mailing fees). Because SDG&E
12 does not forecast any customers on ECR, SDG&E's 2025 marketing charge is
13 \$0.00000/kWh.
- 14 5. **Renewable Energy Commodity Credit**⁸² assumes the customer has already
15 purchased the rights to this output from the developer and the Utility concurrently
16 assigns a credit to the customer equal to Renewable Energy Commodity Price
17 ("Renewable Energy Commodity Credit"). These values are part of the contract
18 agreement with the Developers and therefore not addressed in this proceeding.
- 19 6. **SDG&E's Average Commodity Cost Adjustment** is intended to approximate the
20 avoided commodity costs and is based on SDG&E's forecasted 2025 class average
21 commodity rates, which is credited to the customer and is discussed in more detail
22 below.
- 23 7. **Western Renewable Energy Generation Information System ("WREGIS")**
24 may include, but is not limited to, the annual WREGIS fee and a per MWh
25 certificate fee that is charged as Renewable Energy Credits ("RECs") are retired.
26 As discussed in the direct testimony of SDG&E witness Mr. Elias, the 2025
27 WREGIS costs are \$0.00400/MWh, or \$0.00000/kWh.
- 28 8. **CAISO Grid Management Charges ("GMC")** include CAISO charges
29 associated with GMCs and energy scheduling. The 2025 CAISO GMC costs, as
30 described in the direct testimony of Jimmy Elias, are ~~\$1.23/MWh~~~~\$1.12/MWh~~, or
31 ~~\$0.00123/kWh~~~~\$0.00112/kWh~~.⁸³
- 32 9. **Renewable Integration Costs ("RIC")** quantify the costs of renewables
33 integration, such as: 1) variable costs for ancillary services and flexible ramping to
34 integrate intermittent renewables into the grid and 2) fixed costs of long-term
35 solutions to the increased need for flexible capacity. The RIC charge is currently

⁸² Formerly known as Solar Commodity Credit.

⁸³ CAISO GMC costs including FF&U are ~~\$0.00125~~~~\$0.00113/kWh~~.

set at \$0/kWh as a placeholder.⁸⁴ A RIC Charge that is greater than \$0/kWh may be imposed in the future on a going-forward basis only to all customers served under this Schedule, unless otherwise directed by the Commission.

10. **PCIA** is intended to serve as a reasonable proxy for the customer indifference charge and is discussed further below.

Table 10
ECR Illustrative Rate Components⁸⁵

	ECR Illustrative Rate Components (\$/kWh)	
	Current Authorized ⁸⁶	2025 Rates
Renewable Energy Commodity Price ⁸⁷	Refer to Contract	
Renewable Energy Value Adjustment ⁸⁸	\$0.00000	\$0.00000
Administrative Costs	\$0.00000	\$0.00000
Marketing Costs	\$0.00000	\$0.00000
Renewable Energy Commodity Credit ⁸⁹	Refer to Contract	
SDG&E's Average Commodity Cost Adjustment	See Table 11 below	
WREGIS	\$0.00000	\$0.00000
CAISO GMC	\$0.00109	\$0.00113
Renewable Integration Cost	\$0.00000	\$0.00000
PCIA	See Attachment <u>CD</u>	

SDG&E's Average Commodity Cost Adjustment is used as a proxy to reflect SDG&E's avoided commodity costs, which ideally would be reflected in the average commodity rate by customer class. To better reflect the avoided commodity cost, the average commodity rate is adjusted for ERRA- and PABA-related balances requested in this application to better

⁸⁴ D.15-01-051 at 115, recognized that “[b]ecause GTSR is made up of renewable resources, the cost of renewables integration is of particular importance.” (~~p. 115~~). D.15-01-051 further directed the IOUs to set a RIC charge of \$0 as a placeholder. Within 60 days of a decision setting a RIC charge for ratepayers, the IOUs must file a Tier 3 Advice Letter setting forth how the RIC charge will be allocated to customers (both new and existing). *Id.*, p. 119.

⁸⁵ ECR Rate components include FF&U except PCIA which includes uncollectibles only.

⁸⁶ Effective January 1, 2024 per AL 4344-E.

⁸⁷ Formerly known as Solar Commodity Price.

⁸⁸ Formerly known as Value of Solar Energy and Capacity Adjustment per SDG&E AL 3006-E, [effective December 29, 2016](#).

⁸⁹ Formerly known as Solar Commodity Credit.

1 approximate avoided costs, as authorized in D.15-01-051. SDG&E’s illustrative 2025 adjusted
 2 class average commodity rate is based on the proposed average commodity rate by customer class
 3 as proposed in this testimony,⁹⁰ shown in the Table 11 below. These adjustment rates will be
 4 updated upon implementation to reflect the actual class average commodity rates at that time.

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

	Current Authorized⁹¹	Proposed
Residential	(0.17250)	(0.16723) (0.14029)
Small Commercial	(0.14614)	(0.14172) (0.11896)
M/L C&I	(0.17903)	(0.17319) (0.14609)
Agricultural	(0.12708)	(0.12249) (0.10330)
Streetlighting	(0.11299)	(0.10954) (0.09186)

8 The PCIA component of the ECR rates comprises the indifference adjustment or the
 9 above-market cost of the Utility’s existing procurement portfolio and is calculated annually.
 10 D.15-01-051, FOF 100 states, “[t]he PCIA calculated for DA and CCA customers provides a
 11 reasonable proxy for the GTSR customer indifference charge.” Accordingly, the utilities were
 12 “directed to use vintaged PCIA as a proxy for the indifference adjustment.”⁹² This is a cost that is
 13 ultimately borne by all customers for resources that were procured on their behalf. ECR
 14 customers’ PCIA rates will be billed by customer class and customer specific vintage using the
 15 proposed 2025 PCIA rates discussed above and identified in Attachment CD.

16 The detailed components of the 2025 ECR rates and the total illustrative 2025 ECR rates
 17 are presented in Attachment DE of this testimony.

⁹⁰ As discussed in Section III.

⁹¹ Effective January 1, 2024 per AL 4344-E.

⁹² D.15-01-051, p. 103.

1 **VII. 2025 MCAM RATES**

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

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

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

19 **A. Bundled Service Customers**

20 The MCAM charge is applicable only to opt-out and backstop procurement LSE
21 customers. Accordingly, costs of SDG&E procurement associated with D.19-11-016 and D.21-
22 06-035 on behalf of bundled service customers will be recovered through the Portfolio Allocation
23 Balancing Account (PABA) and included in bundled service customer commodity rates. For
24 bundled service customers who depart bundled service after the effective date of D.22-05-015,

1 above-market costs for procurement associated with D.19-11-016 and D.21-06-035 requirements
2 will be assigned a 2019 vintage and be collected through the PCIA charge.⁹³

3 **B. Opt-Out LSEs**

4 For customers of LSEs that opted out of self-providing capacity required by D.19-11-016,
5 the opt-out costs and offsetting benefits shall be aggregated into a single bucket for procurement
6 and a single bucket for administrative costs.⁹⁴ All of the procurement-related costs, including
7 incremental administrative costs, shall be recorded in the MCAMBA, offset by any net energy or
8 other revenues received from the contracts. The remaining net capacity costs will be recovered
9 from all customers of all opt-out LSE(s) via the MCAM.⁹⁵

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

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

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

⁹³ D.22-05-015, OP 4.

⁹⁴ D.22-05-015, OP 5.

⁹⁵ Resolution E-5241, OP 1.

1 calculate the MCAM charges specific to the deficient LSE(s) using the methodology described
2 above 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).⁹⁶

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

⁹⁶ D.22-05-015, OP 10.

Table 12 – Proposed 2025 MCAM Rates (\$/kWh)

Customer Class MCAM-CRS	Opt-Out ESPs	Backstop ESPs
Residential	<u>0.000030.00006</u>	-
Small Commercial	<u>0.000040.00010</u>	-
Medium/Large Commercial & Industrial	<u>0.000050.00012</u>	-
Agricultural	<u>0.000030.00006</u>	-
Streetlighting	<u>0.000020.00004</u>	-

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)⁹⁷
- Commercial Energy of California
- Constellation NewEnergy Inc.
- BP Energy Retail Company California LLC⁹⁸
- 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 ERRA revenue requirement of \$461.4~~\$432.3~~ million; (2) the projected 2024 ERRA year-end balance of \$130.5~~\$34.1~~ million; (3) the 2025 PABA revenue requirement of

⁹⁷ 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.

⁹⁸ Previously “EDF Industrial Power Services (CA) LLC.”

1 ~~(\$26.3)~~~~\$251.0~~ million; (4) the projected 2024 PABA year-end balance of
2 ~~(\$352.8)~~~~(\$107.1)~~ million; (5) the 2025 CTC revenue requirement of
3 ~~\$2.3~~~~\$2.1~~ million; (6) the 2025 LG revenue requirement of ~~\$192.1~~~~\$214.4~~
4 million; (7) the projected 2024 LGBA year-end balance of ~~(\$86.2)~~~~(\$51.6)~~
5 million; (8) the 2025 SONGS Unit 1 Offsite Fuel revenue requirement of
6 ~~\$0~~~~\$1.3~~ million; (9) the 2025 MCAM revenue requirement of ~~\$0.1~~~~\$0.3~~
7 million; (10) 2025 SDCP DAC-GT ~~and CS-GT~~ program revenue
8 requirements of ~~\$0~~~~\$0.4~~ million ~~and \$0.3 million, respectively~~; and (11) the
9 TMNBC revenue requirement as set forth in the testimony of SDG&E
10 witness Ms. Felan and confidentiality declaration attached thereto;⁹⁹

- 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 ~~\$81.38~~~~\$100.75~~;
- 20 b. 2025 PCIA rates presented in Attachment ~~CD~~;
- 21 c. 2025 ECR rates presented in Attachment ~~DE~~; and
- 22 d. 2025 MCAM rates presented in Attachment ~~EF~~.

23 This concludes my prepared direct testimony.

⁹⁹ 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~~

ATTACHMENT **AB.1**

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

BUNDLED CUSTOMERS

SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT
2025 ERRR FORECAST APPLICATION
ATTACHMENT AB.1
ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY RATE COMPONENT
BUNDLED CUSTOMERS¹⁰⁰

¹⁰⁰ 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.

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.
PRESENT 3/1/2024																
1	Residential	766,062,944	345,588,659	118,636,200	532,964	3,933,770	152,448,115	60,592	9,000,000	(217,855,590)	1,178,407,654	29,355,466	0	219,711,811	1,427,474,931	1
2	Small Comm.	360,552,797	69,458,951	38,632,105	172,137	1,238,553	40,877,102	23,223	0	(14,283,840)	496,671,028	13,181,651	0	65,075,873	574,928,552	2
3	Med & Lg C&I	874,804,943	298,861,333	168,235,778	705,698	4,614,773	170,642,855	94,911	0	(335,097)	1,517,625,192	39,732,909	0	249,473,710	1,806,831,802	3
4	Agriculture	31,697,624	4,445,705	6,266,625	26,361	109,116	3,510,945	3,417	0	(19,364)	45,940,429	1,978,432	0	8,497,891	56,416,752	4
5	Lighting	13,932,609	1,890,387	(93,543)	5,550	2,832	1,290,226	763	0	0	17,028,824	425,842	0	1,586,604	19,041,270	5
6	System Total	2,047,050,917	720,245,035	331,677,163	1,442,710	9,999,944	368,769,243	182,906	9,000,000	(232,593,891)	3,255,673,127	84,674,291	0	544,345,889	3,894,693,307	6
PROPOSED 2025 ERRR Application																
7	Residential	762,831,470	336,537,413	123,538,412	554,642	2,913,786	68,114,410	60,592	9,000,000	(281,292,468)	1,022,256,257	31,739,048	0	206,850,378	1,260,845,683	7
8	Small Comm.	375,880,435	72,630,131	39,275,505	175,443	898,486	19,097,902	24,283	0	(23,316,800)	484,665,385	13,643,948	0	58,174,317	556,483,650	8
9	Med & Lg C&I	860,991,856	266,888,120	162,183,914	680,810	3,168,776	75,250,849	93,674	0	(376,386)	1,368,681,603	38,763,579	0	248,345,705	1,655,790,887	9
10	Agriculture	32,864,846	3,904,292	6,183,907	26,103	76,904	1,631,172	3,553	0	(560,564)	44,130,213	1,974,508	0	9,419,608	55,524,327	10
11	Lighting	14,616,356	1,988,238	(88,378)	5,710	2,874	606,623	802	0	0	17,131,475	448,936	0	1,881,672	18,462,038	11
12	System Total	2,047,184,963	681,749,194	331,090,360	1,442,708	7,060,026	164,700,956	182,904	9,000,000	(305,546,228)	2,936,864,883	86,570,017	0	524,671,686	3,548,106,686	12
REVENUE CHANGE SUMMARY																
13	Residential	(3,231,474)	(9,051,246)	4,900,212	21,678	(1,019,964)	(84,333,709)	0	0	(63,436,878)	(166,151,397)	2,383,682	0	(12,861,433)	(166,629,248)	13
14	Small Comm.	15,327,638	3,171,180	643,400	3,306	(340,087)	(21,779,200)	1,060	0	(9,032,960)	(12,005,643)	482,297	0	(6,901,556)	(18,444,902)	14
15	Med & Lg C&I	(13,813,087)	(32,173,213)	(6,051,862)	(24,888)	(1,445,997)	(95,392,006)	(1,237)	0	(41,299)	(148,943,598)	(989,321)	0	(1,128,005)	(151,040,915)	15
16	Agriculture	1,167,222	(541,413)	(82,718)	(258)	(32,212)	(1,879,773)	136	0	(441,200)	(1,810,216)	(3,926)	0	921,717	(892,426)	16
17	Lighting	683,747	98,851	4,165	160	(758)	(683,603)	39	0	0	102,601	23,094	0	295,074	420,769	17
18	System Total	134,046	(38,495,841)	(588,803)	(2)	(2,839,918)	(204,068,287)	(2)	0	(72,952,337)	(318,808,244)	1,895,729	0	(19,674,203)	(336,586,721)	18
AVERAGE % CHANGE SUMMARY																
19	Residential	-0.42%	-2.62%	4.13%	4.07%	-25.93%	-55.32%	0.00%	0.00%	-29.12%	-13.25%	8.12%	0.00%	-5.85%	-11.67%	19
20	Small Comm.	4.25%	4.57%	1.67%	1.92%	-27.46%	-53.28%	4.56%	0.00%	-63.24%	-2.42%	3.91%	0.00%	-10.61%	-3.21%	20
21	Med & Lg C&I	-1.58%	-10.77%	-3.60%	-3.53%	-31.33%	-56.90%	-1.30%	0.00%	-12.32%	-8.81%	-2.44%	0.00%	-0.45%	-8.36%	21
22	Agriculture	3.68%	-12.18%	-1.32%	-0.98%	-29.52%	-53.54%	3.98%	0.00%	-369.63%	-3.94%	-0.20%	0.00%	10.65%	-1.58%	22
23	Lighting	4.91%	5.23%	4.45%	2.88%	-26.77%	-52.98%	5.11%	0.00%	0.00%	0.60%	5.42%	0.00%	18.60%	2.21%	23
24	System Total	0.01%	-5.34%	-0.16%	0.00%	-28.68%	-55.34%	0.00%	0.00%	-31.36%	-6.79%	2.24%	0.00%	-3.61%	-8.66%	24

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.
PRESENT 10/1/2024																
1	Residential	779,274,054	345,588,659	121,094,908	532,964	3,933,770	152,448,115	60,592	9,000,000	(217,855,590)	1,194,077,472	29,355,466	0	219,711,811	1,443,144,749	1
2	Small Comm.	365,402,074	69,458,951	40,106,063	172,137	1,238,553	40,877,102	23,223	0	(14,283,840)	502,994,263	13,181,651	0	65,075,873	581,251,787	2
3	Med & Lg C&I	886,204,639	298,861,333	173,640,827	705,698	4,614,773	170,642,855	94,911	0	(335,097)	1,534,429,939	39,732,900	0	249,473,710	1,823,636,549	3
4	Agriculture	32,120,341	4,445,705	6,440,375	26,361	109,116	3,510,945	3,417	0	(119,364)	46,536,896	1,978,432	0	8,497,891	57,013,219	4
5	Lighting	14,120,962	1,890,387	(93,377)	5,550	2,832	1,290,226	763	0	0	17,216,443	425,842	0	1,586,604	19,228,889	5
6	System Total	2,077,121,170	720,245,035	341,188,796	1,442,710	9,899,044	368,769,243	182,906	9,000,000	(232,593,891)	3,295,255,013	84,674,291	0	544,345,889	3,924,275,193	6
PROPOSED 2025 ERRR October Update																
7	Residential	776,053,291	336,537,413	127,820,695	54,475	2,984,188	44,322,083	60,592	9,000,000	(228,127,462)	1,068,705,275	31,739,048	0	230,144,912	1,330,589,235	7
8	Small Comm.	380,955,219	72,630,131	41,192,690	17,232	920,195	12,427,015	24,283	0	(17,673,512)	490,493,253	13,643,948	0	64,701,325	568,838,526	8
9	Med & Lg C&I	872,252,199	266,688,120	169,293,449	66,867	3,245,339	48,965,768	93,674	0	(277,659)	1,360,327,757	38,763,579	0	275,330,854	1,674,422,190	9
10	Agriculture	33,304,753	3,904,292	6,400,352	2,564	78,762	1,061,405	3,553	0	(453,597)	44,302,084	1,974,506	0	10,444,538	56,721,128	10
11	Lighting	14,813,771	1,989,238	(75,602)	561	2,125	394,730	802	0	0	17,125,625	448,936	0	2,094,074	19,668,635	11
12	System Total	2,077,379,233	681,749,194	344,631,584	141,699	7,230,609	107,171,001	182,904	9,000,000	(246,532,230)	2,980,953,994	86,570,017	0	582,715,703	3,650,239,714	12
REVENUE CHANGE SUMMARY																
13	Residential	(3,220,763)	(9,051,246)	6,725,787	(478,489)	(949,582)	(108,126,032)	0	0	(10,271,872)	(125,372,197)	2,383,582	0	10,433,101	(112,555,514)	13
14	Small Comm.	15,553,145	3,171,180	1,086,627	(154,905)	(318,358)	(28,450,087)	1,060	0	(3,389,672)	(12,501,010)	462,297	0	(374,548)	(12,413,261)	14
15	Med & Lg C&I	(13,952,440)	(32,173,213)	(4,347,378)	(638,831)	(1,369,434)	(121,677,087)	(1,237)	0	57,438	(174,102,182)	(969,321)	0	25,857,144	(149,214,359)	15
16	Agriculture	1,184,412	(541,413)	(40,023)	(23,797)	(30,354)	(2,449,540)	136	0	(334,233)	(2,234,812)	(3,926)	0	1,946,647	(292,091)	16
17	Lighting	693,709	98,851	17,775	(4,989)	(707)	(895,496)	39	0	0	(90,818)	23,094	0	507,470	439,746	17
18	System Total	258,063	(38,495,841)	3,442,788	(1,301,011)	(2,668,435)	(261,598,242)	(2)	0	(13,938,339)	(314,301,019)	1,895,726	0	38,369,814	(274,035,479)	18
AVERAGE % CHANGE SUMMARY																
19	Residential	-0.41%	-2.62%	5.55%	-9.78%	-24.14%	-70.93%	0.00%	0.00%	-4.71%	-10.50%	8.12%	0.00%	4.75%	-7.80%	19
20	Small Comm.	4.26%	4.57%	2.71%	-89.99%	-25.70%	-69.60%	4.56%	0.00%	-23.73%	-2.49%	3.51%	0.00%	-0.58%	-2.14%	20
21	Med & Lg C&I	-1.57%	-10.77%	-2.50%	-90.52%	-29.68%	-71.31%	-1.30%	0.00%	17.14%	-11.35%	-2.44%	0.00%	10.36%	-8.18%	21
22	Agriculture	3.89%	-12.18%	-0.62%	-90.27%	-27.82%	-69.77%	3.98%	0.00%	-280.01%	-4.80%	-0.20%	0.00%	22.91%	-0.51%	22
23	Lighting	4.91%	5.23%	19.04%	-89.89%	-24.96%	-69.41%	5.11%	0.00%	0.00%	-0.53%	5.42%	0.00%	31.98%	2.29%	23
24	System Total	0.01%	-5.34%	1.01%	-90.18%	-26.96%	-70.94%	0.00%	0.00%	-5.99%	-9.54%	2.24%	0.00%	7.05%	-6.98%	24

ATTACHMENT **AB.2**

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

UNBUNDLED CUSTOMERS

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT -
2025 ERRRA FORECAST APPLICATION
ATTACHMENT AB.2
ILLUSTRATIVE CLASS AVERAGE REVENUE CHANGES BY RATE COMPONENT
UNBUNDLED CUSTOMERS¹⁰¹**

¹⁰¹ 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.

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.
PRESENT 3/1/2024																
1	Residential	766,062,944	345,588,659	118,636,200	532,864	3,933,770	152,448,115	60,592	9,000,000	(217,855,590)	1,178,407,654	29,355,466	0	52,379,361	1,260,142,481	1
2	Small Comm.	360,552,797	69,458,951	38,632,105	172,137	1,238,563	40,877,102	23,223	0	(14,283,840)	496,671,028	13,181,651	0	11,314,193	521,166,872	2
3	Med & Lg C&I	674,804,943	298,661,333	168,235,776	705,698	4,614,773	170,642,855	94,911	0	(335,097)	1,517,625,192	39,732,900	0	35,675,349	1,593,233,441	3
4	Agriculture	31,697,624	4,445,705	6,266,625	26,361	109,116	3,510,945	3,417	0	(119,364)	45,940,429	1,978,432	0	2,090,416	49,999,277	4
5	Lighting	13,932,609	1,990,387	(93,543)	5,550	2,832	1,290,226	763	0	0	17,028,824	425,842	0	296,982	17,751,648	5
6	System Total	2,047,050,917	720,245,035	331,677,163	1,442,710	9,899,044	368,769,243	182,906	9,000,000	(232,593,891)	3,255,673,127	84,674,291	0	101,946,301	3,442,293,719	6
PROPOSED 2025 ERRA Application																
7	Residential	762,831,470	336,537,413	123,836,412	554,642	2,913,786	68,114,410	60,592	9,000,000	(281,292,468)	1,022,296,257	31,739,048	0	65,230,657	1,119,225,962	7
8	Small Comm.	375,880,435	72,530,131	39,275,505	175,443	895,496	19,097,902	24,263	0	(23,316,800)	484,665,385	13,643,948	0	16,792,420	515,101,753	8
9	Med & Lg C&I	860,991,856	266,688,120	162,193,914	680,810	3,168,776	75,250,849	93,674	0	(376,396)	1,368,681,603	38,763,579	0	63,184,848	1,470,630,030	9
10	Agriculture	32,864,846	3,904,292	6,183,807	26,103	78,904	1,631,172	3,553	0	(960,564)	44,130,213	1,974,506	0	2,828,705	48,933,424	10
11	Lighting	14,816,680	1,989,688	(93,016)	5,710	2,674	889,689	868	0	0	17,791,469	440,580	0	380,639	18,000,602	11
12	System Total	2,047,164,963	681,749,194	331,090,360	1,442,708	7,060,026	164,700,956	182,904	9,000,000	(305,546,228)	2,938,664,683	86,570,017	0	146,544,862	3,171,979,762	12
REVENUE CHANGE SUMMARY																
13	Residential	(3,231,474)	(9,051,246)	4,900,212	21,878	(1,019,984)	(84,333,705)	0	0	(63,436,878)	(166,161,397)	2,383,882	0	12,851,296	(140,918,519)	13
14	Small Comm.	15,327,638	3,171,180	643,400	3,306	(340,067)	(21,779,200)	1,060	0	(9,032,960)	(12,605,643)	462,297	0	5,478,227	(6,065,119)	14
15	Med & Lg C&I	(15,813,087)	(32,173,213)	(6,091,862)	(24,889)	(1,445,997)	(95,392,060)	(1,237)	0	(41,299)	(148,943,589)	(869,321)	0	27,309,499	(122,603,411)	15
16	Agriculture	1,167,222	(541,413)	(62,719)	(289)	(32,212)	(1,879,773)	136	0	(441,200)	(1,810,216)	(3,926)	0	748,289	(1,065,853)	16
17	Lighting	683,747	98,851	4,165	160	(758)	(683,603)	39	0	0	102,601	23,094	0	211,250	336,945	17
18	System Total	134,046	(38,495,641)	(896,803)	(2)	(2,839,018)	(204,068,287)	(2)	0	(72,952,337)	(318,808,244)	1,895,726	0	46,599,561	(270,313,987)	18
AVERAGE % CHANGE SUMMARY																
19	Residential	-0.42%	-2.62%	4.13%	4.07%	-25.93%	-55.32%	0.00%	0.00%	-29.12%	-13.25%	8.12%	0.00%	24.54%	-11.18%	19
20	Small Comm.	4.25%	4.57%	1.67%	1.92%	-27.46%	-63.28%	4.56%	0.00%	-63.24%	-2.42%	3.51%	0.00%	48.42%	-1.16%	20
21	Med & Lg C&I	-1.58%	-10.77%	-3.60%	-3.53%	-31.33%	-55.90%	-1.30%	0.00%	-12.32%	-8.81%	-2.44%	0.00%	76.12%	-7.70%	21
22	Agriculture	3.68%	-12.18%	-1.32%	-0.98%	-29.52%	-53.54%	3.98%	0.00%	-369.63%	-3.94%	-0.20%	0.00%	35.97%	-2.13%	22
23	Lighting	4.91%	5.23%	4.45%	2.88%	-26.77%	-82.98%	5.11%	0.00%	0.00%	0.60%	5.42%	0.00%	71.13%	1.90%	23
24	System Total	0.01%	-5.34%	-0.18%	0.00%	-28.68%	-55.34%	0.00%	0.00%	-31.36%	-9.79%	2.24%	0.00%	45.71%	-7.85%	24

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.
PRESENT 10/1/2024																
1	Residential	779,274,054	345,588,659	121,094,908	532,964	3,933,770	152,448,115	60,992	9,000,000	(217,855,690)	1,194,077,472	29,355,466	0	52,379,361	1,275,812,299	1
2	Small Comm.	365,402,074	69,458,951	40,106,063	172,137	1,238,553	40,877,102	23,223	0	(14,283,840)	502,994,263	13,181,651	0	11,314,193	527,490,107	2
3	Med & Lg C&I	886,204,639	298,861,333	173,640,827	705,698	4,614,773	170,642,855	94,911	0	(335,097)	1,534,429,939	39,732,900	0	35,875,349	1,610,038,188	3
4	Agriculture	32,120,341	4,445,705	6,440,375	26,361	109,116	3,510,945	3,417	0	(119,364)	46,536,896	1,978,432	0	2,800,416	50,595,744	4
5	Lighting	14,120,062	1,890,387	(93,377)	5,550	2,832	1,290,226	763	0	0	17,216,443	425,842	0	296,982	17,939,267	5
6	System Total	2,077,121,170	720,245,035	341,188,796	1,442,710	9,899,044	368,769,243	182,906	9,000,000	(232,593,891)	3,295,255,013	64,674,291	0	101,946,301	3,481,875,605	6
PROPOSED 2025 ERRRA October Update																
7	Residential	776,653,291	336,537,413	127,820,695	54,475	2,984,188	44,322,083	60,992	9,000,000	(228,127,462)	1,068,705,275	31,739,048	0	(94,629,887)	1,005,814,466	7
8	Small Comm.	380,955,219	72,630,131	41,192,690	17,232	920,195	12,427,015	24,283	0	(17,673,512)	490,493,253	13,643,948	0	(28,925,997)	475,211,204	8
9	Med & Lg C&I	872,252,199	266,688,120	169,293,449	66,867	3,245,339	48,965,768	93,674	0	(277,659)	1,360,327,757	38,763,579	0	(101,032,353)	1,298,058,983	9
10	Agriculture	33,304,753	3,904,292	6,400,352	2,564	78,762	1,061,405	3,553	0	(453,597)	44,302,084	1,974,506	0	(3,845,265)	42,431,325	10
11	Lighting	14,813,771	1,989,238	(75,602)	561	2,125	394,730	802	0	0	17,125,825	448,936	0	(876,221)	16,698,340	11
12	System Total	2,077,379,233	691,749,194	344,631,584	141,699	7,230,609	107,171,001	182,904	9,000,000	(246,532,230)	2,980,953,994	86,570,017	0	(229,309,694)	2,838,214,317	12
REVENUE CHANGE SUMMARY																
13	Residential	(3,220,763)	(9,051,246)	6,725,787	(478,489)	(949,582)	(108,126,032)	0	0	(10,271,872)	(125,372,197)	2,383,582	0	(147,009,218)	(269,997,833)	13
14	Small Comm.	15,553,145	3,171,180	1,086,627	(154,905)	(318,358)	(28,450,087)	1,060	0	(3,389,672)	(12,501,010)	462,297	0	(40,240,191)	(52,278,904)	14
15	Med & Lg C&I	(13,952,440)	(32,173,213)	(4,347,378)	(638,831)	(1,369,434)	(121,677,087)	(1,237)	0	57,438	(174,102,182)	(969,321)	0	(136,907,702)	(311,979,205)	15
16	Agriculture	1,184,412	(541,413)	(40,023)	(23,797)	(30,354)	(2,449,540)	136	0	(334,233)	(2,234,812)	(3,926)	0	(5,925,681)	(8,164,419)	16
17	Lighting	693,709	98,851	17,775	(4,989)	(707)	(895,496)	39	0	0	(90,818)	23,094	0	(1,173,203)	(1,240,927)	17
18	System Total	258,063	(38,495,841)	3,442,788	(1,301,011)	(2,668,435)	(261,598,242)	(2)	0	(13,938,339)	(314,301,019)	1,895,726	0	(331,255,995)	(643,661,288)	18
AVERAGE % CHANGE SUMMARY																
19	Residential	-0.41%	-2.62%	5.55%	-8.78%	-24.14%	-70.93%	0.00%	0.00%	-4.71%	-10.50%	8.12%	0.00%	-280.66%	-21.16%	19
20	Small Comm.	4.28%	4.57%	2.71%	-89.99%	-25.70%	-89.60%	4.96%	0.00%	-23.73%	-2.49%	3.51%	0.00%	-355.66%	-9.91%	20
21	Med & Lg C&I	-1.57%	-10.77%	-2.50%	-90.52%	-29.68%	-71.31%	-1.30%	0.00%	17.14%	-11.35%	-2.44%	0.00%	-381.62%	-19.38%	21
22	Agriculture	3.69%	-12.18%	-0.62%	-90.27%	-27.82%	-69.77%	3.98%	0.00%	-280.01%	-4.80%	-0.20%	0.00%	-284.83%	-16.14%	22
23	Lighting	4.91%	5.23%	19.04%	-89.89%	-24.96%	-69.41%	5.11%	0.00%	0.00%	-0.53%	5.42%	0.00%	-395.04%	-6.92%	23
24	System Total	0.01%	-5.34%	1.01%	-90.18%	-26.96%	-70.94%	0.00%	0.00%	-5.99%	-9.54%	2.24%	0.00%	-324.93%	-18.49%	24

ATTACHMENT **BC.1**

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

BUNDLED CUSTOMERS

SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT
2025 ERRR FORECAST APPLICATION
ATTACHMENT ~~BC~~.1
ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE COMPONENT
BUNDLED CUSTOMERS⁴⁰²

⁴⁰² ~~Various rate components and determinants have been designated confidential to prevent the disclosure of Bundled Sales. See Confidentiality Declaration of Erica Wissman attached herewith.~~

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)	In-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.
PRESENT 3/1/2024																			
1	Residential	6,059,160,276	7,323,388,100	1,448,759,729	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	2,365,307,594	506,275,869	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	9,696,893,176	1,578,241,700	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	362,220,676	75,710,685	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	76,256,047	15,976,062	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	19,824,065,592	3,624,964,045	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
PROPOSED 2025 ERRA Application																			
7	Residential	6,059,160,276	7,793,802,938	1,515,275,355	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	2,465,317,822	502,540,616	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	9,666,707,755	1,745,340,932	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	366,795,413	93,625,585	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	80,243,577	21,052,198	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	20,272,867,504	3,877,834,687	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
RATE CHANGE SUMMARY																			
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
AVERAGE % CHANGE SUMMARY																			
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

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.
PRESENT 10/1/2024																			
1	Residential	6,059,160,276	7,323,388,100	1,448,759,729	12.861	5.704	1.654	0.007	0.054	2.516	0.001	0.149	(3.595)	19.351	0.401	0.000	15.166	34.918	1
2	Small Comm.	2,322,265,148	2,365,307,594	506,275,869	15.735	2.991	1.696	0.007	0.052	1.760	0.001	0.000	(0.615)	21.627	0.557	0.000	12.854	35.038	2
3	Med & Lg C&I	9,491,063,403	9,696,893,176	1,578,241,700	9.337	3.149	1.791	0.007	0.048	1.798	0.001	0.000	(0.004)	16.127	0.410	0.000	15.807	32.344	3
4	Agriculture	341,698,843	362,220,676	75,710,685	9.400	1.301	1.778	0.007	0.030	1.027	0.001	0.000	(0.035)	13.509	0.546	0.000	11.224	25.279	4
5	Lighting	76,266,047	76,266,047	15,976,062	18.517	2.479	(0.122)	0.007	0.004	1.692	0.001	0.000	0.000	22.578	0.558	0.000	9.931	33.067	5
6	System Total	18,290,443,717	19,824,065,592	3,624,964,045	11.356	3.938	1.721	0.007	0.050	2.016	0.001	0.049	(1.272)	17.866	0.427	0.000	15.017	33.310	6
PROPOSED 2025 ERRRA October Update																			
7	Residential	6,059,160,276	7,793,802,938	1,515,275,355	12.808	5.554	1.640	0.001	0.038	0.731	0.001	0.149	(3.765)	17.157	0.407	0.000	15.188	32.752	7
8	Small Comm.	2,428,289,241	2,465,317,822	502,540,616	15.688	2.991	1.671	0.001	0.037	0.512	0.001	0.000	(0.728)	20.173	0.553	0.000	12.875	33.601	8
9	Med & Lg C&I	9,367,446,739	9,566,707,755	1,745,340,932	9.312	2.847	1.770	0.001	0.034	0.523	0.001	0.000	(0.003)	14.485	0.405	0.000	15.775	30.665	9
10	Agriculture	355,305,819	366,795,413	93,625,585	9.374	1.099	1.745	0.001	0.021	0.299	0.001	0.000	(0.128)	12.412	0.538	0.000	11.156	24.106	10
11	Lighting	80,243,577	80,243,577	21,052,198	18.461	2.479	(0.094)	0.001	0.003	0.492	0.001	0.000	0.000	21.343	0.559	0.000	9.947	31.849	11
12	System Total	18,290,445,653	20,272,867,504	3,877,834,687	11.358	3.727	1.700	0.001	0.036	0.586	0.001	0.049	(1.348)	16.110	0.427	0.000	15.027	31.564	12
RATE CHANGE SUMMARY																			
13	Residential				(0.053)	(0.150)	(0.014)	(0.006)	(0.016)	(1.785)	0.000	0.000	(0.170)	(2.194)	0.006	0.000	0.022	(2.166)	13
14	Small Comm.				(0.047)	0.000	(0.025)	(0.006)	(0.015)	(1.248)	0.000	0.000	(0.113)	(1.454)	(0.004)	0.000	0.021	(1.437)	14
15	Med & Lg C&I				(0.025)	(0.302)	(0.021)	(0.006)	(0.014)	(1.275)	0.000	0.000	0.001	(1.642)	(0.005)	0.000	(0.032)	(1.679)	15
16	Agriculture				(0.026)	(0.202)	(0.033)	(0.006)	(0.009)	(0.728)	0.000	0.000	(0.093)	(1.097)	(0.008)	0.000	(0.068)	(1.173)	16
17	Lighting				(0.056)	0.000	0.028	(0.006)	(0.001)	(1.200)	0.000	0.000	0.000	(1.235)	0.001	0.000	0.016	(1.218)	17
18	System Total				0.002	(0.211)	(0.021)	(0.006)	(0.014)	(1.430)	0.000	0.000	(0.076)	(1.756)	0.000	0.000	0.010	(1.746)	18
AVERAGE % CHANGE SUMMARY																			
19	Residential				-0.41%	-2.63%	-0.85%	-85.71%	-29.63%	-70.95%	0.00%	0.00%	-4.73%	-11.34%	1.50%	0.00%	0.15%	-6.20%	19
20	Small Comm.				-0.30%	0.00%	-1.47%	-85.71%	-28.85%	-70.91%	0.00%	0.00%	-18.37%	-6.72%	-0.72%	0.00%	0.16%	-4.10%	20
21	Med & Lg C&I				-0.27%	-9.59%	-1.17%	-85.71%	-29.17%	-70.91%	0.00%	0.00%	25.00%	-10.18%	-1.22%	0.00%	-0.20%	-5.19%	21
22	Agriculture				-0.28%	-15.53%	-1.86%	-85.71%	-30.00%	-70.89%	0.00%	0.00%	-265.71%	-8.12%	-1.47%	0.00%	-0.61%	-4.64%	22
23	Lighting				-0.30%	0.00%	22.95%	-85.71%	-25.00%	-70.92%	0.00%	0.00%	0.00%	-5.47%	0.18%	0.00%	0.16%	-3.68%	23
24	System Total				0.02%	-5.36%	-1.22%	-85.71%	-28.00%	-70.93%	0.00%	0.00%	-5.97%	-9.83%	0.00%	0.00%	0.07%	-5.24%	24

ATTACHMENT **BC.2**

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

UNBUNDLED CUSTOMERS

SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT
2025 ERRR FORECAST APPLICATION
ATTACHMENT **BC.2**
ILLUSTRATIVE CLASS AVERAGE RATE CHANGES BY RATE COMPONENT
UNBUNDLED CUSTOMERS⁴⁰³

⁴⁰³ Various rate components and determinants have been designated confidential to prevent the disclosure of Bundled Sales. See Confidentiality Declaration of Erica Wissman attached herewith.

Line No.	Determinants System Net (kWh)	Determinants System Delivered (kWh)	Determinants Departed Load (kWh)	Distribution Avg Rate (¢/kWh)	Transmission Avg Rate (¢/kWh)	Public Goods Avg Rate (¢/kWh)	Nuc Decom Avg Rate (¢/kWh)	In-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.	
PRESENT 3/1/2024																			
1	Residential	6,059,160,276	7,323,388,100	4,610,398,000	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	2,365,307,594	1,815,956,000	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	9,696,893,176	7,910,981,000	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	362,220,676	267,866,000	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	76,256,047	60,280,000	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	19,824,065,592	14,665,481,000	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
PROPOSED 2025 ERRRA Application																			
7	Residential	6,059,160,276	7,793,802,938	4,543,884,921	12.890	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	2,465,317,822	1,925,748,625	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	9,666,707,755	7,622,105,807	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	366,795,413	261,680,234	9.250	1.099	1.686	0.007	0.021	0.459	0.001	0.000	(0.158)	12.365	0.538	0.000	1.061	13.984	10
11	Lighting	80,243,577	80,243,577	59,191,379	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	20,272,867,504	14,412,610,966	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
RATE CHANGE SUMMARY																			
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
AVERAGE % CHANGE SUMMARY																			
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

Line No.		Determinants System Net (kWh)	Determinants System Delivered (kWh)	Determinants Departed Load (kWh)	Distribution Avg Rate (¢/kWh)	Transmission Avg Rate (¢/kWh)	Public Goods Avg Rate (¢/kWh)	Nuclear Decommissioning Avg Rate (¢/kWh)	Non-Going CTC Avg Rate (¢/kWh)	LGC Avg Rate (¢/kWh)	RS Avg Rate (¢/kWh)	TRAC Avg Rate (¢/kWh)	GHG Avg Rate (¢/kWh)	Total UDC Avg Rate (¢/kWh)	WF-NBC Avg Rate (¢/kWh)	DWR-BC Avg Rate (¢/kWh)	PCIA Avg Rate (¢/kWh)	Total Avg Rate (¢/kWh)	Line No.
PRESENT 10/1/2024																			
1	Residential	6,059,160,276	7,323,388,100	4,610,398,000	12.861	5.704	1.654	0.007	0.054	2.516	0.001	0.149	(3.595)	19.351	0.401	0.000	1.136	20.888	1
2	Small Comm.	2,322,265,148	2,365,307,594	1,815,956,000	15.735	2.991	1.696	0.007	0.052	1.760	0.001	0.000	(0.615)	21.627	0.557	0.000	0.623	22.807	2
3	Med & Lg C&I	9,491,063,403	9,696,893,176	7,910,981,000	9.337	3.149	1.791	0.007	0.048	1.798	0.001	0.000	(0.004)	16.127	0.410	0.000	0.453	16.990	3
4	Agriculture	341,698,843	362,220,676	267,866,000	9.400	1.301	1.778	0.007	0.030	1.027	0.001	0.000	(0.035)	13.509	0.546	0.000	0.777	14.832	4
5	Lighting	76,256,047	76,256,047	60,280,000	18.517	2.479	(0.122)	0.007	0.004	1.692	0.001	0.000	0.000	22.578	0.558	0.000	0.493	23.629	5
6	System Total	18,290,443,717	19,824,065,592	14,665,481,000	11.356	3.938	1.721	0.007	0.050	2.016	0.001	0.049	(1.272)	17.866	0.427	0.000	0.695	18.988	6
PROPOSED 2025 ERRa October Update																			
7	Residential	6,059,160,276	7,793,802,938	4,543,884,921	12.808	5.554	1.640	0.001	0.038	0.731	0.001	0.149	(3.765)	17.157	0.407	0.000	(2.083)	15.481	7
8	Small Comm.	2,428,289,241	2,465,317,822	1,925,748,625	15.688	2.991	1.671	0.001	0.037	0.512	0.001	0.000	(0.728)	20.173	0.553	0.000	(1.502)	19.224	8
9	Med & Lg C&I	9,367,446,739	9,566,707,755	7,622,105,807	9.312	2.847	1.770	0.001	0.034	0.523	0.001	0.000	(0.003)	14.485	0.405	0.000	(1.326)	13.564	9
10	Agriculture	355,305,819	366,795,413	261,680,234	9.374	1.099	1.745	0.001	0.021	0.299	0.001	0.000	(0.128)	12.412	0.538	0.000	(1.469)	11.481	10
11	Lighting	80,243,577	80,243,577	59,191,379	18.461	2.479	(0.094)	0.001	0.003	0.492	0.001	0.000	0.000	21.343	0.559	0.000	(1.480)	20.422	11
12	System Total	18,290,445,653	20,272,867,504	14,412,610,966	11.358	3.727	1.700	0.001	0.036	0.586	0.001	0.049	(1.348)	16.110	0.427	0.000	(1.591)	14.946	12
RATE CHANGE SUMMARY																			
13	Residential				(0.053)	(0.150)	(0.014)	(0.006)	(0.016)	(1.785)	0.000	0.000	(0.170)	(2.194)	0.006	0.000	(3.219)	(5.407)	13
14	Small Comm.				(0.047)	0.000	(0.025)	(0.006)	(0.015)	(1.248)	0.000	0.000	(0.113)	(1.454)	(0.004)	0.000	(2.125)	(3.583)	14
15	Med & Lg C&I				(0.025)	(0.302)	(0.021)	(0.006)	(0.014)	(1.275)	0.000	0.000	0.001	(1.642)	(0.005)	0.000	(1.779)	(3.426)	15
16	Agriculture				(0.026)	(0.202)	(0.033)	(0.006)	(0.009)	(0.728)	0.000	0.000	(0.093)	(1.097)	(0.008)	0.000	(2.246)	(3.351)	16
17	Lighting				(0.056)	0.000	0.028	(0.006)	(0.001)	(1.200)	0.000	0.000	0.000	(1.235)	0.001	0.000	(1.973)	(3.207)	17
18	System Total				0.002	(0.211)	(0.021)	(0.006)	(0.014)	(1.430)	0.000	0.000	(0.076)	(1.756)	0.000	0.000	(2.286)	(4.042)	18
AVERAGE % CHANGE SUMMARY																			
19	Residential				-0.41%	-2.63%	-0.85%	-85.71%	-29.63%	-70.95%	0.00%	0.00%	-4.73%	-11.34%	1.50%	0.00%	-283.36%	-25.89%	19
20	Small Comm.				-0.30%	0.00%	-1.47%	-85.71%	-28.85%	-70.91%	0.00%	0.00%	-18.37%	-6.72%	-0.72%	0.00%	-341.09%	-15.71%	20
21	Med & Lg C&I				-0.27%	-9.59%	-1.17%	-85.71%	-29.17%	-70.91%	0.00%	0.00%	25.00%	-10.18%	-1.22%	0.00%	-392.72%	-20.16%	21
22	Agriculture				-0.28%	-15.53%	-1.86%	-85.71%	-30.00%	-70.89%	0.00%	0.00%	-265.71%	-8.12%	-1.47%	0.00%	-289.06%	-22.59%	22
23	Lighting				-0.30%	0.00%	22.98%	-85.71%	-25.00%	-70.92%	0.00%	0.00%	0.00%	-5.47%	0.18%	0.00%	-400.20%	-13.57%	23
24	System Total				0.02%	-5.36%	-1.22%	-85.71%	-28.00%	-70.93%	0.00%	0.00%	-5.97%	-9.83%	0.00%	0.00%	-328.92%	-21.29%	24

ATTACHMENT **CD**

2025 ILLUSTRATIVE PCIA RATES

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT
2025 ERRR FORECAST APPLICATION
ATTACHMENT ~~CD~~**

**ILLUSTRATIVE POWER CHARGE INDIFFERENCE ADJUSTMENT (PCIA) RATES FOR DIRECT ACCESS AND COMMUNITY
CHOICE AGGREGATION CUSTOMERS^{104,105}**

(\$/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

¹⁰⁴ 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.

¹⁰⁵ The PCIA rates will be updated with updated ERRR and PABA forecasted year-end balances in SDG&E's year-end consolidated electric rates advice letter pursuant to Resolution E-5217.

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
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	0.00070	0.00061	0.00061	0.00269	0.00357	0.00486	(0.00348)	(0.00376)	(0.00828)	(0.00302)	0.00053	0.00234
Small Commercial	0.00049	0.00043	0.00043	0.00189	0.00252	0.00343	(0.00246)	(0.00266)	(0.00585)	(0.00214)	0.00039	0.00167
Medium & Large C&I	0.00053	0.00043	0.00043	0.00260	0.00351	0.00485	(0.00382)	(0.00412)	(0.00882)	(0.00322)	0.00071	0.00274
Agriculture	0.00053	0.00046	0.00046	0.00208	0.00277	0.00377	(0.00273)	(0.00295)	(0.00648)	(0.00238)	0.00053	0.00201
Streetlighting	0.00048	0.00042	0.00042	0.00185	0.00246	0.00334	(0.00239)	(0.00258)	(0.00569)	(0.00208)	0.00037	0.00161
System Total	0.00058	0.00049	0.00049	0.00250	0.00335	0.00460	(0.00346)	(0.00373)	(0.00810)	(0.00297)	0.00056	0.00237

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
0.00344	0.00360	0.00234	0.00332	0.00060	(0.01564)	(0.02050)	(0.02120)	(0.01932)	(0.01940)	(0.03814)	(0.00350)	(0.00350)
0.00245	0.00257	0.00167	0.00237	0.00043	(0.01119)	(0.01469)	(0.01519)	(0.01236)	(0.01243)	(0.02742)	0.00184	0.00184
0.00398	0.00417	0.00274	0.00386	0.00074	(0.01821)	(0.02402)	(0.02486)	(0.02107)	(0.02117)	(0.03894)	(0.00844)	(0.00844)
0.00291	0.00304	0.00201	0.00281	0.00058	(0.01271)	(0.01669)	(0.01726)	(0.01482)	(0.01487)	(0.03056)	(0.00589)	(0.00589)
0.00236	0.00247	0.00161	0.00228	0.00041	(0.01074)	(0.01407)	(0.01455)	(0.01200)	(0.01206)	(0.02439)	(0.00166)	(0.00166)
0.00347	0.00363	0.00237	0.00336	0.00061	(0.01589)	(0.02089)	(0.02161)	(0.01901)	(0.01909)	(0.03679)	(0.00510)	(0.00510)

ATTACHMENT **DE**

ILLUSTRATIVE 2025 ECR COMPONENTS

SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT
2025 ERRR FORECAST APPLICATION
ATTACHMENT DE
ILLUSTRATIVE 2025 ENHANCED COMMUNITY RENEWABLES (ECR) RATE COMPONENTS¹⁰⁶

Description	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh
	Residential	Sm Commercial	M/L C&I	Ag	Streetlighting
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	(0.16723) (0.14029)	(0.14172) (0.11896)	(0.17319) (0.14609)	(0.12249) (0.10330)	(0.10954) (0.09186)
WREGIS	0.00000	0.00000	0.00000	0.00000	0.00000
CAISO GMC	<u>0.001250-00113</u>	<u>0.001250-00113</u>	<u>0.001250-00113</u>	<u>0.001250-00113</u>	<u>0.001250-00113</u>
Renewable Integration Cost	0.00000	0.00000	0.00000	0.00000	0.00000
<i>ECR Differential</i>	(0.16598) (0.13916)	(0.14047) (0.11782)	(0.17194) (0.14496)	(0.12124) (0.10217)	(0.10829) (0.09073)
PCIA	See Attachment <u>CD</u>				

¹⁰⁶ The Average Commodity Cost Adjustment will be updated upon implementation to reflect the actual class average commodity rates at that time.

ATTACHMENT EF
2025 MCAM RATES

SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT
2025 ERRA FORECAST APPLICATION
ATTACHMENT ~~EF~~
2025 MCAM RATES

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

Customer Class MCAM-CRS	Opt-Out ESPs	Backstop ESPs
Residential	0.0000 <u>36</u>	
Small Commercial	0.0000 <u>410</u>	
Med/Large C&I	0.0000 <u>512</u>	
Agricultural	0.0000 <u>36</u>	
Lighting	0.0000 <u>24</u>	