

Application No.: A.19-04-
Exhibit No.: _____
Witness: Khoang T. Ngo

PREPARED DIRECT TESTIMONY OF
KHOANG T. NGO
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

*****Public Version*****

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

April 15, 2019



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GLOSSARY OF ACRONYMS

1 **II. BACKGROUND**

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

12 The purpose of the TCBA is to accrue all CTC revenues and recover all CTC-eligible
13 generation-related costs. Pursuant to D.02-12-074 and D.02-11-022, payments to Qualifying
14 Facilities (“QFs”) that are above the market benchmark proxy are charged to the TCBA. Eligible
15 CTC expenses² reflect the difference between the market proxy and the contract price of costs
16 associated with certain QF contracts.

17 The purpose of the LGBA is to record the revenues and costs of generation and other
18 energy sources where the Commission has determined that the resource is subject to the Cost
19 Allocation Mechanism (“CAM”). Such generation may take the form of purchase power
20 agreements, company-owned generation units associated with new generation resources, and any
21 other resources approved by the Commission for CAM treatment.

¹ In compliance with D.03-12-063, the NGBA became effective January 1, 2004.
² Expenses eligible for CTC recovery are defined by Assembly Bill (“AB”) 1890.

1 **III. 2020 ERRA, CTC, AND LG REVENUE REQUIREMENT FORECASTS**

2 As shown in Table 1 below, SDG&E’s 2020 ERRA revenue requirement forecast is
 3 \$1,204.973 million, including forecasted GHG costs as well as franchise fees and uncollectibles
 4 (“FF&U”). The direct testimony of SDG&E witness Mr. Deturi provides a detailed discussion of
 5 the Greenhouse Gas (“GHG”) costs.

6 **TABLE 1 - ERRA REVENUE REQUIREMENT**
 7 **(\$Millions of Dollars)**

No.	Component	2020 Forecast		2019 Forecast		Change from Prior Year	
1.	Load ISO Charges		██████		██████		██████
2.	Supply ISO Revenues	██████		██████		██████	
3.	Contract Costs (non-CTC)	██████		██████		██████	
4.	Contract Costs (CTC up to market)	██████		██████		██████	
5.	Generation Fuel	██████		██████		██████	
6.	Net Supply ISO Revenues		██████		██████		██████
7.	Equity Re-balancing Costs		█		██████		██████
8.	CAISO Misc. Costs		██████		██████		█
9.	Hedging Costs		██████		██████		██████
10.	Direct and Indirect GHG Costs		██████		██████		██████
11.	Subtotal		1,190.513 ₃		1,215.534		(25.021)
12.	FF&U ⁴		14.460		14.763		(0.304)
13.	TOTAL⁵		1,204.973		1,230.297		(25.325)

8
 9
³ This includes the PABA revenue requirement of \$508.667 million (\$514.845 million including FF&U) for recovery of the above-market costs and revenues associated with all generation resources that are eligible for cost recovery through Power Charge Indifference Adjustment (“PCIA”) rates.

⁴ The 2020 and 2019 Forecasts reflect the franchise fee and uncollectible factor of 1.0121448.

⁵ Sums may not equal due to rounding.

1 While the GHG Forecast was formerly filed in a separate application, SDG&E began
 2 including the GHG Forecast within the ERRA Forecast beginning in 2016 (Application (“A.”)
 3 15-04-014), in accordance with D.14-10-033. Consistent with that approach, the 2020 GHG
 4 Forecast is included in this ERRA Forecast Application.

5 The forecasted cost components set forth in the line items contained in Table 1 above,
 6 and the reasons for the \$(25.325) million decrease in the 2020 ERRA revenue requirement
 7 forecast – as compared to the 2019 ERRA revenue requirement (as submitted in the 2019
 8 Forecast) – are addressed in Mr. Deturi’s testimony.

9 SDG&E’s 2020 ERRA revenue requirement forecast includes the fuel costs for its
 10 electric generation facilities, including Miramar Energy Facility I (“Miramar I”), Miramar
 11 Energy Facility II (“Miramar II”), Palomar Energy Center (“Palomar”), Desert Star Energy
 12 Center (“Desert Star”), and the Cuyamaca Peak Energy Plant (“Cuyamaca”). The actual fuel
 13 costs of Miramar I, Miramar II, Palomar, Desert Star, and Cuyamaca are recorded in the ERRA
 14 for recovery through commodity rates. SDG&E’s non-fuel costs for these facilities are recorded
 15 in the NGBA and also recovered through SDG&E’s commodity rates.

16 As shown in Table 2 below, SDG&E’s 2020 CTC revenue requirement forecast is
 17 \$17.103 million, including FF&U.

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

No.	Component	2020 Forecast	2019 Forecast	Change from Prior Year
1.	QF Contracts	16.898	17.493	(0.595)
2.	FF&U ⁶	0.205	0.212	(0.007)
3.	TOTAL	17.103	17.705	(0.602)

⁶ *Ibid.*

1 For CTC-eligible purchase power contracts, the power purchased is recorded to the
 2 ERRA at the market proxy of \$52.47/MWh. The difference between the actual contract price
 3 and the market proxy is included in the 2020 CTC forecast and recorded to the TCBA. SDG&E
 4 witness Mr. Deturi discusses the market proxy of \$52.47/MWh in greater detail.

5 As shown in Table 3 below, SDG&E’s 2020 Local Generation (“LG”) revenue
 6 requirement forecast is \$186.486 million, including FF&U.

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

No.	Component	2020 Forecast	2019 Forecast	Change from Prior Year
1.	New Generation PPAs			
2.	Combined Heat & Power			
3.	Energy Storage			
4.	Peakers			
5.	Local Generation GHG			
6.	SUBTOTAL	184.248	177.437	6.812
7.	FF&U ⁷	2.238	2.155	0.083
8.	TOTAL⁸	186.486	179.592	6.894

9 The LGBA was authorized in D.13-03-029. The LGBA records the LG costs and the
 10 revenues received from SDG&E’s LG rate. On a monthly basis, the LGBA compares the LG
 11 costs with the revenues received. Interest is applied to any over- or under-collected balance at
 12 the three-month Commercial Paper rate. The LGBA utilizes sub-accounts for each generation
 13 resource. In the 2019 LG Forecast, costs for new energy storage units were presented in the New
 14 Generation PPAs line. For the 2020 LG Forecast, energy storage is shown as a separate line
 15 item.

⁷ *Ibid.*

⁸ Sums may not equal due to rounding.

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

2 In SDG&E’s 2017 ERRRA Compliance Application, which is pending the approval in A.18-
3 06-002 , SDG&E presented a monthly summary of accounting entries recorded to the LGBA
4 during 2017, totaling \$14.4 million. In that application, SDG&E proposed to request cost
5 recovery in this 2020 ERRRA Forecast Application. Accordingly, SDG&E seeks recovery of the
6 2017 activity, as shown in Table 3 in the 2017 ERRRA Compliance Application.

7 **V. COMPARISON OF 2018 RECORDED VS ACTUAL YEAR-END BALANCES IN**
8 **GHG BALANCING ACCOUNTS**

9 In accordance with Finding of Fact (“FOF”) 13 of D.14-10-033, utilities must reconcile
10 forecast amounts with recorded amounts until all actuals are available for the forecast year.
11 Consistent with this methodology, SDG&E provides a comparison of the 2018 year-end
12 recorded/forecasted balances with the 2018 year-end actual balances in three GHG balancing
13 accounts in Table 4 below. More specifically, (1) GHG allowance revenues are recorded in the
14 GHG Revenue Balancing Account (“GHGRBA”); (2) expenses are recorded in the GHG
15 Customer Outreach and Education Memorandum Account (“GHGCOEMA”); and (3) expenses
16 are recorded in the GHG Administrative Costs Memorandum Account (“GHGACMA”).

TABLE 4 - COMPARISON OF 2018 RECORDED VS ACTUAL YEAR-END BALANCES IN GHG BALANCING ACCOUNTS

Line	Description	2018 Recorded ¹ (\$)	2018 Actual (\$)	Difference
	(1) GHGRBA			
1	Beginning Balance 1/1/2018	(6,529,128)	(6,529,128)	-
2	Allowance Revenue	(94,230,697)	(93,727,555)	503,142
3	Revenue returned to customers	90,690,451	94,634,580	3,944,129
4	Franchise Fees and Uncollectibles	(1,088,220)	(1,135,547)	(47,327)
5	Transfer to GHGCOEMA and GHGACMA ^{2,3}	48,463	48,463	-
5	Allowance Set Aside for Multi-Family Program ⁴	10,300,000	10,300,000	-
6	Interest	122,939	143,250	20,311
7	Ending Balance 12/31/2018	(686,192)	3,734,063	4,420,255
	(2) GHGCOEMA			
8	Beginning Balance 1/1/2018	(141,452)	(141,452)	-
9	Transfer from GHGRBA ²	1,485	1,485	-
10	Expenses	-	-	-
11	Interest	(2,583)	(2,665)	(82)
12	Ending Balance 12/31/2018	(142,550)	(142,632)	(82)
	(3) GHGACMA			
13	Beginning Balance 1/1/2018	(12,573)	(12,573)	-
14	Transfer from GHGRBA ³	(49,948)	(49,948)	-
15	Expenses	23,343	23,425	82
16	Interest	(1,088)	(1,082)	6
17	Ending Balance 12/31/2018	(40,266)	(40,178)	88
¹ Per A.18-04-004 (2019 ERRRA Forecast Update November 27, 2018) Attachment G. Template D-1: Annual Allowance Revenue Receipts and Customer Returns; and Template D-3: Detail of Outreach and Administrative Expenses. Recorded amounts represent actual recorded activity from January through September 2018 and forecasted amounts from October through December 2018.				
² Transfer per D.17-12-014 from GHGRBA to GHGCOEMA. This represents 1/1/18 projected overcollected balance of (\$141,485), plus 2018 forecasted expenses of \$140,000.				
³ Transfer per D.17-12-014 from GHGRBA to GHGACMA. This represents 1/1/18 projected undercollected balance of \$2,448, plus 2018 forecasted expenses of \$47,500.				
⁴ Transfer per D.17-12-014 from GHGRBA to SOMAHBA. This represents the program funding for 2018.				

1 **VI. GREEN TARIFF SHARED RENEWABLE BALANCING ACCOUNT**
2 **(“GTSRBA”)**

3 Per D.15-01-051, SDG&E established the GTSRBA⁹ to record the difference between the
4 revenues collected from individual customers electing to participate in the GTSR program and the
5 incremental costs incurred to serve customers participating in that program. The GTSR program
6 consists of both a Green Tariff (“GT”) component and an Enhanced Community Renewables
7 (“ECR”) component which are recorded in separate subaccounts with the GTSRBA. SDG&E’s
8 GTSR program began in 2016 and recorded minimal activity through 2018 as described in
9 SDG&E’s Annual GTSR Program Progress Report filed on March 15, 2019 (A.12-01-008).
10 SDG&E is not requesting recovery of prior year balances in this instant application.

11 **VII. TREE MORTALITY NON-BYPASSABLE CHARGE BALANCING ACCOUNT**
12 **(“TMNBCBA”)**

13 Per D.18-12-003, SDG&E filed AL 3343-E¹⁰ requesting approval to establish the
14 TMNBCBA to record the tree mortality related procurement costs incurred as directed by
15 Resolution E-4770 and Resolution E-4805. As noted in D.18-12-003, Ordering Paragraph (“OP”)
16 9, the TMNBCBA cost will be recovered through the public purpose program (“PPP”) charge. At
17 the time of this filing, AL 3343-E has not yet been approved. In AL 3343-E, SDG&E requested the
18 review of its 2017-2018 costs recorded in the BioMASSMA and BioRAMMA memorandum
19 accounts, and upon approval will transfer the balance in the BioMASSMA and BioRAMMA to the
20 TMNBCBA in this instant application. SDG&E will file an additional Advice Letter to request
21 review and approval of the 2019 costs in BioMASSMA and BioRAMMA after TMNBCBA is
22 approved.

⁹ See SDG&E Advice Letter (“AL”) 2889-E, approved June 23, 2016 and effective May 28, 2016.

¹⁰ See SDG&E AL 3343-E, filed on February 19, 2019, and currently pending approval.

1 SDG&E's 2020 TM NBC revenue requirement forecast is \$ [REDACTED] million (\$ [REDACTED]
2 including FF&U), which is described in Mr. Deturi's testimony. Once approved, this revenue
3 requirement and the 2018 year-end balance in the TMNBCBA will be included in the upcoming
4 October Electric PPP Filing for rates effective January 1, 2020. These costs will continue to be
5 recorded in the current BioMASS Memorandum Account (BioMASSMA) and BioRAM
6 Memorandum Account (BioRAMMA) until TMNBCBA is approved by the Commission.

7 **VIII. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)**

8 Pursuant to Commission Decision 18-10-019, the purpose of the PABA is to record the
9 "above-market" costs and revenues associated with all generation resources that are eligible for
10 cost recovery through the PCIA rates, including SDG&E's Utility-Owned Generation ("UOG").
11 Costs recorded in each vintage subaccount will include, but are not limited to, fuel, GHG costs,
12 third party power purchase contracts, and UOG's revenue requirement. The above-market costs
13 of all generation resources that are eligible for cost recovery through the PCIA rates, including
14 SDG&E's UOG, will be recorded in the PABA going forward. SDG&E's 2020 PABA revenue
15 requirement forecast is \$526.227 million, including FF&U.

16 SDG&E is currently waiting for the approval of its Tier 2 Advice Letter 3318-E
17 establishment of PABA preliminary statement and the necessary proposed modifications to the
18 ERRA. SDG&E's PABA account shall take effect January 1, 2019, subject to advice letter
19 approval. Above-market costs will continue to be recorded in ERRA until AL 3318-E is
20 approved and PABA is established.

21 **IX. SONGS UNIT 1 OFFSITE SPENT FUEL STORAGE**

22 This section of my testimony requests authorization of the SONGS Unit 1 Offsite Spent
23 Fuel Storage costs revenue requirement of \$1.097 million (\$1.11 million including FF&U) for

1 2020, which are described in Mr. Deturi's testimony. The authorized revenue requirement is
2 tracked in SDG&E's Nuclear Decommissioning Adjustment Mechanism account.

3 **X. SUMMARY**

4 My testimony presents the following revenue requirements for which SDG&E seeks
5 recovery in this 2020 ERRA Forecast Application:

- 6 ■ the 2020 ERRA revenue requirement forecast (which includes forecasted GHG
7 costs) of \$1,204.973 million;
- 8 ■ the 2020 CTC revenue requirement forecast of \$17.103 million; and
- 9 ■ the 2020 LG revenue requirement forecast of \$186.486 million.
- 10 ■ the 2020 TM NBC revenue requirement forecast of \$ [REDACTED] million.¹¹
- 11 ■ the 2020 PABA revenue requirement forecast of \$514.845 million

12 Each of these amounts include FF&U.

13 SDG&E also requests recovery of the December 31, 2017 LGBA activity of \$14.4
14 million.

15 In addition, my testimony also presents the comparison of the 2018 recorded/forecasted
16 vs. actual year-end balances in the GHG allowance revenues and expenses balancing accounts.

17 Finally, SDG&E requests that the Commission approve the 2020 revenue requirement of
18 \$1.097 million (\$1.11 million including FF&U) for the forecasted SONGS Unit 1 Offsite Spent
19 Fuel Storage costs.

20 This concludes my prepared direct testimony.
21

¹¹ Once approved, this revenue requirement and the 2018 year-end balance in the TMNBCBA will be included in the upcoming October Electric PPP Filing for rates recovery effective January 1, 2020.

1 **XI. QUALIFICATIONS**

2 My name is Khoang T. Ngo. I am employed by SDG&E as the Senior Energy
3 Administrator in the Settlements & Systems Department. My business address is 8315 Century
4 Park Court, San Diego, California 92123. My current responsibilities include handling the
5 payment, recovery, and regulatory reporting processes for SDG&E's procurement activities. I
6 began working in Settlements & Systems as a Senior Energy Administrator in November 2013.

7 I have been employed by SDG&E since January of 2000. In addition to my current role in
8 Settlements & Systems, I have worked in two other departments at SDG&E in positions of
9 increasing responsibility. From January 2000 to August 2006, I was employed in the Cost
10 Accounting group where I was primarily responsible for the accounting related to Electric
11 Transmission assets, prepared FERC Forms, and involved in the monthly close functions of the
12 transmission FERC accounts. From August 2006 to September 2013, I worked in the Electric
13 Transmission Planning group. My responsibilities included managing the generator
14 interconnection contracts, interconnection financial security deposits, CAISO study agreements
15 and reconciling engineering interconnection and network reliability costs.

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

GLOSSARY OF ACRONYMS

AB: Assembly Bill
CAISO: California Independent System Operator
CTC: Competition Transition Charge
CAM: Cost Allocation Mechanism
CPUC: California Public Utilities Commission
CUYAMACA: Cuyamaca Peak Energy Plant
DESERT STAR: Desert Star Energy Center
ECR: Enhanced Community Renewables
ERRA: Energy Resource Recovery Account
EECC: Electric Energy Commodity Cost
FASB: Financial Accounting Standards Board
FOF: Finding of Fact
FF&U: Franchise fee and uncollectible
GT: Green Tariff
GHG: Greenhouse Gas
GHGACMA: GHG Administrative Costs Memorandum Account
GHGCOEMA: GHG Customer Outreach and Education Memorandum Account
GTSRBA: Green Tariff Shared Renewable Balancing Account
GHGRBA: GHG Revenue Balancing Account
LG: Local Generation
LGBA: Local Generating Balancing Account
MIRAMAR I: Miramar Energy Facility I
MIRAMAR II: Miramar Energy Facility II
MWh: Megawatt hour
NGBA: Non-Fuel Generation Balancing Account
OMEC: Otay Mesa Energy Center
OP: Ordering Paragraph
PALOMAR: Palomar Energy Center
PABA: Portfolio Allocation Balancing Account
PPP: Public Purpose Program

QFs: Qualifying Facilities

SDG&E's: San Diego Gas & Electric Company's

SONGS: San Onofre Nuclear Generating Station

TCBA: Transition Cost Balancing Account

TMNBCBA: Tree Mortality Non-Bypassable Charge Balancing Account

UOG: Utility-Owned Generation

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

**DECLARATION
OF KHOANG T. NGO**

A.19-04-___

Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2020 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

I, Khoang T. Ngo, declare as follows:

1. I am a Senior Energy Administrator for San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s April 15, 2019 Application for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Senior Energy Administrator, I am thoroughly familiar with the facts and representations in this Declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

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

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

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

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

I, James Magill, 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 Kendall Helm, Vice President of Energy Supply. I have reviewed Khoang Ngo’s Prepared Direct Testimony (“Testimony”) in support of SDG&E’s “Application ... for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts 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.”) 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 15th day of April, 2019, at San Diego.



James Magill

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2020 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
Table 1, line 10: Direct and Indirect 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).	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.
Table 3, line 5: Local Generation GHG	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g).	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.

- 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. As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

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

Confidential Information	Matrix Reference	Reason for Confidentiality
Table 3, line 3: Energy Storage	II.B.1	Utility Retained Generation
Table 3, line 4: Peakers	II.B.3 II.B.4	Generation Cost Forecasts of QF Contracts; confidential for 3 years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.
Section VII, second paragraph, and section X Summary: Tree Mortality contract	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for 3 years.

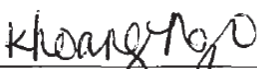
4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

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

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

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

Executed this 15th day of April, 2019, at San Diego, California.



Khoang T. Ngo
Senior Energy Administrator
San Diego Gas & Electric Company