

Docket No.: A.26-05-009

Exhibit No.: _____

Date: August 19, 2026

Witness: Brian Dickman

**PREPARED DIRECT TESTIMONY OF BRIAN DICKMAN
ON BEHALF OF
SAN DIEGO COMMUNITY POWER AND CLEAN ENERGY ALLIANCE
IN SAN DIEGO GAS AND ELECTRIC COMPANY'S
2027 ERRR FORECAST PROCEEDING**

PUBLIC

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ATTACHMENTS

Attachment A:	Curriculum Vitae of Brian Dickman
Attachment B:	Select SDG&E Responses to SDCP and CEA Data Requests
Attachment C:	SDG&E Monthly Volumes Reports
Attachment D:	SDG&E Response to SDCP and CEA Data Request Regarding AL 4817-E

1 **I. INTRODUCTION AND SUMMARY OF TESTIMONY**

2 San Diego Community Power (“**SDCP**”) and Clean Energy Alliance (“**CEA**”)
3 (together, the “**San Diego CCAs**” or “**SD CCAs**”) present this direct testimony in the
4 *Application of San Diego Gas and Electric Company (“**SDG&E**”) for Approval of its*
5 *2027 Electric Procurement Revenue Requirement Forecasts, 2027 Electric Sales*
6 *Forecast, and GHG-related Forecasts (“**Application**”).* This testimony has been
7 prepared on behalf of the SD CCAs by Brian Dickman, Partner and Chief Financial
8 Officer, NewGen Strategies and Solutions, LLC. Mr. Dickman’s qualifications are set
9 forth in Attachment A.

10 The SD CCAs have a particular interest in the Power Charge Indifference
11 Adjustment (“**PCIA**”) and the Portfolio Allocation Balancing Account (“**PABA**”), both
12 of which are charged to the SD CCAs’ customers through the PCIA rates for which
13 SDG&E seeks approval in this proceeding. This testimony focuses on the following
14 issues in Commissioner Baker’s July 22, 2026, Scoping Ruling:¹

- 15 1. Whether the Commission should approve SDG&E’s total 2027 forecast
16 revenue requirement and the amount of the 2027 Tree Mortality Non-
17 Bypassable Charge forecast revenue requirement, to become effective in rates
18 on January 1, 2027;
19
20 2. Whether the Commission should approve SDG&E’s revenue requirement
21 forecasts for the following:
22
23 a. 2027 Energy Resource Recovery Account (“**ERRA**”) revenue
24 requirement and projected 2026 ERRA year-end balance;
25
26 b. 2027 PABA revenue requirement and projected 2026 PABA year-end
27 balance;

¹ Application (“**A.**”) 26-05-009, *Assigned Commissioner’s Scoping Memo and Ruling*, pp. 2-4 (July 22, 2026) (“Scoping Ruling”).

- 1 5. Whether the Commission should approve SDG&E's proposed vintage PCIA
2 in rates; and
3
4 6. Whether the Commission should approve SDG&E's proposed 2027 Modified
5 Cost Allocation Mechanism ("MCAM") rates.
6

7 Based on my review of SDG&E's Application, supporting workpapers, and
8 responses to discovery, I make the following recommendations to bring SDG&E's
9 request in line with prior Commission decisions and just and reasonable ratemaking:

- 10 • The Commission should require SDG&E to forecast its 2027 sales of Resource
11 Adequacy ("RA") from PCIA-eligible resources as a percentage of projected
12 excess RA capacity rather than simply assuming sales will equal actual volumes
13 delivered from April 2025 through March 2026. Applying the percentage of
14 excess RA sold over the most recent twelve months increases average PCIA-
15 eligible Forecast Sold RA from 380 MW to 571 MW and reduces the 2027
16 Indifference Amount by \$26.5 million.
- 17 • The Commission should require SDG&E to classify the RA capacity buffer it
18 withholds from the market as Forecast Retained RA. Consistent with Decision
19 ("D") 19-10-001, Forecast Retained RA is the amount of RA compliance
20 allocations and RA retained for investor-owned utility ("IOU") use. If SDG&E
21 has not yet determined its 2027 year-ahead buffer, it should include the buffer
22 withheld in its 2026 year-ahead solicitation.
- 23 • The Commission should direct SDG&E to apply a vintage-specific normalizing
24 adjustment to its generation revenue allocation factors, calculated as the ratio of
25 vintage-specific class sales to bundled customer class sales for the forecast period.
26 Applying a single set of allocation factors across all vintages, regardless of class

1 mix, leaves departed load residential customers paying PCIA rates that are
2 disproportionate to their bundled counterparts, contrary to D.18-10-019.

- 3 • The Commission should require SDG&E to present a Medium Commercial
4 MCAM rate for the Commission's consideration in the current case or through a
5 Tier 2 advice letter filed after the Commission's final decision in this case.

6 SDG&E would need to recalculate the MCAM 12 coincident peak ("**12-CP**")
7 allocation factor to separate the Medium Commercial class and to calculate an
8 MCAM rate specific to that class.

- 9 • The Commission should direct SDG&E to demonstrate in its October Update that
10 it has removed the \$29 million GRC Memorandum Account amortization
11 included in its as-filed 2027 PCIA forecast.

12 **II. DETERMINING PCIA AND BUNDLED COMMODITY RATES**

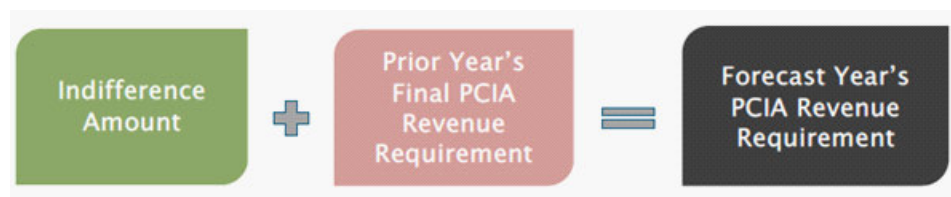
13 **A. PABA Background and PCIA Rate Development.**

14
15 Community Choice Aggregator ("**CCA**") customers receive generation services
16 from their local CCA, and receive transmission, distribution, billing, and other services
17 from the incumbent IOU. CCA customers pay CCA-specific generation rates. CCA rates
18 are partially influenced by local mandates to procure and maintain clean electricity
19 portfolios that in many cases exceed state requirements for renewable generation. In
20 addition, CCA and other unbundled customers are subject to several non-bypassable
21 charges ("**NBCs**"), including PCIA rates to recover above market costs of the utility's
22 PCIA-eligible resources and the Local Generation Charge ("**LGC**") rate to recover Cost
23 Allocation Mechanism ("**CAM**") costs.

The Commission has an obligation to ensure “indifference,” meaning when customers of IOUs depart from bundled service and receive their electricity from a non-IOU provider, such as a CCA, “those customers remain responsible for costs previously incurred on their behalf by the IOUs — but only those costs.”² The PCIA is the tool the Commission adopted “intend[ing] to equalize cost sharing” between bundled and unbundled customers.³ This is a two-way street. Departed load is responsible for those unavoidable portfolio resource costs that the IOU incurred on its behalf, but those customers are also entitled to a credit or allocation of the benefits from that portfolio.

The PCIA revenue requirement is derived from two sources in each utility's ERRA forecast case, as demonstrated in Figure 1. The first is the Indifference Amount forecasted for the year *for which* rates are being set, *i.e.*, the Indifference Amount forecasted for 2027 in the instant proceeding. The second is the final PCIA revenue requirement for the year *in which* rates are being set, *i.e.*, the final 2026 PCIA revenue requirement in the instant proceeding, which is derived from the balance in the PABA the utility anticipates seeing at the end of the year.

Figure 1



The utility updates the Indifference Amount annually in each year's ERRA Forecast proceeding. The Indifference Amount is the difference between the forecasted cost of the

² Rulemaking (“**R.**”) 17-06-026, *Scoping Memo and Ruling of Assigned Commissioner*, at 2 (September 25, 2017); *see also* Decision (“**D.**”) 18-10-019, p. 3 (Oct. 11, 2018).

³ See D.18-10-019 at 3.

IOU's supply portfolio and the forecasted market value of the IOU's supply portfolio, as demonstrated in Figure 2.

Figure 2



The forecasted Utility Portfolio Cost includes:

- (i) the cost for Utility-Owned Generation (“**UOG**”) (*i.e.*, the capital investment recovery and fixed maintenance costs the Commission sets in a General Rate Case (“**GRC**”)),
- (ii) the cost of purchased power, such as that from power purchase agreements (“**PPAs**”),
- (iii) fuel costs for UOG and PPAs with tolling agreements, and
- (iv) California Independent System Operator (“**CAISO**”) grid charges and revenues, net of any sales.⁴

The forecasted Utility Portfolio Value is derived from total eligible resource output (quantities) multiplied by the Market Price Benchmarks (“**MPBs**”). These MPBs are an administratively determined set of proxy values that is intended to estimate the market value of the IOU's resource portfolio (prices).⁵ Utility Portfolio Value consists of three principal components: Energy Value, Renewable Portfolio Standard (“**RPS**”) Value, and RA Value.

⁴ D.11-12-018, pp. 8-9 (Dec. 1, 2011).

⁵ D.19-10-001, p. 6 (Oct. 10, 2019) (“Market Value is the estimated financial value, measured in dollars, that is attributed to a utility portfolio of energy resources for the purpose of calculating the Power Charge Indifference Adjustment for a given year.”).

- Energy Value is the estimated financial value, measured in dollars, that is attributed to the non-RPS energy component of a utility portfolio for a given year.⁶
- RPS Value is the estimated financial value, measured in dollars, that is attributed to the renewable energy component of a utility portfolio for a given year above and beyond the Energy Value.⁷
- RA Value is the estimated financial value, measured in dollars, that is attributed to the resource adequacy component of a utility portfolio for a given year.⁸

MPBs are estimates of the value per unit (not total portfolio value) associated with the three principal sources of value in utility portfolios (non-RPS energy, RPS, and RA capacity).⁹ Each MPB must be multiplied by the relevant portfolio volume as part of the overall calculation of Portfolio Market Value:¹⁰

- Energy Index is the MPB that reflects the estimated market value of each unit of energy in a utility portfolio, in dollar value per megawatt hour (“\$/MWh”). It is sometimes referred to as “Brown Power Index,” “Brown Power component,” “Brown Power Adder,” or “Brown Power benchmark.”¹¹
- RPS Adder is the MPB that reflects the estimated incremental value of each unit of RPS-eligible energy in \$/MWh.¹²
- RA Adder is the MPB that reflects the estimated value of each unit of capacity in a utility portfolio that can be used to satisfy RA obligations, in dollar value per kilowatt-month (“\$/kW-month”).¹³

The forecast Utility Portfolio Value calculation is shown in Figure 3 below:

⁶ *Id.*
⁷ *Id.*
⁸ *Id.*
⁹ *Id.*
¹⁰ *Id.*
¹¹ *Id.* at 7.
¹² *Id.*
¹³ *Id.*

Figure 3



The forward-looking, forecasted ingredients of Utility Portfolio Cost and Utility Portfolio Value constitute the Indifference Amount portion of the PCIA revenue requirement.

The second Forecast PCIA revenue requirement ingredient is the true-up from the prior year's PCIA. This captures the difference between what the IOU predicted would happen in the prior year and the reality of what happened. It modifies the forecasted PCIA revenue requirement to reflect, among other things, actual revenues received for products sold from the portfolio and to reflect a zero-dollar value for products left unsold from the portfolio. The revenue requirement modification also updates the proxy market values (prices) for products the utilities used to serve bundled customers, changing the *forecast* energy, RPS, and RA MPBs to *final* energy, RPS, and RA MPBs. This “true-up” relies on the same methodology used for the forecast and determines the final portfolio value, as shown in Figure 4 below:¹⁴

¹⁴ Because the true-up for 2026 occurs during 2026, this true-up is developed using (1) actual values that are available to date and (2) a forecast of actual values for the remainder of the year. SDG&E's Application includes an estimate of the 2026 year-end PABA balance comprising a combination of actual entries from January through March 2026 and a projection of activity from April through December 2026. SDG&E's October Update should include an estimate of the 2026 year-end PABA balance comprising a combination of actual entries from January through August 2026 and a projection of activity from September through December 2026. The final December 31, 2026, advice letter implementing rates for 2027 will include actual entries.

Figure 4



Prior to D.18-10-019, the PCIA rate was set only on a forecast basis with no after-the-fact adjustment to the forecasted PCIA revenue requirement for unbundled customers.

Decision 18-10-019 approved such an adjustment via the PABA, a rolling balancing account tracking the difference between costs and revenues. The PABA is used to determine the difference between the forecasted PCIA revenue requirement and the actual costs and revenues SDG&E realizes during the year related to its PCIA-eligible resource portfolio

To summarize, SDG&E’s PCIA rates for 2027 will be set in this proceeding based on two components: (1) the forecasted Indifference Amount, *i.e.*, the difference between the forecasted cost of SDG&E’s generation portfolio in 2027 and the forecasted market value of SDG&E’s generation portfolio in 2027; and (2) the final 2026 PCIA revenue requirement based on the year-end balance in the PABA, also referred to as the 2026 “True-Up Amount” (capturing the under- or over-collection in 2026). The 2027 Indifference Amount and the final 2026 PCIA revenue requirement are added together to form the 2027 PCIA revenue requirement recovered through rates from bundled and unbundled customers (SDG&E calls this the PABA revenue requirement). SDG&E’s total proposed PABA revenue requirement is \$446.2 million.¹⁵

¹⁵ A.26-05-009, *Prepared Direct Testimony of Mindy Guardado on Behalf of San Diego Gas & Electric Company*, pp. MG-4 – MG-5 (May 15, 2026). Note: The value is the sum of the \$301.4 million PABA revenue requirement and the \$144.8 million PABA Year-end balance.

1 Each generation resource and departing customer is assigned a “vintage.” A
2 distinct portfolio of generation resources is identified for each vintage year based on
3 when a commitment to procure each resource was made. Customers are assigned to
4 vintage years according to the date they departed bundled IOU service.¹⁶ Customers
5 continuing to receive bundled service from the IOU are included in the latest vintage
6 (e.g., vintage 2027 in the current application). Each vintage is assigned both a separate
7 Indifference Amount and a separate final 2026 revenue requirement,¹⁷ and customers are
8 responsible for the cumulative Indifference Amount for years prior to and including their
9 vintage.

10 The overall PABA revenue requirement is allocated among both bundled and
11 unbundled customers based on the customers’ vintage and their rate class. SDG&E uses
12 generation revenue allocation factors based on its most recently approved GRC to allocate
13 costs among rate classes.¹⁸ The end result is a \$/kWh PCIA rate for each class within each
14 vintage of customer.

15 **B. ERRA Background and Commodity Rates Charged to Bundled Customers.**

16 Bundled customers receive all electric services from the IOU, including
17 generation, transmission, distribution, billing, and other services. Bundled customers pay
18 a commodity rate to recover the generation portion of the IOU revenue requirement not
19 included in other rates or surcharges—like unbundled customers, bundled customers are
20 subject to certain NBCs, such as the LGC for CAM costs. Bundled customers also pay

¹⁶ Unlike portfolio resources, customers are assigned to vintages using a July to June calendar period. For example, customers departing bundled service between July 2019 and June 2020 are assigned to the 2019 vintage.

¹⁷ D.11-12-018, p. 9 (Dec. 1, 2011).

¹⁸ D.18-10-019 at 122 and Ordering Paragraph (“**OP**”) 4.

1 their share of above-market costs of the utility’s PCIA-eligible resources. However, rather
2 than pay a specified PCIA charge, SDG&E includes bundled customers’ share of PCIA-
3 related costs in the commodity revenue requirement. These costs are recovered through
4 the bundled commodity rate.¹⁹

5 The advent of the PABA balancing account in D.18-10-019 affected the
6 formulation of the bundled customer commodity revenue requirement. Consistent with
7 that decision, costs to meet bundled customers’ energy and ancillary service requirements
8 through the California Independent System Operator (“CAISO”) market, along with the
9 cost of resources that are not eligible for recovery in the PABA or other mechanisms
10 (e.g., the CAM), are tracked in the ERRA.²⁰ The ERRA revenue requirement also
11 includes a charge representing the imputed cost of retained Renewable Energy Credits
12 (“RECs”) and RA products used to meet compliance requirements for bundled
13 customers, with an offsetting credit recorded to the PABA.²¹ The total bundled customer
14 commodity revenue requirement is calculated by combining ERRA costs with bundled
15 customers’ share of the above-market cost of PCIA-eligible contracts and utility-owned
16 resources.²² Further adjustments may be made for programs or issues specific to bundled
17 customers, and the sum total determines the final amount to be recovered through

¹⁹ D.20-03-019, OP 2 (Apr. 6, 2020).

²⁰ ERRA also features a rolling true-up of the actual costs to serve bundled customers and actual revenue received. Customers receiving bundled service from SDG&E during the time costs accrue to the ERRA balancing account are responsible for subsequent recovery, or refund, of the true-up balance.

²¹ SDG&E refers to this imputed cost as the ‘market cost’ of PCIA-eligible resources.

²² SDG&E often refers to its utility-owned resources as “NGBA” resources because the fixed costs for these resources are approved in general rate cases and recorded in the Non-Fuel Generation Balancing Account.

1 bundled commodity rates. SDG&E's Application includes a total commodity revenue
2 requirement of \$508.8 million.²³

3 SDG&E develops its commodity revenue requirement in the annual ERRA
4 Forecast proceeding based on expectations for the forecast year, including projected
5 bundled customer load, generation resource availability and operation, and CAISO
6 market conditions. Decision 22-03-003 authorized SDG&E to file annual sales forecasts
7 in its annual ERRA Forecast applications, ensuring that customer commodity revenue
8 requirement and rates are calculated using the latest sales forecast within the same
9 proceeding.

10 **III. THE COMMISSION SHOULD REQUIRE SDG&E TO FORECAST ITS 2027 RA**
11 **SALES CONSISTENT WITH ITS HISTORICAL RESULTS AND TO CLASSIFY**
12 **ITS RA BUFFER AS FORECAST RETAINED RA.**

13 Decision 19-10-001 required the IOUs, including SDG&E, to calculate the
14 Forecast RA Value in their respective ERRA Forecast proceedings using specific price
15 and quantity guidelines set forth therein.²⁴ RA capacity associated with PCIA-eligible
16 resources must be classified in one of three ways: Retained RA, Sold RA, or Unsold RA.

17 Retained RA is valued at the applicable RA Adder MPB and credited to the
18 PCIA. As the Commission explained in D.19-10-001, Forecast Retained RA includes the
19 IOU RA allocation and amounts of RA retained by the IOU for its own use.²⁵ The
20 Commission also clarified that the amount of RA retained for IOU use is the amount of

²³ Guardado Direct at Attachment A.1.

²⁴ D.19-10-001 at OP 2 ("Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall calculate Forecast Renewables Portfolio Standard Value and Forecast Resource Adequacy Value in their respective Energy Resource Recovery Account (ERRA) forecast proceedings by using the price and quantity descriptions listed in Table I and Table II of Attachment B").

²⁵ *Id.* at Attachment B, Table II.

RA not offered for sale or forecasted to be offered for sale.²⁶ Sold RA is valued at the actual sales price for actual transactions, or, for forecasted transactions, the value is estimated using the RA Adder MPB. Forecast Unsold RA is RA offered for sale but not sold or used by the IOU,²⁷ and it is valued at \$0 in the Indifference Amount calculation. Because Unsold RA contributes no offsetting value to the PCIA, whether SDG&E classifies its RA capacity as either Retained, Sold, or Unsold has a direct effect on 2027 Indifference Amount.

Table II from Appendix B of D.19-10-001 lays out each of these definitions as shown below.

Table II: Forecast RA Value (Price and Quantity)

	Price (\$/kW-year)	Quantity (MW)
Forecast Retained RA	June: Forecast RA Adder published in November of previous year November: Applicable Forecast RA Adder, as calculated by Staff	June: IOU forecasted RA allocations and amounts retained for IOU use ³³ November: Final RA allocations and the amounts forecasted retained for IOU use
Actual Sold RA	Actual prices for sales up to 45 days prior to ERRA Forecast filing (November update)	Actual volumes for sales up to 45 days prior to ERRA Forecast filing (November update)
Forecast Sold RA	Applicable Forecast RA Adder, as calculated by Staff	Applicable forecasted sold volumes
Forecast Unsold RA	\$0	Applicable forecasted unsold volumes ³⁴

A. SDG&E's Change in Method to Determine Forecasted RA Sales Understates 2027 RA Sales.

SDG&E's 2027 ERRA Forecast Application represents a substantive change in its methodology for forecasting non-MCAM Forecast Sold RA, ultimately resulting in the

²⁶ *Id.* at Attachment B, Table II, Footnote 33.

²⁷ *Id.* at 31 and 37.

1 lowest forecast amount of RA sales since 2022. This understatement creates a
2 misalignment between SDG&E's forecast and its actual historical RA sales and inflates
3 PCIA rates for all customers.

4 SDG&E's 2027 ERRRA Forecast includes an estimate of RA sales from both
5 MCAM and non-MCAM resources in its PABA and CAM generation portfolios. SDG&E
6 explains that RA sales revenues from PCIA-eligible resources—including both MCAM
7 and non-MCAM resources—are reflected as a reduction to the PABA revenue
8 requirement in the corresponding vintages, while RA sales revenues from CAM-eligible
9 resources are included as a reduction to the Local Generation Balancing Account
10 ("LGBA") revenue requirement.²⁸

11 SDG&E estimated RA sales from MCAM resources for 2027 based on the
12 requirements of D.23-12-014 and Advice Letter 4516-E.²⁹ SDG&E projects MCAM RA
13 sales averaging [REDACTED] per month.³⁰ SDG&E assumed its projected RA sales from non-
14 MCAM resources to be equal to actual sales volumes from a 12-month historical period.
15 SDG&E states that, "[f]or this May filing, SDG&E used the most recent 12 months of
16 historical RA sales to forecast 2027 RA sales. This is meant to be an approximation of
17 how much PCIA-eligible RA will actually be sold, and these revenue credits are included
18 in this 2027 PABA forecast, with no added buffer quantity."³¹ Based on workpapers
19 received in discovery, SDG&E's non-MCAM sales projection is equal to actual sales

²⁸ A.26-05-009, *Prepared Direct Testimony of Sheri Miller on Behalf of San Diego Gas & Electric Company*, p. SM-9 (May 15, 2026).

²⁹ *Id.* at SM-8.

³⁰ A.26-05-009, *Prepared Direct Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company*, p. JE-5 (May 15, 2026).

³¹ Miller Direct at SM-9.

with delivery from April 2025 through March 2026.³² The average non-MCAM RA sales volume is [REDACTED] per month from PCIA-eligible resources.³³ As a result, the total RA sales projected from PCIA-eligible resources ([REDACTED] from MCAM and [REDACTED] from non-MCAM) is 380 MW for 2027.³⁴

SDG&E’s total estimated average Forecast Sold RA of 380 MW from PCIA-eligible resources for 2027 is much lower than its Actual Sold RA since 2023 and is just over 50 percent of its Forecast Sold RA in its 2026 ERRA Forecast. Table 1 below summarizes actual Retained, Sold, and Unsold RA volume from 2022 through 2025, compared to SDG&E’s forecasts for 2026 and 2027.³⁵

Table 1: Retained, Sold and Unsold RA from PCIA-Eligible Resources

	Actual (MW)				Forecast (MW)	
	2022	2023	2024	2025	2026	2027
Retained RA	1,332	1,334	1,193	1,011	1,032	1,006
Sold RA	308	574	671	465	728	380
Unsold RA	485	377	590	762	709	1,145
Total	2,125	2,285	2,454	2,239	2,469	2,530
Excess PCIA RA Before Sales	792	951	1,260	1,228	1,437	1,524
% of Excess RA Sold	39%	60%	53%	38%	51%	25%

The reduction in estimated sales proposed for 2027 is particularly stark when compared to SDG&E's excess RA (*i.e.*, Total RA minus Retained RA) from PCIA resources over that same time period. Despite steady increases in excess RA available for sale, SDG&E’s 2027 forecast includes the lowest amount of RA sales since 2022. In fact,

³² Attachment B: *Select SDG&E Responses to SDCP and CEA Data Requests*, DRs 2.34, 2.35, and 2.37.

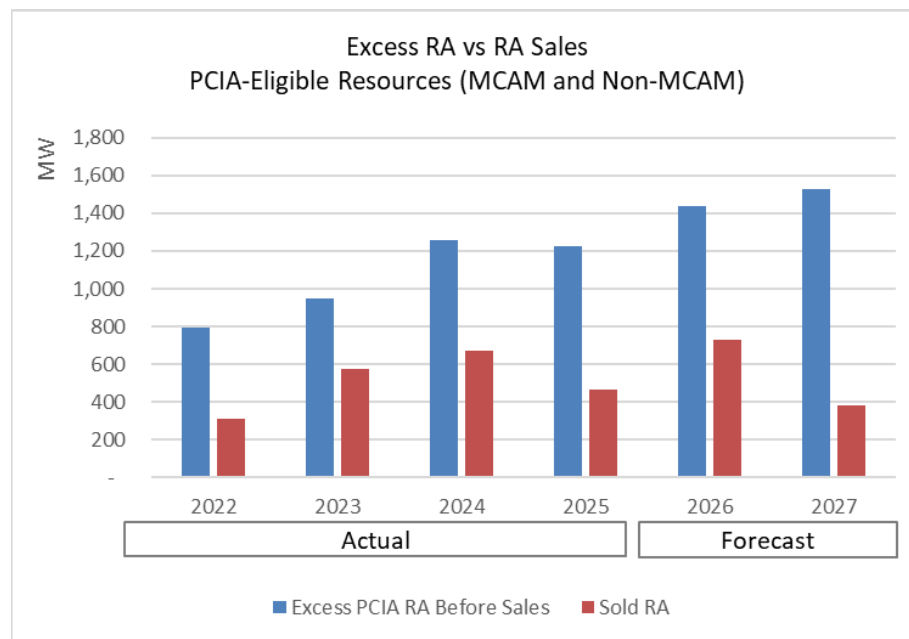
³³ *Id.* SDG&E also forecasts [REDACTED] of RA sales from CAM resources.

³⁴ Total PCIA-eligible Forecast Sold RA quantity provided in Guardado workpaper “PCIA Model_2027 ERRA Forecast May.xlsx”.

³⁵ Actual Retained, Sold, and Unsold RA from 2022 through 2025 sourced from SDG&E’s Monthly Volumes Reports provided in Attachment C.

SDG&E’s forecast of RA sales assumes it will only sell 25 percent of its excess RA, well below the percentage it actually sold each year from 2022 through 2025. Figure 5 below illustrates that despite the steady increase in excess RA capacity provided by SDG&E’s PCIA-eligible resources, SDG&E’s 2027 Forecast Sold RA is projected to be lower than any year since 2022.

Figure 5: Excess RA and RA Sales from PCIA-Eligible Resources



SDG&E’s proposed method for projecting 2027 non-MCAM Forecast Sold is a marked change from how SDG&E forecasted these sales in its 2025 and 2026 ERRA Forecast proceedings. In each of those cases, SDG&E first determined a monthly RA position based on the availability of each of its resources, minus the capacity it needed to retain for bundled customer RA compliance, a planning reserve margin, and a buffer held back to cover uncertainties. Any remaining excess capacity was assumed to be offered for sale to the market. In its 2025 ERRA Forecast SDG&E assumed it would sell 50% of the

1 non-MCAM excess RA in Q2 and 100% of the excess in Q3.³⁶ In its 2026 ERRRA
2 Forecast, SDG&E assumed it would sell 25% of the non-MCAM excess RA in Q1, Q2,
3 and Q4, and 100% of the excess RA in Q3.³⁷

4 For the 2027 ERRRA Forecast, however, SDG&E determined its non-MCAM
5 Forecast Sold RA by simply assuming it will equal actual RA sales with delivery from
6 April 2025 through March 2026. SDG&E gives no justification for this change in
7 approach, but states the result is meant to be an approximation of how much PCIA-
8 eligible RA will actually be sold.³⁸ But SDG&E's new approach reflects only April 2025
9 through March 2026; its actual sales over a longer historic period tell a different story.
10 Table 1 above demonstrates that SDG&E's proposed Forecast Sold RA for 2027 is
11 significantly understated compared to the actual amount of PCIA-eligible RA it typically
12 sells. Furthermore, SDG&E's proposal assumes that it will have a significant amount of
13 excess RA capacity that remains unsold every month in 2027, including summer months
14 when there is high demand for RA by all Load Serving Entities ("**LSEs**") in California.

15 Table 2 below provides the monthly details of SDG&E's proposed volumes of
16 Forecast Retained RA, Forecast Sold RA, and Forecast Unsold RA for 2027.

³⁶ A.24-05-010, Elias Testimony, Fall Update, p. JE-6.

³⁷ A.25-05-012, Fall Update, pp. JE-5 – JE-6.

³⁸ Miller Direct at SM-9.

Table 2: SDG&E Proposed Forecast RA, Monthly

Line Item	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Average
Total Net Qualifying Capacity (NQC)	2,195	2,285	2,303	2,411	2,461	2,805	3,040	2,637	2,685	2,428	2,290	2,289	2,486
Less: Forecast Sold RA													(380)
Subtotal NQC Adjusted for Sales													2,106
Forecast Retained RA - Local (MW)	547	561	556	583	548	647	724	777	804	715	583	545	633
Forecast Retained RA - Flex (MW)	0	0	0	0	0	0	0	0	0	0	0	0	0
Forecast Retained RA - System (MW)	324	329	326	338	314	369	381	464	457	439	380	356	373
Subtotal Forecasted Retained RA	872	890	881	921	862	1,016	1,105	1,240	1,261	1,155	963	902	1,006
Forecast Unsold RA (Total NQC less Sales less Retained)													1,101

To address SDG&E's forecast, the SD CCAs recommend that SDG&E estimate Forecast Sold RA volumes as a percentage of excess RA capacity projected to be available in the forecast period, similar to the approach used in the 2025 and 2026 ERRA Forecast proceedings. When asked to provide historical data demonstrating SDG&E's actual monthly excess RA and corresponding RA sales, SDG&E refused, but pointed the SD CCAs to SDG&E's Monthly Volumes Report which accompanies SDG&E's monthly PABA reporting and provides aggregated Actual Sold RA from PCIA-eligible resources.³⁹ Based on the Monthly Volume Reports, the SD CCAs determined the excess PCIA-eligible RA capacity available and the percentage of that capacity SDG&E has sold each month since 2022. Table 3 below provides the results.

Table 3: Percentage of Excess PCIA-Eligible RA Capacity Sold by Month

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022	30%	44%	24%	29%	16%	29%	33%	63%	100%	33%	48%	41%
2023	80%	84%	62%	39%	37%	44%	83%	47%	96%	48%	72%	52%
2024	33%	37%	32%	70%	45%	65%	76%	74%	45%	18%	84%	41%
2025	37%	32%	42%	17%	17%	28%	43%	52%	62%	41%	54%	34%
2026	47%	30%	18%	27%	32%							
Average % Sold	46%	45%	36%	37%	29%	41%	59%	59%	76%	35%	64%	42%
Most Recent 12 Months % Sold	47%	30%	18%	27%	32%	28%	43%	52%	62%	41%	54%	34%

³⁹ Attachment B at DR 2.38 Supplemental. Monthly Volumes Reports for 2022 through 2026 (as available) are provided in Attachment C to my testimony.

1 For the 2027 ERRA Forecast case, SDG&E should forecast its RA sales by
2 applying the percentage of excess PCIA-eligible RA sold during the most recent twelve
3 months to the projected excess PCIA-eligible RA capacity available in 2027. At the time
4 this testimony was prepared, the period of June 2025 through May 2026 was available.
5 Using the most recent twelve months of data is appropriate in this case given the
6 significant changes to the RA market related to the Commission's implementation of
7 Slice of Day RA compliance effective beginning in 2025.

8 One benefit of projecting RA sales as a percentage of excess RA capacity is that
9 changes in SDG&E's resource portfolio through 2027 can be taken into account. Table 1
10 above shows that SDG&E's need to retain RA for bundled customers has declined over
11 time, while the total RA capacity in its PCIA-eligible portfolio has increased. If SDG&E
12 has growing excess RA capacity, it should be able to sell more of it and increase RA sales
13 revenue that reduces the PCIA for all customers. By contrast, SDG&E's 2027 forecast
14 implies that *SDG&E will have over 1,100 MW of excess RA capacity that it classifies as*
15 *Unsold RA during 2027,* [REDACTED]

16 [REDACTED].
17 The SD CCAs have previously provided testimony in SDG&E's ERRA
18 Compliance proceedings demonstrating that SDG&E's RA sales have been suboptimal or
19 that insufficient RA value has been recognized in the PCIA, indicating a need to reform
20 SDG&E's Bundled Procurement Plan.⁴⁰ SDG&E's historical RA sales show that it is not
21 maximizing RA sales for the benefit of customers, in particular in high demand summer

⁴⁰ See generally, A.23-06-002, SDG&E 2022 ERRA Compliance Proceeding, Direct Testimony of Carlo Bencomo-Jasso; A.24-06-001, SDG&E 2023 ERRA Compliance Proceeding, Direct Testimony of Carlo Bencomo-Jasso; A.25-06-002, SDG&E 2024 ERRA Compliance Proceeding, Direct Testimony of Carlo Bencomo-Jasso.

1 months. While the SD CCAs’ proposal in this case relies on SDG&E’s past performance
2 to determine projected RA sales in 2027, doing so carries forward an assumption that
3 SDG&E will continue to have significant amounts of Unsold RA, increasing rates for
4 bundled and unbundled customers alike. As customer affordability has become a priority
5 in California, SDG&E should initiate new approaches or solutions aimed at improving
6 the success of its RA sales efforts and reducing the stranded value to ratepayers. The SD
7 CCAs continue to recommend that the Commission thoroughly consider revisions to
8 SDG&E’s Bundled Procurement Plan in the Integrated Resource Planning proceeding,
9 Rulemaking 25-06-019, to ensure customers receive as much value as possible from
10 SDG&E’s RA resources.⁴¹

11 In the instant proceeding, applying the SD CCAs’ recommended method to
12 SDG&E’s excess PCIA-eligible RA capacity in 2027 increases the average projected
13 PCIA-eligible Forecast Sold RA to 571 MW, an increase of 191 MW compared to 380
14 MW included in SDG&E’s initial filing. Of the 571 MW total PCIA-eligible RA sales
15 recommended by the SD CCAs, [REDACTED] would be from MCAM resources and [REDACTED]
16 from non-MCAM resources. Notably, SDG&E’s Actual Sold RA from 2022 through
17 2025 averages 504 MW, which is similar to the SD CCAs’ updated Forecast Sold RA
18 recommendation for 2027. Increasing RA sales as the SD CCAs recommend reduces the
19 2027 Indifference Amount by \$26.5 million.

20 SDG&E states in testimony that it “will also hold solicitations to sell 2027
21 resource adequacy from non-MCAM contracts,” and that “[i]f by the time the October

⁴¹ The Commission is currently slated to host workshops and accept comments on the IOUs’ Bundled Procurement Plans in R.25-06-019. *See* R.25-06-019, *Administrative Law Judge’s Ruling Requesting Comment on the Investor-Owned Utilities’ Bundled Procurement Plans, Proceeding Schedule, and Notice of Workshop* (Aug. 17, 2026).

1 update of this filing is calculated SDG&E has more up to date information regarding its
2 2027 RA sales, it will incorporate that information into the October update filing.”⁴² The
3 SD CCAs recommend that additional information regarding any executed 2027 RA sales
4 should be incorporated in the October update and should be used to update the remaining
5 excess RA available for sale in 2027.

6 **B. SDG&E Should Classify its RA Buffer as Retained RA.**

7 In its 2027 Erra Forecast Application, SDG&E deviates from its own prior
8 practice and that of other IOUs by declining to include RA buffer quantities in its forecast
9 of Retained RA. SDG&E routinely holds back a “buffer” in its RA solicitations. A buffer
10 is excess RA held back from the market to cover uncertainties related to its bundled
11 customer compliance needs.⁴³ In other words, rather than attempt to sell all of the RA
12 capacity available in excess of its RA compliance requirement, SDG&E holds onto some
13 of its excess RA capacity and does not offer it for sale in the market in case it is needed to
14 meet SDG&E’s own compliance needs for bundled customers. In removing anticipated
15 RA buffer quantities from its forecast of Retained RA, SDG&E now deprives customers
16 of the upfront value of resources it will, at least initially, hold for its own use.

17 As stated in Table II of D.19-10-001 Appendix B, Forecast Retained RA includes
18 “forecasted RA allocations *and amounts retained for IOU use*.”⁴⁴ The Commission
19 further clarified, “[t]he amount of RA retained for IOU use is the amount of RA not

⁴² Miller Direct at SM-9.

⁴³ A.24-05-010, *Prepared Direct Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company*, p. JE-5, lines 10-12 (May 15, 2024).

⁴⁴ D.19-10-001 at Attachment B, Table II (emphasis added).

1 offered for sale or forecasted to be offered for sale.”⁴⁵ By contrast, an IOU’s Forecast
2 Unsold RA is RA *offered for sale* but not sold or used by the IOU.⁴⁶

3 SDG&E uses an RA capacity buffer to benefit bundled customers by holding it
4 back from the market to ensure it can cover any contingencies and meet bundled
5 customer RA requirements, and in past ERRA Forecast proceedings SDG&E
6 appropriately recognized this buffer as Forecast Retained RA. In its 2025 ERRA
7 Forecast, SDG&E determined its monthly RA compliance requirement based on the most
8 constrained hour by month plus a 17% planning reserve margin and plus a monthly
9 buffer.⁴⁷ In that case, SDG&E provided testimony explaining: ⁴⁸

10 In addition, D.19-10-001 defines “Retained RA” as the “amount of RA not
11 offered for sale or forecasted to be offered for sale” from PCIA-eligible
12 resources. Similarly, SDG&E defines “RA Reserves”, as “capacity that is
13 not required to meet its annual and/or monthly RA compliance requirements
14 but it [sic] not offered for sale.” SDG&E clarifies its methodology for
15 forecasting RA sales: to the extent that it has RA Reserves (“i.e., buffer”),
16 this amount will be added to its RA capacity required to meet compliance
17 obligations and included in Retained RA, with the remaining capacity
18 offered for sale to the market.

19 In its 2026 ERRA Forecast, SDG&E again assumed that its monthly RA
20 compliance requirements included an RA buffer, but with updated quantities.⁴⁹ Notably,
21 this approach is the same used by SCE in its ERRA Forecast proceedings. SCE considers

⁴⁵ *Id.* at Attachment B, p. 1, Footnote 33.

⁴⁶ *Id.* at 31, 37.

⁴⁷ A.24-05-010, *Updated Prepared Direct Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company*, p. JE-6 (Oct. 21, 2024).

⁴⁸ A.24-05-010, *Prepared Rebuttal Testimony of Jimmy Elias*, p. JE-4 (Sep. 9, 2024).

⁴⁹ A.25-05-012, *Updated Prepared Direct Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company*, p. JE-6 (Oct. 14, 2025).

1 any RA capacity amount needed to meet its RA requirements, plus a buffer, to be
2 Retained RA.⁵⁰

3 SDG&E's 2027 ERRA Forecast no longer recognizes a buffer as Forecast
4 Retained RA, and in discovery, SDG&E confirmed that its calculation of Retained RA
5 for 2027 does not reflect any buffer quantity.⁵¹ SDG&E asserts that this accounting is
6 appropriate, as it considers the buffer to be a temporary designation for RA quantities that
7 it withholds during a given solicitation, but subsequently offers to the market.⁵² Prior to
8 each RA compliance month, SDG&E will dispose of the buffer in some way. It may end
9 up needing to use the reserved capacity in place of another resource, thereby turning the
10 buffer into Actual Retained RA. Or, if the capacity is not needed, SDG&E may attempt to
11 sell it to a third party. Depending on SDG&E's efforts and market demand, the capacity
12 previously held as a buffer may end up as Actual Sold RA or Actual Unsold RA.

13 While the buffer may ultimately end up as Actual Sold RA or Actual Unsold RA,
14 for the purposes of the forecast it is properly considered Retained RA, and SDG&E's
15 refusal to recognize the buffer as such is unreasonable. SDG&E withholds the buffer
16 capacity from the RA market during its RA solicitations, and therefore SDG&E's
17 decision not to classify the RA capacity it retains as a buffer for its own use as Forecast
18 Retained RA is directly at odds with the Commission's definition of Forecast Retained
19 RA. Accordingly, SDG&E's Forecast Retained RA should include the buffer, valued at
20 the RA Adder MPB, to recognize the value it provides for bundled customers during the
21 time SDG&E withholds the capacity from the market. Importantly, the final disposition

⁵⁰ A.26-05-006, SCE-01: *Energy Resource Recovery Account (ERRA) 2027 Forecast of Operations*,
p. 54 (May 15, 2026).

⁵¹ Attachment B at DR 3.16.

⁵² *Id.* at DR 3.19 Supplemental.

1 of the buffer will be reflected in the actual PABA accounting for 2027, and PCIA rates
2 will be trued up accordingly.

3 SDG&E's unwillingness to be transparent about the size of this buffer inhibits the
4 SD CCAs' ability to precisely quantify the impact of this problem. In discovery, SDG&E
5 refused to quantify the buffer held in its 2026 RA solicitation⁵³ and claims that it has not
6 yet decided how much buffer it will hold back in its 2027 year-ahead solicitation.⁵⁴

7 Because SDG&E has not yet determined anticipated buffer quantities for 2027,
8 the SD CCAs recommend that the Commission require SDG&E to include an RA buffer
9 in Forecast Retained RA based on the buffer withheld from the market in the latest
10 available year ahead RA solicitation. For example, if SDG&E has not yet decided what
11 buffer will be held in its 2027 year ahead RA solicitation, it should include the buffer
12 from its 2026 year ahead solicitation in the Forecast Retained RA in the current case.

13 **IV. THE COMMISSION SHOULD DIRECT SDG&E TO ADOPT A VINTAGE-**
14 **SPECIFIC NORMALIZING ADJUSTMENT TO GENERATION REVENUE**
15 **ALLOCATION FACTORS.**

16 Under its current methodology, SDG&E's PCIA revenue requirement allocation
17 to customer classes creates a disparity in SDG&E's departed load PCIA rates compared
18 to bundled commodity rates and an inherent cost shift between vintage-specific customer
19 classes. SDG&E uses generation revenue allocation factors to allocate the PCIA revenue
20 requirement among customer classes and to determine departed load PCIA rates. In
21 testimony, SDG&E states that, pursuant to D.18-10-019, its PCIA allocations to customer
22 classes will be consistent with the factors used to allocate generation costs to bundled

⁵³ Attachment B at DR 3.19, 3.19 Supplemental.

⁵⁴ *Id.* at DR 3.19, 3.19 Supplemental, 3.20.

1 customers.⁵⁵ In response to discovery, SDG&E explained that these generation revenue
2 allocation factors are derived from the electric energy commodity cost (“EECC”) class
3 revenue allocation proposed in this case, which uses the System Average Percent Change
4 (“SAPC”) methodology approved in D.25-09-006 to recover the projected bundled
5 customer commodity-related revenue requirement.⁵⁶ That commodity-related revenue
6 requirement includes (a) the ERRA revenue requirement, (b) bundled customers’ portion
7 of the PABA revenue requirement, and (c) bundled customers’ portion of the ERRA and
8 PABA year-end balances.⁵⁷ Class average bundled customer commodity rates—*i.e.*, the
9 commodity revenue requirement divided by forecasted bundled sales by class—are
10 provided in Attachment B.1 to SDG&E witness Guardado’s Testimony.

11 Due to variations in departed load customer class mix compared to bundled
12 customers, SDG&E’s application of the generation revenue allocation factors to the PCIA
13 revenue requirement across PCIA vintages is causing residential PCIA rates for departed
14 load customers to be higher relative to their bundled service counterparts. PCIA rates for
15 a given vintage may also be proportionally higher or lower than similar customers in a
16 different vintage. Table 4 below provides SDG&E’s proposed bundled commodity rates
17 and departed load PCIA rates beginning with vintage 2017. When viewed as a percentage
18 of the system average rate, there are clear differences in PCIA rates paid by departed load
19 customers and average bundled customer commodity rates by class.

⁵⁵ Guardado Direct at MG-3, lines 5-6.

⁵⁶ Attachment B at DR 2.12.

⁵⁷ Guardado Direct at MG-3, Footnote 4.

Table 4: Bundled Commodity Rates Versus PCIA Rates by Customer Class

	Vintage Specific PCIA Rates (\$/kWh)											Bundled Commodity Rates (\$/kWh)
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Residential	0.0320	0.0337	0.0336	0.0351	0.0333	0.0305	0.0306	0.0524	0.0536	0.0387	0.0387	0.1660
Small Commercial	0.0237	0.0249	0.0249	0.0260	0.0231	0.0208	0.0208	0.0401	0.0412	0.0280	0.0280	0.1502
Med Commercial	0.0257	0.0271	0.0270	0.0283	0.0250	0.0221	0.0222	0.0439	0.0450	0.0302	0.0302	0.1669
Large C&I	0.0265	0.0280	0.0280	0.0294	0.0252	0.0210	0.0211	0.0448	0.0461	0.0299	0.0299	0.1824
Agricultural	0.0239	0.0251	0.0251	0.0262	0.0240	0.0222	0.0223	0.0371	0.0379	0.0278	0.0278	0.1140
Lighting	0.0176	0.0186	0.0185	0.0194	0.0168	0.0147	0.0147	0.0297	0.0305	0.0203	0.0203	0.1139
System Total	0.0281	0.0296	0.0295	0.0309	0.0284	0.0254	0.0255	0.0472	0.0484	0.0336	0.0336	0.1665

	Vintage Specific Customer Class %											Bundled Class %
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Residential	114%	114%	114%	114%	117%	120%	120%	111%	111%	115%	115%	100%
Small Commercial	84%	84%	84%	84%	81%	82%	82%	85%	85%	83%	83%	90%
Med Commercial	92%	92%	92%	92%	88%	87%	87%	93%	93%	90%	90%	100%
Large C&I	95%	95%	95%	95%	89%	83%	83%	95%	95%	89%	89%	110%
Agricultural	85%	85%	85%	85%	85%	87%	87%	79%	78%	83%	83%	69%
Lighting	63%	63%	63%	63%	59%	58%	58%	63%	63%	60%	60%	68%
System Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Under SDG&E’s method, departed load PCIA rates are determined by allocating the PCIA revenue requirement in each vintage to customer classes using the *bundled customer* generation revenue allocation factors. SDG&E applies the same generation revenue allocation factor to all vintages, regardless of the customer class mix. Each vintage’s class-level revenue requirement is then divided by vintage-specific sales volume for each class. Therefore, if one vintage has class sales that are out of proportion with the bundled sales forecast underlying the generation revenue allocation factors—e.g., due to a CCA mass enrollment consisting of only commercial customers in one vintage, or only residential customers in another—the PCIA rates by class for that vintage can be skewed.

Table 5 below compares class-level bundled sales volume to vintage-specific sales, beginning with vintage 2017. Material variations are apparent when viewed as a percentage of total sales, with the most significant variances in vintage 2021.

Table 5: Bundled Sales Versus Vintage-Specific Sales by Customer Class

	Vintage Specific Customer Sales by Vintage (GWh)											Bundled Sales (GWh)
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Residential	5,674	5,647	5,647	5,647	5,450	2,898	1,712	1,355	1,355	1,355	1,355	1,355
Small Commercial	1,680	1,666	1,660	1,658	770	747	456	337	335	335	335	335
Med Commercial	2,733	2,684	2,652	2,638	1,202	1,087	733	538	538	538	538	538
Large C&I	3,675	3,627	3,488	3,447	1,386	1,103	896	721	721	721	721	721
Agricultural	345	344	344	344	216	206	99	93	93	93	93	93
Lighting	72	72	72	72	28	28	20	14	14	14	14	14
System Total	14,180	14,040	13,864	13,807	9,052	6,069	3,916	3,058	3,056	3,056	3,056	3,056

	Vintage Specific Customer Class %											Bundled Class %
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Residential	40%	40%	41%	41%	60%	48%	44%	44%	44%	44%	44%	44%
Small Commercial	12%	12%	12%	12%	9%	12%	12%	11%	11%	11%	11%	11%
Med Commercial	19%	19%	19%	19%	13%	18%	19%	18%	18%	18%	18%	18%
Large C&I	26%	26%	25%	25%	15%	18%	23%	24%	24%	24%	24%	24%
Agricultural	2%	2%	2%	2%	2%	3%	3%	3%	3%	3%	3%	3%
Lighting	1%	1%	1%	1%	0%	0%	1%	0%	0%	0%	0%	0%
System Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

The Commission addressed PCIA revenue requirement allocation to customer classes in D.18-10-019 because, at the time, the PCIA revenue requirement was allocated using a completely different method than the allocation of bundled customer commodity costs. The Commission explained:⁵⁸

“In their opening testimony, the Joint Utilities explained that under current ratemaking practices, vintaged Indifference Amounts determined using the Current Methodology are allocated to rate groups using a 'Top 100 hours' methodology that is based on the contribution of each rate group to the highest 100 hours of system load. The allocated costs are then divided by the rate group's total forecast system sales to determine the Indifference Rate for that vintaged portfolio. The Joint Utilities recommended changing the revenue allocation factors for vintaged Indifference Amounts to be consistent with the factors used to allocate generation costs to their bundled service customers: both bundled service and departing load customers are paying the same costs but the disparity caused by using two different types of allocation factors results in higher rates for departing load residential customers relative to their bundled service counterparts, and lower rates for other departing load customer classes relative to their bundled service counterparts. According to the Joint Utilities, ‘the simple solution of using consistent allocation factors for both groups avoids further distortion in

⁵⁸

D.18-10-019 at 122.

1 customer indifference for residential customers and is easily
2 implemented.””

3 The Commission further stated:⁵⁹

4 “For all these reasons, we find that the proposal made by the Joint Utilities
5 in Exhibit IOU-1 should be adopted in this decision, so that the revenue
6 allocation factors for vintaged Indifference Amounts are consistent with the
7 factors used to allocate generation costs to the Joint Utilities' bundled
8 service customers.”

9 Ordering Paragraph 4 directed that “Pacific Gas and Electric Company, Southern
10 California Edison Company, and San Diego Gas & Electric Company shall modify the
11 revenue allocation factors for vintaged Indifference Amounts to be consistent with the
12 factors used to allocate generation costs to their bundled service customers.”⁶⁰

13 SDG&E’s current method of allocating vintaged PCIA revenue requirement to
14 customer classes using a single set of allocation factors for all vintages, regardless of
15 class mix, does not alleviate the disparity in rates for departing load residential customers
16 relative to their bundled service counterparts as D.18-10-019 requires. In fact, because
17 bundled customers’ share of the PCIA revenue requirement is recovered through
18 SDG&E’s commodity rates, the allocation of PCIA costs to bundled customers is
19 inconsistent with SDG&E's allocation of those same costs to departing load customers in
20 specific vintages.

⁵⁹ *Id.* at 124.

⁶⁰ *Id.* at OP 4

1 In contrast to SDG&E, both SCE and PG&E normalize their generation revenue
2 allocation to address this issue, although each takes a different approach. PG&E
3 calculates the bundled generation rate ratio for each class versus the system average and
4 applies that ratio to the system average PCIA rate in each vintage.⁶¹ SCE normalizes the
5 generation revenue allocation factor to account for each rate group's kWh sales forecast
6 by vintage.⁶²

7 Interestingly, SDG&E itself acknowledged that its application of the generation
8 revenue allocation factors to PCIA vintages creates a cost shift between customer classes.
9 On March 17, 2026, SDG&E filed Advice Letter 4817-E requesting approval to present
10 the PCIA rate on bundled customer bills and in its EECC tariffs. SDG&E stated that it
11 planned to calculate the bundled PCIA rates in a way that results in a dollar-per-kWh rate
12 that "is differentiated by customer class, similar to the existing vintaged PCIA rates for
13 unbundled customers, and will not result in any cost-shifts between customer classes."⁶³
14 The SD CCAs submitted discovery to SDG&E seeking clarification on the mechanics of
15 SDG&E's proposed bundled PCIA rates. In response, SDG&E provided additional detail
16 regarding the cost shift inherent in departed load PCIA rates. SDG&E explained:⁶⁴

17 "The most recent vintage PCIA rates are not equivalent to the proposed
18 PCIA rates for bundled customers presented in AL 4817-E. To execute the
19 directives in D.25-09-006 SDG&E calculates bundled PCIA rates
20 separately because utilizing the most recent vintage PCIA rates would result
21 in a cost shift between customer classes. This dynamic is a result of the

⁶¹ A.26-05-007, *Pacific Gas and Electric Company 2027 Energy Resource Recovery Account and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation, Prepared Testimony*, p. 13-4 (May 15, 2026).

⁶² A.26-05-006, SCE-01 at 135.

⁶³ San Diego Gas & Electric Company Advice Letter ("AL") 4817-E, pp. 1-2 (Mar. 17, 2026).

⁶⁴ Attachment D: *SDG&E Response to SD CCA DR Related to AL 4817-E*, DR 1.02 (internal citations omitted).

1 established PCIA rate calculation methodology, described in more detail
2 below.

3 SDG&E uses the authorized generation revenue allocation factors, which
4 are the same factors used to allocate bundled commodity revenues, to split
5 PCIA-related revenues among the customer classes. However, pursuant to
6 the established unbundled PCIA rates calculation methodology, the
7 resulting revenues forecasted to be collected from each vintage of
8 unbundled PCIA rates is not necessarily aligned with the authorized
9 generation revenue allocation factors. When developing unbundled PCIA
10 rates, the class-level incremental revenues for each vintage of resources,
11 which are allocated based on the authorized generation allocation factors,
12 are divided by the class-level departed load sales for that vintage. Notably,
13 each customer class's portion of the total departed load sales differs per
14 vintage. The final unbundled PCIA rates are cumulative of each preceding
15 vintage, and therefore the resulting revenues to be collected from the latest
16 vintage of unbundled PCIA rates reflects the differing customer class sales
17 and effective revenues resulting from all incremental unbundled vintaged
18 rates. As a result, applying the latest unbundled vintage PCIA rate to
19 bundled sales would result in a cost shift."

20 To remedy the disparity in SDG&E's departed load PCIA rates compared to
21 bundled commodity rates and eliminate the inherent cost shift between vintage-specific
22 customer classes, the SD CCAs recommend that SDG&E make a normalizing adjustment
23 to its generation revenue allocation factor for each vintage. The adjustment should be
24 calculated as the ratio of vintage-specific class sales versus bundled customer class sales
25 for the forecast period. Table 6 below illustrates the normalizing adjustment ratios for the
26 current case beginning with vintage 2017.

Table 6: Vintage-Specific Normalizing Adjustment

	Vintage Specific Normalizing Adjustment - % of Bundled Class Sales											Bundled
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
Residential	90%	91%	92%	92%	136%	108%	99%	100%	100%	100%	100%	100%
Small Commercial	108%	108%	109%	109%	78%	112%	106%	100%	100%	100%	100%	100%
Med Commercial	109%	109%	109%	108%	75%	102%	106%	100%	100%	100%	100%	100%
Large C&I	110%	110%	107%	106%	65%	77%	97%	100%	100%	100%	100%	100%
Agricultural	80%	81%	82%	82%	79%	112%	83%	100%	100%	100%	100%	100%
Lighting	108%	109%	110%	111%	66%	97%	107%	100%	100%	100%	100%	100%
System Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

SDG&E should apply this normalizing adjustment ratio for each vintage to its generation revenue allocation factor to create a vintage-specific allocation factor.⁶⁵ Adjusting the generation revenue allocation factors in this manner aligns the customer class allocation of the PCIA revenue requirement with vintage-specific sales volumes, resulting in PCIA rates by class that have similar proportions to the system average rate as bundled customer commodity rates.

Table 7 below shows the impact of applying the SD CCAs' recommended normalizing adjustment to SDG&E's proposed PCIA rates, including the updated PCIA rates for vintage 2017 and later and a comparison of the class rates as a percentage of system average rates. Note that the system average PCIA rates are unchanged from SDG&E's May filing—only the class-specific rates are affected by the SD CCAs' proposal.

⁶⁵ A small scalar adjustment would also need to be applied to each vintage to ensure the total of allocated PCIA costs equals the PCIA revenue requirement in each vintage.

Table 7: Updated PCIA Rates Using a Normalized Generation Revenue Allocation

	Updated Vintage Specific PCIA Rates (\$/kWh)											Bundled
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Commodity
Residential	0.0280	0.0295	0.0295	0.0308	0.0283	0.0253	0.0254	0.0472	0.0484	0.0335	0.0335	0.1660
Small Commercial	0.0249	0.0263	0.0262	0.0274	0.0252	0.0225	0.0226	0.0420	0.0430	0.0298	0.0298	0.1502
Med Commercial	0.0279	0.0294	0.0293	0.0307	0.0282	0.0252	0.0253	0.0470	0.0482	0.0334	0.0334	0.1669
Large C&I	0.0305	0.0321	0.0321	0.0336	0.0309	0.0276	0.0277	0.0514	0.0527	0.0365	0.0365	0.1824
Agricultural	0.0190	0.0200	0.0200	0.0209	0.0192	0.0172	0.0172	0.0320	0.0328	0.0227	0.0227	0.1140
Lighting	0.0193	0.0203	0.0202	0.0212	0.0195	0.0174	0.0175	0.0324	0.0332	0.0230	0.0230	0.1139
System Total	0.0281	0.0296	0.0295	0.0309	0.0284	0.0254	0.0255	0.0472	0.0484	0.0336	0.0336	0.1665

	Change in Vintage Specific PCIA Rates (\$/kWh)											Bundled
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Commodity
Residential	(0.0040)	(0.0042)	(0.0042)	(0.0043)	(0.0049)	(0.0052)	(0.0052)	(0.0052)	(0.0052)	(0.0052)	(0.0052)	-
Small Commercial	0.0013	0.0013	0.0013	0.0015	0.0021	0.0018	0.0018	0.0019	0.0019	0.0019	0.0019	-
Med Commercial	0.0022	0.0023	0.0023	0.0024	0.0032	0.0031	0.0032	0.0031	0.0031	0.0031	0.0031	-
Large C&I	0.0040	0.0041	0.0041	0.0042	0.0057	0.0066	0.0066	0.0066	0.0066	0.0066	0.0066	-
Agricultural	(0.0049)	(0.0051)	(0.0051)	(0.0053)	(0.0049)	(0.0051)	(0.0051)	(0.0051)	(0.0051)	(0.0051)	(0.0051)	-
Lighting	0.0016	0.0017	0.0017	0.0018	0.0027	0.0027	0.0027	0.0027	0.0027	0.0027	0.0027	-
System Total	(0.0000)	0.0000	0.0000	0.0000	0.0000	(0.0000)	0.0000	(0.0000)	0.0000	0.0000	0.0000	-

	Updated Vintage Specific Customer Class %											Bundled
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Class %
Residential	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Small Commercial	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	90%
Med Commercial	99%	99%	99%	99%	99%	99%	99%	100%	100%	99%	99%	100%
Large C&I	109%	109%	109%	109%	109%	109%	109%	109%	109%	109%	109%	110%
Agricultural	68%	68%	68%	68%	68%	68%	68%	68%	68%	68%	68%	69%
Lighting	69%	69%	69%	69%	69%	68%	68%	69%	69%	69%	69%	68%
System Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

V. THE COMMISSION SHOULD REQUIRE SDG&E TO CALCULATE A MEDIUM COMMERCIAL MCAM RATE.

SDG&E's Application does not present a Medium Commercial Class MCAM rate for the Commission's consideration. Pursuant to D.22-05-015, the net costs of procurement undertaken by SDG&E on behalf of LSEs that opted out of their portion of the procurement ordered in D.19-11-016 are recovered from customers of all opt-out LSEs through SDG&E's MCAM rates. To calculate MCAM rates, projected opt-out procurement costs are allocated to customer classes using a 12-CP allocation factor, and the allocated costs are then divided by the 2027 forecasted opt-out LSE sales volumes by customer class to determine a \$/kWh rate.

SDG&E implemented the new Medium Commercial customer class on April 1, 2026. However, unlike other rates being updated in this proceeding, SDG&E's proposed

1 MCAM rates continue to combine Medium Commercial and Large Commercial &
2 Industrial customers into one class. In its testimony, SDG&E explains:⁶⁶

3 “Since the Medium Commercial class was combined with the Large
4 Commercial & Industrial class at the time D.22-05-015 was approved,
5 SDG&E believes it is reasonable that the Medium Commercial class rate
6 should continue to use the combined Medium/Large Commercial &
7 Industrial revenue allocation factor based on the 12-CP that was calculated
8 based on the opt-out load serving entities (‘LSEs’) that were in place at the
9 time that D.22-05-015 was approved.”

10 According to SDG&E, the 12-CP allocation factors used to allocate forecasted
11 MCAM costs are based on the 12-month coincident peak for the specific opt-out LSEs in
12 SDG&E’s service territory from 2018 through 2020.⁶⁷ SDG&E confirmed in discovery
13 that it did not update the 12-CP allocation factors based on the most recent forecast of
14 opt-out LSE load for 2027.⁶⁸ When the SD CCAs asked SDG&E to quantify the 12-CP
15 factors attributable to the newly created Medium Commercial class within the combined
16 Medium/Large Commercial & Industrial class, SDG&E refused to do so.⁶⁹ SDG&E
17 indicated that it may be possible to separate the Medium Commercial class 12-CP based
18 on today’s definitions, but argued that doing so may not be an accurate representation of
19 the split for the time the costs were incurred.⁷⁰ SDG&E stated:⁷¹

20 “It is also possible that customers could have adjusted their energy usage
21 from the 2018-2020 time to the current period which could put those
22 customers into a different class now compared to where the costs were
23 originally incurred in the past, or a customer may have discontinued service
24 for which they would not have gone through the Medium vs Large
25 transition. In other words, the costs would be allocated to a class but the

⁶⁶ Guardado Direct at MG-27, lines 6-10.

⁶⁷ Attachment B at DR 3.06.

⁶⁸ *Id.* at DR 3.07.

⁶⁹ *Id.* at DR 3.08.

⁷⁰ *Id.* at DRs 3.08, 3.10.

⁷¹ *Id.* at DR 3.08.

1 customers that caused the costs would no longer be in that class due to
2 applying a definition that was not in place at the time.”

3 Because SDG&E’s 12-CP MCAM allocation is frozen in time using coincident
4 peak data from 2018 through 2020, changes to customer count or load in any customer
5 class may have already rendered the 12-CP ‘inaccurate.’ SDG&E identifies in testimony
6 that one energy service provider that had opted out of MCAM procurement has since left
7 the market.⁷² SDG&E also describes that the CCA Solana Energy Alliance opted out of
8 MCAM procurement before later merging with Clean Energy Alliance, such that the opt-
9 out procurement costs incurred on behalf of Solana Energy Alliance customers are now
10 recovered from all CEA customers. Any number of other customers could likewise have
11 adjusted their energy usage, shifted customer classes, or discontinued service since 2018–
12 2020.⁷³

13 Furthermore, when SDG&E implemented the new Medium Commercial class in
14 April 2026, the SD CCAs followed suit—CEA and SDCP customers are currently billed
15 according to the separated Medium Commercial and Large Commercial & Industrial
16 classes. Notably, when SDG&E originally sought to establish the MCAM 12-CP revenue
17 allocation, the Commission directed that it be “based on the customer classes specific to
18 the opt-out LSEs in SDG&E’s territory.”⁷⁴

19 Despite the concerns SDG&E raised in discovery about the accuracy of updating
20 a frozen allocator, SDG&E did make an adjustment to the 12-CP to reflect the movement
21 of Schedule TOU-M out of the Small Commercial class and into the Medium
22 Commercial class (combined with Large Commercial & Industrial), and moved the

⁷² Guardado Direct at MG-26 lines 16-18.

⁷³ Attachment B at DR 4.05.

⁷⁴ Resolution E-5241, p. 11 (Jan. 17, 2023).

1 corresponding Schedule TOU-M sales accordingly.⁷⁵ In discovery, SDG&E demonstrated
2 that it is able to separate the Medium Commercial class sales volumes used to determine
3 MCAM rates.⁷⁶ The SD CCAs recommend that SDG&E also update the 12-CP allocation
4 factor to separate the Medium Commercial class, and present a Medium Commercial
5 MCAM rate for the Commission’s consideration in the current case or through a Tier 2
6 advice letter filed after the Commission’s final decision this case.

7 **VI. THE COMMISSION SHOULD CONFIRM THAT SDG&E HAS REMOVED THE**
8 **GRC MEMORANDUM ACCOUNT AMORTIZATION FROM ITS 2027 PCIA**
9 **FORECAST**

10 Since February 2025, SDG&E has been amortizing the authorized GRC revenue
11 requirement that accrued to the General Rate Case Memorandum Account (“**GRCMA**”)
12 prior to the delayed effective date of SDG&E’s 2024 GRC Phase 1 decision. The
13 amortization was scheduled to occur over 18 months, from February 2025 through July
14 2026, and has been recovered from departing load customers through PCIA rates and
15 from bundled customers through commodity rates. SDG&E included approximately \$29
16 million of GRCMA amortization in its proposed 2027 PCIA rates as filed in this
17 Application.⁷⁷

18 On July 31, 2026, SDG&E filed Advice Letter 4868-E, which eliminated the
19 GRCMA amortization from rates effective August 1, 2026, consistent with the 18-month
20 amortization schedule rolling off that date.⁷⁸ SDG&E represented in discovery that it will
21 remove the \$29 million from its PCIA workpapers in its October Update.⁷⁹ The SD CCAs

⁷⁵ Guardado Direct at MG-3; Attachment B at DRs 3.04, 3.07.

⁷⁶ Attachment B at DR 3.09.

⁷⁷ *Id.* at DR 2.51.

⁷⁸ *Id.* at DR 2.50.

⁷⁹ *Id.* at DRs 2.50, 2.51.

1 recommend that the Commission direct SDG&E to demonstrate in its October Update
2 that it has removed the \$29 million in GRCMA amortization from its 2027 PCIA
3 forecast.

4 **VII. STATUS OF SDG&E'S PROJECTED 2026 YEAR-END PABA BALANCE**

5 SDG&E's Application presents a projected 2026 year-end PABA balance that
6 assumes the PABA will be under-collected by approximately \$144.8 million. As
7 explained earlier in this testimony, the PABA is a rolling true-up of the actual above-
8 market costs, *i.e.*, Indifference Amount, of SDG&E's PCIA-eligible resource portfolio
9 and the amount collected from customers to recover such above-market costs. An under-
10 collected PABA account can be the result of many different factors, including lower than
11 expected customer revenues, higher than expected procurement costs, or lower than
12 expected market revenue from resource generation.

13 In this Application, SDG&E provides data supporting the PABA balance line
14 items and how the PABA balance is incorporated into PCIA rates. SDG&E's continued
15 provision of detailed PABA-related data in this ERRR Forecast application has allowed
16 the SD CCAs to evaluate the 2026 PABA accounting and compare it to the 2026 PCIA
17 forecast approved in the previous ERRR forecast proceeding. Table 8 outlines the various
18 2026 year-end PABA Balance line-items and their contributions to the total projected
19 under-collection balance of \$144.8 million.

Table 8: Comparison of 2026 PCIA Forecast and 2026 PABA Projection

	2026 PCIA Forecast (\$000)	2026 PABA Projection (\$000)	Variance (\$000)
Total Portfolio Costs	\$744,873	\$743,398	(\$1,475)
Brown Power Market Value	(\$340,592)	(\$241,664)	\$98,928
Retained RPS Market Value	(\$85,064)	(\$77,910)	\$7,155
Retained RA Market Value	(\$142,817)	(\$128,182)	\$14,635
Total Market Value	(\$568,474)	(\$447,756)	\$120,718
Indifference Amount	\$176,399	\$295,642	\$119,243
Adjustments ¹		(\$817)	
Interest		\$8,891	
Adjusted PCIA Revenue Requirement	\$176,399	\$303,716	\$127,317
Customer Revenue	(\$501,545)	(\$461,463)	\$40,082
Subtotal Under/(Over) Recovery	(\$325,146)	(\$157,748)	\$167,398
PABA Balance in PCIA Rates	\$298,315		(\$298,315)
ERRA Balance in PCIA Rates	(\$2,208)		\$2,208
GRCMA Balance in PCIA Rates	\$29,039	12,844	
Total Under/(Over) Recovery	\$0	(\$144,903)	(\$144,903)
2026 PABA YE Balance			
Beginning Balance		\$289,687	
Activity		(\$144,903)	
Ending Balance		\$144,783	

As shown in Table 8, SDG&E is projecting a decrease in the market value of Brown Power, Retained RPS, and Retained RA for the year-end 2026 PABA when compared to the 2026 PCIA forecast. Customer revenues are also expected to decrease from the 2026 PCIA forecasted value. A majority of the expected under-collection remaining in the PABA at the end of 2026 is due to lower than expected brown power market value compared to the approved forecast.

1 This concludes my testimony.

Attachment A

Curriculum Vitae of Brian Dickman



BRIAN DICKMAN

Chief Financial Officer

CONTACT

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EDUCATION

Master of Business Administration,
Finance Emphasis, University of Utah

Bachelor of Science, Accounting, Utah
State University

KEY EXPERTISE

Cost of Service and Rates

Financial Analysis and Modeling

Power Charge Indifference Amount

Regulatory Strategy

Revenue Requirement

Mr. Brian Dickman is a partner in NewGen's energy practice with over 20 years of utility industry experience. Mr. Dickman's career includes over a decade working for PacifiCorp, a vertically integrated investor-owned utility, including senior-level positions in regulatory, financial, and commercial roles. He began consulting in 2017, assisting a wide array of clients across the United States and internationally, including utilities, large consumers, and private investment firms. Mr. Dickman has extensive experience preparing and evaluating utility revenue requirements and cost allocation studies, developing utility-avoided costs, and analyzing the impact of new initiatives and transactions on a utility and its customers. In addition to his extensive technical experience, Mr. Dickman understands the regulatory governance process, and he has personally testified as an expert witness before state public utility commissions in California, Idaho, Indiana, Oregon, Utah, Washington, and Wyoming.

Mr. Dickman advises numerous Community Choice Aggregator (CCA) clients in California, focusing on regulatory and rate issues such as the state-mandated exit fee known as the Power Charge Indifference Adjustment (PCIA). He also represents California CCAs as a member of the Cost Allocation Mechanism Procurement Review Groups for PG&E and Southern California Edison, which the California Public Utility Commission established to provide an independent review of the centralized procurement of local generation capacity requirements.

RELEVANT EXPERIENCE

Electric Cost of Service, Rate Design, and Regulatory Analysis

Mr. Dickman leads projects developing utility revenue requirements, preparing cost of service and rate design studies, and performing financial and regulatory analyses for electric utilities. Mr. Dickman previously held leadership positions at a multi-billion-dollar utility. He interfaced with state regulatory agencies in support of revenue requirements, cost recovery mechanisms, avoided costs, valuations of potential asset acquisitions and other commercial opportunities, and financial impacts of utility initiatives. Mr. Dickman now works with clients and stakeholders to prepare pro forma financial models to determine revenue sufficiency, evaluate the cost of service studies and rate design proposals, and support such proposals before local and state governing bodies. Mr. Dickman's experience also includes evaluating the financial and rate impact of proposed mergers and acquisitions, acquisition and divestiture of utility assets, negotiated retail service contracts, changing business models, and stranded costs due to exiting load. A sample of Mr. Dickman's utility clients includes the following:

- Abu Dhabi Distribution Company, UAE
- Central Coast Community Energy, CA
- City and County of San Francisco, CA
- Clean Power Alliance, CA
- Duke Energy, NC
- East Bay Community Energy, CA
- Hydro One, Ontario, Canada
- Liberty Utilities, CA

BRIAN DICKMAN

Partner

Electric Cost of Service, Rate Design, and Regulatory Analysis (cont.)

- Lubbock Power and Light, TX
- Minnesota Power, MN
- New York Power Authority, NY
- Portland General Electric, OR
- San Diego Community Power, CA
- San Jose Clean Energy, CA
- Silicon Valley Clean Energy Authority, CA
- Vermont Gas Systems, VT

Non-Utility Clients

A sample of Mr. Dickman's non-utility clients includes the following:

- Blackstone Group, NY
- California Community Choice Association, CA
- Facebook, CA
- Hemlock Semiconductor, MI
- Newmont Mining, NV
- SABIC Innovative Plastics, IN
- Tri-County Metropolitan Transportation District, OR
- Vistra Energy, TX

Expert Witness and Litigation Support

Mr. Dickman provides comprehensive expert witness testimony related to utility revenue requirements, cost of service, rate design, and other ratemaking issues before state and local regulatory bodies. He has provided litigation support in wholesale and retail jurisdictions, including California, Idaho, Indiana, Oregon, Washington, Wyoming, Utah, the Federal Energy Regulatory Commission, and Ontario Energy Board. Mr. Dickman offers expert witness testimony and litigation support in the following areas.

Revenue Requirement | Cost Allocation | Rate Design

Mr. Dickman prepared revenue requirements, inter-jurisdictional cost allocation, coincident peak allocation studies, and supporting testimony for PacifiCorp over many years. He now provides litigation support and expert testimony for clients wishing to review utility filings on revenue requirements, cost allocation, and rate design, including program-specific rate tariffs.

Power Supply Costs | Stranded Costs | Rate Adjustment Mechanisms

Mr. Dickman has prepared and evaluated variable power supply cost forecasts, power supply cost balancing accounts and other rate mechanisms, stranded costs, and exit fees for departing loads. Since 2019, Mr. Dickman has actively participated in PCIA matters in California on behalf of CCA clients.

Avoided Costs | Resource Valuation

Mr. Dickman provided expert testimony for PacifiCorp on various components included in a proposed method for valuing solar generation resources, the calculation of Public Utility Regulatory Policies Act avoided costs for large resources and support of modifications to the avoided cost calculation for small resources.

BRIAN DICKMAN

Partner

WORKSHOPS AND PRESENTATIONS

Host organizations and the topics Mr. Dickman presented are displayed below.

Advanced Workshop in Regulation and Competition, Center for Research in Regulated Industries, 2018

Customer Choice at a Vertically Integrated Utility

Advanced Workshop in Regulation and Competition, Center for Research in Regulated Industries, 2018

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
1. PG&E SCE SDG&E	R.25-02-005	Expert testimony addressing the value of renewable energy credits banked prior to Power Charge Indifference Amount reform in 2019	California Public Utilities Commission	California Community Choice Association	2026
2. PG&E	A.25-02-013	Expert testimony evaluating the recovery of costs recorded to the Portfolio Allocation Balancing Account	California Public Utilities Commission	California Community Choice Association	2025
3. PG&E	A.25-05-011	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	California Community Choice Association	2025
4. SCE	A.25-05-008	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	California Community Choice Association	2025
5. PG&E SCE SDG&E	R.25-02-005	Rebuttal testimony addressing resource adequacy market price benchmark calculation for the power charge indifference adjustment	California Public Utilities Commission	California Community Choice Association	2025
6. PG&E SCE SDG&E	A.23-05-012 A.23-07-012 A.23-06-001 A.23-05-013	Expert testimony addressing definition of fixed generation costs and recovery from bundled and unbundled customers	California Public Utilities Commission	California Community Choice Association, San Diego Community Power, Clean Energy Alliance	2024
7. PG&E	A.24-05-009	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	California Community Choice Association	2024
8. SCE	A.24-05-007	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	California Community Choice Association	2024

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
9. PG&E	A.24-03-018	Expert testimony evaluating allocation of generation benefits during period of extended operations at Diablo Canyon Nuclear Power Plant	California Public Utilities Commission	California Community Choice Association	2024
10. SCE	A.23-06-001	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	California Community Choice Association	2023
11. PG&E	A.22-09-018	Expert testimony evaluating customer benefits of a proposal to transfer generation assets to a newly created regulated utility subsidiary	California Public Utilities Commission	California Community Choice Association	2023
12. PG&E	R.23-01-007	Expert testimony proposing new rate design and allocation of generation benefits during period of extended operations at Diablo Canyon Nuclear Power Plant	California Public Utilities Commission	California Community Choice Association	2023
13. Joint IOUs	R.22-07-005	Expert testimony addressing inclusion of stranded costs in newly proposed income graduated fixed charges for residential customers	California Public Utilities Commission	California Community Choice Association	2023
14. SCE	A.12-01-008 A.12-04-020 A.14-01-007	Declaration supporting response to petition for modification of D.15-01-051, addressing changes to optional green tariff program rates	California Public Utilities Commission	Clean Power Alliance, California Choice Energy Authority	2022
15. SCE	A.22-05-014	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Clean Power Alliance, California Choice Energy Authority, and Central Coast Community Energy	2022

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
16. PG&E, SCE, SDG&E	A.20-02-009 A.20-04-002 A.20-06-001 (Consolidated)	Expert testimony evaluating the unrealized sales volumes and revenue due to Public Safety Power Shutoff events	California Public Utilities Commission	CCA Parties (9 individual CCAs)	2022
17. San Diego Gas & Electric	A.21-09-001	Expert testimony responding to proposed residential electrification tariff	California Public Utilities Commission	San Diego Community Power and Clean Energy Alliance	2022
18. San Diego Gas & Electric	R.20-05-003	Declaration supporting motion for clarification of D.19-11-016, quantifying impact to allocated incremental reliability procurement requirement due to departing load	California Public Utilities Commission	San Diego Community Power	2021
19. Southern California Edison	A.21-06-003	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Clean Power Alliance and California Choice Energy Authority	2021
20. Pacific Gas & Electric	A.21-06-001	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Joint Community Choice Aggregators	2021
21. San Diego Gas & Electric	A.21-04-010	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	San Diego Community Power and Clean Energy Alliance	2021
22. Pacific Gas & Electric	A.12-01-008 A.12-04-020 A.14-01-007	Declaration supporting petition for modification of D.15-01-051, recommending changes to optional green tariff program rates designed to avoid shifting costs of resource capacity to non-participants	California Public Utilities Commission	Joint Community Choice Aggregators	2021

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
23. Pacific Gas & Electric	A.19-11-019	Expert testimony (adopted) addressing use of marginal costs to determine economic development rates and responding to proposed electrification tariff for retail customers	California Public Utilities Commission	Joint Community Choice Aggregators	2021
24. Pacific Gas & Electric	A.20-07-002	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Joint Community Choice Aggregators	2020
25. Southern California Edison	A.20-07-004	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Clean Power Alliance and California Choice Energy Authority	2020
26. Pacific Power	Docket UE 375	Joint testimony supporting a settlement agreement resolving the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	Facebook, Inc.	2020
27. Pacific Gas & Electric	A.20-02-009	Expert testimony evaluating the appropriateness of entries recorded to the Portfolio Allocation Balancing Account to true up the Power Charge Indifference Amount	California Public Utilities Commission	Joint Community Choice Aggregators	2020
28. Vectren Energy Delivery of Indiana	Cause No. 43354 MCRA 21 S1	Expert testimony supporting a settlement agreement regarding the calculation and use of a 4CP load study to allocate tariff rider costs among customer classes	Indiana Utility Regulatory Commission	SABIC Innovative Plastics Mt. Vernon, LLC	2020
29. PacifiCorp	Docket UE 307	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon		2016

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
30. PacifiCorp	Docket UM 1662	Joint testimony with Portland General Electric regarding the need for a renewable resource tracking mechanism to provide cost recovery related to the impacts of renewable resource generation	Public Utility Commission of Oregon		2015
31. PacifiCorp	Docket UE 296	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon		2015
32. PacifiCorp	Docket No. 20000-469-ER-15	Expert testimony regarding the annual variable power supply cost forecast and modifications to the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming		2015
33. PacifiCorp	Docket No. 15-035-03	Provided expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2015
34. PacifiCorp	Docket UM 1716	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Utility Commission of Oregon		2015
35. PacifiCorp	Docket No. 20000-481-EA-15	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Service Commission of Wyoming		2015
36. PacifiCorp	Docket No. 15-035-T06	Expert testimony updating standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Public Service Commission of Utah		2015

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
37. PacifiCorp	Case No. PAC-E-15-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resource	Idaho Public Utilities Commission		2015
38. PacifiCorp	Docket UE-144160	Declaration supporting updates to standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Washington Utilities and Transportation Commission		2014
39. PacifiCorp	Docket UE 287	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon		2014
40. PacifiCorp	Case No. PAC-E-14-01	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission		2014
41. PacifiCorp	Docket A.14-08-002	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission		2014
42. PacifiCorp	Docket No. 20000-447-EA-14	Expert testimony regarding the true up of annual variable power supply cost in the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming		2014
43. PacifiCorp	Docket No. 14-035-31	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2014
44. PacifiCorp	Case No. PAC-E-13-03	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission		2013

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
45. PacifiCorp	Docket A.13-08-001	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission		2013
46. PacifiCorp	Docket No. 13-035-32	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2013
47. PacifiCorp	Docket UM 1610	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Public Utility Commission of Oregon		2012
48. PacifiCorp	Docket A.12-08-003	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission		2012
49. PacifiCorp	Docket No. 12-035-67	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2012
50. PacifiCorp	Docket No. 20000-389-EP-11	Expert testimony regarding the collection of deferred balances accrued through previous Power Cost Adjustment Mechanisms	Public Service Commission of Wyoming		2011
51. PacifiCorp	Docket No. 20000-405-ER-11	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2011
52. PacifiCorp	Case No. GNR-E-11-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Idaho Public Utilities Commission		2011

Record of Testimony: **Brian Dickman**

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
53. PacifiCorp	Case No. PAC-E-06-10	Expert testimony regarding low-income customer weatherization rebates	Idaho Public Utilities Commission		2010
54. PacifiCorp	Docket No. 20000-405-ER-10	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2010
55. PacifiCorp	Docket No. 10-035-89	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Utah		2010
56. PacifiCorp	Docket No. 20000-352-ER-09	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2009
57. PacifiCorp	Case No. PAC-E-08-07	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Idaho Public Utilities Commission		2008
58. PacifiCorp	Docket No. 20000-333-ER-08	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2008

Attachment B

Select SDG&E Responses to SDCP and CEA Data Requests

2027 ERRA FORECAST A.26-05-009
SAN DIEGO COMMUNITY POWER/ CLEAN ENERGY ALLIANCE
SDCP_CEA-SDGE-DR-02
DATE RECEIVED: JUNE 15, 2026
DATE RESPONDED: JUNE 29, 2026

SDCP/CEA to SDG&E 2.12:

Referring to Witness Guardado's workpaper "PCIA Model_2027 ERRA Forecast May.xlsx," tab 'Indifference Rate Calc – PABA': Please provide any electronic workpapers, with working formulae, used to calculate the values associated with "Generation Revenue Allocation Factor" (cells B6:B11).

SDG&E Response to Question 2.12:

Please refer to the attached excel workbook titled "2027 ERRA Forecast May_CCA DR002 Q12.xlsx". The Generation Revenue Allocation Factor is the EECC class revenue allocation. Due to the System Average Percent Change calculation methodology approved in OP 4 of D. 25-09-006, the EECC Revenue Allocation Factor is a result of creating a common SAPC Goal Seek Factor that considers the current detailed rates and proposed forecasted billing determinants rather than class-level determinants. The SAPC Goal Seek Factor, found in cell AO31 of the attached workpaper, scales all of the rate components that are not otherwise held steady or calculated outside of the EECC tab by the same amount, regardless of customer class, to set rates at amounts that are forecasted to collect the proposed bundled commodity revenue requirement. The Generation Revenue Allocation Factors are then calculated based on the class-level revenues derived from the SAPC Goal Seek Factor, as demonstrated in cells AI34:AN34 of the attached workbook.

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DATE RECEIVED: JUNE 15, 2026
DATE RESPONDED: JUNE 29, 2026

SDCP/CEA to SDG&E 2.34:

Referring to SDG&E's Prepared Testimony of Jimmy Elias, JE-5 lines 6-11: Please provide electronic workpapers with working formulae demonstrating SDG&E's calculation of its total monthly RA position, RA capacity necessary to retain for compliance, excess RA capacity, RA sales, and unsold RA. Workpapers should include detail by month and by individual resource.

SDG&E Response to Question 2.34:

The attached document titled *CONFIDENTIAL – 2027 CEA_SDCP DR2_SDGE Response_ELIAS.xlsx* contains “Protected Materials” (i.e., trade secret, market sensitive, or other confidential and/or proprietary information) as determined by SDG&E in accordance with the provisions of D. 06-06-066 and subsequent decisions and subject to a Nondisclosure Agreement. The Protected Materials have been highlighted in yellow. A confidentiality declaration is also provided.

SDG&E updated its Non-MCAM RA sales methodology to use 12 months of historical sales data to forecast future volumes. Please see JE-5, lines 8-9. Please see attached file *CONFIDENTIAL – 2027 CEA_SDCP DR2_SDGE Response_ELIAS.xlsx*.

Attachment(s) Confidential

2027 ERRA FORECAST A.26-05-009
SAN DIEGO COMMUNITY POWER/ CLEAN ENERGY ALLIANCE
SDCP_CEA-SDGE-DR-02
DATE RECEIVED: JUNE 15, 2026
DATE RESPONDED: JUNE 29, 2026

SDCP/CEA to SDG&E 2.35:

Referring to SDG&E's Prepared Testimony of Jimmy Elias, at JE-5, lines 6-11:

- a) Please explain what kind of sales constitute "non-MCAM" sales, including the type of resources or contracts and balancing account associated with these "non-MCAM" sales.
- b) Please provide a workbook, in excel spreadsheet format with working formulae, that demonstrates the non-MCAM sales forecast calculation methodology (as explained in lines 6-11 at JE-5) SDG&E used for its 2027 forecast.
- c) Please provide workpapers, in excel spreadsheet format with working formulae, that outline the individual resources and demonstrate the sales treatment and accounting associated with the 2027 forecasted monthly MCAM and non-MCAM sales for RA capacity.

SDG&E Response to Question 2.35:

The attached document titled *CONFIDENTIAL – 2027 CEA_SDCP DR2_SDGE Response_ELIAS.xlsx* contains "Protected Materials" (i.e., trade secret, market sensitive, or other confidential and/or proprietary information) as determined by SDG&E in accordance with the provisions of D. 06-06-066 and subsequent decisions and subject to a Nondisclosure Agreement. The Protected Materials have been highlighted in yellow. A confidentiality declaration is also provided.

- a) Please see attached file *CONFIDENTIAL – 2027 CEA_SDCP DR2_SDGE Response_ELIAS.xlsx*.
- b) Please see attached file *CONFIDENTIAL – 2027 CEA_SDCP DR2_SDGE Response_ELIAS.xlsx*.
- c) Please see attached file *CONFIDENTIAL – 2027 CEA_SDCP DR2_SDGE Response_ELIAS.xlsx*.

Attachment(s) Confidential

2027 ERRRA FORECAST A.26-05-009
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SDCP_CEA-SDGE-DR-02
DATE RECEIVED: JUNE 15, 2026
DATE RESPONDED: JUNE 29, 2026

SDCP/CEA to SDG&E 2.37:

Referring to SDG&E's Prepared Testimony of Jimmy Elias, at JE-5, lines 3-11: Please provide all workpapers with working formulae demonstrating the 12 months of historical RA sales and how it was used to determine the forecasted sales of RA capacity in 2027.

SDG&E Response to Question 2.37:

See response to question 2.34

2027 ERRA FORECAST A.26-05-009
SAN DIEGO COMMUNITY POWER/ CLEAN ENERGY ALLIANCE
SDCP_CEA-SDGE-DR-02 – SUPPLEMENTAL 2.38
DATE RECEIVED: JUNE 15, 2026
DATE RESPONDED: JULY 23, 2026

SDCP/CEA to SDG&E 2.38:

Referring to SDG&E's Prepared Testimony of Jimmy Elias, at JE-4 line 12 through JE-5 line 11: Please provide SDG&E's actual monthly excess RA (MW) before RA sales, and corresponding monthly RA sales, for 2023, 2024, 2025, and 2026 to date.

SDG&E Response to Question 2.38:

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence.

SDG&E Supplemental Response to Question 2.38

SDG&E reiterates its objection to this request under Rule 10.1 to the extent it seeks the production of historical actual monthly excess RA before RA sales, which is neither relevant to the subject matter involved in the pending proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

SDG&E further objects to this request on the basis that it would require SDG&E to conduct analysis or calculations, or create documentation that does not already exist, and to the extent that it seeks information that is equally available to the SD CCAs. SDG&E utilized a new methodology for forecasting RA sales for the 2027 ERRA Forecast that relied on prior year actuals, and which required several manual steps. The process included pulling raw data from the Versify system, creating excel tabs for monthly data within an excel workbook, adding names of all resources to the appropriate data, adding the balancing accounts for all resources for each month, creating a pivot table for each month that sums the RA MW by balancing account and PABA vintage, and then for each month and in each PABA vintage, dividing the sum of the RA sold by the number of days in the month. SDG&E did not engage in this process in prior years because it was not required to by any order, regulation, or directive, and it was utilizing a different methodology for forecasting RA sales.

Subject to and without waiving the foregoing objections, SDG&E responds as follows: SDG&E points the SD CCAs to SDG&E's Monthly Volumes Report, which has been provided to the SD CCAs on a monthly basis, and which reflects aggregated actual RA sales for PCIA-eligible resources. SDG&E further notes that it will provide an updated RA sales forecast in the forthcoming October update, which will provide the SD CCAs a second data set to compare against the initial 2027 forecast.

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SDCP_CEA-SDGE-DR-02
DATE RECEIVED: JUNE 15, 2026
DATE RESPONDED: JUNE 29, 2026

SDCP/CEA to SDG&E 2.50:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-21, lines 19-21: Please provide SDG&E's authorized General Rate Case Memorandum Account ("GRCMA") balance that will be included in the 2027 PCIA rates, in excel spreadsheet format with formulae intact if possible.

SDG&E Response to Question 2.50:

Please refer to the attached excel workbook titled "2027 ERRA Forecast May_CCA DR002 Q07-09 & Q50.xlsx", tab "Revenue Split Bundled vs DL" for the GRCMA amount included in PCIA rates proposed in the 2027 ERRA May filing. However, as mentioned in SDG&E's Prepared Testimony of Mindy Guardado, the GRCMA will roll off from rates on August 1, 2026, and therefore the October Update will reflect zero dollars in 2027 PCIA rates resulting from GRCMA.

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SDCP/CEA to SDG&E 2.51:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-21, lines 19-21: With respect to SDG&E's statement in footnote 66 that the GRCMA is scheduled to roll off in August 2026:

- a. Please explain whether SDG&E's proposed commodity and PCIA rates effective January 1, 2027 include GRCMA amortization.
- b. Please confirm that SDG&E plans to update PCIA rates effective August 1, 2026 to remove the GRCMA amortization, and quantify the GRCMA amount that will be removed and its impact on PCIA rates.

SDG&E Response to Question 2.51:

- a. The proposed commodity and PCIA rates included in the 2027 ERRA filing did include the approved 2026 GRCMA amortization. As mentioned in SDG&E response to question 2.50, the GRCMA roll off in August 2026 will be reflected in the October Update.
- b. SDG&E will have an August 1, 2026, rate change which, among other things, will remove a total of \$29.0 million from SDG&E's PCIA rates (including bundled PCIA). SDG&E expects the PCIA rates to decrease with the removal of the GRCMA amortization.

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DATE RESPONDED: JULY 10, 2026

SDCP/CEA to SDG&E 3.06:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 4-16: Please explain in detail how SDG&E calculates the 12-CP allocation factors used to allocate MCAM revenue to the customer classes shown in Table 10.

SDG&E Response to Question 3.06:

Per D. 22-05-015 and Resolution E-5241 and approved with AL 4151-E and 4151-E-A, the 12-CP factors for MCAM are based on the 12-month coincident peak for the specific Opt-Out LSEs in the service territory from 2018-2020.

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SDCP/CEA to SDG&E 3.07:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 4-16: Please explain whether SDG&E updated 12-CP allocation factors in the current case based on its most recent forecast of Opt-Out LSE load for 2027. If no, please explain why not.

SDG&E Response to Question 3.07:

No, the 12-CP factors used for Opt-Out LSE revenue requirement allocation were based on the 12-month coincident peak for the specific Opt-Out LSEs in the service territory from 2018-2020 as set forth in Advice Letter (AL) 4151-E / E-A. The only adjustment was to separate TOU-M's 12-CP factors from Small Commercial and add the 3-year Avg 12-CP factors specific to TOU-M to Medium/Large Commercial & Industrial to align with TOU-M's new medium classification per D.25-09-006.

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SDCP/CEA to SDG&E 3.08:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 4-16 and Table 10: Please quantify the 12-CP factors included in the combined Medium Commercial/Large Commercial & Industrial class in Table 10 for all Opt-Out LSEs that belong to the Medium Commercial Class adopted in D.25-09-006 and AL 4791-E/E-A.

SDG&E Response to Question 3.08:

SDG&E objects to the question under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

While SDG&E believes it may be possible to separate the newly implemented Medium Commercial class 12-CP from the total Medium/Large Commercial & Industrial (C&I) 12-CP by today's definition, SDG&E cannot confirm it would be an accurate representation of the split for the time the costs were incurred since it would require going into historical data and retroactively applying current definitions that were not established at the time to historical data. It is also possible that customers could have adjusted their energy usage from the 2018-2020 time to the current period which could put those customers into a different class now compared to where the costs were originally incurred in the past, or a customer may have discontinued service for which they would not have gone through the Medium vs Large transition. In other words, the costs would be allocated to a class but the customers that caused the costs would no longer be in that class due to applying a definition that was not in place at the time.

SDG&E maintains since the Medium Commercial class was combined with the Large Commercial & Industrial class at the time D.22-05-015 was approved, it is reasonable that the Medium Commercial class rate should continue to use the combined Medium/Large Commercial & Industrial revenue allocation factor based on the 12-CP that was calculated based on the opt-out load serving entities ("LSEs") that were in place at the time that D.22-05-015 was approved.¹

¹ SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 6-10,

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DATE RESPONDED: JULY 10, 2026

SDCP/CEA to SDG&E 3.09:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 4-16 and Table 10: Please quantify the load included in the combined Medium Commercial/Large Commercial & Industrial class in Table 10 for all Opt-Out LSEs that belong to the Medium Commercial Class adopted in D.25-09-006 and AL 4791-E/E-A.

SDG&E Response to Question 3.09:

Please refer to the attached excel workbook titled "2027 ERRA Forecast May_CCA DR003 Q03_Q05_Q09.xlsx", tab "2027 Opt Out LSE Forecast".

**SAN DIEGO COMMUNITY POWER (SDCP) AND CLEAN ENERGY ALLIANCE (CEA)
SDG&E 2027 ERRR FORECAST APPLICATION (A.26-05-009)**

Data Request 003

SDG&E RESPONSE - Question 03, 05, 09

2025 Sales History (kwh)

Class	DA		Opt Out LSE - DA		% Opt Out LSE
Agriculture	27,940,966		7,105,890		25.4%
Lighting	2,099,692		28,687		1.4%
Lrg Commercial-Industrial	3,387,275,330		617,572,740		18.2%
Med Commercial Total	489,842,483		155,372,620		31.7%
<i>TOUM</i>		<i>45,276,045</i>		<i>12,472,511</i>	
<i>Other Med Com</i>		<i>444,566,438</i>		<i>142,900,109</i>	
Residential	3,535,011		2,638,917		74.7%
Small Commercial - less TOUM	47,066,920		11,307,482		24.0%
Total	3,957,760,402		794,026,336		

**SAN DIEGO COMMUNITY POWER (SDCP) AND CLEAN ENERGY ALLIANCE (CEA)
SDG&E 2027 ERRA FORECAST APPLICATION (A.26-05-009)**

Data Request 003

SDG&E RESPONSE - Question 03, 05, 09

2027 Forecast (kwh)

Class	2027 DA Forecast		2027 CEA Forecast	
Agriculture	27,818,934		23,891,656	
Lighting	5,055,086		12,491,193	
Lrg Commercial-Industrial	3,418,288,198		606,793,999	
Med Commercial Total	434,955,036		517,619,273	
<i>TOUM</i>		<i>44,116,993</i>		<i>107,358,193</i>
<i>Other</i>		<i>390,838,043</i>		<i>410,261,080</i>
Residential	3,671,988		890,786,917	
Small Commercial	52,118,715		319,154,820	
Total	3,941,907,956		2,370,737,857	

**SAN DIEGO COMMUNITY POWER (SDCP) AND CLEAN ENERGY ALLIANCE (CEA)
SDG&E 2027 ERRR FORECAST APPLICATION (A.26-05-009)**

Data Request 003

SDG&E RESPONSE - Question 03, 05, 09

2027 Forecast (kwh)

Class	2027 Opt Out DA Forecast	2027 CEA Forecast	2027 Total Opt Out Forecast
Agriculture	7,074,855	23,891,656	30,966,511
Lighting	69,065	12,491,193	12,560,258
Lrg Commercial-Industrial	623,227,049	606,793,999	1,230,021,048
Med Commercial	137,962,928	517,619,273	655,582,201
Residential	2,741,171	890,786,917	893,528,089
Small Commercial	12,521,139	319,154,820	331,675,958
Total	783,596,208	2,370,737,857	3,154,334,064

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SDCP/CEA to SDG&E 3.10:

Referring to SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 4-16: Please confirm it is possible, given the data available to SDG&E, to separate out the Medium Commercial class from the combined Medium Commercial/Large Commercial & Industrial class proposed MCAM rates shown in Table 10. If confirmed, please provide an updated Table 10 with the Medium Commercial class shown separate from Large Commercial & Industrial.

SDG&E Response to Question 3.10:

SDG&E objects to the question under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. SDG&E further objects to this request to the extent it seeks documents, data, and analysis that does not currently exist. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

While SDG&E believes it may be possible to separate the newly implemented Medium Commercial class 12-CP from the total Medium/Large Commercial & Industrial (C&I) 12-CP by today's definition, SDG&E cannot confirm it would be an accurate representation of the split for the time the costs were incurred since it would require going into historical data and retroactively applying current definitions that were not established at the time to historical data. It is also possible that customers could have adjusted their energy usage from the 2018-2020 time to the current period which could put those customers into a different class now compared to where the costs were originally incurred in the past, or a customer may have discontinued service for which they would not have gone through the Medium vs Large transition. In other words, the costs would be allocated to a class but the customers that caused the costs would no longer be in that class due to applying a definition that was not in place at the time.

SDG&E maintains since the Medium Commercial class was combined with the Large Commercial & Industrial class at the time D.22-05-015 was approved, it is reasonable that the Medium Commercial class rate should continue to use the combined Medium/Large Commercial & Industrial revenue allocation factor based on the 12-CP that was calculated based on the opt-out load serving entities ("LSEs") that were in place at the time that D.22-05-015 was approved.²

² SDG&E's Prepared Testimony of Mindy Guardado, at MG-27 lines 6-10,

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SDCP/CEA to SDG&E 3.16:

Referring to SDG&E's Prepared Testimony of Sheri Miller, at SM-4 line 20 through SM-5 line 5: Does SDG&E include a buffer or other adjustments to account for uncertainty when calculating its RA compliance requirement for 2027 as reflected in the current proceeding? If yes, please quantify the buffer by month and demonstrate how it is included in the calculation of Retained RA. If no, please explain why not.

SDG&E Response to Question 3.16:

No. The methodology for calculating RA compliance requirement as described in the response to 3.15 above does not include buffer amounts or adjustments.

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DATE RESPONDED: AUGUST 11, 2026

SDCP/CEA to SDG&E 3.19:

Referring to SDG&E's Prepared Testimony of Sheri Miller, at SM-9 lines 6-8: Did SDG&E reduce the quantity of RA available for sale to reflect a 'buffer' for uncertainty in any of its solicitations offering to sale RA for delivery in 2026 or 2027? If yes, please identify the solicitation and quantify the buffer by delivery month.

SDG&E Response to Question 3.19:

Regarding the 2026 solicitations, SDG&E objects to this question under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence.

Regarding the 2027 calendar year, SDG&E has not yet held a solicitation for the sale of 2027 RA.

SDG&E Supplemental Response to Question 3.19:

In response to SDG&E's initial relevance objection, SD CCAs providing the following position to demonstrate relevance:

- *"This information goes directly to SDG&E's position in this proceeding concerning its forecast of Retained RA. SDG&E forecasts its Retained RA as equivalent to its RA compliance obligation and excludes any "buffer" quantities that may be withheld from the market to hedge against uncertainty and ensure compliance. See Miller Direct at SM-9.*

DR 3.19 seeks information necessary to test the reasonableness of that position. Specifically, if SDG&E in practice withholds RA from solicitations to preserve a buffer, that conduct is directly relevant to whether such quantities are "retained" at some point for purposes of meeting compliance obligations, and whether SDG&E's forecast should reflect that practice.

While SDG&E objects that this information is not relevant, the reasonableness of SDG&E's RA forecasts (including its forecast of Retained RA) is expressly within the scope of this proceeding. See A.26-05-009, Scoping Ruling at 4. SDG&E's proposal to exclude buffer quantities from its forecast does not prevent parties from testing and scrutinizing that proposal. Rather, it makes discovery into the existence, magnitude, and treatment of those buffer quantities essential to evaluating the reasonableness of SDG&E's RA forecasting methodology." (A. Greenwald July 30, 2026 email)

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In light of this information provided by the SD CCAs, SDG&E reasserts its objection that this request seeks information that is not relevant to the subject matter involved in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

The information requested in DR 3.19 regarding whether SDG&E may have withheld a quantity of Resource Adequacy ("RA") capacity from a particular solicitation is not relevant to the issues in this proceeding because such information does not inform, affect, or test the reasonableness of SDG&E's forecast of Retained RA or associated forecasted revenues and credits.

The SD CCAs continue to conflate—in contradiction to the D.19-10-001 rules governing RA accounting—RA temporarily held back from an RFO for portfolio management purposes to mitigate against risk (i.e. "buffer") and "Retained RA," which is RA that is ultimately used for compliance requirements.

A temporary operational decision concerning the timing or quantity of capacity offered in a solicitation does not determine the forecasting or accounting treatment ultimately assigned to that capacity. For ERRA forecasting purposes, the relevant inquiry is whether capacity is reasonably expected to be needed to satisfy SDG&E's RA compliance obligations or reasonably expected to be available for sale. Whether excess capacity may be temporarily withheld from a particular solicitation while SDG&E evaluates system conditions, outages, market opportunities, or compliance needs is not an input to the forecast methodology and does not alter the forecasted disposition of that capacity.

Forecasted Retained RA is based on the quantity of capacity expected to be required to satisfy SDG&E's RA compliance obligations. Capacity expected to be needed for compliance is forecast as Retained RA. The remaining capacity is then included in SDG&E's calculation of forecasted sales. The forecast does not contain a separate category for capacity that may be temporarily withheld from a solicitation, nor does it assign any distinct accounting treatment or value to such capacity. Consequently, information regarding the existence or magnitude of a temporary solicitation-stage buffer would not provide information concerning any forecast input, assumption, calculation, or forecast result. Please see testimony of J. Elias for more detailed description of SDG&E's forecasting methodology.

Moreover, the information sought would not assist in evaluating the reasonableness of SDG&E's forecast because including temporary solicitation-stage buffer quantities in the forecast would produce a less accurate forecast and would be inconsistent with the manner in which RA-related values are ultimately reflected in rates and balancing accounts.

By way of example, assume SDG&E forecasts that 100 MW of RA capacity will be required to satisfy its compliance obligations. Under SDG&E's forecasting methodology, the forecasted Retained RA amount would reflect that 100 MW compliance requirement. If SDG&E instead forecast 110 MW by adding a 10 MW temporary buffer quantity, the forecast would assign

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DATE RECEIVED: JUNE 25, 2026
DATE RESPONDED: AUGUST 11, 2026

Retained RA value to capacity that is not expected to be used for compliance and may ultimately be sold or remain unsold. In that circumstance, the forecast would overstate the quantity of Retained RA and the associated forecasted credits reflected in PABA, artificially lowering the PABA rate and resulting in an undercollection. Because actual accounting treatment ultimately reflects the quantity of RA actually used for compliance, rather than temporary hedge quantities that may be operationally maintained during the solicitation process, including such temporary quantities in the forecast would create a mismatch between forecasted and recorded results and increase forecast error rather than improve accuracy (and would thus constitute improper accounting and an unreasonable methodology for forecasting RA-related values).

The fact that capacity may be temporarily withheld from a particular solicitation therefore does not establish that such capacity is "retained" for ratemaking purposes, nor does it demonstrate that such quantities should be included in forecasted Retained RA. Prior to the applicable delivery period, excess RA capacity remains available for potential sale. Ultimately, that capacity will either be: (1) used to satisfy compliance obligations; (2) sold; or (3) remain unsold. The relevant forecasting question is the *expected ultimate disposition of the capacity*, not whether the capacity was offered in a particular solicitation at a particular point in time.

Therefore, information concerning temporary solicitation-stage withholding does not provide a basis for evaluating the reasonableness of SDG&E's forecast of Retained RA, forecasted RA sales, forecasted PABA credits, or any other component of SDG&E's ERRA forecast. Because the requested information concerns a temporary operational status that is neither forecast nor separately recognized for accounting or ratemaking purposes, SDG&E maintains that the information sought by DR 3.19 is not relevant to the issues in this proceeding.

For completeness SDG&E has not yet held a solicitation for the sale of 2027 RA.

2027 ERRA FORECAST A.26-05-009
SAN DIEGO COMMUNITY POWER/ CLEAN ENERGY ALLIANCE
SDCP_CEA-SDGE-DR-03
DATE RECEIVED: JUNE 25, 2026
DATE RESPONDED: JULY 10, 2026

SDCP/CEA to SDG&E 3.20:

Referring to SDG&E's Prepared Testimony of Sheri Miller, at SM-9 lines 6-8: Does SDG&E intend to reduce the quantity of RA available for sale to reflect a 'buffer' for uncertainty in its upcoming solicitations offering to sale RA for delivery in 2027? If yes, please identify the solicitation and quantify the buffer by delivery month.

SDG&E Response to Question 3.20:

At the time of this writing, SDG&E has not yet made final decisions regarding the structure of any future solicitations that it may hold to sell 2027 RA.

2027 ERRA FORECAST A.26-05-009
SAN DIEGO COMMUNITY POWER/ CLEAN ENERGY ALLIANCE
SDCP_CEA-SDGE-DR-04
DATE RECEIVED: JULY 24, 2026
DATE RESPONDED: AUGUST 7, 2026

SDCP/CEA to SDG&E 4.05:

Referring to SDG&E's responses to SDCP/CEA DRs 3.08 and 3.10:

- a. Please confirm that the Opt Out LSE Load (MWh) used to calculate the proposed MCAM rates is based on the forecasted load for 2027.
- b. Please confirm that the forecasted load for 2027 would reflect for all customer classes the type of issues referenced in SDG&E's response to DR 3.10, including that customers could have adjusted their energy usage from 2018-2020 to the current period, customers could be in a different class now compared to the past, customers may have discontinued service.

SDG&E Response to Question 4.05:

- a. Yes, the Opt-Out load serving entities ("LSEs") load is based on the 2027 forecast SDG&E is proposing in A.26-05-009.
- b. Yes, the LSE 2027 forecasted load for MCAM reflects changes for all customer classes that customers have made since the 2018-2020 time frame including any adjustments to energy usage, class shift, and possible discontinued service.

Attachment C

SDG&E Monthly Volumes Reports

2022

San Diego Gas & Electric
Portfolio Allocation Balancing Account (PABA) - Summary
Monthly Volumes Report to Accompany the PABA Schedule in the monthly ERRR Reports 1
Non-confidential

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total
Customer Monthly Usage (MWh)													
PCIA MWh - CCA	348,283	267,931	387,196	346,661	287,863	574,602	584,782	703,350	757,356	677,645	562,065	561,323	6,059,056
PCIA MWh - DA	268,680	236,658	389,368	286,962	263,071	372,043	331,275	385,601	343,138	377,305	318,597	268,042	3,840,741
PCIA MWh - Bundled	822,155	663,937	779,891	559,994	621,453	516,234	586,658	737,347	797,796	643,848	522,706	548,088	7,800,107
Total PABA volumes	1,439,118	1,168,526	1,556,455	1,193,617	1,172,387	1,462,879	1,502,716	1,826,298	1,898,289	1,698,798	1,403,368	1,377,453	17,699,904
CAISO Supply volumes (MWh)													
CAISO Load volumes (MWh)	(435,859)	(404,404)	(749,688)	(608,874)	(909,222)	(745,496)	(756,689)	(1,241,185)	(1,085,699)	(804,412)	(835,286)	(795,546)	(9,372,359)
Utility-Owned Generation (MWh)													
Combined Cycle generation	86,272	155,412	257,248	133,716	183,013	222,355	414,888	541,752	543,701	352,356	479,951	444,774	3,815,438
Simple Cycle Combustion Turbine generation	81	844	6,923	5,715	1,757	2,623	2,991	7,558	9,900	3,844	1,911	1,969	46,115
Solar Energy	10	2	-	9	-	-	-	-	-	-	-	-	20
Total MWh	86,362	156,258	264,170	139,440	184,770	224,978	417,879	549,310	553,600	356,200	481,862	446,743	3,861,573
CONTRACT PURCHASES													
Purchases of Contract Generation (MWh)2													
Tolling & Other Conventional Contracts	402	788	3,421	1,496	51,281	88,893	82,871	77,230	75,714	60,339	492	306	443,233
Renewable-Solar	189,416	262,200	285,809	310,488	346,462	340,511	337,940	318,587	266,391	292,108	218,629	181,117	3,349,658
Renewable-Wind	262,671	283,223	310,857	306,013	362,514	288,899	217,328	139,582	165,404	176,904	307,804	238,163	3,059,365
Renewable-Other	7,873	6,612	8,402	8,949	6,154	9,427	9,693	9,643	8,661	5,595	4,562	3,820	89,390
Purchases of Resource Adequacy (MW)													
Purchases - Resource Adequacy-only contracts	604	604	604	604	604	604	604	604	604	604	604	604	
Renewable Energy Credit (REC) Volumes (MWh)													
(1 REC = 1 MWh)													
Total RECs generated by Utility-Owned and Contract Renewable Resources	459,970	552,037	605,067	625,459	715,131	638,837	564,962	467,812	440,456	474,608	530,995	423,100	6,498,434
Less: Sales of Bundled RECs	-	-	-	-	-	-	(360,000)	(360,000)	(345,000)	(325,000)	(230,000)	(210,000)	(1,830,000)
Less: Bundled RECs used for the Green Tariff Interim Pool product	-	-	-	-	-	-	-	-	-	-	-	-	-
=2022 vintage RECs held in Active status in the WREGIS system (may be sold, retired and used for compliance, or retired and kept in the bank).													
Unsold RECs	459,970	552,037	605,067	625,459	715,131	638,837	204,962	107,812	95,456	149,608	300,995	213,100	4,668,434
Resource Adequacy (MW)													
Total Net Qualifying Capacity (NQC) adjusted for outages	1,954	2,047	2,318	1,860	2,315	2,505	2,562	2,297	1,856	2,032	1,947	2,053	
Less: Sales of Resource Adequacy (MW)	(140)	(279)	(219)	(272)	(140)	(330)	(367)	(517)	(434)	(238)	(421)	(338)	
Less: Substitution of PCIA resource RA for CAM resource RA	-	(22)	(8)	(35)	(50)	-	(6)	(0)	-	-	(121)	(8)	
Subtotal NQC adjusted for outages and sales	1,814	1,747	2,090	1,553	2,124	2,175	2,188	1,780	1,422	1,794	1,406	1,707	
Less: Retained for Compliance - Resource Adequacy -Local (MW)	1,286	1,262	1,298	859	1,341	1,270	1,358	1,271	1,070	1,144	912	1,062	
Less: Retained for Compliance - Resource Adequacy -Flex (MW)	-	-	29	26	26	35	20	22	172	86	117	154	
Less: Retained for Compliance - Resource Adequacy - System (MW)	200	145	74	50	45	72	73	185	180	88	37	16	
Subtotal RA used for SDG&E Compliance	1,485	1,407	1,401	936	1,413	1,377	1,450	1,479	1,422	1,318	1,066	1,232	
Unsold RA	328	339	689	618	712	798	738	301	0	476	340	475	

1) All volumes shown are the estimates used for month-end accruals. Actual RECs may not yet have been received. Actual final volumes may differ from this report.
2) Volumes do not include curtailed MWh.
3) SDG&E offers all excess RA for sale, therefore all RA that is not classified as retained for compliance or sold is classified as unsold.

2023

San Diego Gas & Electric

Portfolio Allocation Balancing Account (PABA) - Summary

Monthly Volumes Report to Accompany the PABA Schedule in the monthly ERRR Reports^{1,4}

Non-confidential

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total
Customer Monthly Usage (MWh)													
PCIA MWh - CCA	645,920	550,945	608,558	494,314	585,706	765,932	680,805	915,954	836,340	825,711	722,926	676,801	8,309,914
PCIA MWh - DA	378,256	249,064	299,453	286,176	330,363	334,455	300,791	402,581	335,818	379,049	317,650	304,219	3,917,876
PCIA MWh - Bundled	581,361	464,911	550,603	377,974	282,978	311,577	260,893	423,700	391,595	344,071	318,052	311,842	4,619,557
Total PABA volumes	1,605,537	1,264,921	1,458,614	1,158,465	1,199,047	1,411,964	1,242,490	1,742,236	1,563,753	1,548,832	1,358,628	1,292,862	16,847,347
CAISO Supply volumes (MWh)													
CAISO Load volumes (MWh)	(734,085)	(541,275)	(790,347)	(623,243)	(717,598)	(594,518)	(829,578)	(959,874)	(786,826)	(799,950)	(663,022)	(598,856)	(8,639,172)
Utility-Owned Generation (MWh)													
Combined Cycle generation	177,440	283,272	311,749	190,796	25,332	104,056	215,043	408,121	313,217	304,987	310,700	312,296	2,957,009
Simple Cycle Combustion Turbine generation	1,010	1,148	2,255	1,281	947	3,630	7,043	9,247	3,381	3,668	1,249	1,220	36,077
Solar Energy	-	-	-	66	8	73	409	401	38	52	255	32	1,335
Total MWh	178,450	284,420	314,004	192,143	26,287	107,759	222,495	417,768	316,637	308,707	312,204	313,548	2,994,422
Utility-Owned Energy Storage (MW)													
	20	20	20	20	20	20	20	86	86	86	86	86	
CONTRACT PURCHASES													
Purchases of Contract Generation (MWh)²													
Tolling & Other Conventional Contracts	2,526	2,692	5,786	5,053	5,965	5,591	7,402	4,685	3,409	5,114	2,530	2,441	53,193
Renewable-Solar	205,588	239,913	227,902	322,923	350,827	343,744	338,263	310,133	283,271	276,737	205,315	169,995	3,274,610
Renewable-Wind	293,005	291,894	302,476	264,185	318,905	300,938	245,260	205,370	202,002	209,083	267,132	220,281	3,120,533
Renewable-Other	3,334	4,428	5,025	7,159	5,939	2,471	2,053	3,050	3,116	3,083	1,997	2,706	44,359
Purchases of Resource Adequacy (MW)													
Purchases - Resource Adequacy-only contracts	805	799	799	799	799	799	799	879	898	873	873	873	
Renewable Energy Credit (REC) Volumes (MWh)													
(1 REC = 1 MWh)													
Total RECs generated by Utility-Owned and Contract Renewable Resources	501,927	536,235	535,402	594,334	675,680	647,225	585,985	518,954	488,427	488,955	474,699	393,015	6,440,838
Less: Sales of Bundled RECs	-	-	-	-	-	-	-	-	-	-	-	-	-
Less: PCIA Voluntary Allocations of bundled RECs	(217,837)	(235,955)	(271,429)	(286,701)	(341,023)	(337,885)	(297,025)	(269,847)	(259,908)	(245,138)	(199,783)	(154,322)	
Less: PCIA Voluntary Allocations of unbundled RECs	-	-	(4,348)	(5,425)	(3,397)	(3,518)	(3,888)	(4,608)	(4,841)	(4,553)	(279,857)	(53,164)	
Less: SDG&E's PCIA Voluntary Allocation of bundled RECs	(109,411)	(114,729)	(134,812)	(144,110)	(178,255)	(169,403)	(150,374)	(128,893)	(119,532)	(120,263)	(99,143)	(76,607)	
Less: SDG&E's PCIA Voluntary Allocation of unbundled RECs	(33,659)	(38,181)	(17,864)	(24,824)	(14,471)	(15,428)	(41,222)	(18,721)	(19,410)	(18,706)	(36,787)	(36,344)	
Less: PCIA Market offer sales	(38,600)	(47,203)	(19,436)	(30,538)	(79,728)	(84,144)	(79,789)	(59,699)	(84,736)	(77,083)	(97,510)	(75,173)	
Less: Bundled RECs used for the Green Tariff Interim Pool product	-	-	-	-	-	-	-	-	-	-	-	-	-
Unsold RECs ⁵	102,421	100,166	87,513	102,735	58,806	36,847	13,687	37,186	-	23,212	(238,381)	(2,595)	321,598
Resource Adequacy (MW)													
Total Net Qualifying Capacity (NQC) adjusted for outages	2,213	2,298	2,309	2,306	2,330	2,115	1,909	2,489	2,508	2,340	2,476	2,469	
Less: Sales of Resource Adequacy (MW)	(692)	(477)	(574)	(491)	(416)	(558)	(741)	(800)	(864)	(383)	(439)	(451)	
Less: Substitution of PCIA resource RA for CAM resource RA	(3)	(39)	(96)	(14)	(79)	(3)	(2)	-	(0)	(9)	(88)	(5)	
Subtotal NQC adjusted for outages and sales	1,518	1,783	1,639	1,801	1,836	1,553	1,166	1,689	1,644	1,948	1,949	2,014	
Less: Retained for Compliance - Resource Adequacy -Local (MW)	724	979	726	746	662	476	683	680	961	1,015	937	1,086	
Less: Retained for Compliance - Resource Adequacy -Flex (MW)	278	357	319	219	262	185	139	14	237	402	632	386	
Less: Retained for Compliance - Resource Adequacy - System (MW)	345	392	343	95	277	184	193	106	411	129	301	130	
Subtotal RA used for SDG&E Compliance	1,347	1,728	1,389	1,061	1,201	846	1,015	801	1,609	1,546	1,870	1,601	
Unsold RA ³	171	54	251	740	635	708	151	888	35	403	79	413	

1) All volumes shown are the estimates used for month-end accruals. Actual RECs may not yet have been received. Actual final volumes may differ from this report.

2) Volumes do not include curtailed MWh.

3) SDG&E offers all excess RA for sale, therefore all RA that is not classified as retained for compliance or sold is classified as unsold.

4) MWh shown do not include net losses from energy storage resources.

5) Per D.22-11-021, volumes of RECs eligible for PCIA Market Offer that are unsold/procured by the IOU are valued at zero for PCIA ratemaking.

2024

San Diego Gas & Electric

Portfolio Allocation Balancing Account (PABA) - Summary

Monthly Volumes Report to Accompany the PABA Schedule in the monthly ERRA Reports ^{1,4}

Non-confidential

	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Total
Customer Monthly Usage (MWh)													
PCIA MWh - CCA	868,440	710,804	674,933	643,777	650,044	672,274	892,266	970,217	989,062	943,656	707,624	799,143	9,522,239
PCIA MWh - DA	319,854	292,787	302,424	305,220	328,852	291,352	384,733	365,776	359,762	368,732	286,361	355,963	3,961,816
PCIA MWh - Bundled	352,569	306,074	276,254	262,946	205,270	191,904	262,061	299,261	296,323	272,325	228,786	253,460	3,207,235
Total PABA volumes	1,540,863	1,309,665	1,253,611	1,211,944	1,184,166	1,155,530	1,539,060	1,635,254	1,645,147	1,584,713	1,222,772	1,408,565	16,691,290
CAISO Supply volumes (MWh)	(739,758)	(435,977)	(488,828)	(534,258)	(547,964)	(638,407)	(866,128)	(740,059)	(671,725)	(614,312)	(542,943)	(338,882)	(7,159,241)
CAISO Load volumes (MWh)	352,569	306,074	276,254	262,946	205,270	191,904	262,061	299,261	296,323	272,325	228,786	253,460	3,207,235
Utility-Owned Generation (MWh)													
Combined Cycle generation	372,298	74,373	33,991	70,224	-	80,494	345,812	232,657	197,025	218,460	95,173	49,393	1,769,901
Simple Cycle Combustion Turbine generation	771	248	698	108	-	424	4,939	2,453	3,072	3,085	420	365	16,582
Solar Energy	266	224	335	394	-	415	397	260	374	321	271	184	3,442
Total MWh	373,335	74,845	35,024	70,726	-	81,334	351,148	235,369	200,470	221,866	95,864	49,942	1,789,925
Utility-Owned Energy Storage (MW)	151	151	151	151	151	151	151	151	151	151	151	151	
CONTRACT PURCHASES													
Purchases of Contract Generation (MWh)²													
Tolling & Other Conventional and Contracts	8,992	6,458	5,527	6,590	11,455	10,902	16,895	12,471	8,165	3,757	3,337	1,902	96,452
Renewable-Solar	182,797	209,327	251,694	281,886	333,453	362,648	345,380	353,835	311,961	269,284	182,865	181,283	3,266,413
Renewable-Wind	243,057	233,247	321,573	298,742	354,814	345,903	191,588	198,648	189,517	189,472	210,870	173,749	2,951,181
Renewable-Other	2,859	4,295	2,803	4,358	4,481	4,249	4,517	2,257	5,360	6,364	7,373	6,336	55,253
Purchases of Resource Adequacy (MW)													
Purchases - Resource Adequacy-only contracts	819	745	824	824	823	823	823	823	220	124	100	95	
Renewable Energy Credit (REC) Volumes (MWh) (1 REC = 1 MWh)													
Total RECs generated by Utility-Owned and Contract Renewable Resources	428,979	447,094	576,406	585,380	692,748	713,215	541,882	554,999	507,212	465,441	401,378	361,553	6,276,289
Less: PCIA Voluntary Allocations of bundled RECs	(197,820)	(231,314)	(285,498)	(295,629)	(354,451)	(393,572)	(299,834)	(307,251)	(285,983)	(162,966)	(198,057)	(173,364)	(3,185,739)
Less: PCIA Voluntary Allocations of unbundled RECs	(44,930)	(39,312)	(28,399)	(46,616)	(35,537)	(24,912)	(24,917)	(21,008)	(22,809)	(25,948)	(45,018)	(50,610)	(410,016)
Less: SDG&E's PCIA Voluntary Allocation of bundled RECs	(86,416)	(88,045)	(112,652)	(117,087)	(146,853)	(154,313)	(118,017)	(120,434)	(108,230)	(93,639)	(79,359)	(69,019)	(1,294,064)
Less: SDG&E's PCIA Voluntary Allocation of unbundled RECs	(19,861)	(17,865)	(25,753)	(22,844)	(18,948)	(16,498)	(12,111)	(10,112)	(12,418)	(16,004)	(14,983)	(16,845)	(204,241)
Less: PCIA Market offer sales	(76,073)	(65,868)	(80,984)	(101,348)	(109,846)	(110,724)	(80,823)	(74,979)	(69,473)	(67,546)	(51,507)	(43,994)	(933,165)
Remaining RECs ⁵	3,879	4,690	43,120	1,856	27,113	13,197	6,180	21,215	8,299	99,338	12,454	7,721	249,064
Resource Adequacy (MW)													
Total Net Qualifying Capacity (NQC) adjusted for outages	2,476	2,552	2,546	2,527	2,576	2,583	2,628	2,613	2,551	2,028	2,228	2,228	
Less: Sales of Resource Adequacy (MW)	(350)	(415)	(410)	(931)	(613)	(984)	(1,096)	(1,329)	(769)	(162)	(556)	(432)	
Less: Substitution of PCIA resource RA for CAM resource RA	(4)	(34)	-	(5)	-	(1)	(5)	(6)	(5)	(17)	(7)	(9)	
Subtotal NQC adjusted for outages and sales	2,122	2,103	2,136	1,591	1,964	1,598	1,527	1,278	1,778	1,849	1,665	1,788	
Less: Retained for Compliance - Resource Adequacy -Local (MW)	944	966	989	706	727	846	731	526	637	908	729	733	
Less: Retained for Compliance - Resource Adequacy -Flex (MW)	166	190	237	244	203	51	51	53	-	49	301	120	
Less: Retained for Compliance - Resource Adequacy - System (MW)	310	274	56	244	290	171	405	227	194	188	533	320	
Subtotal RA used for SDG&E Compliance	1,420	1,430	1,282	1,194	1,220	1,069	1,188	806	831	1,145	1,563	1,173	
Unsold RA ³	702	673	854	396	744	529	340	472	947	704	101	615	

1) All volumes shown are the estimates used for month-end accruals. Actual RECs may not yet have been received. Actual final volumes may differ from this report.

2) Volumes do not include curtailed MWh.

3) SDG&E offers all excess RA for sale, therefore all RA that is not classified as retained for compliance or sold is classified as unsold.

4) MWh shown do not include net losses from energy storage resources.

5) Per D.22-11-021, volumes of RECs eligible for PCIA Market Offer that are unsold/procured by the IOU are valued at zero for PCIA ratemaking.

2025

San Diego Gas & Electric

Portfolio Allocation Balancing Account (PABA) - Summary

Monthly Volumes Report to Accompany the PABA Schedule in the monthly ERRR Reports ^{1,4}

Non-confidential

	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Total
Customer Monthly Usage (MWh)													
PCIA MWh - CCA	977,265	734,437	774,524	693,189	687,116	845,610	845,610	873,219	1,026,025	971,295	658,079	722,561	9,808,931
PCIA MWh - DA	339,919	283,060	322,709	318,226	312,674	352,482	352,482	343,449	310,932	386,997	356,630	206,651	3,886,210
PCIA MWh - Bundled	287,561	210,284	217,544	192,913	198,320	256,579	256,579	253,192	310,557	280,009	225,379	206,198	2,895,117
Total PABA volumes	1,604,745	1,227,781	1,314,777	1,204,329	1,198,110	1,454,672	1,454,672	1,469,861	1,647,515	1,638,301	1,240,088	1,135,410	16,590,259
CAISO Generation Supply volumes (MWh)													
	(602,029)	(478,164)	(565,940)	(579,267)	(637,507)	(632,813)	(819,626)	(951,483)	(814,618)	(650,783)	(545,647)	(442,810)	(7,720,689)
CAISO Load volumes (MWh)	287,561	210,284	217,544	192,913	198,320	256,579	256,579	253,192	310,557	280,009	225,379	206,198	2,895,117
Utility-Owned Generation (MWh)													
Combined Cycle generation	154,842	83,833	33,359	40,050	53,457	101,826	253,628	384,065	338,997	130,539	183,776	62,934	1,821,306
Simple Cycle Combustion Turbine generation	2,277	198	-	64	338	-	538	3,189	9,745	918	1,541	3,301	22,108
Solar Energy	204	-	-	-	-	284	290	135	121	156	98	54	1,342
Total MWh	157,323	84,031	33,359	40,114	53,795	102,110	254,457	387,390	348,862	131,612	185,415	66,289	1,844,757
CONTRACT PURCHASES													
Purchases of Contract Generation (MWh)²													
Tolling & Other Conventional and Contracts	4,199	2,734	1,960	1,934	2,660	3,937	445	4,914	8,887	4,356	2,616	11,079	49,723
Renewable-Solar	202,930	203,173	238,730	298,671	327,318	340,591	361,233	389,957	310,049	329,965	205,017	203,708	3,411,340
Renewable-Wind	231,347	184,336	287,264	236,012	250,622	183,119	200,459	164,710	142,145	183,112	147,341	160,541	2,371,008
Renewable-Other	6,229	3,891	4,627	2,536	3,111	3,056	3,032	4,513	4,676	1,738	5,259	1,193	43,861
Purchases of Resource Adequacy (MW)													
Purchases - Resource Adequacy-only contracts	159	159	154	152	148	103	118	129	124	125	117	114	
Renewable Energy Credit (REC) Volumes (MWh)													
(1 REC = 1 MWh)													
Total RECs generated by Utility-Owned and Contract Renewable Resources	440,710	391,399	530,620	537,219	581,052	527,050	565,015	559,316	456,990	514,971	357,714	365,496	5,827,552
Less: PCIA Voluntary Allocations of bundled RECs	(215,770)	(202,250)	(268,578)	(302,639)	(313,069)	(296,346)	(297,053)	(270,387)	(232,964)	(241,932)	(172,067)	(159,920)	(2,972,975)
Less: PCIA Voluntary Allocations of unbundled RECs	(49,868)	(28,970)	(32,999)	(36,366)	(26,429)	(17,575)	(21,404)	(19,631)	(17,933)	(37,879)	(34,115)	(46,940)	(370,109)
Less: SDG&E's PCIA Voluntary Allocation of bundled RECs	(93,678)	(89,435)	(125,890)	(130,253)	(138,513)	(131,449)	(136,627)	(116,587)	(100,896)	(100,324)	(70,581)	(64,817)	(1,299,050)
Less: SDG&E's PCIA Voluntary Allocation of unbundled RECs	(18,188)	(10,566)	(12,040)	(13,264)	(9,639)	(6,413)	(7,807)	(7,160)	(6,541)	(13,815)	(12,442)	(17,120)	(134,995)
Less: PCIA Market offer sales	(4,083)	(3,828)	(5,086)	(5,732)	(5,930)	(5,612)	(5,624)	(4,795)	(15,356)	(4,494)	(3,192)	(2,968)	(66,700)
Remaining RECs ⁵	59,123	56,350	86,027	48,966	87,472	69,655	96,500	140,755	83,300	116,527	65,317	73,730	983,722
Resource Adequacy (MW)													
Total Net Qualifying Capacity (NQC) adjusted for outages	2,033	2,125	2,075	2,246	2,341	2,586	2,789	2,268	2,453	2,137	1,974	1,958	
Less: Sales of Resource Adequacy (MW)	(449)	(404)	(587)	(213)	(246)	(415)	(708)	(564)	(754)	(448)	(523)	(274)	
Less: Substitution of PCIA resource RA for CAM resource RA	(12)	-	-	(27)	(1)	(0)	0	(10)	(0)	(1)	(64)	(6)	
Subtotal NQC adjusted for outages and sales	1,571	1,721	1,488	2,006	2,093	2,170	2,082	1,694	1,699	1,688	1,387	1,678	
Less: Retained for Compliance - Resource Adequacy -Local (MW)	780	610	273	296	268	793	889	803	784	881	664	649	
Less: Retained for Compliance - Resource Adequacy -Flex (MW)	-	194	212	247	212	32	139	242	193	87	279	422	
Less: Retained for Compliance - Resource Adequacy - System (MW)	55	67	205	472	380	264	132	142	259	66	60	78	
Subtotal RA used for SDG&E Compliance	834	870	690	1,015	860	1,089	1,160	1,187	1,236	1,035	1,002	1,150	
Unsold RA ³	737	850	798	991	1,233	1,082	922	507	463	653	385	528	

1) All volumes shown are the estimates used for month-end accruals. Actual RECs may not yet have been received. Actual final volumes may differ from this report.

2) Volumes do not include curtailed MWh.

3) Unsold RA shown here is calculated without buffer retention taken into consideration.

4) MWh shown do not include net losses from energy storage resources.

5) Per D.22-11-021, volumes of RECs eligible for PCIA Market Offer that are unsold/procured by the IOU are valued at zero for PCIA ratemaking.

2026

San Diego Gas & Electric

Portfolio Allocation Balancing Account (PABA) - Summary

Monthly Volumes Report to Accompany the PABA Schedule in the monthly ERRR Reports ^{1,3}

Non-confidential

	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Total
Customer Monthly Usage (MWh)													
PCIA MWh - CCA	906,765	722,561	795,732	795,254	614,780								3,835,092
PCIA MWh - DA	323,717	206,651	344,077	352,009	257,559								1,484,012
PCIA MWh - Bundled	257,356	206,198	223,796	224,384	187,477								1,099,210
Total PABA volumes	1,487,838	1,135,410	1,363,604	1,371,647	1,059,815	-	-	-	-	-	-	-	6,418,314
CAISO Generation Supply volumes (MWh)													
	(408,736)	(424,328)	(447,422)	(327,200)	(488,524)	-	-	-	-	-	-	-	(2,096,210)
CAISO Load volumes (MWh)	257,356	206,198	223,796	224,384	187,477	-	-	-	-	-	-	-	1,099,210
Utility-Owned Generation (MWh)													
Combined Cycle generation	17,205	44,635	25,918	7,719	18,992	-	-	-	-	-	-	-	114,469
Simple Cycle Combustion Turbine generation	3,000	361	2,228	3,719	1,330	-	-	-	-	-	-	-	10,637
Solar Energy	79	126	264	-	-	-	-	-	-	-	-	-	469
Total MWh	20,284	45,122	28,146	11,438	20,322	-	-	-	-	-	-	-	125,575
CONTRACT PURCHASES													
Purchases of Contract Generation (MWh)²													
Tolling & Other Conventional Contracts	162	465	3,735	879	3,435	-	-	-	-	-	-	-	8,676
Renewable-Solar	213,105	213,440	240,592	134,826	225,846	-	-	-	-	-	-	-	1,027,810
Renewable-Wind	172,197	162,517	175,090	228,094	235,624	-	-	-	-	-	-	-	973,521
Renewable-Other	2,988	2,784	2,858	2,895	3,298	-	-	-	-	-	-	-	14,823
Purchases of Resource Adequacy (MW)													
Purchases - Resource Adequacy-only contracts	119	117	118	119	117								
Renewable Energy Credit (REC) Volumes (MWh)													
(1 REC = 1 MWh)													
Total RECs generated by Utility-Owned and Contract Renewable Resources	388,369	378,867	418,803	365,815	464,768	-	-	-	-	-	-	-	2,016,622
Less: PCIA Voluntary Allocations of bundled RECs	(213,853)	(208,944)	(232,291)	(192,838)	(263,915)								(1,111,841)
Less: PCIA Voluntary Allocations of unbundled RECs	(55,127)	(45,153)	(39,641)	(37,114)	(35,648)								(212,683)
Less: SDG&E's PCIA Voluntary Allocation of bundled RECs	(73,582)	(68,979)	(80,052)	(70,990)	(95,179)								(388,781)
Less: SDG&E's PCIA Voluntary Allocation of unbundled RECs	(19,414)	(13,868)	(12,176)	(11,399)	(10,949)								(67,806)
Less: PCIA Market offer sales	(3,733)	(3,667)	(4,077)	(3,381)	(4,719)								(19,577)
Remaining RECs ⁴	22,660	38,256	50,567	50,093	54,358	-	-	-	-	-	-	-	215,934
Resource Adequacy (MW)													
Total Net Qualifying Capacity (NQC) adjusted for outages	1,706	2,086	2,369	2,069	2,195								
Less: Sales of Resource Adequacy (MW)	(275)	(245)	(284)	(389)	(461)								
Less: Substitution of PCIA resource RA for CAM resource RA	(1)	(6)	(9)	(30)	(3)								
Subtotal NQC adjusted for outages and sales	1,429	1,834	2,077	1,650	1,731	-	-	-	-	-	-	-	
Less: Retained for Compliance - Resource Adequacy -Local (MW)	779	413	488	400	457								
Less: Retained for Compliance - Resource Adequacy -Flex (MW)	254	334	201	94	162								
Less: Retained for Compliance - Resource Adequacy - System (MW)	91	511	81	127	129								
Subtotal RA used for SDG&E Compliance	1,125	1,258	770	621	748	-	-	-	-	-	-	-	
RA that was offered for sale but remained unsold:	304	576	1,307	1,029	983	-	-	-	-	-	-	-	

1) All volumes shown are the estimates used for month-end accruals. Actual RECs may not yet have been received. Actual final volumes may differ from this report.

2) Volumes do not include curtailed MWh.

3) MWh shown do not include net losses from energy storage resources.

4) Per D.22-11-021, volumes of RECs eligible for PCIA Market Offer that are unsold/procured by the IOU are valued at zero for PCIA ratemaking.

Attachment D

SDG&E Response to SD CCA DR Regarding AL 4817-E

San Diego Community Power/Clean Energy Alliance
SDCP_CEA-SDGE-DR-001_4817-E
DATE RECEIVED: March 20, 2026
DATE RESPONDED: March 31, 2026

SDCP/CEA to SDG&E 1.02.

Referring generally to SDG&E Advice Letter 4817-E: Does SDG&E agree that the most recent vintage PCIA rates calculated using SDG&E's PCIA model workpapers used in ERRR proceedings would be equivalent to the PCIA rate for bundled customers described in AL 4817-E (e.g. vintage 2026 PCIA rates would be equal to bundled PCIA rates for 2026)? If SDG&E does not agree, please explain in detail why the most recent vintage PCIA rates would not be equivalent to the proposed PCIA rates for bundled customers.

SDG&E Response to 1.02:

The most recent vintage PCIA rates are not equivalent to the proposed PCIA rates for bundled customers presented in AL 4817-E. To execute the directives in D.25-09-006 SDG&E calculates bundled PCIA rates separately because utilizing the most recent vintage PCIA rates would result in a cost shift between customer classes. This dynamic is a result of the established PCIA rate calculation methodology, described in more detail below.

SDG&E uses the authorized generation revenue allocation factors, which are the same factors used to allocate bundled commodity revenues, to split PCIA-related revenues among the customer classes. However, pursuant to the established unbundled PCIA rates calculation methodology, the resulting revenues forecasted to be collected from each vintage of unbundled PCIA rates is not necessarily aligned with the authorized generation revenue allocation factors. When developing unbundled PCIA rates, the class-level incremental revenues for each vintage of resources, which are allocated based on the authorized generation allocation factors, are divided by the class-level departed load sales for that vintage.¹ Notably, each customer class's portion of the total departed load sales differs per vintage. The final unbundled PCIA rates are cumulative of each preceding vintage, and therefore the resulting revenues to be collected from the latest vintage of unbundled PCIA rates reflects the differing customer class sales and effective revenues resulting from all incremental unbundled vintaged rates. As a result, applying the latest unbundled vintage PCIA rate to bundled sales would result in a cost shift.

Vintaged PCIA rates are currently calculated for unbundled customers only, and are used as an illustrative proxy only in the summary section of bundled bills, since bundled PCIA revenues are already embedded in bundled commodity rates.² In order to both "delineate the PCIA from bundled commodity rates in its EECC tariffs" and implement the approved revenue allocation factors, pursuant to D.25-09-006, SDG&E proposes to take the bundled

¹ D.19-10-001, OP 6.

² Because bundled PCIA is embedded within bundled commodity rates, it is collected via seasonal demand and time-of-use volumetric rates versus unbundled PCIA is a flat, non-seasonal \$/kWh rate.

San Diego Community Power/Clean Energy Alliance
SDCP_CEA-SDGE-DR-001_4817-E
DATE RECEIVED: March 20, 2026
DATE RESPONDED: March 31, 2026

portion of PCIA revenues, allocate them among the customer classes using the authorized generation revenue allocation, then divide the revenues per class by the classes' sales, which prevents cost shifting among customer classes, and results in different rates than the latest vintage unbundled PCIA rates.