

**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: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2022, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Portfolio Allocation Balancing Account, Power Charge Indifference Adjustment Undercollection Balancing Account, Transition Cost Balancing Account, Local Generating Balancing Account in 2022, and (iii) Costs Recorded in Related Regulatory Accounts in 2022.

A.23-06-002
(Filed June 01, 2023)

**JOINT MOTION TO ENTER TESTIMONY AND EXHIBITS INTO THE
EVIDENTIARY RECORD**

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THE PUBLIC ADVOCATES OFFICE

March 22, 2024

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

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2022, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Portfolio Allocation Balancing Account, Power Charge Indifference Adjustment Undercollection Balancing Account, Transition Cost Balancing Account, Local Generating Balancing Account in 2022, and (iii) Costs Recorded in Related Regulatory Accounts in 2022.

A.23-06-002
(Filed June 01, 2023)

**JOINT MOTION TO ENTER TESTIMONY AND EXHIBITS INTO THE
EVIDENTIARY RECORD**

Pursuant to Rules 11.1, 13.7 and 13.8 of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure (“Rules”), the San Diego Gas & Electric Company (“SDG&E”), the Public Advocates Office at the California Public Utilities Commission (“Cal Advocates”), San Diego Community Power (“SDCP”) and Clean Energy Alliance (“CEA”) (collectively “the Parties”) respectfully file this Joint Motion to Enter Testimony and Exhibits into the Evidentiary Record (“Motion”) in the above-referenced proceeding.¹

I. DISCUSSION

As set forth in the Parties’ Joint Report Re Meet and Confer (Rule 13.9) dated March 8, 2024, the Parties have met and conferred and have stipulated to the admission of certain documents into the evidentiary record. Attached hereto as **Attachment A** is a joint exhibit list, which includes testimony previously served in this proceeding (along with accompanying

¹ Pursuant to Pub. Util. Code Section 1.8(d), SDG&E represents that it has been fully authorized by Cal Advocates, SDCP and CEA to file this Motion on their behalf.

attachments thereto), data request responses, and other documents that the parties hereby move into the evidentiary record of this proceeding.

The Parties respectfully move that all of the exhibits listed in Attachment A be admitted into the evidentiary record of this proceeding on the grounds that the material contained therein is relevant to the issues to be determined in this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling dated October 31, 2023.

Concurrent with the filing of its Application on June 1, 2023, SDG&E served Exhibits SDGE-1 through SDGE-6 on the official service list for its Record Year 2021 ERRRA Compliance Proceeding (A.22-06-001). All parties to this Record Year 2022 ERRRA Compliance Application (A.23-06-002) have since received a copy of those exhibits. On August 28, 2023, SDG&E served Exhibit SDGE-7 on the official service list for this proceeding. On February 23, 2024, SDG&E served Exhibits SDGE-8 through SDGE-11 on the official service list for this proceeding.

On December 22, 2023, Cal Advocates served Exhibit CALAD-01 on the official service list for this proceeding. On December 22, 2023, the SDCP and CEA jointly served Exhibit CCA-01 on the official service list for this proceeding. Through their meet and confer, the Parties have stipulated to the introduction of Exhibit CCA-02 into the record.

Pursuant to Rule 13.7(f), the Parties have individually submitted the public versions of the above referenced exhibits as "supporting documents" using the Electronic Filing System on the Commission's website. Links to the documents are contained in Attachment A hereto.

In addition, the Parties will be individually filing their respective Motions to Seal the Evidentiary Record under Rule 11.5 to request the protection of confidential versions of the proposed exhibits listed above.

II. CONCLUSION

For the reasons set forth above, the parties jointly request that the Commission grant their Joint Motion to Enter Testimony and Exhibits into the evidentiary record in this proceeding. All parties reserve the right to move additional exhibits into the evidentiary record as necessary to respond to the arguments raised by the other parties in their respective briefs.

Respectfully submitted,

/s/ Roger A. Cerda

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March 22, 2024

ATTACHMENT A
JOINT EXHIBIT LIST

Proceeding No.
A.23-06-002

Joint Exhibit List
SDG&E 2022 ERRA COMPLIANCE
March 22, 2024

ALJ
Rajan Mutialu

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
SDG&E EXHIBITS				
SDGE-1	Counts	Prepared Direct Testimony of Kevin M. Counts on Behalf of SDG&E (June 1, 2023)		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7151/527510324.pdf
SDGE-2	Bautista/ Karazuba	Prepared Direct Testimony of Joe Bautista on Behalf of SDG&E (June 1, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7151/527533685.pdf
SDGE-2C	Bautista/ Karazuba	Prepared Direct Testimony of Joe Bautista on Behalf of SDG&E (June 1, 2023) **CONFIDENTIAL VERSION**		Not applicable.
SDGE-3	Elliot	Prepared Direct Testimony of Stephen Elliot on Behalf of SDG&E (June 1, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7151/527510635.pdf
SDGE-3C	Elliot	Prepared Direct Testimony of Stephen Elliot on Behalf of SDG&E (June 1, 2023) **CONFIDENTIAL VERSION**		Not applicable.
SDGE-4	Menvielle	Prepared Direct Testimony of Michelle Menvielle on Behalf of SDG&E (June 1, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7151/527510636.pdf
SDGE-4C	Menvielle	Prepared Direct Testimony of Michelle Menvielle on Behalf of SDG&E (June 1, 2023) **CONFIDENTIAL VERSION**		Not applicable.
SDGE-5	Miller	Prepared Direct Testimony of Sheri Miller on Behalf of SDG&E (June 1, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7151/527512651.pdf
SDGE-5C	Miller	Prepared Direct Testimony of Sheri Miller on Behalf of SDG&E (June 1, 2023) **CONFIDENTIAL VERSION**		Not applicable.

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
SDGE-6	Scates	Prepared Direct Testimony of Andrew Scates on Behalf of SDG&E (June 1, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7151/527532656.pdf
SDGE-6C	Scates	Prepared Direct Testimony of Andrew Scates on Behalf of SDG&E (June 1, 2023) **CONFIDENTIAL VERSION**		Not applicable.
SDGE-7	Mondragon	Prepared Supplemental Testimony of Josue Mondragon Regarding Record Year 2022 Public Safety Power Shutoff Unrealized Sales and Revenue Calculations on Behalf of SDG&E (August 28, 2023)		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/6618/518816838.pdf
SDGE-8	Scates	Prepared Rebuttal Testimony of Andrew Scates on Behalf of SDG&E (February 23, 2024)		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7058/526147221.pdf
SDGE-9	Karazuba	Prepared Rebuttal Testimony of Amy Karazuba on Behalf of SDG&E (February 23, 2024)		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7058/526146998.pdf
SDGE-10	Chasse	Prepared Rebuttal Testimony of Josh Chasse on Behalf of SDG&E (February 23, 2024) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7058/526147878.pdf
SDGE-10C	Chasse	Prepared Rebuttal Testimony of Josh Chasse on Behalf of SDG&E (February 23, 2024) **CONFIDENTIAL VERSION**		Not applicable.
SDGE-11	Mondragon / Gahagan	Prepared Rebuttal Testimony Regarding Record Year 2022 Public Safety Power Shutoff Unrealized Sales and Revenue Calculations on Behalf of SDG&E (February 23, 2024)		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7058/526147545.pdf

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
CAL ADVOCATES EXHIBITS				
CALAD-01	Various	Testimony on Application of San Diego Gas & Electric Company for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2022 Complied with its Adopted Procurement Plan; and for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts (December 22, 2023) **PUBLIC VERSION**		Part One: https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/6940/521827556.pdf Part Two: https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/6940/521963244.pdf
CALAD-01C	Various	Testimony on Application of San Diego Gas & Electric Company for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2022 Complied with its Adopted Procurement Plan; and for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts (December 22, 2023) **CONFIDENTIAL VERSION**		Not applicable.
SDCP /CEA EXHIBITS				
CCA-01	Bencomo-Jasso	Prepared Direct Testimony of Carlo Bencomo-Jasso on Behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas and Electric Company's 2022 ERRR Compliance Proceeding (December 22, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7152/527510641.pdf
CCA-01C	Bencomo-Jasso	Prepared Direct Testimony of Carlo Bencomo-Jasso on Behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas and Electric Company's 2021 ERRR Compliance Proceeding (December 22, 2023) **CONFIDENTIAL VERSION**		Not applicable.

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
CCA-02	SDG&E	SDG&E Response to SDCP/CEA Data Requests Set 3 **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306002/7152/527510328.pdf
CCA-02C	SDG&E	SDG&E Response to SDCP/CEA Data Requests Set 3 **CONFIDENTIAL VERSION**		Not applicable.