

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



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Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2017 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 16-04-018
(Filed April 15, 2016)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
TO OFFER PREPARED TESTIMONY AND APPENDICES INTO EVIDENCE**

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Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

November 17, 2016

**BEFORE THE PUBLIC UTILITIES COMMISSION
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**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
TO OFFER PREPARED TESTIMONY AND APPENDICES INTO EVIDENCE**

Pursuant to Rule 13.8(c) of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”) respectfully submits this motion to offer prepared testimony and appendices into evidence in this proceeding.

On April 15, 2016, SDG&E submitted its Application for Approval of its 2017 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Accompanying the Application were the prepared direct testimony of six SDG&E witnesses: Ms. Monica Vazquez Chihwaro, Ms. Ana Garza-Beutz, Mr. Benjamin A. Montoya, Ms. Norma Jasso, Ms. Yvonne Le Mieux, and Mr. Rick Janke. On November 7, 2016, SDG&E submitted its November Update to the Application (“November Update”). Accompanying the November Update were updated versions of the direct testimony of each of the six aforementioned witnesses (with Mr. Christopher Swartz adopting Ms. Le Mieux’s direct testimony and updating her testimony).

Certain information in the testimony submitted in April and November was confidential, and contemporaneously with both the Application and the November Update, SDG&E filed a Motion for Leave to File Confidential Materials Under Seal, Confidential Materials Attached and Filed Under Seal. In addition, each witness who sponsored confidential material included a

confidentiality declaration with their testimony and appropriately marked the confidential material.¹ Separate public versions (with confidential materials redacted) were also prepared. To ensure confidential treatment of this testimony, SDG&E is filing a motion to seal a portion of the evidentiary record under Rule 11.5(b) (“Motion to Seal”) concurrently with this motion.

SDG&E hereby moves the Commission to receive the following prepared testimony, inclusive of any attachments and appendices, and related declarations (attached hereto) into evidence in this proceeding:

Public/Redacted Version

1. Exhibit SDG&E-1 – Direct Testimony of Monica Vazquez Chihwaro;
2. Exhibit SDG&E-2 – Direct Testimony of Ana Garza-Beutz;
3. Exhibit SDG&E-3 – Direct Testimony of Benjamin A. Montoya;
4. Exhibit SDG&E-4 – Direct Testimony of Norma Jasso;
5. Exhibit SDG&E-5 – Direct Testimony of Christopher Swartz;
6. Exhibit SDG&E-6 – Direct Testimony of Rick Janke; and
7. Exhibit SDG&E-7 – SDG&E 2017 ERRRA/GHG November Update to Prepared Testimony (Vazquez Chihwaro, Garza-Beutz, Montoya, Jasso, Swartz, and Janke)

Confidential Version

8. Exhibit SDG&E-1C – Direct Testimony of Monica Vazquez Chihwaro - Confidential;
9. Exhibit SDG&E-2C – Direct Testimony of Ana Garza-Beutz - Confidential;
10. Exhibit SDG&E-3C – Direct Testimony of Benjamin A. Montoya- Confidential;

¹ Those witnesses were Ms. Vazquez Chihwaro, Ms. Garza-Beutz, Mr. Montoya, and Ms. Jasso. In addition, Appendix G (the GHG Revenue and Reconciliation Application Form) to the Application and the November Update contained confidential information, which was also covered by confidentiality declarations.

11. Exhibit SDG&E-4C – Direct Testimony of Norma Jasso- Confidential; and
12. Exhibit SDG&E-5C – SDG&E 2016 ERRRA/GHG November Update to Prepared Testimony – Confidential (Vazquez Chihwaro, Garza-Beutz, Montoya, and Jasso).

Respectfully submitted,

By: /s/ Christopher M. Lyons
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DECLARATIONS

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**DECLARATION OF MONICA VAZQUEZ CHIHWARO IN SUPPORT OF PREPARED
TESTIMONY**

I, Monica Vazquez Chihwaro, do hereby declare and affirm that I sponsor Exhibits 1 and 1-C, entitled “Prepared Direct Testimony of Monica Vazquez Chihwaro,” and portions of Exhibits 7 and 5-C, entitled “Updated Prepared Direct Testimony of Monica Vazquez Chihwaro.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Monica Vazquez Chihwaro whose witness qualifications are set forth in Exhibits 1 and 1-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 17th day of November, 2016 at San Diego,
California.

/s/ Monica Vazquez Chihwaro
Monica Vazquez Chihwaro

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**DECLARATION OF ANA GARZA-BEUTZ IN SUPPORT OF PREPARED
TESTIMONY**

I, Ana Garza-Beutz, do hereby declare and affirm that I sponsor Exhibits 2 and 2-C, entitled "Prepared Direct Testimony of Ana Garza-Beutz," and portions of Exhibits 7 and 5-C, entitled "Updated Prepared Direct Testimony of Ana Garza-Beutz." These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Ana Garza-Beutz whose witness qualifications are set forth in Exhibits 2 and 2-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 17th day of November, 2016 at San Diego,
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/s/ Ana Garza-Beutz
Ana Garza-Beutz

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**DECLARATION OF BENJAMIN A. MONTOYA IN SUPPORT OF PREPARED
TESTIMONY**

I, Benjamin A. Montoya, do hereby declare and affirm that I sponsor Exhibits 3 and 3-C, entitled "Prepared Direct Testimony of Benjamin A. Montoya," and portions of Exhibits 7 and 5-C, entitled "Updated Prepared Direct Testimony of Benjamin A. Montoya." These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Benjamin A. Montoya whose witness qualifications are set forth in Exhibits 3 and 3-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 17th day of November, 2016 at San Diego,
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/s/ Benjamin A. Montoya
Benjamin A. Montoya

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DECLARATION OF NORMA JASSO IN SUPPORT OF PREPARED TESTIMONY

I, Norma Jasso, do hereby declare and affirm that I sponsor Exhibits 4 and 4-C, entitled “Prepared Direct Testimony of Norma Jasso,” and portions of Exhibits 7 and 5-C, entitled “Updated Prepared Direct Testimony of Norma Jasso.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Norma Jasso whose witness qualifications are set forth in Exhibits 4 and 4-C in this proceeding. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 17th day of November, 2016 at San Diego,
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/s/ Norma Jasso
Norma Jasso

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**DECLARATION OF CHRISTOPHER SWARTZ IN SUPPORT OF PREPARED
TESTIMONY**

I, Christopher Swartz, do hereby declare and affirm that I sponsor Exhibit 5, originally entitled “Prepared Direct Testimony of Yvonne M. Le Mieux,” but which I have adopted as my own, and portions of Exhibit 7, entitled “Updated Prepared Direct Testimony of Christopher Swartz.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Christopher Swartz whose witness qualifications are set forth in Exhibit 7 in this proceeding. My qualifications to offer this testimony are set forth in that exhibit.

Sworn to under penalty of perjury this 17th day of November, 2016 at San Diego,
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/s/ Christopher Swartz
Christopher Swartz

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DECLARATION OF RICK JANKE IN SUPPORT OF PREPARED TESTIMONY

I, Rick Janke, do hereby declare and affirm that I sponsor Exhibit 6, entitled “Prepared Direct Testimony of Rick Janke,” and portions of Exhibit 7, entitled “Updated Prepared Direct Testimony of Rick Janke.” These exhibits were prepared by me or under my supervision, and the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Rick Janke whose witness qualifications are set forth in Exhibit 6 in this proceeding. My qualifications to offer this testimony are set forth in that exhibit.

Sworn to under penalty of perjury this 17th day of November, 2016 at San Diego,
California.

/s/ Rick Janke
Rick Janke