

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



Application of SAN DIEGO GAS &
ELECTRIC COMPANY (U 902-E) for
Approval of its 2024 Electric Procurement
Revenue Requirement Forecasts, 2024 Electric
Sales Forecast, and GHG-Related Forecasts

Application 23-05-013
(Filed May 15, 2023)

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

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September 29, 2023

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I. INTRODUCTION

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

II. DISCUSSION

As set forth in the parties’ Joint Report Re Meet and Confer dated September 22, 2023, the parties have met and conferred and have stipulated to the admission of certain documents into the evidentiary record. Attached hereto as **Attachment A** is combined joint exhibit list, which includes all testimony previously served in this proceeding (along with accompanying attachments thereto), data request responses, and other documents that the parties hereby move

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

into the evidentiary record of this proceeding. Cal Advocates, DACC, and CalCCA do not have any exhibits to submit at this time. All parties reserve the right to submit additional exhibits into the evidentiary record as may become necessary, including following SDG&E's October Update.

SDG&E and the CCA Parties respectfully move that all of the prepared testimony and exhibits listed in Attached A be admitted into the evidentiary record of this proceeding on the grounds that the material contained therein is relevant to the issues to be determined in this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling dated August 4, 2023. Stipulation as to the admission of these exhibits was a key factor in parties' agreement to waive hearings in this matter.

Concurrent with the filing of its Application on May 15, 2023, SDG&E served Exhibits SDGE-01 through SDGE-07 on the official service list for last year's 2023 ERRRA Forecast Application (A.22-05-025). All parties to this year's 2024 ERRRA Forecast Application (A.23-05-013) have since received a copy of those exhibits. On August 15, 2023, SDG&E served supplemental testimony as Exhibit SDG&E-08 to the official service list for this proceeding. Subsequently on September 8, 2023, SDG&E served rebuttal testimony as Exhibits SDGE-09 through SDGE-12 on the official service list for this proceeding. On August 28, 2023, the CCA Parties served Exhibit CCA-01 on the official service list for this proceeding. Through their meet and confer, the parties have stipulated to the introduction of Exhibits CCA-02 through CCA-07 into the record.

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

Concurrently with this motion, SDG&E and the CCA Parties will be individually filing their respective Motions to Seal the Evidentiary Record under Rule 11.5 to request the protection of confidential versions of the proposed exhibits listed above.

III. CONCLUSION

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

Respectfully submitted,

/s/ Roger A. Cerda

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September 29, 2023

ATTACHMENT A – EXHIBIT LIST

| | | | | |
|-----------------------|--|-------------------------------------------------------------|--|------------------|
| Proceeding No. | | Exhibit List | | ALJ |
| A.23-05-013 | | SDG&E 2024 ERRR FORECAST, A.23-05-013 September 29, 2023 | | Rafael L. Litrag |

| Exh. No. | Sponsor/Witness | Description | Entered into Evidence | Link on CPUC Supporting Documents Website |
|---------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SDG&E Exhibits | | | | |
| SDGE-01 | Baez | Prepared Direct Testimony of Rachelle R. Baez on Behalf of San Diego Gas & Electric Company (May 15, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520482501.pdf |
| SDGE-01C | Baez | Prepared Direct Testimony of Rachelle R. Baez on Behalf of San Diego Gas & Electric Company (May 15, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| SDGE-02 | Elias | Prepared Direct Testimony of Jimmy on Behalf of San Diego Gas & Electric Company (May 15, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520489061.pdf |
| SDGE-02C | Elias | Prepared Direct Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company (May 15, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| SDGE-03 | Hua | Prepared Direct Testimony of Brenda Hua on Behalf of San Diego Gas & Electric Company (May 15, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520486807.pdf |
| SDGE-03C | Hua | Prepared Direct Testimony of Brenda Hua on Behalf of San Diego Gas & Electric Company (May 15, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| SDGE-04 | Elliott | Prepared Direct Testimony of Stephen M. Elliott on Behalf of San Diego Gas & Electric Company (May 15, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520484383.pdf |

| Exh. No. | Sponsor/Witness | Description | Entered into Evidence | Link on CPUC Supporting Documents Website |
|----------|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SDGE-04C | Elliott | Prepared Direct Testimony of Stephen M. Elliott on Behalf of San Diego Gas & Electric Company (May 15, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| SDGE-05 | Miller | Prepared Direct Testimony of Sheri Miller on Behalf of San Diego Gas & Electric Company (May 15, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520483999.pdf |
| SDGE-05C | Miller | Prepared Direct Testimony of Sheri Miller on Behalf of San Diego Gas & Electric Company (May 15, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| SDGE-06 | Schiermeyer | Prepared Direct Testimony of Kenneth E. Schiermeyer on Behalf of San Diego Gas & Electric Company (May 15, 2023) | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520481556.pdf |
| SDGE-07 | Skopec | Prepared Direct Testimony of Daniel F. Skopec on Behalf of San Diego Gas & Electric Company (May 15, 2023) | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520482389.pdf |
| SDGE-08 | Miller | Prepared Supplemental Testimony of Sheri Miller Regarding Energy Index Market Price Benchmark on Behalf of San Diego Gas & Electric Company (August 15, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6562/517407676.pdf |
| SDGE-08C | Miller | Prepared Supplemental Testimony of Sheri Miller Regarding Energy Index Market Price Benchmark on Behalf of San Diego Gas & Electric Company (August 15, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| SDGE-09 | Ellias | Prepared Rebuttal Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company (September 8, 2023) | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6682/519776779.pdf |

| Exh. No. | Sponsor/Witness | Description | Entered into Evidence | Link on CPUC Supporting Documents Website |
|-----------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SDGE-10 | Hua | Prepared Rebuttal Testimony of Brenda Hua on Behalf of San Diego Gas & Electric Company (September 8, 2023) | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6682/519776998.pdf |
| SDGE-11 | Miller | Prepared Rebuttal Testimony of Sheri Miller on Behalf of San Diego Gas & Electric Company (September 8, 2023) | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6682/519776348.pdf |
| SDGE-12 | Baez | Prepared Rebuttal Testimony of Rachelle R. Baez on Behalf of San Diego Gas & Electric Company (September 8, 2023) | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6723/520480541.pdf |
| CCA Parties Exhibits | | | | |
| CCA-01 | Bencomo-Jasso | Prepared Direct Testimony of Carlo Bencomo-Jasso on Behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas and Electric Company's 2024 ERRA Forecast Proceeding (August 28, 2023) **PUBLIC VERSION** | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6577/517617227.pdf |
| CCA-01C | Bencomo-Jasso | Prepared Direct Testimony of Carlo Bencomo-Jasso on Behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas and Electric Company's 2024 ERRA Forecast Proceeding (August 23, 2023) **CONFIDENTIAL VERSION** | | Not applicable. |
| CCA-02 | Bencomo-Jasso | SDG&E Response to SDCP/CEA Data Request Set 5 | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6735/520504164.pdf |
| CCA-03 | Bencomo-Jasso | SDG&E Response to SDCP/CEA Data Request Set 5 – Attachment A | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6735/520511619.pdf |
| CCA-04 | Bencomo-Jasso | SDG&E Response to SDCP/CEA Data Request Set 5 – Attachment B | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6735/520497183.pdf |
| CCA-05 | Bencomo-Jasso | SDG&E Response to SDCP/CEA Data Request Set 5 – Attachment C | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6735/520502040.pdf |
| CCA-06 | Bencomo-Jasso | SDG&E Response to SDCP/CEA Data Request Set 5 – Attachment D | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6735/520496882.pdf |

| Exh. No. | Sponsor/Witness | Description | Entered into Evidence | Link on CPUC Supporting Documents Website |
|-----------------|------------------------|-----------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CCA-07 | Bencomo-Jasso | SDG&E Response to SDCP/CEA Data Request Set 6 | | https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2305013/6735/520495884.pdf |