BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) for Approval of its 2025 Electric Procurement Revenue Requirement Forecasts, 2025 Electric Sales Forecast, and GHG-Related Forecasts

Application 24-05-010 (Filed May 15, 2024)

SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E) OCTOBER UPDATE TO APPLICATION

PUBLIC VERSION

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I. INTRODUCTION

On May 15, 2024, San Diego Gas & Electric Company ("SDG&E") submitted its Application for Approval of its 2025 Electric Procurement Revenue Requirement Forecasts, 2025 Electric Sales Forecast, and GHG-Related Forecasts ("Application"). In the fall of each year, SDG&E updates certain information in the testimony supporting its forecast application using data that was not available at the time it submitted its application (*i.e.*, the "October Update"). Consistent with that practice, and per the Assigned Commissioner's Scoping Memo and Ruling dated August 14, 2024 ("Scoping Memo") and Email Ruling dated October 14, 2024, SDG&E hereby submits its October Update, which consists of updated information sponsored by several SDG&E witnesses.

In addition, consistent with the Administrative Law Judge's ("ALJ") request made during evidentiary hearings, Section IV below summarizes the key changes between the October Update and the May filing, including an explanation for any significant changes in the revenue requirements proposed.

II. BACKGROUND

In the Application, SDG&E requested approval of its 2025 forecast of (1) the Energy Resource Recovery Account ("ERRA") revenue requirement, which includes greenhouse gas

("GHG") costs; (2) the Portfolio Allocation Balancing Account ("PABA") revenue requirement; (3) the Competition Transition Charge ("CTC") revenue requirement tracked in the Transition Cost Balancing Account ("TCBA"); (4) the Local Generation ("LG") revenue requirement tracked in the Local Generating Balancing Account ("LGBA");² (5) the San Onofre Nuclear Generating Station ("SONGS") Unit 1 Offsite Spent Fuel Storage Cost revenue requirement tracked in SDG&E's Nuclear Decommissioning Adjustment Mechanism ("NDAM") account; (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; (8) the Tree Mortality Non-Bypassable Charge ("TMNBC") revenue requirement; and (9) the GHG allowance revenues and return allocations. By its Application, SDG&E also requested Commission approval of its 2025 electric sales forecast as directed by D.22-03-003. Additionally, SDG&E requested approval for its proposed 2025: (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment ("PCIA") rates; (3) rate components for the Green Tariff Shared Renewables ("GTSR") Program; and (4) MCAM rates. SDG&E's Application was supported by the testimony of seven witnesses.

The October Update has traditionally served to update testimony regarding the CTC Market Price Benchmark ("MPB") and the PCIA benchmarks. This information is provided to SDG&E by the Commission's Energy Division, which compiles and provides updated input assumptions to the investor-owned utilities ("IOUs") so that the MPB can be calculated. These

The purpose of the TCBA is to accrue all the CTC revenues and recover all CTC-eligible generation-related costs.

The purpose of the LGBA is to record revenues and costs of generation and other energy sources where the Commission has determined that the resource is subject to the Cost Allocation Mechanism ("CAM").

assumptions typically do not become available until early fall, as they include forward price curves for all the trading days in September.³

Updates to the ERRA testimony are warranted since approximately five months have passed since the filing of the May Application, and various input assumptions have changed, some of which include the following. As noted above, the ERRA testimony has been updated to include the updated MPBs, which saw a significant increase.⁴ In addition, revenues from all signed Voluntary Allocation Market Offer ("VAMO") sales contracts for remaining excess bundled RECs are now included in PABA. Also, projected 2024 year-end ERRA and PABA account balances have been revised to reflect actuals through August 2024 and the correct 2023 and 2024 California Independent System Operator ("CAISO") revenues.

SDG&E has also made updates based on Commission decisions that require certain updates be included in the October Update and/or other relevant information that has become available since the submission of the Application.

III. SUMMARY OF UPDATES TO THE APPLICATION

In its Application, SDG&E sought approval of a total 2025 forecasted revenue requirement of \$469.4 million. In this October Update, SDG&E seeks approval of its *updated* total 2025 forecasted revenue requirement of \$71.7 million, which is comprised of several

D.22-01-023, Ordering Paragraph ("OP 1") changed the release of the Market Price Benchmarks from November 1st to October 1st of each year to allow for the update process to take place in October instead of November.

⁴ Annual Market Price Benchmark updates were received from the Commission on October 2 and October 4, 2024, with an Errata on October 11, 2024. This October Update reflects the final 2024 Renewable Energy Credits ("RECs") and Resource Adequacy ("RA") benchmarks, and also the forecasted 2025 Energy Index, RECs, and RA benchmarks.

forecasts of specific items.⁵ Table 1 below reflects SDG&E's proposed changes to the forecasts set forth in the Application:

	TABLE 1 Proposed Revenue Requirements (\$M) ⁶											
Line	Description	2025 Revenue Requirement May Filing	2025 Revenue Requirement October Update	Change	Change (%)							
		w/out FF&U	w/out FF&U	w/out FF&U	w/out FF&U							
1	ERRA	432.3	461.4	29.1	6.7%							
2	ERRA Year-end Balance	34.1	130.5	96.4	282.9%							
3	PABA	251.0	(26.3)	(277.3)	-110.5%							
4	PABA Year-end Balance	(107.1)	(352.8)	(245.8)	229.5%							
5	CTC	2.1	2.3	0.2	8.0%							
6	LG	214.4	192.1	(22.3)	-10.4%							
7	LGBA Year-end Balance	(51.6)	(86.2)	(34.6)	66.9%							
8	GHG Revenues for Return	(308.0)	(249.4)	58.6	-19.0%							
9	SONGS	1.3	-	(1.3)	-100.0%							
10	Modified CAM	0.3	0.1	(0.2)	-57.9%							
11	SDCP DAC- GT/CS-GT	0.7	_	(0.7)	-100.0%							
12	Total	469.4	71.7	(397.8)	-84.7%							

Based on this October Update, SDG&E projects a combined total decrease in revenue requirement of \$687.4 million (including FF&U) compared to the currently effective rates. In total, these changes, when implemented with SDG&E's 2025 sales forecast, would decrease the total bundled system average rate 1.7 cents per kWh, or –5.2%. Without the Residential and

This forecasted revenue requirement excludes Franchise Fees and Uncollectibles ("FF&U") and the 2025 TMNBC revenue requirement due to confidentiality concerns.

This table reflects a consolidated summary of proposed revenue requirements for both bundled and departed load combined.

Small Business Semi-Annual CCC, the total bundled system average rate would decrease by 1.7 cents per kWh, or -4.8%. For unbundled customers, SDG&E's system average delivery plus PCIA rates will decrease 4.0 cents per kWh, or -21.3%. Without the Residential and Small Business Semi-Annual CCC, SDG&E's system average delivery plus PCIA rates would decrease 4.0 cents per kWh, or -19.6%.

A typical bundled non-California Alternative Rates for Energy ("CARE") residential customer using 400 kilowatt-hours ("kWh") could see a monthly bill decrease of -8.3%, or \$13⁷ (from \$153 to \$141). A typical bundled CARE residential customer using 400 kWh could see a monthly bill decrease of -8.0%, or \$8 (from \$94 to \$87). A typical unbundled non-CARE residential customer using 400 kWh could see a monthly bill decrease of -23.6%, or \$23 (from \$97 to \$74). A typical unbundled CARE residential customer using 400 kWh could see a monthly bill decrease of -27.5%, or \$16 (from \$57 to \$41).

IV. FACTORS IMPACTING CHANGE IN REVENUE REQUIREMENTS

SDG&E's 2025 ERRA revenue requirement increased by approximately \$29 million due to higher compliance costs resulting from the significantly higher 2025 Forecast RA and RPS MPBs compared to the 2024 Forecast MPBs used in SDG&E's May Application. ERRA's projected year-end balance likewise increased significantly (\$96 million) as a result of the true-up of the REC and RA market values to the increased 2024 Final MPBs. Conversely, SDG&E's

⁷ Differences may not equal due to rounding.

⁸ Customers' actual bill impacts will vary with usage per month, by season and by climate zone. Please refer to the testimony of SDG&E witness Wissman for additional details on rate and bill impacts.

⁹ Customers' actual bill impacts will vary with usage per month, by season and climate zone and when a customer became an unbundled customer (Power Charge Indifference Adjustment ("PCIA")) vintage. Please refer to the testimony of SDG&E witness Wissman for additional details on rate and bill impacts.

2025 PABA revenue requirement decreased by approximately \$277 million from the May Application as a result of higher sales revenues forecasted at the new, higher MPBs. PABA's projected year-end balance similarly decreased significantly (\$246 million) as a result of (1) the increased credits in PABA for retained RECs and RA based on the true-up to the increased 2024 Final MPBs, (2) the increased RPS voluntary allocation sales revenues based on the true-up to the increased 2024 Final MPBs and (3) the Investment Tax Credits ("ITCs") that SDG&E is eligible to claim for its energy storage and microgrid projects that came online in 2023 being amortized over one year (all in 2025 rates) rather than two years. DG&E's LGBA 2024 projected year-end balance also decreased significantly (\$35 million) as a result of the amortization of the ITCs over one year rather than two.

V. SUPPORTING TESTIMONY

This October Update includes the testimony of five SDG&E witnesses.¹¹ Each witness has prepared a markup (served concurrently herewith) of their original direct testimony, in which updates are reflected in a redline format. Those witnesses (and summaries of the updates they performed) are as follows:

A. Mr. Jimmy Elias

Mr. Elias updates SDG&E's 2025 forecast of the procurement costs that it expects to record to the ERRA, TCBA, PABA and LGBA, as well as procurement costs related to renewable energy contracts. In addition, Mr. Elias provides an update to the forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. Elias also updates SDG&E's forecast of 2025 total GHG costs – both direct and indirect – incurred in connection with SDG&E's

Please refer to the testimony of Ms. Wissman for additional details on the change in amortization.

¹¹ The direct prepared testimonies of James Simmerman and Daniel Skopec were not updated.

compliance with California's cap-and-trade program, which Ms. Felan uses in her 2025 forecast of the ERRA revenue requirement. Additionally, Mr. Elias provides an updated forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2025. Mr. Elias also provides an updated forecast of Tree Mortality Non-Bypassable Charge Balancing Account ("TMNBC") costs. Lastly, Mr. Elias's updated testimony supports Ms. Wissman's development of the GHG allowance revenue return allocation and the volumetric revenue return for small business and residential customers, and the PCIA.

B. Ms. LaRee Felan

Based on updated forecasts provided by Mr. Elias, Ms. Felan updates SDG&E's 2025 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; (3) the LG revenue requirement; (4) TMNBC revenue requirement; and (5) PABA revenue requirement and the projected PABA year-end balance. Ms. Felan also compares SDG&E's 2023 year-end balances with the actual 2023 year-end balances in the GHG allowance revenues and expenses balancing accounts, as well as reconciliation of the 2024 GHG Allowance Revenue & Expenses. Lastly, Ms. Felan's testimony requests authorization of the revenue requirement of the SONGS Unit 1 Offsite Spent Fuel Storage costs.

C. Ms. Erica Wissman

Based on the updated revenue requirements provided by Ms. Felan, Ms. Wissman updates the rate impacts associated with the ERRA, PABA, CTC, LG, SONGS, MCAM, SDCP'S DAC GT and CS-GT, and TMNBC revenue requirements as well as the GHG allowance revenue return and projected year-end balances in the ERRA, PABA and LGBA. Based on 2025 Energy Division input factors that recently became available, Ms. Wissman updates the CTC and PCIA rates. Ms. Wissman also updates the allowance revenue return based on updated information provided by Mr. Elias. Ms. Wissman also updates the 2025 rate

components associated with the Enhanced Community Renewables ("ECR") programs and 2025 MCAM rates.

D. Mr. Stephen Elliott

Mr. Stephen Elliott's testimony updates revenues and costs for GHG compliance instruments to satisfy SDG&E's 2023-2024 compliance obligations under the cap-and-trade program. Mr. Elliott's testimony also includes SDG&E's 2023-2024 revenues related to the sale of its allowance allocation.

E. Ms. Sheri Miller

Ms. Sheri Miller's testimony updates the forecasted Power Charge Indifference

Adjustment ("PCIA") costs to include the updated PCIA market price benchmarks issued by

Energy Division in the beginning of October.

VI. CONFIDENTIALITY

Along with its original Prepared Direct Testimony, SDG&E submitted declarations attesting to the confidentiality of data presented therein. SDG&E requested that the confidential information in its Prepared Direct Testimony be kept confidential pursuant to Public Utilities Code §§ 583, 454.5(g), D.06-06-066, D.08-04-023, and D.14-10-033, as identified in SDG&E's confidentiality matrix. This October Update contains confidential information that is identified in SDG&E's confidentiality matrix and covered by declarations, which are being submitted with the respective Updated Prepared Direct Testimony. SDG&E requests that the same confidential treatment requested with the original filing apply to the information marked confidential in this October Update.

VII. CONCLUSION

SDG&E respectfully requests that the Commission approve the forecasts and proposals in its Application, subject to the updates contained in this October Update.

Respectfully submitted,

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October 21, 2024

UPDATED ATTACHMENT G

GHG REVENUE AND RECONCILATION APPLICATION FORM (Attachment D of Decisions D.14-10-033 and D.15-01-024 as modified by AL 4587-E-C)

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Attachment D of Decision 14-10-033, as amended by advice letters listed below.

Yellow shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

Advice Letter 4587-E-A/B/C

(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E-A/B/C

(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-A/B/C

(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-A/B/C

(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E-A/B/C

(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E-A/B/C

(PacifiCorp U 901 E)

	Year 2	021	Year 2	Year 2022		023	Year 20	024	Year 2025	
Line Description	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded	Forecast	Recorded	Forecast	Recorde
1 Proxy GHG Price (\$/MT)	17.12	23.15	28.86	29.48	29.02	\$ 34.06	38.26	N/A	36.16	N/A
2 Allocated Allowances (MT)	6,766,147	6,732,862	6,737,256	6,651,508	6,586,708	6,491,305	6,435,664		6,279,487	-
3 Revenues (\$)	3,172,937									
4 Prior Balance		7,376,791	(15,086,698)	(19,307,155)	(5,109,732)	(1,132,447)	606,214	(18,481,272)	(33,945,829)	-
5 Allowance Revenue	(115,836,437)	(161,825,842)	(194,403,522)	(189,236,214)	(191,139,679)	(214,387,613)	(246,234,940)	(248,062,550)	(227,092,414)	-
6 Interest	2,372	13,371	(16,300)	(286,178)	(740,443)	350,661	856,139	(368,810)	(130,781)	-
7 Franchise Fees and Uncollectibles	(1,189,180)	(1,176,522)	(2,112,270)	(2,301,661)	(2,111,339)	(2,209,861)	(2,804,571)	(2,914,360)	(2,988,533)	-
8 Subtotal Revenues	(113,850,308)	(155,612,202)	(211,618,790)	(211,131,208)	(199,101,193)	(217,379,260)	(247,577,158)	(269,826,992)	(264,157,557)	
9 Expenses (\$)										
10 Outreach and Administrative Expenses (fr	45,133	104,957	59,799	27,778	27,778	83,000	6,075	-	(9,956)	-
11 Franchise Fees and Uncollectibles				-		-	-	-		-
12 Interest		(25)	-	-	-	-	-	-	-	-
13 Subtotal Expenses	45,133	104,932	59,799	27,778	27,778	83,000	6,075	-	(9,956)	
14 Total Allowance Revenue Approved for Clean										
Energy or Energy Efficiency Programs (\$) (Sum of Lines 14a through 14g)	17,773,708	38,035,035	20,261,326	16,039,939	16,039,939	14,462,722	14,462,722	(7,242,206)	14,725,635	
14a SOMAH (Current Year's Request) ³	11,583,644	31,023,996	19,440,352	12,015,972	12,015,972	12,015,972	12,015,972	-	12,015,972	-
14d Prior Year SOMAH True-up 4,5	100,486	(108,540)	(209,026)	2,933,967	2,933,967	1,351,750		(7,242,206)	1,614,663	
							1,351,750	(7,242,200)		
14e DAC SASH	1,030,000	2,060,000	1,030,000	1,090,000	1,090,000	1,095,000	1,095,000	-	1,095,000	
14f DAC-GT 14g CS-GT						-			-	
Net GHG Revenues Available for Customers in	(96,031,467)	(117,472,235)	(191,297,664)	(195,063,491)	(183,033,476)	(202,833,538)	(233,108,361)	(277,069,198)	(249,441,878)	
Forecast Year (\$) (Line 8 + Line 13 + Line 14)	(50,031,407)	(117,472,255)	(151,257,004)	(155,005,451)	(103,033,470)	(202,033,330)	(233,100,301)	(277,003,136)	(245,441,070)	
16 GHG Revenue Returned to Eligible EITE Customers a	and Small Business Vo	olumetric Customers	(\$)							
17 EITE Customer Return	838,557	389,294	389,295	514,470	514,470	743,942	514,470	2,909,649	2,909,649	
18 Small Business Volumetric Return	1,656,571	2,922,616	-	-		-	-	-	-	
19 Semi-Annual Climate Credit										
20 Number of Eligible Residential Bundled	1,351,533	1,319,172	1,307,609	631,782	668,860	429,449	430,248	389,896	292,726	
21 Number of Eligible Residential	-	51,539	54,259	748,759	702,461	955,869	962,326	1,002,588	1,108,940	-
22 Number of Eligible Small Business		-	125,715	126,523	131,966	126,941	94,210	142,914	113,083	-
23 Total Customers Eligible for Climate	1,351,533	1,370,711	1,487,583	1,507,064	1,503,287	1,512,259	1,486,784	1,535,398	1,514,749	
24 Per-Customer Semi-Annual Climate										
Credit (-0.5 x (Line 15 + 17 + 18) ÷ Line 23)	34.60	34.60	64.17	64.17	60.71	60.71	78.22	78.23	81.38	-
25 Total Revenue Distributed for the										
Climate Credit (\$) (2 x Line 23 x Line 24)	93,536,339	94,853,170	190,908,370	193,416,573	182,519,006	183,608,321	232,593,891	240,213,720	246,532,229	-
Revenue Balance (\$)										
(Line 15 + Line 17 + Line 18 + Line 25)	N/A	(19,307,155)	N/A	(1,132,447)	N/A	(18,481,272)	N/A	(33,945,829)	N/A	-

¹ Recorded data reflects actual data for January 2024 to August 2024 and updated forecasted data for September to December 2024.

2 Forecasted Outreach & Administrative Expenses are the forecasted expenses (from Template D-3) adjusted for any forecasted prior year's under/over-collection in the GHGCDEMA and GHGACMA.

3 The IOUs' forecasted GHG proceeds exceed \$1 billion; therefore, pursuant to D.22-09-009, SDG&E has set aside the set amount of \$12,015,971.92.

4 The 2022 SOMAH True-up of additional \$1,315,750 was incorrect. It should have been a return of \$5,890,485. Therefore, a true-up of \$7,324,206 will be returned for the 2022 SOMAH funding reconciliation.

5 AL 4392-E-B is effective July 2, 2024. The proportions in the AL were determined in coordination with the other IOUs. Their corresponding AL numbers are: 7196-E-B for PG&E, 5421-E-B for SCE, 234-E-B for Liberty and 732-E-B for Pacificorp.

			Year 2021		Yea	r 2022		Year	2023	Yea		Year 2025		
Line	Description	Forecast		Recorded	Forecast	Recorded	Fo	orecast	Recorded	Forecast	Recorded	Forecast		Recorded
1	Direct GHG Emissions (MTCO2e)					•					•			
2	Utility Owned Generation (UOG)													
3	Tolling Agreements													
4	Energy Imports (Specified)													
5	Energy imports (Unspecified)													
6	Qualifying Facility (QF) Contracts													
7	Contracts with Financial Settlement													
8	Subtotal													
9	Total Emissions (MTCO2e)													
10	Proxy GHG Price (\$/MT)	\$	17.12	\$ 23.15	\$ 28.80	\$ 29.	48 \$	29.02	\$ 34.06	\$ 38.26		\$	36.16	
11	GHG Costs (\$)													
12	Direct GHG Costs													
13	Direct GHG Costs - Financial Settlement													
14	Previous Year's Forecast Reconciliation (Line 16)													
15	Total Costs													
	Forecast Variance (\$) ¹						_							

 $^{^{1}\!\}text{Also}$ reflects adjustment for shift in regulatory accounting from cash to accrual

Template D-3: Detail of Outreach and Administrative Expenses

		2023		2024			2025	
Line	Description	Forecast	Recorded ²	Forecast	Recorded ¹	Forecast	Re	ecorded
1	Utility Outreach Expenses (\$)							
2a	SMB Communications	13,295	25,000	(14,993)	-		(25,560)	
2b	Other (Consultant)							
3	Subtotal Outreach	13,295	25,000	(14,993)	-		(25,560)	
4	Utility Administrative Expenses (\$)							
5	Marketing - SDG&E (email, bill insert)	14,483	58,000	21,068	-		15,604	
6	Subtotal Administrative	14,483	58,000	21,068	-		15,604	
7	Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	27,778	83,000	6,075	-		(9,956)	
8	Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-		-	-
9	Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	27,778	83,000	6,075			(9,956)	

¹ 2024 Recorded data reflects actual data for January 2024 to August 2024 and updated forecasted data for September to December 2024.

² 2023 Recorded data reflects funding for the 2024 Forecast. Decision 23-12-021 approved the 2024 ERRA Forecast Application (A. 23-05-013) and issued on 12/15/2023, therefore, the funding was recorded in December 2023.