

**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 2027
Electric Procurement Revenue Requirement
Forecasts, 2027 Electric Sales Forecast, and GHG-
Related Forecasts

Application 26-05-009
(Filed: May 15, 2026)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO SEAL
EVIDENTIARY RECORD PURSUANT TO RULE 11.5**

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September 25, 2026

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2027
Electric Procurement Revenue Requirement
Forecasts, 2027 Electric Sales Forecast, and GHG-
Related Forecasts

Application 26-05-009
(Filed: May 15, 2026)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO SEAL
EVIDENTIARY RECORD PURSUANT TO RULE 11.5**

Pursuant to Rules 11.1 and 11.5(b) of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, and Public Utilities Code (Pub. Util. Code) Sections 583 and 8380,¹ San Diego Gas & Electric Company (“SDG&E”) files this motion to seal portions of the evidentiary record containing confidential versions of prepared written testimony submitted in support of its 2026 ERRR Forecast Application, which contain commercially sensitive data (“Motion”). The material SDG&E seeks to protect is the confidential, unredacted version of SDG&E’s proposed exhibits (*i.e.*, prepared testimony) identified in the Joint Motion to Enter Testimony and Exhibits into the Evidentiary Record, which is being filed concurrently herewith.

Pub. Util. Code Section 583 provides that, “[n]o information furnished to the commission by a public utility ... except those matters specifically required to be open to public inspection by this part, shall be open to public inspection or made public except on order of the commission, or by the commission or commissioner in the course of a hearing or proceeding.” The confidential exhibits for which SDG&E requests confidential treatment are identified in the Joint Motion to Enter Testimony and Exhibits into the Record as follows:

PROPOSED EXHIBIT NUMBER	DATE	TITLE
SDGE-2C	May 15, 2026	Prepared Direct Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company (May 15, 2026) **CONFIDENTIAL VERSION**
SDGE-3C	May 15, 2026	Prepared Direct Testimony of LaRee Felan on Behalf of San Diego Gas & Electric Company (May 15, 2026) **CONFIDENTIAL VERSION**

¹ Pub. Util. Code Section 8380 protects customer-specific data, which may include demand, loads, names, addresses, and billing data.

PROPOSED EXHIBIT NUMBER	DATE	TITLE
SDGE-4C	May 15, 2026	Prepared Direct Testimony of Stephen M. Elliott on Behalf of San Diego Gas & Electric Company (May 15, 2026) **CONFIDENTIAL VERSION**
SDGE-5C	May 15, 2026	Prepared Direct Testimony of Sheri Miller on Behalf of San Diego Gas & Electric Company (May 15, 2026) **CONFIDENTIAL VERSION**
SDGE-8C	September 9, 2026	Prepared Rebuttal Testimony of Sheri Miller and Josh Chasse on Behalf of San Diego Gas & Electric Company (September 9, 2026) **CONFIDENTIAL VERSION**

Each of these exhibits includes a confidentiality declaration which: (1) describes the material for which SDG&E seeks confidential treatment; (2) the basis for the confidential treatment; and (3) the location of the confidential information in the document. A copy of the respective confidentiality declarations are also attached hereto at **Attachment A**.

For all the reasons described above, SDG&E requests that the Commission grant this request to file under seal the confidential, unredacted versions of these exhibits as required by Rule 11.5(b). A Proposed Ruling is attached to this Motion at **Attachment B**.

Respectfully submitted,

/s/ Krista deBoer
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Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

September 25, 2026

ATTACHMENT A
CONFIDENTIALITY DECLARATIONS

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

**DECLARATION
OF JIMMY ELIAS**

A.26-05-XXX

**Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2027 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts**

I, Jimmy Elias, declare as follows:

1. I am a Senior Resource Planner for San Diego Gas & Electric Company (“SDG&E”). I sponsored my Updated Prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2026 Application for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as the Senior Resource Planner, 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

- 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 (designated in Yellow Highlight)	Matrix Reference	Reason for Confidentiality and Timing
JE-3	V.C	LSE Total Energy Forecast – Bundled Customer; confidential for the front three years
JE-4 Table 1	IV.F	Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years
JE-5	VI.A VII.B	Utility Bundled Net Open Position for Capacity; confidential for the front three years Contracts and power purchase agreements between utilities and non-affiliated third parties
JE-7 Table 2	IV.A	Forecast of IOU Generation Resources; confidential for three years
JE-9	IV.B	Forecast of Qualifying Facility Generation; confidential for three years
JE-10	II.B.1 II.B.3 II.B.4 IV.J	Generation Cost Forecasts of Utility Retained Generation, confidential for three years, Generation Cost Forecasts of QF Contracts, confidential for three years, Generation Cost Forecasts of Non-QF Bilateral Contracts, confidential for three years, Forecast of Wholesale Market Purchases; confidential for the front three years
JE-11	II.A.2	Utility Electric Price Forecasts; confidential for three years,
JE-12	II.B.3	Generation Cost Forecast of QF Contracts; confidential for three years

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 (designated in Yellow Highlight)	Matrix Reference	Reason for Confidentiality and Timing
JE-13	II.B.1 II.B.4	Generation Cost Forecasts of Utility Retained Generation, confidential for three years, Generation Cost Forecasts of Non-QF Bilateral Contracts, confidential for three years,
JE-16, JE-17	I.A.4	Long-term Fuel (gas) Buying and Hedging; confidential for three years
JE-25 Table 4	Justification for confidentiality provided in Declaration of Chris Summers	GHG emissions forecast: Providing these forecasts to market participants would allow them to know SDG&E's GHG 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.
JE-25, JE-26, JE-27	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts, confidential for three years
Attachment A - SDG&E 2027 ERRR and LG Expenses	XI	Monthly Procurement Costs; confidential for three years
Attachment B - SDG&E 2027 Generation Portfolio Delivery Volumes - CTC and non-CTC QF generation data - UOG and non-UOG gas, pumped hydro storage, and battery storage generation data	IV.A IV.E IV.B IV.F	Forecast of IOU Generation Resources; confidential for three years Forecast of Pre-1/1/2003 Bilateral Contracts; confidential for three years Forecast of Qualifying Facility Generation; confidential for three years Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years

Location of Protected Information (designated in Yellow Highlight)	Matrix Reference	Reason for Confidentiality and Timing
Attachment D - SDG&E 2027 CTC Qualifying Facility (QF) Detail • CTC QF dispatchable and non-dispatchable data • Long-Term Power Purchase CTC data • TCBA Expenses data	IV.E IV.B II.B.4 II.B.3	Forecast of Pre-1/1/2003 Bilateral Contracts; confidential for three years Forecast of Qualifying Facility Generation; confidential for three years Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years Generation Cost Forecast of QF Contracts; confidential for three years
Attachment E - SDG&E Greenhouse Gas (GHG) Detail	Justification for confidentiality provided in Declaration of Chris Summers	GHG emissions forecasts: Providing these forecasts to market participants would allow them to know SDG&E's GHG 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.

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 May, 2026, at San Diego, California.

/s/ Jimmy Elias
 Jimmy Elias
 Senior Resource Planner
 San Diego Gas & Electric Company

Yellow highlighted information is confidential/privileged pursuant to applicable provisions of D.06-06-066, G.O. 66-D, and Pub. Util. Code Sections 583 and 454.5

ATTACHMENT G

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

I, Chris Summers do declare as follows:

1. I am the Director of Origination, Energy Supply, & Dispatch in the Energy Procurement 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 Jimmy Elias’s Prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2026 Application for Approval of Its 2027 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 May 2026, in San Diego.

/s/ Chris Summers

Chris Summers

Director of Origination, Energy Supply & Dispatch

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2027 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information (designated in Yellow Highlight)	Legal Authority	Narrative Justification
JE-25 Table 4, and Attachment E - SDG&E Greenhouse Gas (GHG) Detail Application Attachment G, Template D-2: Forecasted Emissions and Costs	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g).	The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information in that providing these GHG emissions 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.

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

**DECLARATION
OF LAREE FELAN**

A.26-05-XXX

**Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2027 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts**

I, LaRee Felan, declare as follows:

1. I am the Senior Supervisor for San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2026, Application for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as a Senior Supervisor, 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 Testimony and 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 Code¹. 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 Retention Period
Amounts highlighted in yellow in Table 1 of testimony named “ERRA Revenue Requirement”. Amounts highlighted in tab “Table 1 ERRA Revenue 2027” and tab “ERRA 2026 YE Forecast” of workpapers named “Balancing Accounts 2027 ERRA forecast workpapers_CONFIDENTIAL.xlsx”.	I.A.4	Long-term Fuel (gas) Buying and Hedging Plans; confidential for three years.
	II.A.2	Utility Electric Price Forecasts; confidential for three years.
	II.B.1	Generation Cost Forecasts of Utility Retained Generation; confidential for three years.
	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for three years.
	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
	V.C	LSE Total Energy Forecast; confidential for the front three years.

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 Retention Period
Amounts highlighted in yellow in Table 3 of testimony named “LGBA Revenue Requirement”. Amounts highlighted in tab “Table 3 LGBA Revenue 2027” and tab “2026 LGBA YE Forecast Balance” of workpapers named “Balancing Accounts 2027 ERRRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.B.1 II.B.3 II.B.4	Generation Cost Forecasts of Utility Retained Generation, confidential for three years. Generation Cost Forecasts of QF Contracts; confidential for three years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
Amounts highlighted in yellow in Section VIII and Table 5 of testimony named “TMNBCA Revenue Requirement”. Amounts highlighted in tab “Table 5 TMNBCA Revenue 2027” of workpapers named “Balancing Accounts 2027 ERRRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
Amounts highlighted in yellow in Table 8 of testimony named “PABA Revenue Requirement”. Amounts highlighted in tab “Table 8 PABA Revenue 2027” and tab “Attach C_2026 PABA YE Fcst Bal” of workpapers named “Balancing Accounts 2027 ERRRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.A.2 II.B.1 II.B.3 II.B.4	Utility Electric Price Forecasts; confidential for three years. Generation Cost Forecasts of Utility Retained Generation; confidential for three years. Generation Cost Forecasts of QF Contracts; confidential for three years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.

Location of Protected Information	Matrix Reference	Reason for Confidentiality and Retention Period
Amounts highlighted in yellow in Table 9 of testimony named “MCAMBA Revenue Requirement”. Amounts highlighted in tab “Table 9 MCAMBA Revenue 2027” of workpapers named “Balancing Accounts 2027 ERRRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.A.2	Utility Electric Price Forecasts; confidential for three years.
	II.B.1	Generation Cost Forecasts of Utility Retained Generation; confidential for three years.
	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for three years.
	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
	V.C	LSE Total Energy Forecast; confidential for the front three 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 May, 2026, at San Diego, California.

/s/ LaRee Felan
LaRee Felan
Senior Supervisor,
Energy Trading & Operations Support
San Diego Gas & Electric Company

Yellow highlighted information is confidential/privileged pursuant to applicable provisions of D.06-06-066, G.O. 66-D, and Pub. Util. Code Sections 583 and 454.5

ATTACHMENT B

DECLARATION OF AARON FRANZ REGARDING 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**

A.26-05-XXX

**Application of San Diego Gas & Electric Company (U 902-E)
For Approval of Its 2027 Electric Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts**

I, Aaron Franz, 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 LaRee Felan’s Prepared Direct Testimony (“Testimony”) in support of SDG&E’s “Application for Approval of its 2027 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 am providing this Declaration to demonstrate that the confidential information (“Protected Information”) in support of the referenced Testimony and 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 Code¹. 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 Retention Period
Amounts highlighted in yellow in Table 1 of testimony named “ERRA Revenue Requirement”. Amounts highlighted in tab “Table 1 ERRA Revenue 2027” and tab “ERRA 2026 YE Forecast” of workpapers named “Balancing Accounts 2027 ERRA forecast workpapers_CONFIDENTIAL.xls”.	I.A.4	Long-term Fuel (gas) Buying and Hedging Plans; confidential for three years.
	II.A.2	Utility Electric Price Forecasts; confidential for three years.
	II.B.1	Generation Cost Forecasts of Utility Retained Generation; confidential for three years.
	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for three years.
	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
	V.C	LSE Total Energy Forecast; confidential for the front three years.
Amounts highlighted in yellow in Table 3 of testimony named “LGBA Revenue Requirement”. Amounts highlighted in tab “Table 3 LGBA Revenue 2027” and tab “2026 LGBA YE Forecast Balance” of workpapers named “Balancing Accounts	II.B.1	Generation Cost Forecasts of Utility Retained Generation, confidential for three years.
	II.B.3	Generation Cost Forecasts of QF Contracts; confidential for three years.
	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.

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.

2027 ERRA forecast workpapers_CONFIDENTIAL.xlsx”.		
Amounts highlighted in yellow in Section VIII and Table 5 of testimony named “TMNBCA Revenue Requirement”. Amounts highlighted in tab “Table 5 TMNBCA Revenue 2027” of workpapers named “Balancing Accounts 2027 ERRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.B.4	Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
Amounts highlighted in yellow in Table 8 of testimony named “PABA Revenue Requirement”. Amounts highlighted in tab “Table 8 PABA Revenue 2027” and tab “Attach C_2026 PABA YE Fcst Bal” of workpapers named “Balancing Accounts 2027 ERRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.A.2 II.B.1 II.B.3 II.B.4	Utility Electric Price Forecasts; confidential for three years. Generation Cost Forecasts of Utility Retained Generation; confidential for three years. Generation Cost Forecasts of QF Contracts; confidential for three years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years.
Amounts highlighted in yellow in Table 9 of testimony named “MCAMBA Revenue Requirement”. Amounts highlighted in tab “Table 9 MCAMBA Revenue 2027” of workpapers named “Balancing Accounts 2027 ERRA forecast workpapers_CONFIDENTIAL.xlsx”.	II.A.2 II.B.1 II.B.3 II.B.4 V.C	Utility Electric Price Forecasts; confidential for three years. Generation Cost Forecasts of Utility Retained Generation; confidential for three years. Generation Cost Forecasts of QF Contracts; confidential for three years. Generation Cost Forecasts of Non-QF Bilateral Contracts; confidential for three years. LSE Total Energy Forecast; confidential for the front three 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 May, 2026, at San Diego.

/s/ Aaron Franz
Aaron Franz
Manager, Settlements & Systems

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

**DECLARATION OF STEPHEN M. ELLIOTT
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-24, *et al.***

I, Stephen M. Elliott, do declare as follows:

1. I am an Energy Trading Senior I in the Electric and Fuel Procurement department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Miguel Romero, Senior Vice President of Energy Innovation and Commercial Development. I have reviewed the Prepared Direct Testimony (“Testimony”) and Attachment G, the GHG Revenue and Reconciliation Application Form, in support of SDG&E’s “Application for approval of its 2027 Electric Procurement Revenue Requirement Forecasts and GHG Related-Forecasts (“Application”). I am personally familiar with the facts 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.”) D.16-08-024, D.17-05-035 and D.17-09-023 to demonstrate that the confidential information (“Protected Information”) provided in Mr. Elliott’s Testimony and Attachment G are within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachment A, 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 7th day of April 2026, at San Diego.

DocuSigned by:
Stephen M. Elliott
647E885B23E2473...

Stephen M. Elliott
Energy Trading Senior I, Electric & Fuel Procurement

ATTACHMENT A

SDG&E Request for Confidentiality on the following information contained in Stephen M. Elliott's Testimony and Attachment G in support of SDG&E's Application

Location of Protected Information	Legal Citations	Narrative Justification
1. SDG&E Direct GHG prices and Direct GHG calculations <i>(The 2025 Direct GHG price appears in Stephen M. Elliott's Testimony. The 2013 - 2025 Direct GHG calculations are utilized in tab "D-2" of Attachment G.</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024 The Matrix makes the following confidential: "Weighted Average Cost (WAC) of compliance instruments, and the calculation of WAC" Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
2. Historical/Recorded UOG Emissions	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.

Location of Protected Information	Legal Citations	Narrative Justification
<i>(The 2025 Historical UOG Emissions appear in Stephen M. Elliott's Testimony. The 2013- 2025 Recorded UOG Emissions appear in Attachment G of this Application.)</i>	General Order (“GO”) 66-D 17 CCR § 95914(c) (the “ARB Confidentiality Regulations”) Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded UOG emissions as confidential Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.” Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
3. <i>Historical/Recorded California Tolling Agreement Emissions</i> <i>(The 2025 Tolling Agreement Emissions appear in Stephen M. Elliott's Testimony. The 2013- 2025 Tolling Agreement Emissions appear in Attachment G of this Application.)</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order (“GO”) 66-D 17 CCR § 95914(c) (the “ARB Confidentiality Regulations”) Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Tolling Agreements emissions as confidential Gov’t Code §§6254(k), 6254.7 (d), Evidence	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.” Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher

Location of Protected Information	Legal Citations	Narrative Justification
4. <i>Historical/Recorded Specified Imported MWh and calculated Emissions</i> <i>(The 2025 Specified Imported MWh and calculated Emissions appear in Stephen M. Elliott's Testimony. The 2013- 2025 Recorded Specified Imported Emissions appear in Attachment G of this Application.)</i>	Code 1060, Civil Code §3426 et seq. D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Energy Imports (Specified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers. The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
5. <i>Historical/Recorded Unspecified Imported MWh and calculated Emissions</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations")	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of

Location of Protected Information	Legal Citations	Narrative Justification
<i>(The 2025 Unspecified Imported MWh and calculated Emissions appear in Stephen M. Elliott's Testimony. The 2013- 2025 Unspecified Imported Emissions appear in Attachment G of this Application.)</i>	Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
6. Historical RPS Adjustment eligible MWh and calculated Emissions <i>(The RPS Adjustment eligible MWh and calculated Emissions for 2025 appear in Stephen M. Elliott's Testimony. The 2013- 2025 RPS Adjustment Emissions appear in Attachment G</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions, which includes any applicable RPS Adjustments as confidential. Knowledge of the MWh	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.

Location of Protected Information	Legal Citations	Narrative Justification
<i>of this Application.)</i>	makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	
7. Total Direct Compliance Obligation <i>(The 2025 Total Direct Compliance Obligation appears in Stephen M. Elliott's Testimony. The 2013- 2025 Total Direct Compliance Obligation appear in Attachment G of this Application.)</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Direct GHG Emissions Subtotal as confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
8. Indirect Purchases in MWh and calculated Emissions	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.

Location of Protected Information	Legal Citations	Narrative Justification
<i>(The 2025 forecasted Indirect Purchase MWhs and calculated Emissions appear in Stephen M. Elliott's Testimony. The 2013-2024 final and 2025 forecasted Indirect Emission calculations appear in Attachment G of this Application.)</i>	17 CCR § 95914(c) (the “ARB Confidentiality Regulations”) Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Indirect GHG Emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus, the MWh are also confidential. Gov’t Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.” Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
9. Direct GHG Costs <i>(The 2025 Direct GHG Costs appear in Stephen M. Elliott's Testimony. The 2013 – 2024 final and 2025 estimated Direct GHG Costs appear in Attachment G of this Application.)</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order (“GO”) 66-D 17 CCR § 95914(c) (the “ARB Confidentiality Regulations”) Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Direct GHG Costs as confidential.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost (“WAC”) and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E’s bidding/consignment strategies contain “commercial value,” which gives SDG&E “an opportunity to obtain a business advantage over competitors who do not know or use it.” Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher

Location of Protected Information	Legal Citations	Narrative Justification
	Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
10. Estimated Indirect GHG Costs <i>(The 2025 estimated Indirect GHG Costs appear in Stephen M. Elliott's Testimony. The 2013 - 2025 estimated Indirect GHG Costs appear in Attachment G of this Application.)</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Indirect GHG Costs as confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
11. GHG Quarterly Auction Revenue <i>(The 2025 GHG Quarterly Auction Revenues</i>	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations")	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.

Location of Protected Information	Legal Citations	Narrative Justification
<i>appear in Stephen M. Elliott's Testimony. The 2013 - 2025 actual GHG Quarterly Auction Revenues appear in Attachment G of this Application.)</i>	1a. of Attachment A of D.14-10-033 and revised in D.15-01-024 1a. makes the following confidential: "AB 32 GHG auction participation." Although Annual Auction Revenues are public, Quarterly Auction Revenues must be confidential since public auction settlement prices and Quarterly Auction Revenues would reveal SDG&E's quarterly auction participation as a consigner Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.

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

**DECLARATION
OF SHERI MILLER**

A.26-05-xxx

**Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2027 Electric Procurement Revenue Requirement Forecast, 2027
Electric Sales Forecast, and GHG-Related Forecasts**

I, Sheri Miller, declare as follows:

1. I am employed as an Energy Trading Operations & Support Principal at San Diego Gas & Electric Company (“SDG&E”). I included my Prepared Direct Testimony (“Testimony”) in support of SDG&E’s May 15, 2026 filing Application for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts, 2027 Electric Sales Forecast, and GHG-Related Forecasts (“Application”). Additionally, as an Energy Trading Operations & Support Principal, 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. Guardado’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 2 of testimony named “2027 PCIA Forecast Summary”	II.B.1 II.B.4	Generation Cost Forecasts of Utility Retained Generation, confidential for three years Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Cells highlighted in yellow in Attachment C “Forecasted 2026 Year End PABA Balance of PABA”	II.B.1 II.B.3 II.B.4 IV.A IV.F XI	Generation Cost Forecasts of Utility Retained Generation, confidential for three years Generation Cost Forecast of QF Contracts; confidential for three years Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years Forecast of IOU Generation Resources; confidential for three years Forecast of Post-1/1/2003 Bilateral Contracts; confidential for three years Detail of monthly variable cost on energy and utility operation (ERRA filings)
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL 2027 Fcst filing PCIA workpapers.xlsx”, tab ‘Utility Owned Generation’	IV.A	Forecast of IOU Generation Resources; confidential for three years

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 2027 Fcst 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 2027 Fcst filing PCIA workpapers.xlsx”, tab ‘PCIA Inputs’.	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)
Cells highlighted in yellow in the spreadsheet named “CONFIDENTIAL SDG&E 2027 ERRA Fcst Update 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 15th day of May 2026, in San Diego, California.

Sheri Miller

Sheri Miller
Energy Supply Operations & Support Principal

San Diego Gas & Electric Company

*Yellow highlighted information is confidential/privileged pursuant to applicable provisions of D.06-06-066,
G.O. 66-D, and Pub. Util. Code Sections 583 and 454.5*

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 Miguel Romero, Senior Vice President of Energy Innovation & Commercial Development. I have reviewed Sheri Miller’s Prepared Direct Testimony (“Testimony”) in support of the May filing of SDG&E’s “Application of San Diego Gas & Electric Company (U 902-E) for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts, 2027 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 15th day of May, 2026, 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 2027 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
Table 2, 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.

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

**DECLARATION
OF SHERI MILLER**

A.26-05-009

**Application of San Diego Gas & Electric Company (U 902-E)
for Approval of Its 2027 Electric Procurement Revenue Requirement Forecast, 2027
Electric Sales Forecast, and GHG-Related Forecasts**

I, Sheri Miller, declare as follows:

1. I am employed as an Energy Trading Operations & Support Principal at San Diego Gas & Electric Company (“SDG&E”). I included my Rebuttal Testimony (“Testimony”) in support of SDG&E’s May 15, 2026 filing Application for Approval of its 2027 Electric Procurement Revenue Requirement Forecasts, 2027 Electric Sales Forecast, and GHG-Related Forecasts (“Application”). Additionally, as an Energy Trading Operations & Support Principal, 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 rebuttal testimony 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 / Legal Reference	Reason for Confidentiality and Timing
Forecasted amounts in the Table in testimony named “SDG&E RA Sales Revenues”	II.B.1 II.B.4	Generation Cost Forecasts of Utility Retained Generation, confidential for three years Generation Cost Forecast of Non-QF Bilateral Contracts; confidential for three years
Actual amounts in the Table in testimony named “SDG&E RA Sales Revenues”	XI	Detail of monthly variable cost on energy and utility operation (ERRA filings)
Broker indications utilized for SDG&E planning	• Gov. Code § 7927.705 • Cal. Civil Code §§ 3426 <i>et seq.</i> • Gov. Code § 7922.000 (Balancing Test) • D.19-07-006 and D.20-02-054 • Pub. Util. Code 454.5(g)	Confidential information provided to utilities by third parties; information relevant to strategic business plans; market sensitive power procurement information

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.

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.

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 9th day of September 2026, in San Diego, California.

Sheri Miller

Sheri Miller

Energy Supply Operations & Support Principal
San Diego Gas & Electric Company

ATTACHMENT B
PROPOSED RULING

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

Application of SAN DIEGO GAS &
ELECTRIC COMPANY (U 902-E) for
Approval of its 2027 Electric Procurement
Revenue Requirement Forecasts, 2027 Electric
Sales Forecast, and GHG-Related Forecasts

Application 26-05-009
(Filed May 15, 2026)

[PROPOSED] RULING

In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission (“Commission”) has considered the motion of San Diego Gas & Electric Company (“SDG&E”), filed September 25, 2026, to seal portions of the evidentiary record containing confidential materials (“Motion to Seal”), namely certain information in the confidential, unredacted version of exhibits presented in the Joint Motion to Enter Testimony and Exhibits into the Evidentiary Record.

The Commission rules as follows:

1. SDG&E’s Motion to Seal is GRANTED.
2. The protected materials in the confidential, unredacted versions of SDG&E’s Exhibits SDGE-2C, SDGE-3C, SDGE-4C, SDGE-5C and SDGE-8C presented in the Joint Motion to Enter Testimony and Exhibits into the Evidentiary Record are described in the declarations included with the Exhibits.
3. The confidential, unredacted version of Exhibits SDGE-2C, SDGE-3C, SDGE-4C, SDGE-5C and SDGE-8C shall remain under seal, and shall not be made accessible or disclosed to anyone other than the Commission staff except on the further order or ruling of the Commission, the Assigned Commissioner, the Assigned Administrative Law Judge (“ALJ”), or the ALJ then designated as Law and Motion Judge.

Dated _____, 2026 at San Francisco, California.

Administrative Law Judge