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

Application of San Diego Gas & Electric Company for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecasts, and GHG-Related Forecasts	Application 23-05-013

OPENING BRIEF OF SAN DIEGO COMMUNITY POWER, CLEAN ENERGY ALLIANCE, AND THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

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October 4, 2023

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2. For future Energy Resource Recovery Account Forecast proceedings, the Commission should direct SDG&E to evaluate RA market conditions and historical RA sales to develop a forecast of Sold RA.
3. The Commission should order SDG&E to revert back to past confidentiality designation processes that allow for the publication of current and proposed class average bundled rates. If necessary for implementation, the Commission should order the Energy Division to facilitate a working group to further develop SDG&E's confidentiality designation practices.

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Pursuant to Rule 13.12 of the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission") and the August 4, 2023 *Assigned Commissioner's Scoping Memo and Ruling*[1] setting the schedule for this proceeding, San Diego Community Power ("SDCP"),[2] Clean Energy Alliance ("CEA"),[3] and the California Community Choice Association ("CalCCA")[4] (collectively, "CCA Parties"), hereby submit this Opening Brief regarding the *Application of San Diego Gas & Electric Company* ("SDG&E") *for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecast, and GHG-Related Forecasts*, submitted May 15, 2023 ("Application").[5]

SDG&E's Application demonstrates a failure to forecast accurate Power Charge Indifference Adjustment ("PCIA") costs. Through its refusal to forecast resource adequacy ("RA") sales, SDG&E artificially raises the total PCIA portfolio cost forecasted — requiring both bundled

[1] Application ("A.") 23-05-013, *Assigned Commissioner's Scoping Memo and Ruling* (August 4, 2023).
[2] SDCP is the Community Choice Aggregator ("CCA") for the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, National City, San Diego, and the unincorporated areas of San Diego County.
[3] CEA is the CCA for the cities of Carlsbad, Del Mar, Solana Beach, Escondido, San Marcos, Oceanside, and Vista.
[4] Per Rule 1.8(d) of the Commission's Rules of Practice and Procedure, representatives of CalCCA authorized SDCP and CEA to file this Opening Brief on their behalf.
[5] A.23-05-013, *Application of San Diego Gas & Electric Company for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecast, and GHG-Related Forecasts* (May 15, 2023).

and unbundled customers to pay more upfront and wait for a refund later through the Portfolio Allocation Balancing Account ("PABA").[6] This approach is inconsistent with the practices of Pacific Gas & Electric ("PG&E") and Southern California Edison ("SCE"), both of which rely on historical RA sales in determining the forecasted amount.[7] By evaluating RA market conditions and its historical RA sales, SDG&E can more accurately forecast PCIA portfolio costs, in turn saving customers money in the short term and reducing rate volatility.[8]

In addition, SDG&E's new redaction practices decrease the overall transparency of its Application compared to prior years. The CCA Parties acknowledge and appreciate the need to protect confidential information[9] and support the Energy Division's efforts to increase transparency in Energy Resource Recovery Account ("ERRA") proceedings.[10] However, the approach SDG&E has chosen to implement the Energy Division's guidance negatively affects the parties the Application impacts that do not have access to SDG&E confidential information.[11] The Commission should order SDG&E to revert back to past confidentiality designation processes that allow for the publication of current and proposed class average bundled rate.

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6 Exh. CCA-01, Direct Testimony of Carlo Bencomo-Jasso on Behalf of San Diego Community Power and Clean Energy Alliance, p. 15 (August 18, 2023).

7 Exh. CCA-07, SDG&E Response to CCA Data Request 6.01.

8 Bencomo-Jasso Direct at 15 (explaining that an accurate forecast of RA sales as proposed by the CCA Parties would result in a $26.9 million reduction in PCIA portfolio costs).

9 *Id*. at 16.

10 *See* Exh. SDGE-12, Rebuttal Testimony of Rachelle Baez on Behalf of San Diego Gas & Electric Company, p. RRB-4 (September 8, 2023) (explaining that SDG&E's change in approach to confidentiality is in response to Energy Division's requests to increase the transparency of ERRA proceedings).

11 Bencomo-Jasso Direct at 16.

I. LEGAL STANDARD

SDG&E, as the applicant, bears the burden of establishing the reasonableness of all aspects of its Application,[12] and that burden of proof generally is measured based upon a preponderance of the evidence.[13] In addition, pursuant to Public Utilities Code Section 451:

> All charges demanded or received by any public utility, or by any two or more public utilities, for any product or commodity furnished or to be furnished or any service rendered or to be rendered shall be just and reasonable. Every unjust or unreasonable charge demanded or received for such product or commodity or service is unlawful.[14]

This foundational "just and reasonable" statutory requirement is applicable to all rates and charges, including those that will be established by this ERRA Forecast proceeding. In Forecast proceedings, the Commission conducts a reasonableness review by evaluating, "…whether the data or actions resulting from, for example, the calculation of a forecasted expense, are reasonable, based on the methods and inputs used."[15] More specifically, the utility's proposed PCIA rates must be reasonable and comply with all applicable rules, regulations, resolutions and decisions for all customer classes.[16]

As discussed in more depth below, SDG&E has not established by a preponderance of the evidence that its Application is reasonable with respect to RA sales forecasts and redactions of

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[12] Rulemaking ("R.") 11-02-019, *Decision Mandating Pipeline Safety Implementation Plan, Disallowing Costs, Allocating Risk of Inefficient Construction Management to Shareholders, and Requiring Ongoing Improvement in Safety Engineering,* p. 42 (December 28, 2012) ("D.12-12-030"); Cal. Pub. Util. Code § 451 (requiring that rates be "just and reasonable").

[13] D.12-11-051, p. 9; D.09-03-025, p. 8.

[14] Cal. Pub. Util. Code § 451.

[15] A.20-04-014, *Decision Adopting 2021 Electric Procurement Revenue Requirement Forecasts and Greenhouse Gas-Related Forecasts for San Diego Gas & Electric Company*, pp. 17-18 (January 14, 2021) ("D.21-01-017").

[16] While not specifically memorialized in this year's scoping ruling, this standard has long been acknowledged as the standard for ERRA Forecast proceedings. *See, e.g.,* A.21-06-001, *Assigned Commissioner's Scoping Memo and Ruling*, p. 6 (August 11, 2021); A.13-05-015, *Scoping Memo and Ruling of Assigned Commissioner*, p. 4 (September 12, 2013).

proposed customer commodity rates. Specifically, its failure to forecast Sold RA is inconsistent with Commission guidance and stands in stark contrast to the approaches to forecasting adopted by both PG&E and SCE. The result is that SDG&E's customers are unreasonably charged more up front and must wait for a refund as sales are realized throughout the year. Finally, SDG&E has decreased the overall transparency of its Application through its attempts to provide more information as requested by the Energy Division. SDG&E can achieve a more reasonable outcome by reverting to past confidentiality practices, which allow for greater customer accessibility and understanding of proposed rates.

II. BACKGROUND

Community Choice Aggregator ("CCA") customers receive generation services from their local CCA but receive transmission, distribution, billing, and other services from the incumbent, for-profit utility.[17] CCA rates are partially influenced by local mandates to procure and maintain clean energy portfolios that exceed state requirements for renewable generation.[18] CCA and other unbundled customers are subject to several non-bypassable charges ("NBCs"), including PCIA rates to recover above market costs of the utility's PCIA-eligible resources and the Local Generation Charge rate to recover Cost Allocation Mechanism costs.[19]

The PCIA is derived from the utility's Indifference Amount, which is updated annually in ERRA Forecast proceedings.[20] The Indifference Amount is the difference in the forecast year between the cost of the IOU's supply portfolio and the market value of the IOU's supply portfolio.[21]

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[17] Bencomo-Jasso Direct at 2-3.
[18] *Id*. at 3.
[19] *Id*.
[20] *Id*.
[21] *Id*.

SDG&E's PCIA rates for 2024 will be set based on: (1) the forecasted Indifference Amount; and (2) the 2023 year-end balance in the Portfolio Allocation Balancing Account ("PABA").[22] The Indifference Amount and the year-end PABA over- or under-collection are added together to form the PABA revenue requirement underlying PCIA rates.[23]

Bundled customers are also subject to a series of NBCs.[24] For bundled customers, the PCIA-related costs are included in the commodity revenue requirement and recovered through a bundled commodity rate.[25] Costs to meet bundled customers' energy and ancillary service requirements through the CAISO market, along with costs of resources not eligible for recovery in the PABA or CAM, are tracked in the ERRA.[26] Total bundled customer commodity revenue requirement is calculated by combining ERRA costs with bundled customers' share of above market cost of PCIA-eligible contracts and utility owned resources.[27]

SDG&E's forecasted amounts of the RA it expects to sell ("Sold RA"), RA retained to meet compliance obligations ("Retained RA"), and RA that will remain unsold ("Unsold RA") directly contribute to the overall PCIA portfolio value.[28] Understating forecasted amounts of Sold RA results in higher quantities of Unsold RA and increases the Indifference Amount that will be

[22] *Id*. at 6.
[23] *Id*.
[24] *Id*. at 8.
[25] *Id*.
[26] *Id*.
[27] *Id*. at 8-9.
[28] *Id*. at 11.

recovered from customers. Incremental Sold RA beyond the forecasted amount will be recorded to the PABA and refunded to customers at a later date.[29] As such, an accurate forecast reduces rate volatility by ensuring that the costs recovered from customers are as close to those actually realized as possible – reducing the need to refund customers large amounts on the back end.

III. SDG&E's FAILURE TO PERFORM A FORECAST OF ITS 2024 SOLD RA IS INCONSISTENT WITH D.19-10-001 AND CREATES UNNECESSARY BILL IMPACTS FOR CUSTOMERS.

Decision 19-10-001, Ordering Paragraph 2 states that, "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."[30] Table II includes price and quantity descriptions for Forecast Retained RA, Actual Sold RA, Forecast Sold RA, and Forecast Unsold RA.[31] To calculate the quantity of Actual Sold RA, Table II directs SDG&E to look at actual sales volumes up to 45 days prior to its ERRA Forecast filing Fall update.[32] To determine the quantity of Forecast Sold RA, Table II directs SDG&E to utilize applicable forecasted sold volumes.[33]

While D.19-10-001 clearly outlines the process for forecasting RA sales over the year, SDG&E's Application merely reports the volumes of System, Local, and Flex RA it is already contracted to sell during the 2024 forecast year.[34] The Application demonstrates that SDG&E expects to retain less RA in 2024 than in 2023 across all RA types, meaning that more RA will be

29 *Id*. at 15.
30 D.19-10-001, p. 55 (emphasis added).
31 *Id*. at Attachment B, p. 1.
32 *Id*.
33 *Id*.
34 Exh. CCA-02, SDG&E Response to CCA Parties' Data Request 5.04 A.

available for sales to third parties.[35] Further, based on a review of SDG&E's actual RA sales reflected in the year-end 2022 and June 2023 monthly PABA volume reports, CCA Parties witness Carlo Bencomo-Jasso identified significant differences in the actual historical sales volumes of RA as compared to the forecasted Sold RA figures for 2024 reflected in the Application.[36]

The discrepancies identified in the Application are a direct result of SDG&E's refusal to actually forecast RA sales.[37] Rather than project the total expected level of RA sales for 2024, SDG&E relies solely on currently executed contracts in calculating its volumes of forecasted Sold RA;[38] those volumes represent the *baseline* of any sales that will actually be made in the forecast year. Without regard to RA market conditions or SDG&E's historical performance in selling RA, SDG&E values the entirety of its remaining RA at zero dollars because it assumes the RA will remain unsold.[39] In fact, SDG&E forecasts 888 MW of Unsold RA, more than double its actual Unsold RA volumes in 2023 and substantially higher than its actual Unsold RA volumes for 2022.[40]

SDG&E is the only utility in California that ignores the potential to make sales beyond those that have already been made through existing contracts. In response to CCA Data Request 6.01, SDG&E acknowledged that both PG&E and SCE forecast RA sales in their respective ERRA forecast proceedings.[41] In fact, SCE's 2024 ERRA Forecast Application states, "SCE has forecast the amount that it expects to sell ('Forecast Sold') and applied the applicable RA Adder (if sold,

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35 Bencomo-Jasso Direct at 12.
36 *Id*. at 13.
37 Exh. CCA-02, SDG&E Response to CCA Parties' Data Request 5.04 A.
38 *Id*.
39 Bencomo-Jasso Direct at 13-14; *See* D.18-10-019, Ordering Paragraph 1C (Unsold RA is valued at zero dollars).
40 Bencomo-Jasso Direct at 13-14.
41 Exh. CCA-07, SDG&E Response to CCA Parties' Data Request 6.01.

SCE will record actual sale prices to the PABA in 2024)."[42] SCE's PCIA Excess Sales framework utilizes both historical System RA sales and a forecast of additional sales based on an assumption that SCE may participate in other central procurement entities' solicitations.[43] Moreover, SCE and PG&E both forecast Unsold RA, with PG&E relying on recent historical experience to formulate forecasts.[44]

An accurate forecast of the RA SDG&E is likely to sell in 2024 is critical to determining its total PCIA portfolio cost. An underrepresentation of the anticipated volume of RA sales results in customers paying more upfront, then waiting to receive a refund based on additional RA sales realized during the year.[45] Although it expresses concerns surrounding the effects of erroneous rate calculations from forecasted RA sales amounts, SDG&E's failure to perform an actual forecast of its 2024 Sold RA will result in similarly unnecessary and unreasonable bill volatility to customers.[46] Importantly, rate stability with a minimum of unexpected changes adverse to customers is a widely accepted, fundamental principle of rate design[47] not met by this Application. SDG&E's approach unreasonably causes rate volatility for customers that could benefit in both the short- and long-term through reduced upfront costs and greater certainty surrounding expected monthly bills.

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42 Exh. CCA-05, CCA Parties DR 5, Attachment C: SCE ERRA 2024 Forecast of Operations, p. 127.

43 *Id*.

44 *Id*.; Exh. CCA-06, CCA Parties DR 5, Attachment D: PG&E 2024 ERRA and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation, pp. 9-16.

45 Bencomo-Jasso Direct at 15.

46 Exh. SDGE-09, Rebuttal Testimony of Jimmy Elias on Behalf of San Diego Gas & Electric Company, p. JE-2 (September 8, 2023).

47 Bonbright, James C., Principles of Utility Rates, p. 291 (1961).

In addition, SDG&E's approach is inconsistent with the purpose of ERRA Forecast proceedings — to forecast accurate commodity rates.[48] As the Commission recently noted, the purpose of the ERRA Forecast proceeding is to adopt a forecast of the utility's electric procurement cost revenue requirement and the electricity sales for the upcoming year.[49] Although a true-up occurs in the subsequent ERRA Compliance proceeding,[50] SDG&E should still forecast RA sales to the highest level of accuracy possible as the accuracy of its forecasts have a direct impact on customers. Rather than requiring customers to front the bill for its refusal to forecast RA sales, SDG&E should adopt an as-accurate-as-possible RA sales forecast based on historical RA sales. Indeed, developing as accurate a projection as possible to mitigate unnecessary bill impacts is the very purpose of forecasting.[51]

Based on the actual sales volumes from 2022 and 2023, SDG&E should adopt an RA sales forecast to reflect a larger volume of RA sales. Specifically, SDG&E should forecast a 2024 RA sales volume equal to the average of actual RA sales recorded between January and June 2023 — 567 MW.[52] This adjustment will more accurately reflect anticipated PCIA portfolio net costs and allow customers to benefit sooner from sales of SDG&E's excess RA that are likely to occur.[53] Specifically, increasing the projected RA sales from 246 MW to 567 MW reduces the PCIA portfolio costs by $26.9 million, conservatively assuming RA sales are Local RA, which is the lowest market price benchmark.[54]

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48 A.23-05-013, *Application of SDG&E for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecast, and GHG-Related Forecasts*, pp. 7-8.

49 *Id*.

50 A.23-06-002, *Application of San Diego Gas & Electric Company for Approval of ERRA Compliance for Record Period 2022*, pp. 2-3.

51 A.23-05-013, *Application of SDG&E for Approval of its 2024 Electric Procurement Revenue Requirement Forecasts, 2024 Electric Sales Forecast, and GHG-Related Forecasts*, pp. 7-8.

52 *See* Bencomo-Jasso Direct at 15.

53 *See id*.

54 *See id*.

IV. SDG&E SHOULD REVERT BACK TO PAST CONFIDENTIALITY DESIGNATION PRACTICES WHICH PROVIDE A HIGHER DEGREE OF TRANSPARENCY THAN CURRENTLY PRESENT IN THE APPLICATION.

In SDG&E's 2023 ERRA Forecast proceeding, the CCA Parties raised concerns about SDG&E's methodology for redacting information that may not individually qualify for confidential treatment.[55] As a result of these conversations, SDG&E agreed to publicly disclose the values discussed for all vintages except the last two PCIA vintages.[56] Despite this agreement, the PCIA Workpapers for this Application contain redactions for the 2024 PCIA portfolio total costs, the total 2024 indifference amount, and the forecasted 2023 PABA year-end balance values for all PCIA vintages.[57] The effect of these additional redactions is a significant step back in recent efforts by the CCA Parties and SDG&E to increase the overall transparency of the Application.

The redactions contained in the current PCIA Workpapers reflect a different approach to confidentiality designations than SDG&E has taken in the past.[58] For example, SDG&E redacted the year end 2023 PABA forecasted costs and market values for all vintages although the same costs and market values for the year end 2022 PABA forecast were public in last year's application.[59] In addition, SDG&E redacted average commodity rates and bundled sales although average commodity rates were published in the 2023 ERRA Forecast proceeding.[60]

With these concerns in mind, the CCA Parties met with SDG&E in June of 2023 to discuss the confidentiality designations in the Application.[61] As a result of these discussions, SDG&E agreed once again to redact only the last two PCIA vintages for the portfolio costs featured in the

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55 *Id*.
56 *Id*. at 15-16.
57 *Id*. at 15.
58 *Id*. at 17; *See also* Baez Rebuttal at RRB-4.
59 Bencomo-Jasso Direct at 16.
60 *Id*.
61 *Id*. at 17.

PCIA Workpapers and the forecasted costs and market values for the year-end 2023 PABA.[62] However, SDG&E did not agree to remove redactions for the present and proposed class average bundled customer commodity rates, even though commodity rates were unredacted in SDG&E's 2023 ERRA Forecast Application.[63]

In rebuttal testimony, SDG&E witness Rachelle Baez explained that SDG&E has deviated from the approach for the presentation of rates taken in previous years in response to requests by Energy Division to present additional information.[64] Specifically, SDG&E references Energy Division's request that SDG&E include new detailed attachments and a breakdown of class average revenues and rates by component for both bundled and unbundled customers.[65] SDG&E further argues that compliance with this request necessitated revisiting its approach to confidential treatment of class average rates.[66]

However, SDG&E admits that Energy Division did not specify whether the information it requested was to be assigned a public or confidential designation.[67] Moreover, SDG&E agreed that it is logistically possible to redact bundled sales volumes and commodity revenues through the ERRA Forecast Application, while publishing unredacted class average bundled commodity rates — subject to a perceived conflict with the public presentation of revenue requirements in the implementation advice letter.[68] Ultimately, SDG&E indicated that it is not opposed to reverting to its previous practices, but would like additional coordination with Energy Division.[69]

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62 *Id*.
63 *Id*.
64 Baez Rebuttal, p. RRB-4.
65 *Id*.
66 *Id*.
67 Exh. CCA-02, SDG&E Response to CCA DR 5.02 A.
68 Exh. CCA-02, SDG&E Response to CCA DR 5.02 B.
69 Exh. CCA-02, SDG&E Response to CCA DR 5.02 C.

The CCA Parties agree that bundled sales forecasts may be protected pursuant to D.06-06-066, and that SDG&E may take appropriate measures to maintain confidentiality of this information. Moreover, the CCA Parties support Energy Division's efforts to increase transparency in ERRA proceedings, and generally agree that the information requested from SDG&E should be provided for review. However, the steps SDG&E has taken to comply with Energy Division's requests have reduced the overall transparency of the Application and introduce additional barriers to CCAs as they plan for possible customer rate impacts. Unnecessary redactions of public filings are harmful to parties that are impacted by the filing but do not have access to confidential information.[70] In particular, redactions of the class average rates prevent impacted customers from gaining clear insight into the changes in rates they will be subject to in the following year.[71] Furthermore, many CCAs determine the rates charged to unbundled customers by applying a percent discount or premium to the bundled commodity rates. Redacting the current and proposed bundled commodity rates in SDG&E's filing prohibits CCAs from understanding and planning for the potential rate impacts of the ERRA proceeding.

The Commission should strive for as much transparency as possible, especially in proceedings that are directly related to customer rate impacts. In addition, SDG&E should be held to similar standards of transparency as that of SCE and PG&E, both of which publish unredacted average commodity rates.[72] To achieve these goals and to ensure that current and proposed class average rates are accessible for review by all customers who are impacted, the Commission should order SDG&E to revert back to past confidentiality designation processes that allow for the

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70 Bencomo-Jasso Direct at 16.

71 *Id*. at 18.

72 *Id*.; Exh. CCA-02, SDG&E Response to CCA DR 5.02 C. (stating that PG&E voluntarily does not redact bundled sales forecasts and that SCE is able to provide both the revenues and the class average rates through a less detailed description).

publication of current and proposed class average bundled rates. If necessary for implementation, the CCA Parties support the establishment of a working group led by Energy Division to further develop SDG&E's confidentiality practices.

V. CONCLUSION

For the foregoing reasons, the Commission should direct SDG&E to (1) adopt a forecasted 2024 RA sales volume equal to the average of actual RA sales recorded between January and June 2023 (567 MW), (2) in future proceedings, to evaluate RA market conditions and historical RA sales to develop a forecast of Sold RA, and (3) to revert back to past confidentiality designation processes that allow for the publication of class average bundled rates. If necessary for implementation, the Commission should order the Energy Division to facilitate a working group to further develop SDG&E's confidentiality designation practices.

Respectfully submitted,

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