

Application No.: A.24-05-010XXX
Exhibit No.: SDGE-165
Witness: Sheri Miller

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

*****REDACTED – PUBLIC VERSION*****

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



May-October 215, 2024

TABLE OF CONTENTS

I.	PURPOSE AND OVERVIEW.....	1
II.	PCIA-ELIGIBLE COSTS.....	1
III.	PCIA BENCHMARKS.....	4
IV.	SALES OF RESOURCE ADEQUACY	8
V.	VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES	11
VI.	MARKET OFFER OF REC ATTRIBUTES	11
VII.	ADDITIONAL RPS REQUEST FOR OFFERS.....	12
VIII.	GREEN TARIFF SHARED RENEWABLES.....	12
IX.	2024 MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND ANNUAL TRUE-UP.....	15
X.	OTHER COSTS RECOVERED IN PABA	18
XI.	SUMMARY	18
XII.	QUALIFICATIONS	20

ATTACHMENT A – DECLARATION OF SHERI MILLER

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

ATTACHMENT C - FORECASTED 2024 YEAR END BALANCE OF PABA (**Confidential**)

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

I. PURPOSE AND OVERVIEW

This updated testimony describes the process of forecasting San Diego Gas & Electric Company's ("SDG&E") Power Charge Indifference Adjustment ("PCIA") costs in the 2025 Energy Resource Recovery Account ("ERRA") Forecast. The PCIA cost is equivalent to the utility's total portfolio costs, less its market value and its sales revenues, in a given year. Additional regulatory history of the PCIA is provided in SDG&E witness Erica Wissman's testimony.

The forecasted PCIA costs are calculated using the modeled forecast costs and volumes provided by SDG&E witness Mr. Elias, and the final PCIA costs presented in this testimony are used by SDG&E witness Ms. Felan in her testimony describing the 2025 balancing account revenue requirements. This PCIA testimony also supports SDG&E witness Ms. Wissman's development of customer rates in her testimony.

II. PCIA-ELIGIBLE COSTS

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

1 The monthly resource cost includes both contract costs and costs related to Utility-Owned
2 Generation (“UOG”). The UOG operation and maintenance (“O&M”) and capital-related
3 expenses for the Palomar, Miramar, Cuyamaca, Desert Star, and Ramona Solar resources were
4 approved for recovery through the Non-Fuel Generation Balancing Account (“NGBA”)
5 mechanism in the General Rate Case (“GRC”) ~~Decision (“D.”) D.~~19-09-051. Since above-market
6 costs are required to be recovered through the PCIA mechanism, the above-market costs for these
7 resources are recovered in PABA, and the market value of the compliance instruments that
8 SDG&E expects to use for its own compliance is recovered through NGBA.

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

17 The forecasted actual costs, generation volumes and the CAISO net revenues are provided
18 by SDG&E’s witness Mr. Elias. Each of the PCIA-eligible resources is identified as belonging to
19 a specific year, called the resource’s “vintage,” which corresponds to the year in which the
20 contract was executed or the year in which the UOG resource commenced operations. In most
21 situations, the costs, generation, CAISO net revenues, sales revenues, and market value of

¹ Per D.22-05-015, Ordering Paragraph (“OP”) 4.

² *Id.* at OP 2.

³ *Id.* at OP 10.

1 attributes are assigned the vintage of the generating resource, unless they are required to have a
2 different cost recovery per another CPUC decision. In D.20-05-006, the Commission ordered a
3 “non-vintaged” subaccount to be established in PABA for the purpose of allocating certain costs
4 to all PCIA-eligible customers without limiting recovery to the timeline of the resource vintage.
5 In this forecast filing, SDG&E has included one contract in this new subaccount that is subject to
6 the non-vintaged treatment.

7 In addition, for this 2025 ERRR forecast filing and going forward, SDG&E has placed the
8 O&M ~~expense for the Procurement department related to the UOG resources mentioned above~~ in
9 the non-vintaged PABA subaccount. These O&M costs are approved in SDG&E’s GRC and
10 relate to the ~~primary~~ operations of SDG&E’s Procurement group. In the past these costs have been
11 recovered through the corresponding PABA vintages of the GRC-approved UOG resources
12 because the cost recovery for Procurement O&M and UOG costs in the GRC filing is requested as
13 one lump sum. Because these costs are associated with the energy scheduling, CAISO
14 management, contract origination, and settlement activity of SDG&E’s entire portfolio and not
15 only the GRC-approved UOG resources, SDG&E has carved out the O&M portion of the UOG
16 lump sum costs and included it in the non-vintaged subaccount. ~~Pacific Gas & Electric Company~~
17 ~~(“PG&E”) raised a similar issue in its prehearing conference statement to address Fixed~~
18 ~~Generation Costs that it submitted in Track 2 of its Application (“A.”) 23-05-012, where it~~
19 ~~identified a cost shift in its Energy Supply Administration (“ESA”) costs. In its statement, PG&E~~
20 ~~proposed to recover 100% of its ESA costs through its Legacy UOG vintage PCIA subaccount to~~
21 ~~ensure that the administration costs “are equitably recovered from a broader set of customers.”⁴~~
22 This change will more fairly distribute these costs and prevent cost-shifting between customer

⁴ ~~A.23-05-012, Prehearing Conference Statement of PG&E (January 5, 2024) at 5.~~

1 groups as load departs. SDG&E is aware that PG&E is also considering changes to its O&M
2 allocation methodology but SDG&E believes that its proposal stands on its own as the most
3 equitable method, and considers it to be the least affected by potential fluctuations in the energy
4 market.

5 At the time of this filing, SDG&E is awaiting a decision in its current GRC Application
6 (A.22-05-016) which may affect the amount of O&M described in this section. If SDG&E
7 receives a decision that updates the amount of O&M revenue requirement, the updated amount
8 will be included at the time of the implementation of changes approved in SDG&E's GRC
9 Application, which changes the amount of O&M revenue requirement, this amount will be updated
10 in the October Update filing.

11 III. PCIA BENCHMARKS

12 Pursuant to D.22-01-023, Energy Division issues updated PCIA market price benchmarks
13 ("MPB") in the beginning of October. ~~The~~is May filing of the 2025 ERRa Forecast useds the
14 latest available benchmarks to calculate PCIA, shown in Table 1 below, that were received from
15 Energy Division on October 2, 2023. ~~On~~In October 4th of 2024, Energy Division ~~will~~ issued
16 final new 2024 benchmarks, which were revised on October 11th with an errata for the Renewable
17 Portfolio Standard ("RPS") benchmark, and SDG&E will submit an updated 2025 ERRa Forecast
18 in its October Update incorporating the new benchmarks, and Table 1 below willhas been updated
19 accordingly. The final 2024 benchmarks have also been used to prepare the forecasted 2024
20 PABA year-end balance in this update filing.

21 **Table 1 – 2024 SDG&E Forecast and Final Benchmarks**~~Adders~~
22

	<u>2024 Forecasted MPB</u>	<u>2024 Final MPB</u>
Energy Index On-Peak	\$68.30 (\$/MWh)	<u>n/a</u>
Energy Index Off-Peak	\$62.59 (\$/MWh)	<u>n/a</u>

System RA	\$15.23 (\$/kW-month)	<u>\$28.65 (\$/kW-month)</u>
Local RA	\$8.60 (\$/kW-month)	<u>\$17.21 (\$/kW-month)</u>
Flexible RA	\$9.12 (\$/kW-month)	<u>\$12.89 (\$/kW-month)</u>
Renewable Portfolio Standard (“RPS”) adder – REC	\$31.73 (\$/MWh)	<u>\$54.56 (\$/MWh)</u>

1
2 [Energy Division also provided the 2025 Forecast Market Price Benchmarks shown in](#)
3 [Table 2 below.](#)

4 **Table 2 – 2025 SDG&E Forecast Benchmarks**

	<u>Forecast 2025 MPB</u>
<u>Energy Index On-Peak</u>	<u>\$41.54 (\$/MWh)</u>
<u>Energy Index Off-Peak</u>	<u>\$47.84 (\$/MWh)</u>
<u>System RA</u>	<u>\$42.54 (\$/kW-month)</u>
<u>Local RA</u>	<u>\$9.99 (\$/kW-month)</u>
<u>Flexible RA</u>	<u>\$14.16 (\$/kW-month)</u>
<u>Renewable Portfolio Standard (“RPS”) adder - REC</u>	<u>\$71.24 (\$/MWh)</u>

5
6 D.23-06-006 requires SDG&E to calculate a factor to be multiplied by the Commission-
7 provided energy benchmarks, as described in Appendix B of the decision. The factor is a measure
8 of the difference between a three-year historical average of actual energy revenues received for
9 PCIA resources and the actual average CAISO SP15 day ahead market prices. In accordance with
10 D.23-06-006, SDG&E has completed its calculation of its weighting factors to be used in its 2025
11 ERRA Forecast filing, using historical data from the last three full years (2021, 2022, and 2023).
12 This calculation is provided in the file “CONFIDENTIAL SDG&E 2025 ERRA Forecast Energy
13 Index calculation workpaper”.

SDG&E then used the issued on-peak and off-peak forecast energy indexes together with the updated energy factor to calculate the forecasted weighted average price of the energy component of the contract attributes. This price is then multiplied by the forecasted hourly generation for each resource to calculate the expected market value of the PCIA resource generation in 2025. This expected market value represents the amount of CAISO revenue that SDG&E expects to receive for its PCIA resources, including contracted resources and UOG. This amount is presented in Ms. Felan’s testimony in Table 8 “PABA revenue requirement,” labeled “Supply ISO Revenues.” The actual CAISO revenues will be recorded in PABA each month when they are received by SDG&E, and the revenue will partially offset the costs of the PCIA resources.

2025 SDG&E Forecasted PCIA RA

D.22-06-050 adopted a 24-hour slice of day (“SOD”) approach to RA program requirements. At the time of this filing, no changes to the PCIA RA methodology for SOD have been discussed in front of the Commission, and therefore no changes have been approved. The Scoping Memo to this proceeding indicates that the ERRA Forecast is not the appropriate proceeding to address changes to any previously approved rate or benchmark calculations. SDG&E is therefore making no such changes to the PCIA methodology for RA or the Indifference Amount in this filing. Definitions of SDG&E’s 2025 RA components are shown below.

Table 3 – 2025 PCIA RA

<u>PABA Resource Portfolio</u>	<u>SDG&E’s RA Compliance</u>	<u>MCAM RA Sales</u>	<u>RA RFO Sales</u>	<u>Additional RA Sales</u>	<u>Unsold RA</u>
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<u>Capacity of the portfolio is based on NQC for purposes of calculating PCIA.</u>	<u>= CPUC compliance requirement</u> <u>+ a 17% planning reserve margin (approved in D.24-06-004 and discussed in Mr. Elias' rebuttal testimony)</u> <u>+ buffer (amount of capacity is described in Mr. Elias' testimony)</u>	<u>Volumes have been updated for revised contracts per D.23-12-014 and Advice Letter 4516-E.</u>	<u>Volumes that were sold in the 2025 year-ahead solicitation.</u>	<u>Additional Volumes that may also be sold. The percentage of remaining RA likely to sell is assumed to vary by month due to seasonality.</u>	<u>=Resource NQC</u> <u>Less Compliance</u> <u>Less MCAM sales</u> <u>Less RFO Sales</u> <u>Less additional assumed sales</u> <u>= Unsold RA.</u>
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SDG&E's retained RA in 2025 consists of its compliance requirement, a planning reserve margin, and a buffer in certain months. To calculate the forecast market value of ~~the RA attributes of the resources~~ the retained RA, each PCIA resource is assigned to one of the Local, Flex, or System RA categories, based on the RA category that the resource most commonly serves, and if a resource serves more than one category, Local is assigned first if applicable, then Flex, and then System. The most updated monthly net qualifying capacity ("NQC") listing is obtained from the CAISO website, and an average monthly NQC value for each resource is calculated. ~~The resource's NQC value is then multiplied by the assigned RA benchmark to calculate the forecasted market value of the RA for 2025. Adjustments are made for RA forecasted to be sold during the year. Additional adjustments are made to account for the amount of RA actually expected to be needed for compliance after taking departed load into consideration, if necessary.~~ SDG&E's share of MCAM capacity is counted first for compliance, and the remaining compliance capacity needed is counted from other non-MCAM PCIA-eligible and CAM-eligible resources.

1 The retained volumes are multiplied by the RA MPBs to calculate the forecasted market
2 value, which is included in PABA as a offset to expense.- ~~The resulting forecast~~ market value for
3 contract resources is then included in the ERRR revenue requirement as an expense, as it
4 represents the value of the RA attributes which SDG&E retained to use for the RA compliance
5 obligations on behalf of its bundled customers. The market value associated with UOG resources
6 is excluded from ERRR because the UOG costs are recovered in NGBA, and were previously
7 approved for recovery in D.19-09-051, which approved SDG&E’s 2019 GRC Application (A.17-
8 10-007).

9 ~~D.22-06-050 adopted a 24-hour slice of day (“SOD” approach to RA program~~
10 ~~requirements. It is possible that in the future, the PCIA methodology for RA may need to be~~
11 ~~changed to accommodate the SOD approach. At the time of this filing, however, no changes to~~
12 ~~the PCIA RA methodology for SOD have been discussed in front of the Commission, and~~
13 ~~therefore no changes have been approved. SDG&E is therefore making no such changes to the~~
14 ~~PCIA methodology for RA in this filing, and the methodology is consistent with prior years’~~
15 ~~filings.~~

16 IV. SALES OF RESOURCE ADEQUACY

17 Pursuant to D.22-05-015, SDG&E has signed bilateral sales agreements with LSEs in its
18 territory to sell resource adequacy from resources subject to MCAM cost recovery. D.23-12-014
19 further refined this directive by ordering the IOUs to revise the methodology of calculating the
20 amount of MCAM RA that was to be sold to each LSE, effectively raising the amount of RA
21 available for sale beginning on January 1, 2025. On September 20, 2024, SDG&E filed AL 4516-
22 E with amendments to its original MCAM RA sales contracts. The MCAM volumes that are
23 estimated to be sold for 2025 delivery pursuant to these decisions are removed from the vintage

1 2019 capacity volumes in the calculation of the PCIA indifference amount. The sales revenues are
2 forecasted for cost recovery according to the accounting described above in my testimony.

3 For its 2024 ERRA Forecast proceeding, SDG&E was directed in D.23-12-021 by the
4 Commission to use the 2023 average of actual RA sales as a basis for calculating the 2024 forecast
5 RA sales.⁵ However, that method was not prescribed for future forecast proceedings, and SDG&E
6 has not used it in this PCIA calculation.⁶ Instead, as mentioned above, SDG&E has incorporated
7 RA sales from a recent RFO, and in addition has assumed that additional excess RA will also be
8 sold. The estimated sales from PCIA-eligible resources are incorporated into the PCIA calculation
9 as revenues in the corresponding vintages.

10 2025 SDG&E Forecasted PCIA RECs

11 To calculate the forecasted market value of the REC attributes of the resources, the
12 applicable REC benchmark is applied to the 2025 forecasted PCIA-eligible renewable generation
13 expected to provide the required compliance instruments for to be allocated in the PCIA voluntary
14 allocation mechanism to SDG&E's bundled customers. The number of required RPS compliance
15 instruments was calculated using the volumes of forecasted distributed bundled load, which is net
16 of line losses, and multiplying the volumes by the 2025 RPS compliance requirement of 47.0%.⁷

17 The resulting forecasted market value for contract resources is then included in the ERRA revenue
18 requirement as an expense, as it represents the value of the REC attributes which SDG&E is
19 forecasting to retain to use for the Renewable Portfolio Standard ("RPS") compliance obligations
20 on behalf of its bundled customers. As with the RA value discussed above, the market value

⁵ D.23-12-021 at OP 10.

⁶ Id.

⁷ CPUC, 60% RPS Procurement Rules, available at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-compliance-rules-and-process/60-percent-rps-procurement-rules>.

1 associated with RECs from UOG generation is excluded from ERRA and recovered in NGBA.
 2 The total of the REC and RA market values for contracts is included in Ms. Felan’s testimony in
 3 Table 1 labeled “ERRA Revenue Requirement,” on line 3 “non-CTC contract costs,” and also
 4 mentioned in Ms. Wissman’s testimony as part of the “up-to-market” energy procurement costs
 5 recovered in ERRA.

6 ~~At the time of this filing, SDG&E is forecasting to have sufficient RECs from its 2025~~
 7 ~~voluntary allocations to cover RPS obligations, but will continue to monitor the situation. If it~~
 8 ~~appears that SDG&E will need to utilize a small amount of its previously banked RECs, it will be~~
 9 ~~included in the October Update to this filing.~~

10 At the time of this October Update filing, SDG&E is forecasting to have sufficient 2025
 11 RECs available to meet its 2025 RPS compliance obligations, and will not need to use prior years’
 12 RECs from its bank. Table 4 below shows the calculation of SDG&E’s 2025 forecasted RPS
 13 generation and compares it to SDG&E’s compliance needs, and it is apparent that after RPS sales
 14 and allocations, there will still be more 2025 RECs available to SDG&E than its RPS obligation
 15 requires.

16 **Table 4 – Reconciliation of 2025 RPS Generation and RPS Compliance**

	<u>RECs/MWh Calculation</u>
<u>Total 2025 forecasted REC generation</u>	<u>6,044,112</u>
<u>Less: RECs allocated to SDG&E</u>	██████████
<u>Less: RECs allocated to LSEs in PCIA voluntary allocations</u>	██████████
<u>Less: RECs sold in PCIA market offer</u>	██████████
<u>= Remaining RECs</u>	██████████
<u>RECs allocated to SDG&E</u>	██████████
<u>Add: remaining RECs</u>	██████████
<u>= Total Available to SDG&E</u>	██████████

<u>Total 2025 forecasted bundled load</u>	
<u>Net of transmission line losses</u>	
<u>Net of distribution line losses = forecasted retail sales</u>	<u>3,877,925</u>
<u>Multiplied by the 2025 RPS Program requirement</u>	<u>47.0%</u>
<u>= SDG&E's 2025 RPS Compliance requirement</u>	<u>1,822,625</u>

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3 **IV.V. VOLUNTARY ALLOCATIONS OF REC ATTRIBUTES**

4 Pursuant to D.21-05-030, D.22-01-004, and its approved Advice Letters (“AL”) 4121-E
5 and 4257-E, SDG&E includes forecasted RPS allocations in this 2025 forecast application. These
6 allocations include short-term and long-term RPS contracts with the Load-Serving Entities
7 (“LSE”) in SDG&E’s territory that voluntarily elected to receive PCIA RPS allocations.

8 In addition, this forecast also assumes that SDG&E will take 100% of its own REC
9 allocations in 2025. Forecasts of allocations are based upon the forecasted generation of resources
10 in the allocation pool, multiplied by the percentage of load and elections for each LSE contract,
11 and applying the 2025⁵⁴ forecasted RPS MPB. Forecasted allocation revenues are reflected in the
12 PABA revenue requirement in this filing. ~~Pursuant to D.22-11-021, any forecasted generation in
13 excess of SDG&E’s allocations to itself that is not sold or allocated to any other LSE will not be
14 included in the market value expense forecasted in ERRA.~~

15 **V.VI. MARKET OFFER OF REC ATTRIBUTES**

16 Pursuant to D.21-05-030 and approved advice letters 3983-E, 4117-E, 4126-E, 4188-E,
17 4249-E, 4250-E, SDG&E has implemented its PCIA market offer process for RPS products that
18 were not previously allocated as part of the PCIA voluntary allocation process. SDG&E has
19 executed contracts for ~~both short term and long term~~ selected market offers, which will be

1 active in 2025. Accordingly, SDG&E has included the associated forecasted revenues in this
2 filing, which are reflected in the PABA revenue requirement.

3 **VI.VII. ADDITIONAL RPS REQUEST FOR OFFERS**

4 The Commission has granted SDG&E authorization to conduct an RPS solicitation to
5 purchase additional renewable resources to meet its compliance requirements.⁸ The purpose of
6 holding such a solicitation would be to ensure that SDG&E has enough Portfolio Content
7 Category (“PCC”) 1 RECs to remain in compliance with RPS program requirements.

8 At this time, SDG&E does not foresee a shortage of RECs for 2025, and therefore does not
9 plan to launch an additional solicitation in 2024 to procure 2025 renewable energy. Accordingly,
10 no additional contract costs are included in this 2025 forecast. Also, SDG&E would like to
11 mention that on September 23, 2024, it issued a Request for Proposal to seek offers to purchase
12 from SDG&E 2022 and 2023 Portfolio Content Category 3 RECs, as authorized D.23-12-021. ~~If,~~
13 however, an RPS solicitation is launched or completed before the October Update of this
14 application, any resulting contract costs will be included in my October Update testimony.

15 **VII.VIII. GREEN TARIFF SHARED RENEWABLES**

16 A history of Senate Bill (“SB”) 43, which was intended to expand access to renewable
17 energy to ratepayers, is provided in Ms. Wissman’s testimony. Until August 2022, SDG&E
18 provided its bundled customers with the option to purchase 100% renewable energy through the
19 Green Tariff Shared Renewables (“GTSR”) program, branded at SDG&E as EcoChoice. The
20 EcoChoice option enabled customers to purchase renewable energy from contracted solar
21 resources that have been dedicated to the program, which included Midway Solar and Wister
22 Solar. The costs for these resources were to be recovered in the Green Tariff Shared Renewable
23 Balancing Account (“GTSRBA”).

⁸ D.23-12-008 at OP 14.

1 On August 25, 2022, the CPUC issued a Ruling that granted SDG&E’s request for
2 authorization to temporarily suspend its EcoChoice program.⁹ This order suspended the
3 EcoChoice option to new participants and directed SDG&E to quickly disenroll customers from
4 the EcoChoice program. Because there will be no EcoChoice participation in 2025, no contract
5 costs for GTSRBA are included in this 2025 ERRRA forecast. The two dedicated resources
6 mentioned above are instead included in the standard PCIA cost allocation process.

7 SB 43 codified in Public Utilities Code Section 2833(t) states,

8 A participating utility shall, in the event of participant customer attrition or other
9 causes that reduce customer participation or electrical demand below generation
10 levels, apply the excess generation from the eligible renewable energy resources
11 procured through the utility’s green tariff shared renewables program to the utility’s
12 renewable portfolio standard procurement obligations or bank the excess generation
13 for future use to benefit all customers in accordance with the renewables portfolio
14 standard banking and procurement rules approved by the commission.

15 Pursuant to this mandate, SDG&E has included the forecasted generation from both of its green
16 tariff dedicated generators in the cost recovery mechanism used for its RPS eligible contracts,
17 namely ERRRA and PABA through the PCIA process.

18 The Enhanced Community Renewables (“ECR”) program was also established under AB
19 43, which allowed customers to purchase a share of a community renewable project. On May 30,
20 2024, the Commission issued a ~~Proposed D.24-05-065~~ decision in ~~A.22-05-022~~ on March 3, 2024
21 which that would, if adopted, discontinued the ECR program to new projects. SDG&E does not
22 currently have any ECR projects, and so this requirement ~~would~~ effectively terminated SDG&E’s
23 ECR program. On September 27, 2024, SDG&E filed Tier 2 advice letter 4522-E to close its ECR
24 tariff.

⁹ A.22-05-023, Administrative Law Judge’s Ruling Granting Request for Green Tariff Suspension (August 25, 2022) at OP 1.

1 ~~VIII. SALES OF RESOURCE ADEQUACY~~

2 Pursuant to ~~D.22-05-015~~, SDG&E has signed bilateral sales agreements with LSEs in its
3 territory to sell resource adequacy from resources subject to MCAM cost recovery. ~~D.23-12-014~~
4 further refined this directive by ordering the IOUs to revise the methodology of calculating the
5 amount of MCAM RA that was to be sold to each LSE, effectively raising the amount of RA
6 available for sale beginning on January 1, 2025. On April 2, 2024, SDG&E filed AL 4421-E with
7 amendments to its original MCAM RA sales contracts. The MCAM volumes that are estimated to
8 be sold for 2025 delivery pursuant to these decisions are removed from the vintage 2019 capacity
9 volumes in the calculation of the PCIA indifference amount. The sales revenues are forecasted for
10 cost recovery according to the accounting described above in my testimony.

11 SDG&E may also sell 2025 resource adequacy from non-MCAM contracts, but at this time
12 the amount that will be sold is unknown and no contracts have been signed. For its 2024 ERRRA
13 Forecast proceeding, SDG&E was directed in ~~D.23-12-021~~ by the Commission to use the 2023
14 average of actual RA sales as a basis for calculating the 2024 forecast RA sales.¹⁰ However, that
15 method was not prescribed for future forecast proceedings.¹¹

16 As SDG&E's witness Mr. Elias states in his testimony, SDG&E has estimated sales of
17 excess RA in addition to the MCAM RA sales, using a methodology that takes into consideration
18 hourly constraints by month, an estimated Planning Reserve Margin, and allowing for
19 uncertainties around unplanned outages, additional load departure, and Slice of Day
20 implementation. Adding to the uncertainty is the fact that neither SDG&E nor the LSEs in its
21 territory know yet what their RA requirements are for 2025, and whether the RA market in 2025

¹⁰ ~~D.23-12-021 at OP 10.~~

¹¹ ~~Id.~~

1 ~~will experience high demand, lower demand, or perhaps high demand only for specific types of~~
2 ~~RA products to satisfy the new Slice of Day requirements.~~

3 ~~The estimated sales from PCIA-eligible resources are incorporated into the PCIA~~
4 ~~calculation in the corresponding vintages. As Mr. Elias states in his testimony, SDG&E expects~~
5 ~~some of the uncertainty surrounding RA to be resolved by the time it files its October Update, and~~
6 ~~any necessary refinements or revisions to forecasted RA expenses or revenues will be incorporated~~
7 ~~in its October Update filing.~~

8 **IX. 2024 MONTHLY ACCOUNTING FOR REC AND RA MARKET VALUES, AND**
9 **ANNUAL TRUE-UP**

10 Accruals for the estimated REC and RA market values of PCIA eligible resources are
11 recorded monthly to PABA and ERRRA by SDG&E's Settlements & Systems group as part of the
12 monthly accounting close process. Pursuant to D.19-10-001, these amounts ~~have been~~ will be
13 adjusted ~~to reflect when~~ the final 2024 benchmarks ~~that were are~~ received from Energy Division
14 ~~on October 4, 2024.~~ later this year. The October Update ~~filing~~ of my testimony ~~will~~ includes a
15 true-up of the REC and RA market values recorded during January-August 2024, to reflect the
16 updated benchmarks. This true-up ~~is also~~ will be included in the October Update of the forecasted
17 PABA 2024 year-end balance in my testimony.

18 ~~However, SDG&E notes that as of the filing of this Application, market prices for RECs~~
19 ~~and RA are significantly higher than the current benchmarks. If these higher prices continue,~~
20 ~~SDG&E is concerned that the current RA MPB methodology could result in materially higher~~
21 ~~benchmarks in October, and in turn, materially higher bundled rates for 2025. SDG&E will~~
22 ~~continue to monitor the situation and reserves the right to seek appropriate relief in the course of~~
23 ~~this proceeding, including but not limited to, requesting Commission authorization to adopt an~~

1 ~~alternative ratesetting scenario that would allow SDG&E to continue the use of the 2024 system~~
 2 ~~RA MPB for 2025 ratesetting purposes.~~¹²

3 In the 2024 annual true-up, amounts recorded for the REC and RA market values during
 4 the first eight months of the year were revalued and the balancing accounts adjusted accordingly.
 5 Any excess REC and RA attributes that were offered for sale and not sold are considered unsold.
 6 Pursuant to D.18-10-019, actual energy (“brown power”) revenues received from CAISO for
 7 PCIA-related generation are booked to PABA in the month received, and therefore energy market
 8 value does not require a true-up entry in the October update, because the recorded CAISO
 9 revenues reflect actual updated market prices.

10 During the period January through August 2024, the REC market value was calculated
 11 monthly using estimated generated volumes and SDG&E’s voluntary allocation ratio, and was
 12 recorded as part of SDG&E’s monthly financial closing process. The final amount, including the
 13 true-up, is shown in Table 5. It was calculated using actual January-August 2024 retail sales,
 14 multiplied by the 2024 RPS requirement of 44%, and the final 2024 REC benchmark of \$54.56.

15 **Table 5 – 2024 RPS Market Value True Up**

	<u>Price/MWh</u>	<u>Volumes (MWh)</u>	<u>Amount Recorded (millions)</u>
<u>REC Market Value recorded Jan-Aug 2024</u>	<u>\$31.73</u>	<u>1,087,810</u>	<u>\$34.5</u>
<u>True-up volumes to retail sales</u>	<u>\$31.73</u>	<u>(139,019)</u>	<u>(\$4.4)</u>
<u>True-up market value to final MPB</u>	<u>\$54.56 - \$31.73 = \$22.83</u>	<u>948,790</u>	<u>\$21.6</u>
<u>Subtotal of REC true-ups</u>			<u>\$17.2</u>

¹² ~~SDG&E understands that PG&E intends to make a similar request in its 2025 ERRR Forecast Application filed on May 15, 2024.~~

<u>Final REC Market Value Jan-August 2024</u>	<u>\$54.56</u>	<u>948,790</u>	<u>\$51.8</u>
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During January through August 2024, the RA market value was calculated monthly using the Net Qualifying Capacity (“NQC”) values of the PCIA-eligible generators, adjusted for days the resources were unavailable due to outages, and minus capacity sold. This monthly RA market value was recorded as part of SDG&E’s monthly financial closing process. The final amount, including the true-up, is shown in Table 6 and was calculated using the updated benchmarks.

Table 6 – 2024 RA Market Value True Up

<u>Contract Resources</u>	<u>Price (\$/kW-month)</u>	<u>Monthly Ave. MW</u>	<u>Amount Recorded (in millions)</u>
<u>Estimated Local RA Retained</u>	<u>\$8.60</u>	<u>565</u>	<u>\$38.9</u>
<u>Final Local RA Retained</u>	<u>\$17.21</u>	<u>565</u>	<u>\$77.8</u>
<u>Estimated Flex RA Retained</u>	<u>\$9.12</u>	<u>49</u>	<u>\$3.6</u>
<u>Final Flex RA Retained</u>	<u>\$12.89</u>	<u>49</u>	<u>\$5.1</u>
<u>Estimated System RA Retained</u>	<u>\$15.23</u>	<u>100</u>	<u>\$12.1</u>
<u>Final System RA Retained</u>	<u>\$28.65</u>	<u>100</u>	<u>\$22.8</u>
<u>Subtotal PPA true-up amount</u>	<u>n/a</u>	<u>n/a</u>	<u>\$51.1</u>
<u>Utility-Owned Generation</u>			
<u>Estimated Local RA Retained</u>	<u>\$8.60</u>	<u>240</u>	<u>\$16.5</u>
<u>Final Local RA Retained</u>	<u>\$17.21</u>	<u>240</u>	<u>\$33.1</u>
<u>Estimated Flex RA Retained</u>	<u>\$9.12</u>	<u>105</u>	<u>\$7.3</u>
<u>Final Flex RA Retained</u>	<u>\$12.89</u>	<u>105</u>	<u>\$10.3</u>
<u>Estimated System RA Retained</u>	<u>\$15.23</u>	<u>94</u>	<u>\$12.6</u>
<u>Final System RA Retained</u>	<u>\$28.65</u>	<u>94</u>	<u>\$23.8</u>
<u>Subtotal UOG true-up amount</u>	<u>n/a</u>	<u>n/a</u>	<u>\$30.8</u>
<u>Total Combined Contract and UOG true-up amount</u>	<u>n/a</u>	<u>n/a</u>	<u>\$81.9</u>

1 **X. OTHER COSTS RECOVERED IN PABA**

2 As SDG&E’s witness Mr. Elias describes in his testimony, this forecast of the 2025 PABA
3 revenue requirement includes the natural gas fuel costs and associated Greenhouse Gas (“GHG”)
4 expenses for PCIA-eligible conventional resources. These costs are included in the PCIA as part
5 of the above-market cost calculation of the gas-fired resources in their respective vintages.

6 In addition, SDG&E is including the 2024 PABA year-end forecasted overcollected
7 balance of [REDACTED] million in its 2025 Indifference Amount, pursuant to D.19-10-001
8 which authorized the PABA prior year-end balance recovery through that mechanism. The 2024
9 PABA forecasted year-end balance is calculated using eight~~three~~ months of actual data and
10 four~~nine~~ months of forecasted data, and ~~it has been adjusted to include~~ only the amount of
11 Investment Tax Credits relating to PABA-eligible resources that SDG&E will be including in rates
12 in 2025. It is presented in Attachment C to my testimony, and mentioned by SDG&E’s witnesses
13 Ms. Wissman and Ms. Felan.

14 **XI. SUMMARY**

15 A summary of the total 2025 forecasted PCIA above market cost (without franchise fees
16 and uncollectibles) is shown in Table 72 below. The CAISO revenues, fuel, GHG costs, and total
17 PABA revenue requirement shown below are also referenced in Ms. Felan’s testimony.

18 **Table 72 – 2025 PCIA Forecast Summary**

	PCIA Components	2025 Forecast (in millions)
1.	PCIA contract costs	[REDACTED]
2.	PCIA UOG costs	\$20 <u>64</u>
3.	Generation fuel cost	[REDACTED]
4.	Direct GHG costs	[REDACTED]
5.	Less VAMO REC market offer sales	[REDACTED]

	PCIA Components	2025 Forecast (in millions)
6.	Less RA sales	██████████
7.	Less VAMO REC allocations	██████████
8.	Less contract PCIA REC market value	(\$ <u>13047</u>)
9.	Less contract PCIA RA market value	(\$ <u>8250</u>)
10.	Less UOG PCIA RA market value	(\$ <u>16081</u>)
11.	Less CAISO supply revenues	██████████
12.	= Total Indifference Amount revenue requirement	██████████

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This concludes my updated prepared direct testimony.

1 **XII. QUALIFICATIONS**

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

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

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

14 I have previously testified before the California Public Utilities Commission.

ATTACHMENT A

DECLARATION OF SHERI MILLER

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

**DECLARATION
OF SHERI MILLER**

A.24-05-010

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

I, Sheri Miller, declare as follows:

1. I am a Principal Settlements Advisor for San Diego Gas & Electric Company (“SDG&E”). I included my Updated Prepared Direct Testimony (“Testimony”) in support of SDG&E’s October 21, 2024 Update to Application for Approval of its 2025 Electric Procurement Revenue Requirement Forecasts, 2025 Electric Sales Forecast, and GHG-Related Forecasts (“Application”). Additionally, as a Principal Settlements Advisor, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

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

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

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

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

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Amounts highlighted in yellow in Table 4 of testimony named “Reconciliation of 2025 RPS Generation and RPS Compliance”	V.C	Total Energy Forecast – Bundled Customer
	V.H	Forecast bundled customer load plus T&D losses
	VII.G	Contract terms of RPS contracts (VAMO)
Amounts highlighted in yellow in Table 7 of testimony named “2025 PCIA Forecast Summary”	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Cells highlighted in yellow in Attachment C “Forecasted 2024 Year End PABA Balances” Amount highlighted in yellow in testimony page SM-14	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years
	II.B.4	Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
	IV.A	Forecast of IOU Generation Resources; confidential for three years
	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years
	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)

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

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Timing
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL 2025 Fcst update filing PCIA workpapers.xlsx”, tab ‘Utility Owned Generation’	IV.A	Forecast of IOU Generation Resources; confidential for three years
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL 2025 Fcst update filing PCIA workpapers.xlsx”, tab ‘Workpaper IOU TPS’	II.B.I	Generation Cost Forecasts of Utility Retained Generation, confidential for three years
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL SDG&E 2025 ERRA Forecast Energy Index calculation workpaper”, tabs ‘Weight calculation’ and ‘volumes and revenues’.	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)

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

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

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

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

Executed this 21st day of October 2024, in San Diego, California.

Sheri Miller

Sheri Miller
Principal Settlements Advisor
San Diego Gas & Electric Company

ATTACHMENT B

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

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

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

I, Aaron Franz, do declare as follows:

1. I am the Manager of the Settlements & Systems department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Adam Pierce, Vice President of Energy Procurement & Rates. I have reviewed Sheri Miller’s Updated Prepared Direct Testimony (“Testimony”) in support of the update filing of SDG&E’s “Application of San Diego Gas & Electric Company (U 902-E) for Approval of its 2025 Electric Procurement Revenue Requirement Forecast, 2025 Electric Sales Forecast, and GHG-Related Forecasts” (“Application”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

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

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

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

Executed this 16th day of October, 2024, at San Diego.



Aaron Franz
Manager, Settlements & Systems

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2025 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
Table 7, line 4: Direct GHG Costs	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g). California Code of Regulations, Title 17, Section 95914(c)(1)	GHG emissions forecasts: Providing these forecasts to market participants would allow them to know SDG&E's forecasted GHG obligation, thereby compromising SDG&E's contractual bargaining power such that customer costs are likely to rise. Thus, the release of this non-public confidential information will unjustifiably allow market participants to use this information to the disadvantage of SDG&E's customers.

ATTACHMENT C
FORECASTED 2024 YEAR END BALANCE OF PABA
CONFIDENTIAL

SAN DIEGO GAS & ELECTRIC
ATTACHMENT C
FORECASTED 2024 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES
(THOUSANDS OF DOLLARS)

Line No.	Vin 2002	Vin 2003	Vin 2004	Vin 2005	Vin 2006	Vin 2007	Vin 2008	Vin 2009	Vin 2010	Vin 2011	Vin 2012	Vin 2013	Vin 2014	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019	Vin 2020	Vin 2021	Vin 2022	Vin 2023	Vin 2024	Non-Vinseed	Total
<i>Recorded Balances from January through August 2024 (a)</i>																									
1	[REDACTED]																								
2	[REDACTED]																								
3	[REDACTED]																								
4	[REDACTED]																								
5	[REDACTED]																								
6	[REDACTED]																								
7	[REDACTED]																								
8	[REDACTED]																								
9	[REDACTED]																								
10	[REDACTED]																								
11	[REDACTED]																								
12	[REDACTED]																								
<hr/>																									
13																									
14	<i>Forecasted Sept through December 2024 (b)</i>																								
15	[REDACTED]																								
16	[REDACTED]																								
17	[REDACTED]																								
18	[REDACTED]																								
19	[REDACTED]																								
20	[REDACTED]																								
21	[REDACTED]																								
22	[REDACTED]																								
23	[REDACTED]																								
24	[REDACTED]																								
25	[REDACTED]																								
26	[REDACTED]																								
27	[REDACTED]																								
28	[REDACTED]																								

29

	Vin 2002	Vin 2003	Vin 2004	Vin 2005	Vin 2006	Vin 2007	Vin 2008	Vin 2009	Vin 2010	Vin 2011	Vin 2012	Vin 2013	Vin 2014	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019	Vin 2020	Vin 2021	Vin 2022	Vin 2023	Vin 2024	Non-Vintaged	Total
30 Year-End 2024 Forecast (c = a - b)																									
31 Portfolio Costs	0	0	68,137	19,338	29,942	63,335	14,271	10,263	80,950	165,456	58,065	3,272	1,067	873	0	(25,108)	(120,483)	(7,860)	27	38,676	(3,560)				
32 Brown Power Market Value	0	0	(21,305)	(3,392)	(4,964)	(51,046)	(341)	12,321	(5,343)	(25,477)	(7,178)	(891)	(165)	(488)	0	20,927	(522)	(5,967)	0	(9,788)	0				
33 Imputed REC Market Value	0	0	(1,459)	(2,835)	(3,286)	0	(1,741)	(7,383)	(7,672)	(23,421)	(9,402)	(816)	(159)	(1,580)	(171)	(1,972)	(155)	0	0	0	0				
34 Imputed RA Value	0	0	(19,058)	(1,620)	(640)	(4,651)	(1,852)	(9,125)	(4,645)	(9,721)	(2,895)	(334)	(113)	0	0	(1,177)	(31,825)	(9,722)	0	(10,007)	0				
35 PCIA Billed Customer Revenue	108	0	(48,565)	1,195	(13,746)	72,164	(10,472)	7,679	(43,952)	(22,662)	7,691	(41,190)	(1,096)	44,604	(43,686)	51,859	(53,537)	(39,091)	64,281	(52,329)	(97,219)				
36 REC MPB true ups (October update only)	0	0	(339)	(871)	(832)	0	(619)	(1,718)	(2,043)	(6,917)	(2,423)	(268)	0	(139)	0	(867)	(77)	(120)	0	0	0				
37 RA MPB true up (October update only)	0	0	(293)	(1,076)	(268)	0	(5,768)	(1,991)	(3,754)	(1,765)	(236)	(24)	0	0	0	(563)	(21,655)	(10,971)	0	(2,686)	0				
38 UOG RA MPB true up (October update only)	0	0	(12,176)	0	0	(13,469)	(2,619)	0	(2,494)	0	0	0	0	0	0	0	0	0	0	0	0				
39 2023 Westside Canal ITC true up	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
40 MCAM RA Sales MPB true up (October update only)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(7,644)	0				
41 PCIA Voluntary Allocation Sales MPB true up (October update only)	0	0	(33)	(82)	(3,630)	0	(6,384)	(8,522)	(28,897)	(7,082)	(22)	0	(597)	0	(3,789)	(308)	(478)	0	0	0	0				
42 O&M and Capital Costs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6,127	0	54,247			
43 Interest	(13)	0	(2,589)	133	(394)	1,798	(680)	(2,472)	2,468	3,311	1,260	1,479	86	(1,365)	1,400	(1,607)	(3,003)	(186)	(1,494)	(4,199)	1,382				
44 Transfers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
45 Total 2024 actual & forecast	95	0	(37,681)	10,790	2,182	68,120	(4,062)	(2,586)	9,610	45,424	36,278	(39,007)	(403)	41,308	(42,456)	37,674	(231,664)	(75,911)	62,815	11,522	(99,397)				
46 Beginning balance	(1,451)	0	23,957	(1,827)	15,991	(92,216)	(5,478)	(57,065)	51,342	31,663	3,612	56,507	2,126	(57,489)	57,080	(63,349)	(9,640)	29,950	(73,203)	(65,422)	98,814				
47 Total Year-End Balance Forecast	(1,356)	0	(13,723)	8,963	18,174	(24,096)	(9,540)	(59,651)	60,952	77,087	39,890	17,500	1,722	(16,181)	14,625	(25,675)	(241,304)	(45,962)	(10,388)	(53,900)	(584)	(88,995)	0	(716)	(353,158)

**SAN DIEGO GAS & ELECTRIC
ATTACHMENT C
FORECASTED 2024 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES
(THOUSANDS OF DOLLARS)**

Line No.	Vin 2002	Vin 2003	Vin 2004	Vin 2005	Vin 2006	Vin 2007	Vin 2008	Vin 2009	Vin 2010	Vin 2011	Vin 2012	Vin 2013	Vin 2014	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019	Vin 2020	Vin 2021	Vin 2022	Vin 2023	Vin 2024	Non-Vintaged	Total	
Recorded Balances from January through August 2024 (a)																										
1	[REDACTED]																									
2	[REDACTED]																									
3	[REDACTED]																									
4	[REDACTED]																									
5	[REDACTED]																									
6	[REDACTED]																									
7	[REDACTED]																									
8	[REDACTED]																									
9	[REDACTED]																									
activity Jan through August																										
10	[REDACTED]																									
11	[REDACTED]																									
12	[REDACTED]																									
Forecasted Sept through December 2024 (b)																										
13	[REDACTED]																									
14	[REDACTED]																									
15	[REDACTED]																									
16	[REDACTED]																									
17	[REDACTED]																									
18	[REDACTED]																									
19	[REDACTED]																									
20	[REDACTED]																									
21	[REDACTED]																									
22	[REDACTED]																									
23	[REDACTED]																									
24	[REDACTED]																									
25	[REDACTED]																									
26	[REDACTED]																									
27	[REDACTED]																									
28	[REDACTED]																									

SAN DIEGO GAS & ELECTRIC
ATTACHMENT C
FORECASTED 2024 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES
(THOUSANDS OF DOLLARS)

No.	Non-Contract	Vin 2001	Vin 2003	Vin 2004	Vin 2005	Vin 2006	Vin 2007	Vin 2008	Vin 2009	Vin 2010	Vin 2011	Vin 2012	Vin 2013	Vin 2014	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019	Vin 2020	Vin 2021	Vin 2022	Vin 2023	Total	
Recorded Balances from January through March 2024 (a)																									
1	Beginning Balances																								
2	Portfolio Costs																								
3	Brown Power Market Value																								
4	Imputed REC Market Value																								
5	Imputed RA Market Value																								
6	PCIA Billed Customer Revenue																								
7	OCM and Capital Costs																								
8	Interest																								
9	Transfers																								
10	Activity Jan through March																								
11	Balances as of March 31, 2024																								
12																									
Forecasted April through December 2024 (b)																									
14	Portfolio Costs																								
15	Brown Power Market Value																								
16	Imputed REC Market Value																								
17	Imputed RA Market Value																								
18	PCIA Billed Customer Revenue																								
19	REC MPB true up (October update only)																								
20	RA MPB true up (October update only)																								
21	UOG REC MPB true up (October update only)																								
22	UOG RA MPB true up (October update only)																								
23	PCIA Voluntary Allocation Sales MPB true up (October update only)																								
24	OCM and Capital Costs																								
25	Interest																								
26	Forecasted April through December 2024 Activity																								
27																									
Year-End 2024 Forecast (c, d, e, f, g)																									
29	Portfolio Costs																								
30	Brown Power Market Value																								
31	Imputed REC Market Value																								
32	Imputed RA Market Value																								
33	PCIA Billed Customer Revenue																								
34	REC MPB true up (October update only)																								
35	RA MPB true up (October update only)																								
36	PCIA Voluntary Allocation Sales MPB true up (October update only)																								
37	OCM and Capital Costs																								
38	Interest																								
39	Transfers																								
40	Total 2024 actual & first activity																								
41	Beginning balance																								
42	Total Year-End Balance Forecast																								
43	Adjustment to remove the 2025 portion of ITC credit amortization amount																								
44	Adjusted Year-End Balance Forecast																								

SAN DIEGO GAS & ELECTRIC
ATTACHMENT C
FORECASTED 2024 YEAR END PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA) BALANCES
(THOUSANDS OF DOLLARS)

Line	Vin 2002	Vin 2003	Vin 2004	Vin 2005	Vin 2006	Vin 2007	Vin 2008	Vin 2009	Vin 2010	Vin 2011	Vin 2012	Vin 2013	Vin 2014	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019	Vin 2020	Vin 2021	Vin 2022	Vin 2023	Vin 2024	Non-Vinaged	Total
29	Year-End 2024 Forecast (c = a + b)																								
30	0	0	68,137	19,338	29,942	63,335	14,271	10,263	80,950	165,456	58,065	3,272	1,067	873	0	(25,108)	(120,483)	(7,860)	27	38,676	(3,560)				
31	0	0	(21,305)	(3,392)	(4,964)	(51,046)	(341)	12,321	(5,343)	(25,477)	(7,178)	(891)	(165)	(488)	0	20,927	(522)	(5,967)	0	(9,788)	0				
32	0	0	(1,639)	(3,086)	(3,658)	0	(1,856)	(8,287)	(8,493)	(25,615)	(10,445)	(881)	(196)	(1,878)	(210)	(2,026)	(155)	0	0	0	0				
33	0	0	(19,058)	(1,620)	(640)	(4,661)	(1,862)	(9,125)	(4,645)	(9,721)	(2,889)	(334)	(113)	0	0	(1,177)	(31,825)	(9,722)	0	(10,007)	0				
34	108	0	(48,565)	1,195	(13,746)	72,164	(10,472)	7,679	(43,592)	(22,662)	7,691	(41,190)	(1,096)	44,604	(43,686)	51,859	(53,637)	(39,091)	64,281	(52,329)	(97,219)				
35	0	0	(545)	(1,401)	(1,338)	0	(996)	(2,764)	(3,287)	(11,129)	(3,899)	(431)	0	(224)	0	(1,394)	(124)	(193)	0	0	0				
36	0	0	(293)	(1,076)	(268)	0	(5,768)	(1,991)	(3,754)	(1,765)	(236)	(24)	0	0	0	(593)	(21,655)	(10,971)	0	(2,686)	0				
37	0	0	(12,176)	0	0	(13,469)	(2,619)	0	0	(2,494)	0	0	0	0	0	0	0	0	0	0	0				
38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
40	0	0	(40)	(102)	(4,494)	0	0	(7,904)	(10,551)	(35,776)	(8,768)	(28)	0	(739)	0	(4,692)	(381)	(592)	0	0	0				
41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
42	(13)	0	(2,589)	133	(394)	1,798	(680)	(2,472)	2,468	3,311	1,260	1,479	86	(1,365)	1,400	(1,607)	(3,003)	(186)	(1,494)	(4,199)	1,382				
43	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
44	95	0	(38,074)	9,990	440	68,120	(4,554)	(6,055)	5,517	32,139	32,074	(39,240)	(440)	40,783	(42,495)	36,189	(231,784)	(76,098)	62,815	11,522	(99,397)				
45	(1,451)	0	23,957	(1,827)	15,991	(92,216)	(5,478)	(57,065)	51,342	31,963	3,612	56,507	2,126	(57,489)	57,080	(63,349)	(9,640)	29,950	(73,203)	(65,422)	98,814				
46	(1,356)	0	(14,116)	8,163	16,431	(24,096)	(10,032)	(63,120)	56,858	63,802	35,685	17,267	1,686	(16,706)	14,586	(27,159)	(241,424)	(46,148)	(10,388)	(53,900)	(584)	(88,995)	0	(727)	(384,274)