BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Expedited Application of San Diego Gas & Electric Company (U902E) Under the Power Charge Indifference Adjustment Account Trigger Mechanism.	Application 20-07-009

CALIFORNIA COMMUNITY CHOICE ASSOCIATION PROTEST OF EXPEDITED APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U902E) UNDER THE POWER CHARGE INDIFFERENCE ADJUSTMENT ACCOUNT TRIGGER MECHANISM

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EXHIBIT A

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Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (Commission), the California Community Choice Association (CalCCA) submits this protest to the *Expedited Application of San Diego Gas & Electric Company (U902E) Under the Power Charge Indifference Adjustment Account Trigger Mechanism* (Application).

I. INTRODUCTION

The Application proposes eye-popping increases to Power Charge Indifference Adjustment (PCIA) rates in the San Diego Gas & Electric Company (SDG&E) service territory. The increases result from the rapid, three-month amortization of a roughly $9 million undercollection anticipated by year-end in SDG&E's PCIA cap balancing account (CAPBA). The CAPBA records the difference between the full 2020 PCIA revenue requirement for departing load customers and the reduced revenue requirement due to capping PCIA rates at a $0.005/kWh annual increase.

The Application provides a table illustrating the severity of the rate increases SDG&E proposes:[1]

Customer Classes	Current Effective Rates[30] (¢/kWh)	Proposed Rates (¢/kWh)	Change (¢/kWh)	Change (%)
Residential	3.205	49.976	46.771	1459%
Small Commercial	2.693	24.045	21.352	793%
Medium and Large Commercial and Industrial	2.964	6.711	3.747	126%
Agriculture	2.239	78.621	76.382	3412%
Streetlighting	2.106	42.549	40.443	1920%
System	3.001	10.625	7.625	254%

Customers of the only CCA operating in the SDG&E service territory in 2020, Solana Energy Alliance (SEA), will experience similar rate impacts for Vintage 2017. The PCIA rate for SEA residential customers will rise to nearly $0.50/kWh -- roughly **16 times** their current PCIA rate.[2]

These results cannot be reconciled with D.18-10-019. In that decision, the Commission adopted a $0.005/kWh annual cap on PCIA increases in order "to limit the change of the PCIA from one year to the next."[3] The Commission explained:

> We find that the potential for volatility supports adoption of a PCIA cap in this decision. Such a cap should reduce extreme PCIA price spikes, and bill impacts, but not enable a continual state of significant undercollection.[4]

1 The changes SDG&E has shown are for the 2015 vintage (i.e., for customers that departed SDG&E service in vintage year 2015).

2 The current PCIA rate for Vintage 2017 residential departing load customers is $0.03187. SDG&E Schedule CCA-CRS Sheet 1.

3 D.18-10-019, Conclusion of Law.

4 *Id.* at 85.

The Commission went on to affirm that "a cap protects against volatility in the PCIA." Contrary to the Commission's intent, under SDG&E's proposal, customers would first experience a dramatic rate spike for three months, with an increase to Vintage 2017 residential customers of roughly **93 times** the $0.005/kWh annual rate increase cap. This extraordinary increase would be followed by an almost equally precipitous drop. The cap/trigger mechanism would create the volatility it was created to avoid.

The impacts here are extreme, and this is the first-ever PCIA trigger application. Under these circumstances, the 60-day approval process contemplated by D.18-10-019 is unrealistic. It leaves little time to resolve discovery disputes and develop alternative proposals. As already mentioned above, and further elaborated on below, there are errors in the capping and calculation methodologies SDG&E has employed. These errors will take time to resolve, and others have yet to be discovered. Meanwhile, SDG&E's proposed schedule does not even provide opportunities for briefing, leaving this protest as the only opportunity for party input before issuance of a proposed decision.

Haste in the Application's resolution could have far-reaching consequences across future PCIA trigger filings by all three major investor-owned utilities. What is required here is a measured approach to undercollections, both procedurally and substantively. Rather than decided on an expedited timeline, the Application should be consolidated with SDG&E's 2021 Forecast Energy Resource and Recovery Account (ERRA) proceeding, A. 20-04-014; developing a mechanism for amortization of the CAPBA balance goes hand-in-hand with the setting of 2021 PCIA rates. Alternatively, and at a minimum, the Commission should establish a reasonable procedural schedule in this proceeding and include in scope consideration of alternatives to the SDG&E's proposal.

II. CALCCA'S GROUNDS FOR PROTEST

CalCCA protests SDG&E's Application on grounds that the proposed rates create rate shock for CCA departing load customers contrary to the Commission's stated intent in D.18-10-019. Rate shock will occur under either of SDG&E's ratemaking proposals, making development of alternative proposals critical. Moreover, while discovery is not complete, an initial review of the Application shows errors that require further exploration to ensure the costs imposed are accurate and just and reasonable. Under these circumstances, resolving the Application within 60 days would be reckless.

One error has already come to light. SDG&E admitted in early discovery to mistakenly capping the 2020 vintage (*i.e.,* bundled customers).[5] This approach is inconsistent with the Commission's intent to apply the cap only to departing load customers. Relatedly, SDG&E proposes to increase PCIA rates to recovery CAPBA amounts from these same 2020 vintage customers, who should not have contributed to the outstanding CAPBA balance in the first place. Increasing the 2020 vintage rates means that customers departing utility service after June 30, 2020 will be immediately subject to both the extremely high uncapped 2020 vintage PCIA rates, *and* the added CAPBA "kicker". Fully understanding the effects of this erroneous capping of 2020 rates for both bundled and departing load customers, and figuring out what to do about it, will require further analysis and time – time not available with a 60-day clock ticking.

In addition to this error, CalCCA has identified other issues requiring further factual, legal, and policy consideration in this proceeding. Five areas are discussed below, although CalCCA reserves the right to modify its list of issues as discovery unfolds.

1. CAPBA amortization by the end of the calendar year produces rate spikes and thus defeats the purpose of the cap.

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5 *See* SDG&E Response to SDCP DR 01.10, attached as Exhibit A.

D.18-10-019 expressed the Commission's expectation that the cap would reduce PCIA volatility. The Commission did not anticipate that the trigger mechanism – an idea that was raised for the first time in reply comments on the Alternate Proposed Decision[6] -- would itself cause the volatility the cap was intended to prevent. Unlike the ERRA trigger, after which the Commission modeled the CAPBA trigger, the CAPBA balance only increases throughout the year with no possibility of reduction. This design inevitably leads to trigger applications late in the year and, consequently, very short amortization periods.

As proposed by SDG&E, the 2021 PCIA rate cap, including a CAPBA adder, for 2017 vintage customers would be $0.11/kWh; in 2022 the rate cap would snap back down to 2021 uncapped rates plus $0.005/kWh. Faced with this proposal for a 20x jump in the rate cap, the Commission should explore other amortization periods. CalCCA, together with the Joint CCAs, is exploring amortization periods of 12 months or more. These longer amortization periods significantly reduce rate impacts while still ensuring revenue requirement recovery. Expecting those proposals to be fully formulated at the protest stage, however, is unrealistic. Thus, if the Commission intends to evaluate measures to mitigate rate shock, it has no choice but to extend consideration of this Application and consolidate the proceeding with SDG&E's 2021 ERRA Forecast.

2. Whether D.18-10-019 requires SDG&E to bring its CAPBA *down to zero* by year end, as SDG&E has proposed.

D.18-10-019 requires an IOU to make a proposal for amortization of an amount that will bring the balance "below 7 percent;"[7] it does *not* require that the proposal bring the balance to zero as SDG&E proposes. Moreover, it does not limit the IOU's ability to propose alternative

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6 *See* D.18-10-019, at 131 (*referencing* Brightline reply comments at 5-6).

7 D.18-10-019, Ordering Paragraph 10.d. at 162.

methodologies or prevent the Commission from adopting such alternatives, such as bringing the balance down to 6 percent. Indeed, the decision strongly suggests an intent *not* to recover the full balance in the trigger application, but to roll balances below 7 percent into the then-pending ERRA Forecast proceeding.[8] The Commission stated:

> The application shall propose a revised PCIA rate that will bring the projected account balance *below 7%* and *maintain the balance below that level until January 1* of the following year, when the PCIA rate adopted in that utility's ERRA forecast proceeding will take effect.

The question of the appropriate point "below 7 percent" to use in setting trigger rates should be examined in this proceeding. While the issue could become moot if a reasonable amortization schedule is adopted, the Commission should explore this question to provide clarity for the next calendar year.

3. Whether SDG&E has employed the rate design contemplated by D.18-10-019 in calculating initial rate impacts.

SDG&E has proposed two alternative rate designs. The first alternative purports to comport with D.18-10-019, relying on generation revenue allocation factors from SDG&E's General Rate Case. The second alternative would set aside these factors and instead allocate the CAPBA balance on an equal cents per kWh basis for all departing load customers.

The Commission should allow time to explore the accuracy of SDG&E's calculations and the merits of competing alternatives. Substantial consideration is required to consider the impacts of an equal cents per kWh methodology on different customer classes and vintages. There may be additional approaches meriting consideration, depending upon the amortization period adopted by the Commission. The need to consider rate design weighs heavily on a balance already tipped toward deferring the issue to the 2021 ERRA Forecast.

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8 *Ibid.*

4. Whether the PCIA rate cap should be calculated cumulatively, thus affecting other vintages, as SDG&E has proposed.

There are two possible approaches to applying the rate cap on PCIA customers. The first, as proposed by SDG&E, is to apply the caps cumulatively, vintage by vintage. The second approach would cap each vintage and, applying that cap, leave each vintage responsible for its own share of undercollection. CalCCA believes that SDG&E's cumulative approach led to the error of capping the 2020 vintage, as discussed above. Like the other issues discussed above, determining the effects of the vintage capping methodology requires factual exploration to determine the impacts of these alternatives.

5. Whether the CAPBA accruals should be based on sales, rather than just a monthly proportion of annual revenue requirement, as SDG&E has done.

SDG&E's capping methodology is unique among the IOUs. SDG&E determines CAPBA accruals by allocating the total forecast revenue requirement shortfall resulting from the cap on a monthly basis to the CAPBA. Variations between forecast and actual PCIA undercollection from departing load thus are not captured in the CAPBA but instead accrue to the Portfolio Allocation Balancing Account (PABA). An alternative methodology, employed by Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE), accrues the actual PCIA undercollection to their equivalent of the CAPBA as a function of sales. This accounts for the impact forecast/actual sales variance on the CAPBA. While CalCCA does not at this time have sufficient information to evaluate the relative effects, the issue should be considered through a comparison of potential outcomes of the Application using the two methodologies.

Further discovery and analysis are required to understand the implications of each of the foregoing issues. Ultimately, however, CalCCA believes a longer amortization period will be required to mitigate the severity of rate impacts. To enable a reasonable opportunity for these analyses, the Commission has little choice but to consolidate the Application with the 2021 ERRA Forecast for resolution of the entire CAPBA balance.

III. DESCRIPTION OF CALCCA

California's community choice aggregators (CCAs) are local governmental entities that provide electricity services to their residents pursuant to Public Utilities Code Section 366.2. CCAs are currently serving about 10 million customers in more than 170 cities and counties across California.

CalCCA was formed in 2016 as a trade organization to facilitate joint participation in certain regulatory and legislative matters in which members share common interests. CalCCA's voting membership includes CCAs serving load and others in the process of implementing new service, including: Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, CleanPowerSF, Clean Energy Alliance, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, MCE, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, Valley Clean Energy, and Western Community Energy.

IV. CALCCA'S INTEREST IN THIS PROCEEDING

CalCCA seeks party status in this proceeding to address the PCIA rate increases. Customers of CalCCA's member CCAs pay the PCIA rate as departing load customers. CalCCA's interests center on whether SDG&E has calculated the PCIA consistent with applicable Commission decisions in R.17-06-026, a proceeding in which CalCCA has been an active party. CalCCA is also interested in ensuring consistency of application of the PCIA methodologies across the service territories of all three investor-owned utility service territories where member CCAs provide service.

Three individual CCAs who are or will be providing service in the SDG&E service territory are also participating in this proceeding as "Joint CCAs:" SEA, San Diego Community Power, and Clean Energy Alliance. CalCCA intends to coordinate with these CCAs to align interests and participation to the extent possible.

V. PROCEDURAL SCHEDULE, NEED FOR HEARINGS, AND CATEGORIZATION OF PROCEEDING

Pursuant to Rule 2.6(d), CalCCA provides the following procedural comments:

A. Need for Hearing

Evidentiary hearings will be necessary to address the issues identified in Section IV.

B. Proposed Schedule

SDG&E's proposal achieves the 60-day schedule contemplated by D.18-10-019.[9] CalCCA contends, however, that a 60-day schedule is inadequate given the magnitude of the proposed rate increases. For this reason, CalCCA recommends that the Administrative Law Judge issue a ruling to consolidate this application for review in the 2021 Forecast ERRA proceeding, A.20-04-014.

C. Categorization

The proceeding is appropriately categorized as "ratesetting."

VI. PARTY STATUS

Pursuant to Rule 1.4(a)(2), CalCCA hereby requests party status in this proceeding. As described herein, CalCCA has a material interest in the matters being addressed in this

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[9] D.18-10-019, Ordering Paragraph 10.b. at 162.

proceeding. CalCCA designates the following person as the “interested party” in this proceeding:

Evelyn Kahl, General Counsel
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regulatory@cal-cca.org

VII. CONCLUSION

CalCCA appreciates the opportunity to submit this protest to the Application and requests party status.

Respectfully submitted,

Evelyn Kahl

Evelyn Kahl
General Counsel to the
California Community Choice Association

August 13, 2020

EXHIBIT A

SDG&E Response to SDCP DR_01

SAN DIEGO COMMUNITY POWER (SDCP)
SDG&E PCIA TRIGGER APPLICATION (A. 20-07-009)
Data Request 01
SDG&E RESPONSE
DATE RECEIVED: July 17, 2020
DATE RESPONDED: July 31, 2020

PROTECTED MATERIALS SUBJECT TO NONDISCLOSURE AGREEMENT

1. Please provide the capped and uncapped PCIA rates, by vintage and rate group, as approved in SDG&E's 2020 ERRA Forecast Application (A.19-04-010).

   SDG&E Response:

   Please refer to Attachment C of Ms. Fuhrer's testimony for approved capped PCIA rates resulting from A.19-04-010 per Decision (D).20-01-005. Uncapped PCIA rates from A.19-04-010 and D.20-01-005 are not approved but are provided for illustrative purposes in the attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q1."

2. Please provide SDG&E's forecast of 2020 kWh sales, by month, used to develop the PCIA rates in A.19-04-010. Please separately identify the sales as pertaining to bundled, direct access, community choice aggregation, and Green Tariff Shared Renewables customers.

   SDG&E Response:

   This response 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 redacted. The confidentiality declaration of Kenneth E. Schiermeyer is also provided.

   See attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q2-3." All rates calculated in the 2020 ERRA Forecast Application use the 2019 Authorized Sales Forecast from D.18-11-035. The bundled sales forecast is available in cell ranges B15:B21 and again in cells B52:B58. The Green Tariff Shared Renewables sales forecast is contained in Bundled sales and is not separately estimated. The direct access ("DA") sales forecast by vintage is contained exclusively in vintage years 2001 through 2016, and are available in cell range C13:K21. The community choice aggregation ("CCA") sales forecast is exclusively contained in vintage year 2017 and 2018, and are available in cell range L13:M21. The vintage billing determinants of those responsible for the vintage portfolio to determine PCIA rates are contained for DA in cell range C38:K46 and cell range L26:M34 for CCA. The complete set of bundled and vintage billing determinants are also shown in cell range B50:M58. No forecast of 2020 kWh sales by vintage month are available since PCIA rates are established on an annual basis.

3. Please provide the same forecast of 2020 kWh sales referenced in Question 2, differentiated by customer vintage.

   SDG&E Response:

   This response 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 redacted. The confidentiality declaration of Kenneth E. Schiermeyer is also provided.

   Please see response to Question 2.

4. Please provide the 2020 kWh sales, by month, used to develop the projected 2020 CAPBA balance shown in the testimony of Mr. Eric Dalton.
   a. Please include recorded sales volumes for January – May 2020 and forecasted sales volumes for June – December 2020.
   b. Please differentiate the sales provided by rate group.

   SDG&E Response:

   SDG&E does not use monthly kWh sales to book to CAPBA. Due to this, SDG&E also does not use monthly kWh forecasted sales to develop the projected 2020 CAPBA balance. The 2020 forecast is based on the capped portion of the 2020 Departed Load PABA (commonly referred to as PCIA) Revenue Requirement. These capped revenues are applied to CAPBA using the electric seasonality factors. CAPBA is used to track the amount of revenue requirement related to Bundled customers' over payment into PABA that is completely offset by Departed Load customers' under payment due to the cap. Any volumetric differences will be captured in the balances of the various subaccounts within PABA which will be used to set PCIA rates in SDG&E's 2021 ERRA Forecast Application November Update along with any potential remaining balances in CAPBA.

5. Please provide SDG&E's forecast of 2021 kWh sales, by month, used to develop the PCIA rates in A.20-04-14. Please separately identify the sales as pertaining to bundled, direct access, community choice aggregation, and Green Tariff Shared Renewables customers.

   SDG&E Response:

   SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that 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. The PCIA rates being proposed in the 2021 ERRA Forecast application have no impact on the CAPBA rates or revenues being proposed in this application.

6. Please provide the same forecast of 2021 kWh sales referenced in Question 5, differentiated by customer vintage.

   SDG&E Response:

   SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that 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. The PCIA rates being proposed in the 2021 ERRA Forecast application have no impact on the CAPBA rates or revenues being proposed in this application.

7. Please provide workpapers demonstrating the calculations required to compute the monthly CAPBA activity by month customer vintage shown in Attachment A of Mr. Dalton's testimony. Details should include, but not be limited to, monthly kWh sales and the price in $/kWh applied to arrive at the CAPBA activity by vintage.

   SDG&E Response:

   This response 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 redacted and are the same materials included in the confidential workpapers of Stacy Fuhrer for this application. The confidentiality declaration of Stacy Fuhrer is provided.

   See attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q7." The calculation of the CAPBA by vintage is attached and is calculated by taking the vintage system PCIA rate above the cap and multiplying that applicable vintage rate by departed load system vintage sales. The monthly activity is based on the amount of the 2020 revenue requirement that is above the cap by vintage. The 2020 activity is booked to CAPBA by multiplying the total 2020 capped revenue requirement amount with the electric seasonality factors for each month.

8. Please provide workpapers demonstrating the calculations required to compute the proposed PCIA rates included in Attachment A of Ms. Fuhrer's testimony.

   SDG&E Response:

   This response 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 redacted. The confidentiality declaration of Stacy Fuhrer is also provided.

   See attached excel file named "PUBLIC - PCIA Model_2020 CAPBA Trigger 3 Mo._Gen Rev Alloc_Fuhrer_Q8." Please note that SDG&E uses annual sales, not monthly, to calculate rates.

9. Please provide workpapers demonstrating the calculations required to compute the proposed PCIA rates included in Attachment B of Ms. Fuhrer's testimony.

   SDG&E Response:

   This response 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 redacted. The confidentiality declaration of Stacy Fuhrer is also provided.

   See attached excel file named "PUBLIC - PCIA Model_2020 CAPBA Trigger 3 Mo._Equal Cents Alloc_Fuhrer_Q9. Please note that SDG&E uses annual sales, not monthly, to calculate rates.

10. Admit that the PCIA rates effective February 2020 for vintage 2020 customers include the impact of the price cap applied to earlier customer vintages.

    SDG&E Response:

    SDG&E's current effective 2020 vintage PCIA rates as implemented February 1, 2020 per AL 3500-E and D.20-01-005 are impacted by the cap but they should not have been. SDG&E mistakenly included cumulative rates from the application of the cap for PCIA vintage 2020 when it should have used the uncapped 2020 PCIA rates calculated for bundled customers in its 2020 ERRA Forecast Application (A.19-04-010). This error resulted in understating the 2020 PCIA vintage rates for any customer departing under PCIA vintage 2020 but has no impact on bundled customers who pay PCIA (called the Portfolio Allocation Balancing Account (PABA) revenue requirement) through commodity rates. This error also has no impact on the CAPBA revenues as SDG&E is only undercollected in PCIA vintages 2009-2012, 2014 and 2015.

11. If the answer to question 8 is an admission, please explain why 2020 vintage PCIA rates would be impacted by the rate cap given that there was no previous PCIA rate from which to add $0.005/kWh for that vintage.

    SDG&E Response:

    Please see response to question 10 above.

12. Please quantify the total PCIA revenue SDG&E would expect to collect from October – December 2020 if the currently effective PCIA rates remain in place. Provide all workpapers supporting your response.

    SDG&E Response:

    See attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q12-15." SDG&E would expect to collect from October – December 2020 roughly $4.6M from departed load customers if the current effective PCIA rates remain in place for those months.

13. Please quantify the total PCIA revenue SDG&E would expect to collect from October – December 2020 if the uncapped PCIA rates as approved in A.19-04-010 were in place for those months. Provide all workpapers supporting your response.

    SDG&E Response:

    See attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q12-15." As stated above in SDG&E's response to question 1, uncapped PCIA rates from A.19-04-010 and Decision (D).20-01-005 are not approved but if SDG&E's 2020 ERRA Forecast Application had no cap in place then SDG&E would expect to collect from October – December 2020 roughly $7.1M from departed load customers if the uncapped PCIA rates in A.19-04-010 were in place for those months.

14. Please quantify the total PCIA and CAPBA revenue SDG&E would expect to collect from October – December 2020 if the proposed rates shown in Attachment A of Ms. Fuhrer's testimony are in place. Provide all workpapers supporting your response.

    SDG&E Response:

    See attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q12-15." SDG&E would expect to collect from October – December 2020 roughly $13.5M in total PCIA and CAPBA revenue from departed load customers if the proposed rates shown in Attachment A of Ms. Fuhrer's testimony are in place for those months.

15. Please quantify the total PCIA and CAPBA revenue SDG&E would expect to collect from October – December 2020 if the proposed rates shown in Attachment B of Ms. Fuhrer's testimony are in place. Provide all workpapers supporting your response.

SDG&E Response:

See attached excel file named "PUBLIC - SDG&E Response - SDCP DR_01 PCIA Trigger Application Q1-3,7,12-15," tab "DR 1_Q12-15." SDG&E would expect to collect from October – December 2020 roughly $13.5M in total PCIA and CAPBA revenue from departed load customers if the proposed rates shown in Attachment B of Ms. Fuhrer's testimony are in place for those months.

16. Referring to Ms. Fuhrer's testimony, please explain why the currently effective system average PCIA rates for vintages 2017, 2018, and 2018 shown in Attachment C do not match the rates for the same vintages shown on Line 3 of Table 4 – 2020 ERRA Forecast Application PCIA Cap Analysis.

SDG&E Response:

Line 3 of Table 4 is the maximum the vintage PCIA rate could increase in SDG&E's 2020 ERRA Forecast Application. Those rates are not the current effective PCIA rates. PCIA rates are cumulative so capped rates from 2009-2012, 2014 and 2015 impact the cumulative rate for vintages that follow a capped rate like vintages 2017 and 2018.