

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2020
Electric Procurement Revenue Requirement
Forecasts and GHG-Related Forecasts

Application 19-04-010
(Filed April 15, 2019)

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

PUBLIC VERSION

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November 7, 2019

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I. INTRODUCTION

On April 15, 2019, San Diego Gas & Electric Company (“SDG&E”) submitted its Application for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). In November 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 (“November Update”). Consistent with that practice, and per the July 16, 2019 Scoping Memo and Ruling of Assigned Commissioner, SDG&E hereby submits its November Update, which consists of updated information sponsored by several SDG&E witnesses.

II. BACKGROUND

In the Application, SDG&E requested approval of its 2020 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Portfolio Allocation Balancing Account (“PABA”) and associated 2019 undercollection; (3) the Competition Transition Charge (“CTC”) revenue requirement recovered in the Transition Cost Balancing Account (“TCBA”);¹ (4) the Local Generation (“LG”) revenue

¹ The purpose of the TCBA is to accrue all the CTC revenues and recover all CTC-eligible generation-related costs.

requirement recovered 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 recovered in SDG&E’s Nuclear Decommissioning Adjustment Mechanism (“NDAM”) account; (6) the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement; and (7) the GHG allowance revenues and return allocations. SDG&E also requested approval to recover undercollected balances recorded to the LGBA. Lastly, SDG&E requested approval for its proposed 2020 (1) GHG Allowance Return rates; (2) Vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables Program. SDG&E’s Application was supported by the testimony of six witnesses. SDG&E requested approval of its Application for recovery in rates beginning January 1, 2020.

In November of each year, SDG&E updates the testimony it submitted earlier in the year with its April application. The November 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 (“IOU”) so that the MPB can be calculated. These assumptions typically do not become available until early November, as they include forward price curves for all the trading days in October.

Other updates to the ERRA testimony are warranted since approximately six months have passed since the filing of the Application, and various input assumptions have changed, including with respect to gas, electric and GHG forward price curves; the bundled load forecast; and Power Purchase Agreement contract terms and projected operations. These updates result in changes to forecasted ERRA, PABA, CTC and LG expenses and GHG quantities and expenses.

² 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”).

SDG&E has also made several additional updates based on Commission decisions or other relevant information that has become available since the submission of the Application. In Decision (“D”) 19-10-001, the Commission directed utilities to use vintage-billing determinants for calculating PCIA rates, calculate true-ups based on the updated MPBs provided by the Energy Division for PABA costs, and include in the ERRA Forecast November Update any under or over-collected balance associated with PABA. In AL-3318-E, the Commission approved the establishment of PABA to record PCIA revenues and expenses.

In accordance with Ordering Paragraph 11 of D.14-10-033, in which the Commission directed utilities to provide a fourth quarter update to its GHG forecast revenue and reconciliation request no later than November 15 of each year, SDG&E is providing its 2019 GHG Allowance Revenue and Expenses Reconciliation. This process consists of updating the 2019 recorded data to include actual revenues and estimated expenses from January through September 2019 and forecasted revenues and expenses from October through December 2019. Templates D-1 to D-5 of Appendix D to the Application have been updated accordingly, as SDG&E indicated it would do when it filed the Application (Application at 13). *See* Appendix D, attached hereto.

As required by Commission decisions in Application (“A.”) 13-08-002, annual GHG forecast applications (now incorporated into the ERRA forecast filing) include reconciliation of prior years. These prior years are unaffected by changes to the MPB, but volumetric changes to SDG&E’s 2018 GHG emissions, as well as changes to current year emissions, purchases and sales, have led to modifications to 2018-2019 GHG data, as further explained in the testimony of Ana Garza-Beutz. Final verification of annual emissions takes place August of the following year. The 2018 emission volumes became final on August 12, 2019 and both the 2018 volumes and costs have thus changed since the Application was submitted.

III. SUMMARY OF UPDATES TO THE APPLICATION

In the Application, SDG&E seeks approval of its total 2020 forecasted revenue requirement of \$1,488.132 million, which is comprised of several forecasts of specific items.³ In this November Update, SDG&E proposed certain changes to the April filing forecasts, as reflected in Table 1 below:

TABLE 1 – 2020 Revenue Requirement Forecasts⁴

Forecast	April 15, 2019 Application	November 7, 2019 Update
ERRA revenue requirement (includes 2020 forecast GHG costs of \$21.682 million)	\$690.126 million	\$801.225 million
PABA revenue requirement	\$514.845 million	\$363.426 million
CTC revenue requirement	\$17.103 million	\$18.725 million
LG revenue requirement	\$200.906 million	\$132.915 million
SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement	\$1.110 million	\$1.073 million
GHG allowance revenue return allocations	\$(0.437) million for EITE customers \$(3.741) million for small businesses \$(85.052) million for residential California Climate Credit	\$(0.427) million for EITE customers \$(2.902) million for small businesses \$(94.381) million for residential California Climate Credit
PABA undercollection		\$254.057 million
LGBA undercollection	\$14.420	\$14.420
Total 2020 forecasted revenue requirement	\$1,424.091 million	\$1,488.132 million

SDG&E also sought approval of certain forecasts used to calculate GHG allowance revenue return allocations. In this November Update, SDG&E has proposed certain changes to those forecasts, as reflected in Table 2 below:

³ See Application at 2.

⁴ Includes Franchise Fees and Uncollectibles.

TABLE 2 – 2020 GHG Revenue and Expense Forecasts

Forecast	April 15, 2019 Application	November 7, 2019 Update
GHG allowance revenues	\$105.614 million	\$112.360 million
GHG allowance revenue set aside for clean energy/energy efficiency programs	\$12.867 million	\$14.375 million
GHG administration, customer outreach and outreach plan costs	\$0.048 million	\$0.059 million

In the Application, SDG&E also compared the 2020 revenue requirement forecasts against the amounts that were currently effective in rates at that time and concluded that there was a combined total decrease of \$5.215 million. This combined total decrease represented a 0.27% decrease, or 0.63 cents per kilowatt hour. Based on those numbers, SDG&E projected that a typical non-CARE residential customer in the inland climate zone using 500 kilowatt hours could see a monthly winter bill decrease of 0.22%, or \$0.31. SDG&E also noted that the rates to be implemented on January 1, 2020 in connection with the revenue requirements for which it seeks approval could change if the Commission were to approve SDG&E's request to update its authorized sales.

Based on this November Update, SDG&E projects a combined total increase of \$148 million compared to the currently effective rates. This combined total increase represents a 2.04% increase, or 0.501 cents per kilowatt hours. Based on those numbers, SDG&E projects that a typical non-CARE residential customer in the inland climate zone using 400 kilowatt hours could see a monthly winter bill increase of 3.3%, or \$3.53. The main cause of this increase is due to the 2019 PABA undercollection being calculated in rates.

IV. SUPPORTING TESTIMONY

This November Update includes the testimony of six SDG&E witnesses. Each witness has prepared a markup (attached hereto) of their original, April 15, 2019 testimony, in which updates

are reflected in a redline format. Those witnesses (and summaries of the updates they performed) are as follows:

A. Mr. Stefan Covic

Mr. Covic updates SDG&E's 2020 forecasts of (1) the ERRA revenue requirement, which includes GHG costs; (2) the PABA revenue requirement; (3) the CTC revenue requirement; (4) the LG revenue requirement; and (5) the SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement and the sum of 2017 LGBA activity recorded to the LGBA presented in the testimony of SDG&E witness Khoang Ngo. Mr. Covic also provides a 2020 forecast of Tree Mortality Non-Bypassable Charge Balancing Account costs. Lastly, Mr. Covic's updated testimony supports Ms. Montanez's development of the GHG allowance revenue return allocation and the volumetric revenue return for small business and residential customers, the GTSR program, and the PCIA.

B. Ms. Khoang Ngo

Based on updated forecasts provided by Mr. Covic, Ms. Ngo updates SDG&E's 2020 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; (3) TMNBC revenue requirement; (4) PABA revenue requirement and the year-end forecasted 2019 PABA under collection balance and (5) the LG revenue requirement. Ms. Ngo also compares SDG&E's 2018 year-end balances with the actual 2018 year-end balances in the GHG allowance revenues and expenses balancing accounts, as well as reconciliation of the 2019 GHG Allowance Revenue & Expenses. Lastly, Ms. Ngo's testimony requests authorization of the revenue requirement of the SONGS Unit 1 Offsite Spent Fuel Storage costs.

C. Ms. Jennifer Montanez

Based on the updated revenue requirements provided by Ms. Ngo, Ms. Montanez updates the rate impacts associated with the ERRA, PABA, CTC, LG, SONGS and GHG revenue requirements. Based on 2020 Energy Division input factors that recently became available, Ms.

Montanez updates the CTC and PCIA rates. Ms. Montanez also calculates the above-cap portion of departed load's PCIA rates and the revenue requirement associated with the above-cap portion, which will be tracked in the PCIA under-collection balancing account ("CAPBA"). Ms. Montanez also updates the 2020 allowance revenue return based on updated information provided by Mr. Covic. Ms. Montanez also updates the 2020 rate components associated with the Green Tariff ("GT") and Enhanced Community Renewables ("ECR") programs.

D. Ms. Ana Garza-Beutz

Ms. Garza-Beutz's testimony updates revenues and costs for GHG compliance instruments to satisfy SDG&E's 2018-2019 compliance obligations under the cap-and-trade program. These updates are based on D.14-10-33 where utilities are given direction to report GHG information for "any years for which it is recording or reconciling costs and revenues" in addition to the forecast year. Ms. Garza-Beutz's testimony also includes SDG&E's 2018-2019 revenues related to the sale of its allowance allocation. Lastly, Ms. Garza-Beutz's testimony includes SDG&E's Weighted Average Cost ("WAC") calculation for 2018 and January – September 2019. The included WAC utilizes the methodology as required by D.14-10-033, subsequently corrected in D.14-10-055, D.15-01-024 and D.19-04-016.

E. Ms. Monica V. Chihwaro

Ms. Vazquez Chihwaro updates the recorded GHG Compliance Instrument costs expensed in the ERRA balancing account to reflect the actual GHG emissions and WAC by compliance period, in accordance with D.19-04-016, which are described in the testimony of Ms. Garza-Beutz. Based on the WAC calculations provided by Ms. Garza-Beutz, Ms. V. Chihwaro updated the GHG emissions expense to satisfy SDG&E's 2018-2019 compliance obligations under the cap-and-trade program.

F. Ms. April Bernhardt

Ms. Bernhardt updates the projected ongoing education and outreach costs related to the crediting of GHG allowance revenues on customers' bills in the year 2020.

V. CONFIDENTIALITY

Along with its 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.08-04-033, and D.14-10-033, as identified in SDG&E's confidentiality matrix. This November Update contains confidential information that is identified in SDG&E's confidentiality matrix and covered by declarations, which are being submitted herewith. SDG&E requests that the same confidential treatment requested with the original filing apply to the information marked confidential in this November Update.

VI. CONCLUSION

SDG&E respectfully requests that the Commission approve the forecasts and proposals in its Application (Application at 2-3 and 21-23), subject to the updates contained in this November Update.

Respectfully submitted,

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November 7, 2019

**UPDATED APPENDIX D TO APPLICATION
GHG REVENUE AND RECONCILIATION FORM**

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Appendix D of the Proposed Decision mailed 9/12/14 in A.13-08-002 et al. Appendix D provides specific information on reporting methodology and confidentiality treatment of data.

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

For Template D-4, each utility must provide the data in spreadsheet format, but may modify the template as appropriate to present the requested information by rate schedule.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	2013		2014		2015		2016		2017		2018		2019		2020	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ²	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A	12.09	N/A	13.13	N/A	13.23	N/A	15.63	N/A	16.35		18.29	
2 Allocated Allowances (MT)	6 919 341	6 919 341	6 549 142	6 549 142	6 426 430	6 426 430	6 406 805	6 406 805	6 460 042	6 460 042	6 288 321	6 288 321	6 186 936	6 186 937	6 143 946	
3 Revenues																
4 Prior Balance	N/A	N/A	(\$102 074 500)	(\$82 503 131)	(\$19 755 324)	(\$18 393 131)	\$31 586 221	\$31 892 368	\$3 775 309	\$4 334 942	(\$4 295 169)	(\$6 529 128)	(\$686 192)	\$3 734 063	\$1 310 790	
5 Allowance Revenue	(\$103 302 000)	(\$82 453 505)	(\$94 570 000)	(\$76 756 698)	(\$77 695 500)	(\$79 929 224)	(\$84 121 350)	(\$81 558 628)	(\$85 466 355)	(\$92 539 677)	(\$98 286 457)	(\$93 727 555)	(\$101 156 404)	(\$103 152 050)	(\$112 372 776)	
6 Interest	(\$49 626)	(\$28 773)	(\$28 773)	(\$47 002)	(\$76 463)	\$24 203	\$24 796	\$151 893	\$86 857	\$65 917	\$91 282	\$143 250	\$251 025	\$246 525	\$136 079	
7 Franchise Fees and Uncollectibles	\$0	\$0	(\$1 771 359)	(\$1 706 341)	(\$1 190 048)	(\$1 581 513)	(\$1 026 495)	(\$661 789)	(\$1 013 589)	(\$991 175)	(\$1 066 881)	(\$1 135 547)	(\$1 061 344)	(\$1 056 223)	(\$1 188 148)	
8 Subtotal Revenues	(\$103 302 000)	(\$82 503 131)	(\$198 444 632)	(\$161 013 172)	(\$98 717 335)	(\$99 879 665)	(\$53 536 828)	(\$50 176 155)	(\$82 607 777)	(\$89 129 994)	(\$103 557 225)	(\$101 248 980)	(\$102 652 905)	(\$100 227 685)	(\$112 114 056)	
9 Expenses																
10 Outreach and Administrative Expenses ³	\$1 227 500	\$0	\$187 500	\$801 369	\$334 835	\$334 989	\$80 036	\$80 994	(\$2 063)	(\$369)	\$48 463	\$52 210	(\$135 316)	(\$133 958)	\$29 021	
11 Franchise Fees and Uncollectibles	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
12 Interest	\$0	\$0	\$0	(\$119)	\$0	(\$154)	\$0	(\$958)	\$0	(\$1 694)	\$0	(\$3 747)	\$0	(\$1 358)	\$0	
13 Subtotal Expenses	\$1 227 500	\$0	\$187 500	\$801 250	\$334 835	\$334 835	\$80 036	\$80 036	(\$2 063)	(\$2 063)	\$48 463	\$48 463	(\$135 316)	(\$135 316)	\$29 021	
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs ⁴	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1 281 995	\$0	\$10 300 000	\$10 300 000	\$13 649 840	\$13 649 840	\$14 375 823	
15 Net GHG Revenues (Line 8 Line 13 Line 14)	(\$102 074 500)	(\$82 503 131)	(\$198 257 132)	(\$160 211 922)	(\$98 382 500)	(\$99 544 830)	(\$53 456 792)	(\$50 096 119)	(\$81 327 845)	(\$89 132 057)	(\$93 208 762)	(\$90 900 517)	(\$89 138 381)	(\$86 713 160)	(\$97 709 212)	
16 GHG Revenues to be Distributed in Future Years	\$0	\$0	\$51 037 250	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 Line 16)	(\$102 074 500)	(\$82 503 131)	(\$147 219 882)	(\$160 211 922)	(\$98 382 500)	(\$99 544 830)	(\$53 456 792)	(\$50 096 119)	(\$81 327 845)	(\$89 132 057)	(\$93 208 762)	(\$90 900 517)	(\$89 138 381)	(\$86 713 160)	(\$97 709 212)	
18 GHG Revenue Returned to Eligible Customers																
19 EITE Customer Return ^{5,6,7}	\$0	\$0	\$1 583 553	\$0	\$1 384 559	\$0	\$4 238 010	\$2 599 416	\$760 200	\$668 775	\$669 179	\$468 650	\$468 650	\$426 781	\$426 782	
20 Small Business Volumetric Return	\$0	\$0	\$10 982 219	\$11 533 823	\$6 954 493	\$13 247 750	\$3 648 498	\$4 062 057	\$2 701 990	\$3 100 138	\$3 638 944	\$4 330 020	\$2 798 095	\$2 931 110	\$2 901 607	
21 Residential Volumetric Return	\$0	\$0	\$45 915 031	\$35 582 852	\$31 314 308	\$39 050 655	\$0	\$1 767 675	\$0	(\$3 550)	\$0	(\$3 002)	\$0	(\$23)	\$0	
22 Subtotal EITE Volumetric Returns	\$0	\$0	\$58 480 803	\$47 116 675	\$39 653 361	\$52 298 405	\$7 886 508	\$8 429 148	\$3 462 190	\$3 765 363	\$4 308 123	\$4 795 668	\$3 266 745	\$3 357 868	\$3 328 389	
23 Number of Households Eligible for the California Climate Credit	-	-	1 224 253	1 306 520	1 224 251	1 313 989	1 306 630	1 319 006	1 314 398	1 330 804	1 325 052	1 340 879	1 370 670	1 351 630	1 352 478	
24 Per-Household Semi-Annual Climate Credit ⁴ (-0.5 x (Line 17 - 22) Line 23)	\$0.00	\$0.00	\$36.24	\$36.24	\$23.99	\$23.99	\$17.44	\$17.44	\$29.62	\$29.62	\$33.55	\$33.50	\$31.32	\$31.32	\$34.89	
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	\$0	\$0	\$88 739 079	\$94 702 116	\$58 729 139	\$79 138 793	\$45 570 284	\$46 001 913	\$77 865 656	\$78 837 566	\$88 900 639	\$89 838 912	\$85 871 636	\$84 666 082	\$94 380 823	
26 Revenue Balance (Line 15 Line 22 Line 25)	N/A	(\$82 503 131)	N/A	(\$18 393 131)	N/A	\$31 892 368	N/A	\$4 334 942	N/A	(\$6 529 128)	N/A	\$3 734 063	N/A	\$1 310 790	N/A	

¹ Includes 50% of 2013 allowance revenues and expenses.

² Recorded data reflects actual data for January to September 2019 (through the third quarter) and updated forecasted data for October to December 2019 (fourth quarter).

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

⁴ The 2017 recorded column includes the Multifamily Program set aside consistent with the March 18 2016 Administrative Law Judge ruling in the Development of a Successor to Net Energy Metering proceeding (Rulemaking 14-07-002). The 2018 forecasted column represents the October 24 2017 ALJ email ruling directing SDG&E to file an updated calculation of the amount attributable to Senate Bill 92.

⁵ SDG&E's forecasted 2016 EITE Customer Return represents Prior Year EITE Customer Return of \$2 968 113 to be distributed in 2016 as well as the 2016 forecasted EITE Customer Return of \$1 269 897.

⁶ In accordance with the methodology approved in D. 15-01-024 the EITE Customer Return forecast for 2017 includes: a) 2016 EITE return b) the 8-1-16 FF&U factor applied to the 2016 EITE return and c) the 9-1-13 FF&U for EITE returns from 2013 to 2016.

⁷ In accordance with D.15-01-024 the 2018 EITE Customer Return forecast includes the 2016 revenue returned to EITE customers and will be updated with the November update.

⁸ Due to timing in receiving approval of D.15-03-019 the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household. The October residential CCC was based on the authorized 2015 residential CCC of \$23.99 per household.

Line	Description	2013		2014		2015		2016		2017		2018		2019		2020	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	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	RPS Adjustment																
6.3	2013 Under-Reported True-Up (Section 95838 of C&T Regulation) ¹									(75,877)							
7	Qualifying Facility (QF) Contracts																
	Contract with Financial Settlement																
8	Subtotal																
9	Indirect GHG Emissions (MTCO2e)																
10	CAISO Market Purchases																
11	Contract Purchases																
12	Subtotal																
13	Total Emissions (MTCO2e)	3,396,398	3,678,547	3,473,713	3,390,681	4,811,519	3,013,119	4,203,567	4,543,471	4,243,313	4,521,153	3,879,311	4,247,722	3,778,406	2,453,157	3,905,980	
	Direct GHG Costs ²																
14	Proxy GHG Price (\$/MT)	\$17.35	\$13.57	\$14.44	\$12.04	\$12.09	\$12.79	\$13.13	\$12.84	\$13.23	\$14.57	\$15.63	\$15.31	\$16.33	\$17.29		
15	GHG Costs (\$)																
16	Direct GHG Costs ²																
16.3	Direct GHG Costs True-Up ³																
17	Direct GHG Costs - Financial Settlement																
18	Indirect GHG Costs																
19	Previous Year's Forecast Reconciliation ⁴	N/A	N/A	\$0	\$0	(\$25,881,702)	(\$30,475,620)	(\$7,355,343)	(\$16,295,922)	(\$7,874,871)	(\$21,964,804)	(\$8,449,696)	(\$8,449,696)	\$3,474,478	\$3,474,478	(\$24,241,201)	
20	Total Costs (\$)	\$89,750,005	\$61,221,829	\$61,715,000	\$64,361,474	\$32,289,561	\$24,934,218	\$47,848,837	\$39,973,966	\$48,264,166	\$39,814,470	\$52,187,054	\$55,661,532	\$63,251,423	\$41,010,222	\$47,199,173	
21	Forecast Variance ⁵ (\$)	N/A	(\$28,528,177)	N/A	\$2,646,474	N/A	(\$7,355,343)	N/A	(\$7,874,871)	N/A	(\$8,449,696)	N/A	\$3,474,478	N/A	(\$24,241,201)	N/A	

¹In October of 2018 SDG&E recognized a downward adjustment of the under-reported emissions from 2013 and recorded this adjustment in its updated 2017 emissions. The downward adjustment follows section 95838 of the Cap-and-Trade regulation which provides a formula for calculating compliance obligations for under-reporting in a previous compliance period. The result of that formula was a compliance obligation reduction of 75,877 MT.

²Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes. Direct costs for 2017 forward include true-ups.

³As described in the testimony of Ana Garza-Beutz, SDG&E adopted an approach (as per D.19-04-016) that splits Direct GHG costs from prior period true-ups of Direct Costs. This row captures the true-up costs that necessarily need to be added to the Direct Costs prior to recording.

The 2019 Recorded True-up includes an off-cycle \$155,105 true-up to finalize SDG&E's 2018 emission volumes. As of the time of the 2020 ERRA Forecast filing, this true-up amount had not yet been recorded. The amount will be recorded in November 2019.

⁴The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2013 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition, due to updates to recorded 2013 and 2014 amounts, this figure has been updated.

⁵Also reflects adjustment for shift in regulatory accounting from cash to accrual

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Status (Open/Closed) (B)	Bundled Customers				Unbundled Customers				Total
		Forecast MWh Sales (MWh) (C)	Forecast GHG Revenue Req ¹ (\$) (D)	Rate Impact (\$/kWh) ² (E)	Forecast GHG Revenue (\$) (F)	Forecast MWh Sales (MWh) (G)	Forecast GHG Revenue Req ¹ (\$) (H)	Rate Impact (\$/kWh) ² (I)	Forecast GHG Revenue (\$) (J)	Forecast GHG Revenue (\$) (K=F+J)
Residential		6,062,419	\$ 23,275,915	0.00384	\$ 93,827,004	42,544	N/A	N/A	\$ 553,733	\$ 94,380,737
DR	Open									
DR-LI	Open									
TOU-DR-E1	Open									
TOU-DR-E2	Open									
TOU-DR-E3	Open									
TOU-DR	Open									
DM	Open									
DS	Closed									
DT	Closed									
DT-RV	Open									
DR-TOU	Open									
DR-SES	Open									
EV-TOU	Open									
EV-TOU-2	Open									
Small Commercial		2,223,499	\$ 7,212,376	0.00324	\$ 2,736,244	38,947	N/A	N/A	\$ -	\$ 2,736,244
A	Closed									
TOU-A	Open									
ATC	Open									
A-TOU	Open									
UM	Open									
Med/Large C&I³		5,915,422	\$ 22,841,712	0.00386	\$ 291,752	3,525,242	N/A	N/A	\$ 265,021	\$ 556,773
AD	Closed									
AD-TOU	Closed									
AL-TOU	Open									
AY-TOU	Closed									
DGR	Open									
A6-TOU	Open									
OL-TOU	Open									
VGI	Open									
Agricultural		298,011	\$ 814,760	0.00273	\$ 35,371	24,649	N/A	N/A	\$ -	\$ 35,371
PA	Closed									
TOU-PA	Open									
PA-T-1	Open									
Streetlighting		79,522	\$ 200,371	0.00252	\$ -	465	N/A	N/A	\$ -	\$ -
LS-1	Open									
LS-2	Open									
LS-3	Open									
OL-1	Open									
OL-2	Open									
DWL	Open									
System Total		14,578,874	\$ 54,345,135	0.00373	\$ 96,890,372	3,631,847	N/A	N/A	\$ 818,754	\$ 97,709,126

¹In accordance with Section 2.5. of the Amended Joint Investor - Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap and-trade costs incurred will be captured as part of the larger ERRR true-up process. SDG&E will true-up total ERRR balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRR Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column D does not include a GHG cost reconciliation.

²Rate impacts are based on customer class.

³The VGI rate is based on the Medium and Large Commercial and Industrial rate.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Information	2013	2014	2015	2016	2017	2018	2019 (forecast)	2020 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,409,838	\$56,269,888	\$61,779,274	\$64,111,229	\$37,535,744	\$71,440,374
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$81,558,628)	(\$92,539,677)	(\$93,727,555)	(\$103,152,050)	(\$112,372,776)
3	Emissions Intensity (MTCO ₂ e/MWh) *	0.322	0.284	0.269	0.242	0.243	0.241		

* SDG&E Emissions Intensities are calculated based on renewable energy consumed and RECs associated with consumption in that year. It is not adjusted for RPS Compliance banking or modifications to RPS Adjustments in that year.



Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016		2017		2018		2019		2020	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded
1 Utility Outreach																
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Other (Consultant) ^{2,5}	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-	-	-	-	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-	-	-	-	-	-	-
5 Utility Administrative																
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	5,600	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	30,912	-	-	-	-	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	-	-	-	-	-	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	35,000	51,342	35,000	25,512	35,000	26,809	47,500	23,425	47,500	18,873	59,000	
10 Other ⁴	-	N/A	12,500	12,500	12,500	-	12,500	-	12,500	2,361	-	-	-	-	-	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	56,424	47,500	34,770	47,500	23,425	47,500	18,873	59,000	
12 Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	88,683	47,500	56,424	47,500	34,770	47,500	23,425	47,500	18,873	59,000	
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000		140,000	-	140,000	-	140,000	-				
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	88,683	187,500	56,424	187,500	34,770	187,500	23,425	47,500	18,873	59,000	

¹ Recorded data reflects actual data for January to September 2019 (through the third quarter) and updated forecasted data for October to December 2019 (fourth quarter).

² 2013 forecasted expenses were revised from D.13-12-041 to shift the \$52.5k for Targetbase costs from admin to outreach pursuant to Resolution E-4611.

³ 2014 forecasted expenses were revised from D.13-12-041 to shift the \$35k for marketing from outreach to administration pursuant to Resolution E-4611.

⁴ Direct labor costs associated with: (1) Subsequent pricing and credit updates to the billing system; (2) customer eligibility review and verification process; (3) Manual set-up and maintenance required for the identified EITE customers; and (4) Monitoring of check cutting activities related to Net Energy Metering customers.

⁵ Bill inserts and emails costs of \$19,540 booked to GHGCOEMA in April/May/December 2014 were transferred to GHGACMA in October 2015.