

Application No.: A.13-05-
Exhibit No.: _____
Witness: Norma G. Jasso
Date: May 31, 2013

SAN DIEGO GAS & ELECTRIC COMPANY
PREPARED DIRECT TESTIMONY OF
NORMA G. JASSO

****PUBLIC VERSION****

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

May 31, 2013



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1 approved equity rebalancing costs related to the financial statement consolidation under
 2 Accounting Standards Codification 810 (“ASC 810”),¹ of the Otay Mesa Energy Center
 3 (“OMEC”) to serve SDG&E’s bundled service customers.² The ERRA includes revenues from
 4 SDG&E’s Electric Energy Commodity Cost (“EECC”) rate schedule adjusted to exclude
 5 California Department of Water Resources (“CDWR”) revenues for energy provided by CDWR
 6 to SDG&E customers and non-fuel generation revenues allocated to the Non-fuel Generation
 7 Balancing Account (“NGBA”).

8 On a monthly basis, the ERRA compares the energy procurement costs described above
 9 with the revenue from Schedule EECC (excluding CDWR and NGBA revenue). Interest is
 10 applied to any over- or undercollection balance at the three-month Commercial Paper rate.
 11 SDG&E’s adopted ERRA tariff describes the entries that are made to the account on a monthly
 12 basis.³

13 The ERRA balance as of December 31, 2012 was a \$213.6 million undercollection.
 14 Attachment A summarizes the monthly entries to the ERRA during 2012 used to calculate the
 15 balance. The 2012 activity in SDG&E’s ERRA as detailed in Attachment A is summarized in
 16 Table 1 below – under/(over) collection:

17 **Table 1**

December 31, 2011 ERRA Balance ⁴	\$(14,801,695)
Revenue	\$(708,540,085)
Expenses	\$938,267,216
Other - net ⁵	\$(1,524,825)
Interest	\$151,106
December 31, 2012 ERRA Balance	\$213,551,717

18

¹ ASC 810, effective January 1, 2010, amended Financial Accounting Standards Board (“FASB”) Interpretation No. 46 (R).

² As specified in the approved ERRA tariff within sections 2 and 5(t).

³ Within section 5, “Accounting Procedures”.

⁴ SDG&E’s December 31, 2011 balance is pending approval in Application (“A.”) 12-06-003.

⁵ “Other-net” includes FERC refunds settlement payments, transfers from other regulatory accounts, carrying costs related to hedging, Environmental Protection Agency (“EPA”) payments on SO2 allowances, and adjustments.

1 Ordering Paragraph (“OP”) 19 of D.02-12-074 directed Pacific Gas & Electric Company
2 (“PG&E”), Southern California Edison Company (“SCE”) and SDG&E to file a monthly report
3 with the Commission’s Energy Division to include a summary of activity in the ERRA balancing
4 account and to also submit original source documents pertaining to such activities. D.07-04-020
5 modified this requirement to allow SDG&E to provide only a breakdown of costs recorded to the
6 ERRA in the monthly filings and make the supporting documentation available to Commission
7 staff and interested parties upon request. The modified reporting requirement was effective with
8 the April 2007 report. SDG&E submitted the monthly reports to the Energy Division and
9 interested parties for all twelve months of 2012.

10 **III. TCBA**

11 In SDG&E’s 2005 ERRA compliance review proceeding, the Commission authorized the
12 review of SDG&E’s TCBA in future ERRA review proceedings.⁶ The annual ERRA review is
13 the appropriate forum to review the TCBA since the costs that are recorded in the TCBA
14 generally relate to the above-market portion of certain Qualifying Facilities (“QFs”) and
15 purchase power costs eligible for recovery under Assembly Bill (“AB”) 1890.

16 The TCBA records the eligible above-market power costs and the revenues received from
17 SDG&E’s Competition Transition Charge (“CTC”) rate. For 2012, the market benchmarks of
18 \$42.50 and 42.71/MWh⁷ were used to calculate the above-market portion of AB 1890-eligible
19 transition costs. On a monthly basis, the TCBA compares the above-market power costs with the
20 revenue from the CTC rate component. Interest is applied to any over- or undercollection
21 balance at the three-month Commercial Paper rate.

22 The balance in the TCBA as of December 31, 2012 was a \$10.4 million undercollection.⁸
23 Attachment B provides a monthly summary of the entries to the TCBA during 2012. The 2012
24 activity in the SDG&E TCBA as detailed in Attachment B to my testimony is summarized in
25 Table 2 below – under/(over) collection:

⁶ D.06-12-019, at OP 3.

⁷ \$42.50/MWh was authorized in D.11-07-041, which approved SDG&E’s 2011 ERRA Revenue Requirement Forecast proceeding, A.10-10-001. \$42.71/MWh was authorized in D.12-07-006, which approved SDG&E’s 2012 ERRA Revenue Requirement Forecast proceeding, A.11-09-022

⁸ The forecasted 2012 year-end undercollected balance of \$11.6 million was approved in AL 2412-E on January 10, 2013 for amortization in rates effective January 1, 2013.

Table 2

December 31, 2011 TCBA Balance ⁹	\$9,142,527
Revenue	\$(62,363,357)
Expenses	\$62,534,047
Other ¹⁰	\$1,072,763
Interest	\$17,031
December 31, 2012 TCBA Balance	\$10,403,011

IV. MRTUMA

The purpose of the MRTUMA is to record the incremental operation and maintenance (“O&M”) and capital-related costs associated with implementing the CAISO’s MRTU initiative. The CAISO implemented MRTU on April 1, 2009. All market participants were required to comply with the CAISO’s MRTU Tariff. SDG&E filed Advice Letter (“AL”) 1867-E dated January 29, 2007 to request authority from the Commission to establish the MRTUMA to record costs associated with implementing the CAISO’s MRTU tariff. Interest is applied to any over- or under collection balance at the three-month Commercial Paper rate. With respect to recovery of MRTU-related costs, SDG&E’s approved MRTUMA tariff reads:

Recovery of the MRTUMA shall be addressed in the annual ERRR Reasonableness proceeding, or other proceeding determined by the Commission. The balance in the MRTUMA shall be transferred to the Non-fuel Generation Balancing Account (NGBA) upon Commission approval.¹¹

On June 1, 2011, SDG&E filed A.11-06-003 (ERRR Compliance Application for 2010) for, among other things, review and approval of its MRTU-related costs through December 31, 2010. A ruling issued on June 23, 2011 granted a motion to bifurcate and consolidate MRTU issues into a separate proceeding for 2010. As a result, PG&E, SCE and

⁹ SDG&E’s December 31, 2011 balance is pending approval in A.12-06-003.

¹⁰ “Other” includes adjustments for revised 2011 Power Cost Indifference Adjustment (“PCIA”) rate pursuant to AL 2384-E and adjustment to update market benchmark per D.12-07-006.

¹¹ The request to establish SDG&E’s MRTUMA Preliminary Statement was filed in AL 1867-E on January 29, 2007 and approved by the Commission on June 11, 2007, with an effective date of May 24, 2007.

1 SDG&E filed joint application, A.12-01-014, on January 31, 2012 for the adoption of electric
2 revenue requirements and rates associated with the MRTU initiative. In this joint application,
3 SDG&E requested Commission adoption of MRTU-related electric revenue requirement of
4 \$1.6 million associated with cost undercollections recorded through 2010 in its MRTUMA, as
5 originally presented in A.11-06-003. The Division of Ratepayer Advocates (“DRA”), the only
6 intervening party to file comments, did not contest SDG&E’s request for cost recovery,
7 reasonableness review or to transfer the balance per the tariff disposition. As of this date, a final
8 decision in A.12-01-014 has not been issued.

9 On June 1, 2012, SDG&E filed A.12-06-003 (ERRA Compliance Application for 2011)
10 requesting, among other things, recovery of the revenue requirement associated with the 2011
11 activity in the MRTUMA showing a \$2.3 million undercollection. As of this date, a final
12 decision in A.12-06-003 has not been issued.

13 As noted in Ms. Sue E. Garcia’s testimony in support of A.10-12-005 (SDG&E’s 2012
14 General Rate Case (“GRC”)) approved May 9, 2013, for costs beginning in January 1, 2012,
15 “SDG&E plans to shift the O&M and capital from the MRTU to this 2012 GRC.”¹² In the Final
16 Decision on SDG&E’s 2012 GRC (D.13-05-010), SDG&E was authorized to include MRTU
17 costs in the GRC and no longer in the MRTUMA. For this reason, in this Application, SDG&E
18 requests that the amounts requested, if not already approved, for record years 2010 and 2011
19 regarding SDG&E’s MRTUMA be collected in accordance with the final orders from
20 A.11-06-003 and A.12-06-003; and the MRTUMA be eliminated from SDG&E’s preliminary
21 statement on a going-forward basis.¹³

22 V. IEMA

23 In D.04-12-048, the Commission adopted a variety of safeguards and procedures that
24 required the utilities to use Independent Evaluators (“IEs”) if affiliated entities bid in a
25 procurement solicitation or if the utility sought turnkey proposals. In D.05-07-039, the
26 Commission extended the requirement to use independent evaluators for SDG&E’s Renewables
27 Portfolio Standard (“RPS”) solicitations. Pursuant to D.04-12-048 and D.05-07-039, the purpose

¹² SEG-7 lines 14 and 15.

¹³ D.13-05-010, page 35: “With regard to SDG&E’s request that its MRTUMA account should be terminated, that request should be addressed in... a proceeding that covers any remaining MRTU-related costs that were recorded in 2011.”

1 of the IEMA is to record third party costs associated with the use of IEs in the utility’s long-term
2 procurement activities and RPS programs. Interest is applied to any over- or undercollection
3 balance at the three-month Commercial Paper rate.

4 As noted above, on June 1, 2011, SDG&E filed A.11-06-003 and a final decision in that
5 application is still pending. With respect to cost recovery, A.11-06-003 sought authority to
6 recover the IEMA activity for 2010 in the amount of \$0.5 million. As previously noted, a
7 decision in A.11-06-003 to approve the 2010 IEMA transactions has not been issued.

8 On June 1, 2012, SDG&E filed A.12-06-003 (ERRA Compliance Application for 2011)
9 requesting recovery of the IEMA 2011 activity of \$0.6 million undercollection.¹⁴ As of this date,
10 a final decision in A.12-06-003 has not been issued.

11 D.11-10-029,¹⁵ which approved Phase 1 of SDG&E’s 2009 ERRA Compliance Filing,
12 granted authority for SDG&E to update its IEMA tariff disposition to allow it to transfer the
13 balance in the IEMA to the ERRA on an annual basis.¹⁶ In compliance with D.11-10-029,
14 SDG&E transferred the IEMA 2012 activity undercollection balance of \$0.6 million as shown in
15 Line 41 of Attachment A. The transfer from other regulatory accounts is also included in the
16 “Other-net” category of Table 1.

17 As referenced above, for record years prior to 2012, SDG&E used this ERRA
18 Compliance filing to request recovery of the balance in IEMA. However, because of the
19 direction given in D.11-10-029 and because of the transfer of the account balance to ERRA in
20 accordance with the approved IEMA Preliminary Statement, SDG&E is not asking for specific
21 recovery of the IEMA in this Application. Rather, SDG&E is requesting that the amounts
22 transferred from IEMA to ERRA be reviewed for compliance as part of the regular ERRA
23 compliance review in this Application.

24 VI. GREENHOUSE GAS (“GHG”) COSTS

25 In D.12-04-046, approving Tracks I and III of the Long-Term Procurement Plan
26 (“LTPP”) proceeding,¹⁷ and AL 2387-E,¹⁸ the Commission granted SDG&E authority to recover
27 costs associated with the Cap-and-Trade Program through its ERRA. Subsequently, in OP 20 of

¹⁴ 2011 activity of \$.6 million excludes the \$1.2 million IEMA 2009 balance transfer to ERRA per D.11-10-029.

¹⁵ Approved October 20, 2011.

¹⁶ OP 7.c.; approved in AL 2304-E on January 12, 2012 effective November 17, 2011.

¹⁷ OP 10 of D.12-04-046 in R.10-05-006, issued on April 24, 2012, approved on April 19, 2012.

¹⁸ AL 2387-E was filed on July 20, 2012, approved on August 23, 2012, and effective on August 20, 2012.

1 D.12-12-033 in the Commission’s GHG Rulemaking 11-03-012 (“GHG OIR”), SDG&E was
2 “ordered to defer including in rates all GHG costs and revenues, including accrued interest, until
3 all necessary implementation details are finalized.” Accordingly, the 2012 GHG costs are
4 currently recorded and held in SDG&E’s ERRA (shown on Line 28 of Attachment A) until
5 further directive from the Commission. SDG&E is not seeking recovery of those costs in this
6 proceeding as the rate impact of GHG cost recovery is being handled in the GHG OIR. In this
7 Application, SDG&E seeks confirmation that the transactions recorded to SDG&E’s ERRA,
8 including GHG costs, during 2012 were in compliance with Commission directives and are
9 approved pending further direction regarding their disposition in another proceeding.

10 **VII. CONCLUSION**

11 As directed in D.02-10-062 and D.02-12-074, SDG&E seeks approval of the entries and
12 calculations in its ERRA for the period January 1, 2012 through December 31, 2012 and requests
13 that the Commission find these entries and calculations appropriate, correctly stated and
14 recoverable. Furthermore, as directed in D.06-12-019, SDG&E seeks approval of the entries
15 recorded to the TCBA for the period January 1, 2012 through December 31, 2012 and requests
16 that the Commission find these entries and calculations appropriate, correctly stated and
17 recoverable in accordance with applicable Commission policy and decisions. In addition,
18 SDG&E asks that the MRTUMA be eliminated from SDG&E’s preliminary statement. Further,
19 SDG&E provides an overview of GHG-related incurred 2012 costs without requesting recovery,
20 as these matters are being addressed in the GHG OIR. Therefore, SDG&E seeks confirmation of
21 compliance with Commission directives regarding GHG costs, to be recorded in ERRA and
22 temporarily deferred for recovery until receiving further direction from the Commission.
23 SDG&E has made the entries to the aforementioned regulatory accounts in accordance with its
24 adopted tariffs and in compliance with relevant Commission decisions.

25
26 This concludes my prepared direct testimony.

1 **VIII. QUALIFICATIONS OF NORMA G. JASSO**

2 My name is Norma G. Jasso. I am employed by San Diego Gas & Electric Company
3 (SDG&E), as a Regulatory Accounts Project Manager II in the Regulatory Accounts
4 Department. My business address is 8330 Century Park Court, San Diego, California 92123.
5 My current responsibilities include the development, implementation and analysis of regulatory
6 balancing and memorandum accounts.

7 I earned a Bachelor of Business Administration degree with emphasis in Accounting
8 from the University of San Diego in 1981. I also earned a Masters of Business Administration
9 from the University of Phoenix in 1996. I have been employed by SDG&E and Sempra Energy
10 since December, 1997. In addition to my current position, I served as Sundry Services Policy
11 and Compliance Project Manager II, Affiliate Compliance Manager, Senior Business Analyst,
12 and Accounting Systems Analyst.

Attachment A

NGJ-A

**San Diego Gas & Electric Company
Energy Resource Recovery Account (ERRA)
For the period January 1, 2012 - December 31, 2012**

Line #	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12	Nov-12	Dec-12	Total 2012
1 REVENUES													
2 EECC Revenue (Less DWR Revenue)	(80,138,712)	(74,433,818)	(72,747,493)	(68,138,605)	(78,577,064)	(96,149,400)	(99,997,284)	(114,686,862)	(138,022,734)	(127,756,499)	(98,710,419)	(95,665,279)	
3 Peak Time Rebate (PTR) Incentive Payments	(5)	33	-	-	-	-	334,159	4,463,098	5,554,072	1,073,038	1,922	2	
4 Net Energy Metering - Net Surplus Compensation Payments	15,951	21,332	17,270	14,220	14,960	7,919	13,739	16,955	16,026	16,863	16,152	18,284	
5 Total ERRA Balancing Account Revenues including FF&U	(80,122,766)	(74,412,453)	(72,730,223)	(68,124,385)	(78,562,104)	(96,141,481)	(99,649,386)	(110,206,809)	(132,452,636)	(126,666,598)	(98,692,345)	(95,648,993)	
6 Less: FF&U factor (1.011808 effective 5/1/09)	935,235	868,657	848,978	795,191	917,010	1,122,083	1,166,988	1,338,418	1,610,753	1,490,944	1,151,970	1,116,433	
7 Less: FF&U factor for Peak Time Rebate Payments	-	-	-	-	-	-	(3,900)	(52,085)	(64,817)	(12,523)	(22)	-	
8 Less: FF&U factor for Net Energy Metering	(186)	(249)	(202)	(166)	(175)	(92)	(160)	(198)	(187)	(197)	(188)	(213)	
9 Total for FF&U	935,049	868,408	848,776	795,025	916,835	1,121,991	1,162,928	1,286,135	1,545,749	1,478,224	1,151,760	1,116,220	
10 Subtotal ERRA Revenues w/o FF&U	(79,187,717)	(73,544,045)	(71,881,447)	(67,329,360)	(77,645,269)	(95,019,490)	(98,486,458)	(108,920,674)	(130,906,887)	(125,188,374)	(97,540,585)	(94,530,773)	
11 Less Transfer to NGBA	35,758,398	32,596,205	32,896,095	31,007,903	30,901,554	32,848,952	33,316,154	36,345,936	41,514,993	37,655,760	32,199,500	34,636,150	
12 Transfer (FERA) to BBA	(2,217)	(2,867)	(2,876)	(2,835)	(3,533)	(2,785)	(2,999)	(3,127)	(2,748)	(4,040)	-	(3,878)	
13 SDDFD Credit Adjustment for Electric Procurement Bill Credit	-	-	-	-	-	-	-	-	-	-	-	-	
14 Net Revenues to Balancing Account	(43,431,536)	(40,950,707)	(38,988,228)	(36,324,292)	(46,747,248)	(62,173,323)	(65,173,303)	(72,577,865)	(89,394,642)	(87,536,654)	(65,343,787)	(59,898,501)	(708,540,084.67)
EXPENSES													
29 Total Balancing Account Expenses	\$ 57,482,260	\$ 65,708,812	\$ 56,718,880	\$ 43,659,751	\$ 45,670,780	\$ 57,370,298	\$ 90,335,788	\$ 123,107,581	\$ 98,465,915	\$ 90,113,802	\$ 134,509,049	\$ 75,124,301	\$ 938,267,216.44
MISCELLANEOUS													
30 FERC Refunds	-	-	(1,605,511)	(117,444)	-	-	-	(139,117)	-	-	-	-	
31 EPA Payment on SO2 Allowance	-	-	-	(150)	-	-	(23)	-	-	-	-	-	
32 Carry Cost Related to Hedging Margin Dep - Broker	-	-	-	-	-	-	-	-	-	-	-	-	
33 Carry Cost Related to Hedging Margin Dep - Computed	8,480	8,876	10,939	11,919	11,769	10,556	10,522	9,713	8,380	7,596	6,248	5,946	
34 Adjustments	-	-	(368,802)	-	-	-	-	-	-	-	-	-	
35 Rounding	(3)	-	-	-	(1)	-	1	-	-	-	1	(1)	
36 Total Miscellaneous	8,477	8,876	(1,963,374)	(105,675)	11,769	10,556	10,500	(129,404)	8,380	7,596	6,248	5,945	(2,120,107.50)
37 Net Current Month Under / (Over) Collection	\$ 14,059,201	\$ 24,766,981	\$ 15,767,278	\$ 7,229,784	\$ (1,064,699)	\$ (4,792,469)	\$ 25,172,984	\$ 50,400,312	\$ 9,079,653	\$ 2,584,745	\$ 69,171,510	\$ 15,231,745	
38 Interest Rate	0.23%	0.24%	0.23%	0.23%	0.20%	0.16%	0.15%	0.14%	0.16%	0.14%	0.15%	0.14%	
39 Interest (Current Month)	\$ (907)	\$ 1,358	\$ 1,840	\$ 6,511	\$ 7,750	\$ 6,900	\$ 9,411	\$ 16,788	\$ 20,221	\$ 21,197	\$ 25,821	\$ 34,218	\$ 151,106.00
40 Adjustments	-	-	-	-	-	-	-	-	-	-	-	-	
41 Transfers From Other Regulatory Accounts	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 595,281	\$ 595,281.01
42 Current Month Balance With Interest & Transfers	\$ 14,058,294	\$ 24,768,339	\$ 15,769,118	\$ 7,236,295	\$ (1,056,949)	\$ (4,785,570)	\$ 25,182,395	\$ 50,417,100	\$ 9,099,874	\$ 2,605,942	\$ 69,197,331	\$ 15,861,243	
43 Cumulative Balance With Interest & Transfers	\$ (743,401)	\$ 24,024,938	\$ 39,794,056	\$ 47,030,351	\$ 45,973,402	\$ 41,187,832	\$ 66,370,227	\$ 116,787,327	\$ 125,887,201	\$ 128,493,142	\$ 197,690,473	\$ 213,551,717	

Notes:
 Line 30: Refunds from FERC Refund Proceedings resolving issues related to the 2000-2001 California Energy Crisis. March- settlement with NGET and NV Energy. April- settlement with EMMT. August- PG&E CA Parties settlement.
 Line 41: Transfer from IEMA \$586,422 and from LTAMA \$8,859

SB_GT&S_0701925

Attachment B

NGJ-B

San Diego Gas and Electric
 Transition Cost Balancing Account
 For the period January 1, 2012 - December 31, 2012

Under / (Over) Collection	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12	Nov-12	Dec-12	Total 2012
Beginning Balance	\$ 9,142,527	\$ 8,889,751	\$ 8,962,732	\$ 5,331,576	\$ 4,434,840	\$ 7,916,613	\$ 9,720,427	\$ 11,642,268	\$ 12,574,795	\$ 11,978,030	\$ 8,821,102	\$ 9,801,579	
CTC Revenue	\$ (3,572,072)	\$ (4,191,392)	\$ (4,456,828)	\$ (4,113,591)	\$ (5,027,493)	\$ (6,766,218)	\$ (6,688,070)	\$ (7,288,949)	\$ (7,685,070)	\$ (5,404,276)	\$ (3,482,318)	\$ (3,707,090)	\$ (62,363,357)
CTC Costs	\$ 3,318,245	\$ 2,263,447	\$ 2,824,801	\$ 3,216,123	\$ 6,588,237	\$ 6,568,636	\$ 8,608,042	\$ 7,047,275	\$ 7,150,111	\$ 2,281,458	\$ 4,460,508	\$ 4,307,164	\$ 62,534,047
(Over)/Under collection	\$ (253,827)	\$ (1,927,945)	\$ (1,632,026)	\$ (897,468)	\$ 3,480,743	\$ 1,802,417	\$ 1,919,972	\$ (241,674)	\$ (514,958)	\$ (3,142,819)	\$ 978,190	\$ 600,094	
Adjustments	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,171,981	\$ (83,851)	\$ (15,842)	\$ 812	\$ (336)	\$ 1,072,763
Current Month (over)/under collection (before int.)	\$ (253,827)	\$ (1,927,945)	\$ (1,632,026)	\$ (897,468)	\$ 3,480,743	\$ 1,802,417	\$ 1,919,972	\$ 930,307	\$ (598,810)	\$ (3,158,661)	\$ 979,002	\$ 598,748	
Interest Rate	0.14%	0.14%	0.17%	0.18%	0.20%	0.19%	0.21%	0.22%	0.20%	0.20%	0.19%	0.20%	
Interest (Current Month)	\$ 1,052	\$ 925	\$ 871	\$ 732	\$ 1,029	\$ 1,396	\$ 1,869	\$ 2,220	\$ 2,046	\$ 1,733	\$ 1,474	\$ 1,684	\$ 17,031
Current Month Balance With Interest	\$ (252,775)	\$ (1,927,020)	\$ (1,631,155)	\$ (896,736)	\$ 3,481,772	\$ 1,803,813	\$ 1,921,841	\$ 932,527	\$ (596,764)	\$ (3,156,928)	\$ 980,476	\$ 601,432	
Rounding	\$ (1)	\$ 1	\$ (1)	\$ -	\$ 1	\$ 1	\$ -	\$ -	\$ (2)	\$ -	\$ 1	\$ -	
Ending Balance - Cum. Bal. With Interest	\$ 8,889,751	\$ 6,962,732	\$ 5,331,576	\$ 4,434,840	\$ 7,916,613	\$ 9,720,427	\$ 11,642,268	\$ 12,574,795	\$ 11,978,030	\$ 8,821,102	\$ 9,801,579	\$ 10,403,011	

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

**DECLARATION
OF NORMA G. JASSO**

A.13-05-XXX

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least Cost Dispatch and Power Procurement Activities in 2012, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2012 and (iii) Costs Recorded in Related Regulatory Accounts in 2012

I, Norma G. Jasso, declare as follows:

1. I am the Regulatory Accounts Project Manager II for San Diego Gas & Electric Company ("SDG&E"). I have included my Direct Testimony ("Testimony") in support of SDG&E's Application for Approval of: (i) Contract Administration, Least Cost Dispatch and Power Procurement Activities, and (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Incurred During the Record Period January 1, 2012 through December 31, 2012, and (iii) the Entries Recorded in Related Regulatory Accounts. Additionally, as the Regulatory Accounts Project Manager II, I am thoroughly familiar with the facts and representations in this declaration and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information ("Protected Information") in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix ("Matrix") attached to the Commission's Decision D.06-06-066 (the Phase I Confidentiality

decision). Pursuant to the procedures adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 in D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and
- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.¹ As such, the Protected Information provided by SDG&E is allowed confidential treatment in accordance with Appendix 1 – IOU Matrix in D.06-06-066.

Confidential Information	Matrix Reference	Reason for Confidentiality and Timing
Attachment A: ERRRA Monthly Expenses	XI	Monthly Procurement Costs; confidential for 3 years.

4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. I will comply with the limitations on confidentiality specified in the Matrix for the Protected Information.

¹ In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-C. Accordingly, SDG&E seeks confidential treatment of such data under those provisions, as applicable.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized, masked or otherwise protected in a manner that would allow further disclosure of data while still protecting confidential information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 17th day of May, 2013, at San Diego, California.



Norma G. Jasso
Regulatory Accounts Project Manager II
San Diego Gas & Electric Company