

<u>AGENDA</u>

Special Meeting of the Board of Directors of San Diego Community Power (SDCP)

January 15, 2021

1:00 p.m.

Due to the public health orders and guidelines in California and in accordance with the Governor's Executive Orders N-25-20 and N-29-20, there will be no location for in-person attendance. SDCP is providing alternatives to in-person attendance for viewing and participating in the meeting. Further details are below.

Note: Any member of the public may provide comments to the SDCP Board of Directors on any agenda item or on a matter not appearing on the agenda, but within the jurisdiction of the Board. Written public comments or requests to speak during the meeting must be submitted at least one (1) hour before the start of the meeting by using this (web form). Please indicate whether your comment is on a specific agenda item or a non-agenda item when submitting your comment or requesting to speak. When providing comments to the Board, it is requested that you provide your name and city of residence for the record. Commenters are requested to address their comments to the Board as a whole through the Chair. Comments may be provided in one of the following manners:

- Written Comments. All written comments received at least one (1) hour before the meeting will be provided to the Board members in writing. In the discretion of the Chair, the first ten (10) submitted comments shall be stated into the record of the meeting. Comments received after the one (1) hour limit will be collected, sent to the Board members in writing, and be part of the public record.
- 2. Requests to Speak. Members of the public who have requested to speak at least one (1) hour before the meeting will be recognized at the appropriate time during the meeting. To allow the Chair to call on you, please provide the following minimum information with your request to speak: your name (if attending by videoconference) or telephone number (if attending by phone).

Comments shall be limited to either 400 words, or 3 minutes when speaking. If you have anything that you wish to be distributed to the Board, please provide it via info@sdcommunitypower.org, who will distribute the information to the Members.

The public may participate using the following remote options:

Teleconference Meeting Webinar

https://zoom.us/j/97168153558

Telephone (Audio Only)

(669) 900-6833 or (346) 248-7799 | Webinar ID: 971 6815 3558

Welcome

Call to Order

Pledge of Allegiance

Roll Call

Items to be Added, Withdrawn, or Reordered on the Agenda

Public Comments

Opportunity for members of the public to address the Board on any items not on the agenda but within the jurisdiction of the Board. Members of the public may use the web form noted above to provide a comment or request to speak.

Consent Calendar

All matters are approved by one motion without discussion unless a member of the Board of Directors requests a specific item to be removed from the Consent Agenda for discussion. A member of the public may use the web form noted above to comment on any item on the Consent Calendar.

REGULAR AGENDA

The following items call for discussion or action by the Board of Directors. The Board may discuss and/or take action on any item listed below if the Board is so inclined.

1. Approval of the Energy Risk Management Policy Update

Recommendation:

- Amend Section 6.5 "Delegation of Authority per Transaction by Position/Title" to allow the Chief Executive Officer to make collateral and security deposit payment to CAISO;
- 2. Adopt the "Managing Congestion Risk" addendum to the Energy Risk Management Policy.

2. Approval of 2021 Rates

Recommendation: Approve the rates contained in Attachment A to be effective as of March 1, 2021.

Director Comments

Board Members may briefly provide information to other members of the Board and the public, ask questions of staff, request an item to be placed on a future agenda, or report on conferences, events, or activities related to SDCP business. There is to be no discussion or action taken on comments made by Directors unless authorized by law.

Reports by Management and General Counsel

SDCP Management and General Counsel may briefly provide information to the Board and the public. The Board may engage in discussion if the specific subject matter of the report is identified below, but the Board may not take any action other than to place the matter on a future agenda. Otherwise, there is to be no discussion or action taken unless authorized by law.

ADJOURNMENT

Compliance with the Americans with Disabilities Act

SDCP Board of Directors meetings comply with the protections and prohibitions of the Americans with Disabilities Act. Individuals with a disability who require a modification or accommodation, including auxiliary aids or services, in order to participate in the public meeting may contact (858) 492-6005 or info@sdcommunitypower.org. Requests for disability-related modifications or accommodations require different lead times and should be provided at least 72-hours in advance of the public meeting.

Availability of Board Documents

Copies of the agenda and agenda packet are available at www.sdcommunitypower.org/board-meetings. Late-arriving documents related to a Board meeting item which are distributed to a majority of the Members prior to or during the Board meeting are available for public review as required by law. Until SDCP obtains offices, those public records are available for inspection at the City of San Diego Sustainability Department, located at 1200 Third Ave., Suite 1800, San Diego, CA 92101. However, due to the Governor's Executive Orders N-25-20 and N-29-20 and the need for social distancing, that is now suspended and can instead be made available electronically at info@sdcommunitypower.org. The documents may also be posted at the above website. Late-arriving documents received during the meeting are available for review by making an electronic request to the Board Secretary via info@sdcommunitypower.org.



SAN DIEGO COMMUNITY POWER Staff Report – Item 1

To: San Diego Community Power Board of Directors

From: Bill Carnahan, Interim CEO

Subject: Approval of the Energy Risk Management Policy Update

Date: January 15, 2021

RECOMMENDATION

 Amend Section 6.5 "Delegation of Authority per Transaction by Position/Title" to allow the Chief Executive Officer to make collateral and security deposit payments to the CAISO; and

Adopt the "Managing Congestion Risk" addendum to the Energy Risk Management Policy.

BACKGROUND

SDCP is preparing to serve retail customers on March 1, 2021. In addition to identifying and acquiring power supply sources, SDCP is working with the California Independent System Operator (CAISO) on how SDCP will schedule and dispatch its resources.

The CAISO has operational control over most transmission lines in the state¹ and generation resources and dispatches all these resources to minimize daily power supply costs. The CAISO market is a "closed" market in that all generation must be sold to the CAISO at a delivery point and purchased from the CAISO at the load-serving entities' (LSEs) take-out point(s). The price that the CAISO pays for energy at the delivery point usually does not equal the price the LSE pays at the take-out point, with the difference due to transmission congestion and losses. In general, the further east the resource, the lower the price paid to the generator.

The CAISO operates three different energy markets each day, the Day-Ahead Market, the Real-Time Market, which is a 5- and 15-minute market, and Ancillary Services Market that meets the moment to moment fluctuations in energy demand. The CAISO charges participants for any deviations between their dispatched generation and actual load and all the required ancillary services.

¹ Excluding transmission and generation resources owned by the Los Angeles Department of Water and Power, Sacramento Municipal Utility District, and Imperial Irrigation District.

To hedge against transmission congestion in the day-ahead market, market participants participate in a congestion revenue rights market (CRR) where market participants purchase the rights to congestion on specific paths. It is not unusual for congestion costs to exceed energy costs, so the market participants pay close attention to CRR costs.

The CAISO invoices market participants daily and market participants are required to have collateral deposited at the CAISO in the event a schedules resource doesn't operate and the LSE has to purchase from the CAISO. Also, the CAISO requires market participants to make substantial security deposits to ensure no participant fails and the other market participants must make up their losses. If an entity has an investment grade credit rating it may ask to have to make the security deposit waived.

The CAISO has determined that SDCP will make an initial security deposit of \$500,000 and a collateral payment of \$50,000. Once SDCP has an operational history and has an investment grade credit rating, SDCP can ask for the security deposit to be returned. The daily collateral amount changes as SDCP's daily costs change. If SDCP manages its generation resources to meet hourly load, its resources are reliable, and other operating criteria are met, the collateral requirement can go down. Or poor performance can cause the collateral requirement to increase.

ANALYSIS AND DIRECTION

Section 6.5 of the Energy Risk Management Policy (ERMP) delegates the authority to enter into power supply agreements to the Chief Executive Officer. Payments to the CAISO are not addressed but are an integral part of the daily power supply costs and must be paid to avoid substantial penalties and increased security and collateral with the CAISO. Table 6.5 should be modified to include daily CAISO payments, collateral, and security to meet the operating needs of the SDCP.

The table below shows the proposed change to the existing ERMP:

Current				
Delegation of Authority per Transaction by Position/Title	Product Type	Tenor Limit	Volumetric Limit	Notional Value Limit
Chief Executive Officer	System Power	3 years	1,500,00MWh	\$50,000,000
	Resource Adequacy	3 years	10,000 MW	\$50,000,000
	Renewables	3 years	2,500,000 MWh	\$50,000,000
	GHG-Free	3 years	5,000,000 MWh	\$50,000,000
Risk Oversight Committee*				
SDCP Board	All products	Any	Unlimited	Unlimited
Proposed				
Delegation of Authority per Transaction by Position/Title	Product Type	Tenor Limit	Volumetric Limit	Notional Value Limit
Chief Executive Officer	System Power	3 years	1,500,00MWh	\$50,000,000
	Resource Adequacy	3 years	10,000 MW	\$50,000,000
	Renewables	3 years	2,500,000 MWh	\$50,000,000
	GHG-Free	3 years	5,000,000 MWh	\$50,000,000
	CAISO Security and Collateral	N/A	N/A	As required by CAISO
Risk Oversight Committee*				
SDCP Board	All products	Any	Unlimited	Unlimited

As part of the process of becoming a Schedule Coordinator (SC) with the CAISO, SDCP had to provide its risk management plans and certify that it would follow these plans, including providing any documents or analysis SDCP does to identify and manage risk. The CAISO considers congestion costs one of the greatest risks LSEs face in the market daily. However, the ERMP currently does not discuss how to measure and evaluate congestion risk. Staff developed an addendum to the ERMP discussing how monthly transmission risk would be evaluated and mitigated and how the procedure compliments the Risk Management Metrics outlined in Section 6.1 of the ERMP.

A copy of the proposed addendum is presented in Attachment A and would be included as an Addendum to the ERMP.

FISCAL IMPACT

A copy of the proposed addendum is presented in Attachment A and would be included as an Addendum to the ERMP.

ATTACHMENTS

Attachment A: Addendum to Energy Risk Management Policy

Attachment B: Energy Risk Management Policy



Addendum 1 to San Diego Clean Power's Energy Risk Management Policy: Methodology for Evaluating and Mitigating Congestion Risk

I. Transmission Costs

The CAISO has assumed operational control of all 66 kV and above voltage transmission of all Participating Transmission Owners (PTO) including private firms (such as Citizens Energy) that have turned their operating rights over to the CAISO. The CAISO operates this transmission to minimize daily transmission costs for the entire system. ¹

Each PTO utility charges the CAISO the total cost of its transmission plus a rate of return on any owned transmission assets. The charge is called a utilities Transmission Revenue Requirement (TRR). The CAISO aggregates the TRRs of all PTOs and then divides this amount by the forecasted energy use on its system for the year in order to develop a transmission wheeling rate, or Transmission Access Charge (TAC) that is paid based upon the total metered load of the LSE. This rate is a "postage stamp" rate paid by the Load Serving Entity (LSE) that takes final delivery of the energy. It is called a postage stamp rate because every entity pays the same amount regardless of the voltage or how far energy is wheeled across the system.

Each LSE pays the Locational Marginal Price (LMP) for energy that it withdraws at its delivery point(s). The LMP has three components – 1) the marginal energy price that is the same for all LSEs in the CAISO for that period and market (day-ahead market, 5 and 15-minute market; 2) marginal transmission losses and 3) congestion costs.

Any generator or load can use the CAISO transmission system. To manage the use of the transmission system, the CAISO uses congestion pricing. In effect, if entities schedule more energy over a transmission path than the path's capacity, the CAISO begins increasing congestion charge to encourage entities to either move energy to other transmission paths or to back generation down that uses that path. The congestion charge will keep increasing until generation is reduced to the transmission limits over a specific path².

Congestion charges can be quite high over some constrained paths, sometimes more than the price of energy.

These rights to receive congestion charges are known as congestion revenue rights (CRRs). The CRR is a tradable commodity with entities being allowed to purchase and trade the rights to receive congestion charges over a specific transmission line

¹In PG&E and SDG&E's service territory, the CAISO controls transmission lines equal to 66 kV or larger while in SCE's service territory the CAISO controls line 115 kV or greater.

² This is done by a mathematical algorithm approach that creates a large enough congestion charge to push higher priced resources out of the dispatch order.

segment. There are two ways LSE's acquire congestion rights; first, through a CAISO allocation process and, secondly, a CRR auction process.

The CAISO uses a three-stage process to allocate CRRs. First, an annual allocation process that is tied to generating resource ownership or control, then a monthly allocation process and finally a CRR auction process.

Congestion costs are charged on all paths so congestion payments at the end of a period should roughly equal congestion payments for the allocated CRRs. The CRRs created in the auction process are outside the scope of the CAISO and those can result in significantly larger or smaller congestion payments than the congestion costs³

Load serving entities that use a specific transmission path are eligible to receive an allocation of free CRRs tied to the length of their ownership or power sales purchases from specific generators. Generally, only about two-thirds of the available transmission capacity in a path is allocated to LSEs requesting CRRs with the utility (or LSE) subject to congestion charges for the remaining generation. If the LSE wants to protect itself against congestion charges for all its generation, it will need to participate in the CRR monthly allocation process and CRR auctions and bid against other entities for the right to recover any potential congestion charges.

The CAISO allocates its transmission capacity to LSE's based upon existing unit specific generation contracts. If an LSE has a power purchase agreement (PPA) or generator entitlement, it can request CRRs from the CAISO through an annual or monthly allocation process. Because the revenues that the CAISO receives in congestion charges should approximately equal payments to CRR owners, the CAISO is indifferent to congestion revenues paid on a specific line so long as it does not allocate more transmission capacity than available on a specific path.

Entities requesting CRRs on a specific path will only receive their full request if the path has excess capacity after all existing CRR holders and LSE's without rights on a particular path have applied to the CAISO for transmission right during the annual allocation process. If the CAISO has already allocated all the CRRs on a path, the requesting entity may not receive any CRRs or only a portion of their request in the allocation process.

If an entity does not receive the desired allocation of CRRs, it can enter the CRR auction process. In the auction process, any (creditworthy) entity can offer to "buy or sell" CRR revenues for a price determined in a monthly auction along a specific transmission path. If an entity sells CRRs, it is responsible for paying the CRR costs to the purchasing entity.

³ For the past few years, payments to CRR holders has significantly exceeded revenues from congestion. As a result, the CAISO is redesigning the way payments are made to reduce payments on smaller lines with high congestion.

The risk of a CRR is that if a LSE has CRRs over a particular path and the congestion changes to the opposite direction or has low congestion prices during the month, the owner of the CRRs could lose money. That is, acquiring CRRs is not a risk-free proposition. Generally, congestion costs are high for energy imported from the east into California and low for entities exporting from the basin.

SDCP will not acquire more CRRs on a particular path than what is needed to hedge existing power purchase agreements.

II. Evaluating SDCP Congestion Risk

SDCP does not currently have any generation resources although it has been allocated CRRs on some paths from SDG&E as part of the CCA creation process. SDCP does not know what CRRs SDG&E will initially allocate to it.

SDCP will begin evaluating the risk associated with each CRR as they take ownership. SDCP will use the following methodology for evaluating the risk of a unit CRR:

- 1. SDCP will calculate the monthly congestion on each path by calculating the average congestion cost for the past three (3) years.
- 2. SDCP will calculate the mean on and off-peak congestion on each path and the standard deviation of the congestion pricing.
- 3. Using the mean and the standard deviation along each path, SCP will estimate the expected range of congestion costs along each path.
 - a. SDCP will attempt to determine if any paths are expected to be out of service or constrained for any month based upon available planned outage data. Planned outages will affect historic averages.
- 4. The expected congestion cost will be used to estimate SDCP's monthly congestion exposure and confidence interval of the results.

An example of the calculations to determine monthly risk and standard deviation is shown in Appendix 1.

SDCP will always participate in the annual and monthly allocation process as a no-cost means of reducing congestion risk. Participation in the auction process will depend upon the potential exposure along a path and how the congestion risk affects SDCP's total power supply costs as outlined in SDCP's Risk Management Plan.

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49,44647	57.7898	66.04586	58.38534	51.13956	47.18014	42.21266	41.181/6	40.09626	71070.04	00000	0.000	-0 76817	-0.86519	-0.88325	-0.96075	Loss	DLAP_SCE-APND
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48.37276	57.68	65.96	58.41454	50.83783	46.5149	41.63435	40.518/3	38.3009/	20202	-4 10570	-4 40811	-1.8115	-1.50892	-3.13035	-3.35107	Congestion	DLAP_SCE-APND
-0.86361	-0.52452	-0.25659	-0.36144	-0.55714	-0.44595	-0.5943	-0./4012	7/116.0-	67776'0-	38 38773	35.07601	33.31383	33.97829	32.94238	31.94307	LMP	DLAP_SCE-APND
50.21004	55.79962	59.67188	50.1994	47.21558	41.29173	41.5592	43.53626	74.91462	0/207.0	-0 04368	-0.98826	-1.01554	-1.0961	-0.97355	-0.87054	Loss	DLAP_SCE-APND
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49.34643	55,27511	61.50051	49.83797	47.47901	41.19185	3 14435	3 47579	4 74968	1.17416	-0.95702	-2.92262	-3.06235	0.91579	-0.55594	-0.36699	Congestion	DLAP_SCE-APND
-1.01831	-0.68213	-0.14522	-0.17507	-0.36451	/10101/	43 10005	46 37143	48.75253	45,68465	39,99733	39.81748	40.65937	45,49035	41.73922	50.27399	LMP	DLAP_SCE-APND
47.1442	60.36527	63.13936	58.35686	11927.66	0.09300	0.65093	-0.63441	-0 36887	-0.456	-0.72418	-0.53198	-0.63663	-0.63503	-0.57916	-0.29807	Loss	DLAP_SCE-APND
0	-0.65693	1.052	-0.5//29	6195610-	48 60509	48 08937	50.34988	51,95364	51.23568	58,40168	52.15489	53.95164	51.62808	49.50045	54.19366	Energy	DLAP_SCE-APND
46.12588	59,02621	64.04614	57.6045	24527.45	101001	0 55000	0.60194	1.46385	0.68019	8.6325	3.51958	4.28706	4.64694	1.00992	0.28552	Congestion	DLAP_SCE-APND
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47.88175	65.02743	/1.3/12	2086.69	0.0010	-0.2822	-0.43674	-0.63713	-0.4068	-0.83667	-0.4063	-0.52727	-0.66558	-0.75133	-0.47686	-0.02536	Loss	DLAP_SCE-APND
0	0	5.02978	0.52294	6,000,0	50.69530	49 62929	47.90487	55.72594	51.01673	48.95125	47.07742	46.54421	45.81291	48.65919	63.40367	Energy	DLAP_SCE-APND
47.23535	65.25503	//.14325	00.5302	TTTOO.OC	-0.69703	-0.07349	0.69504	4.70411	2.38624	0.99942	1.3061	-0.46199	-0.50394	-0.48636	-0.74326	Congestion	DIAP_SCE-APND
-0.41891	-0.26703	0.0634	0.0329	0.000//	49 74935	49 11906	47.96278	60.02325	52.56629	49.54437	47,85625	45.41664	44.55764	47.69597	62.63504	LMP	DLAP_SCE-APND
49.87013	58,05033	03.40011	0 0379	0.00077	-0.47433	-0.73181	-0.72946	-0.68541	-0.68559	-0.54025	-0.64933	-0.7556	-0.74257	-0.86149	-0.99443	Loss	DLAP_SCE-APND
0	0	1.9/10/	1.2/99	/#01C-0-	46 50338	44.89661	43.16355	43.93672	43.94828	41.24057	43.87354	46.35565	43,93909	49.7972	59.1922	Energy	DLAP_SCE-APND
49.45122	57.78329	05.4345/	1 2700	0 51647	-1 13905	-2 63382	-2.95357	-3.70474	-3.85196	-1.80481	-0.23421	0.00998	-2.22697	-0.53767	-0.56191	Congestion	DLAP_SCE-APND
-0.18567	0.26726	0.4/629	7,56/5.0	51 75305	44 89	41.53097	39.48051	39.54657	39.41073	38,89551	42.99	45.61003	40.96954	48.39803	57,63586	LMP	DLAP_SCE-APND
51.5/58/	02.13403	00020.60	0 57057	0 11330	-0.19475	-0.06238	-0.03816	0.02439	-0.20183	-0.09492	-0.25575	-0.77458	-0.72407	-0,69264	-0.84519	Loss	DIAP CCE APND
-0.05576	62 15463	60 074.009	64.39684	59.64293	59.01516	51.98112	47.69508	48.77769	48.05361	45.20061	48.25453	65.09087	53.24014	54.97104	63.07423	Energy	DI AP SCE-APND
0.33444	0616.10	-0.47960	-0 15151	0.08462	-2.63041	0.21485	-0.46964	0.33747	-0.0661	-0,41184	-0.23014	8.61006	1.14323	0.68473	-0.26643	Congestion	DIAP SCE-APND
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50 47056	58 24895	69 90496	56.9477	53.76428	51.69357	47.03177	46.55831	42.07727	44.40287	44.10066	39.9223	44.98424	35.79345	36.74326	35,43524	Energy	DIAP SCE-APNO
٥ ٥	0	0.41925	0.24122	1.1247	0	0	0	0	0	0	-0.91658	-6.06648	-2.433	-1.82798		Congestion	DIAP SCE-ADNID
50	58 28962	70.17042	57.08072	54.93199	51.50231	46.81072	45,9065	41.4924	43.71907	43.21423	38.1953	37.9506	32,46561	34.0261	34.88954	Connection	DIAP SCE-APND
-0.384	-0.33773	-0 17733	-0.22526	-0.18077	-0.23739	-0.45972	-0.61534	-0.44186	-0.53846	-0.59216	-0.67273	-0.7257	-0.74178	-0.72876	-0.83164	LUSS	DI AD SCE-ADNID
51 00975	56 02073	65.67661	57.75907	62.33307	64.15824	58.93877	52.14725	50.78801	49,40028	49.76152	46.39516	44.52161	41.673	38,15518	38.32454	chergy	DI AP SCE-APNID
106317	20170201	1 98071	1.37767	-0.04612	3.24702	2,24095	1.76689	1.82976	0.06345	0.15467	-2.68578	-4.6336	-3.44957	-4.13205	-2.83371	Congestion	DI AD SCE-ADND
-0.03046	10212.0	67 48	58.91149	62.10618	67.16787	60.72	53.2988	52.17591	48.92526	49.32403	43.03665	39.1623	37.48165	33.29437	34.65918	Concession	DIAP SCE-APNID
0.03646	0.30261	-0 18606	-0.09978	-0.2747	-0.7052	-0.57205	-0.47885	-0.28428	-0.32014	-0.37333	-0.13121	-0.3932	-0.58437	-0.75813	-0.89062	108	DI AD SCE-ADNO
52 08028	57 46268	66.77127	62.36234	72.28949	77.49419	68.9217	66.50762	66.11232	62.7735	56.56502	52.48323	47.95083	46.37831	45.12679	46.8/449	Lincity	DLAP SCF-APNO
0	0.74053	1.85647	2.41619	1.92521	2.66359	3.26648	0.36812	1.21816	-0.83848	-0.53608	-0.69395	-2.25589	-1.4323	-3,9802	2.40891	Energy	DLAP SCE-APND
52.05282	57.9906	68,44079	64.67875	73.94	79.45259	71.61613	66.39689	67.0462	61.61487	55.65562		45.30174	44.36164	40.38846	3 4000	Congestion	DLAP SCE-APND
-0.10468	0.02595	0.075	-0.02847	0.16615	-0.06469	-0.17196	-1.02796	-0.3175	-0.467			-0./9381	65977.0-		43 57407	M	DLAP_SCE-APND
58.15405	64.86808	74.99968	71.16526	79.11737	80.85731	74.76368	71.88557	67.55313	62.26659		52.1561/	40.70019	77007		-1 05120	Loss	DLAP_SCE-APND
-0.20466	0.02281	-0.46645	0.55295	0,66649	-0.48208	1.79758	5.05917	-1.24285	-0.89555		-0.//486		43 25511		46.31221	Energy	DLAP_SCE-APND
57.84471	64,91684	74.60823	71,68975	79,95	80.31054	76.3893	75.91678	65.99279	60,90404		277000		-3 90184		-2.07689	Congestion	DLAP_SCE-APND
											E0 6773	46.09412	38.57468	40,28119	43.18403	LMP	DLAP_SCE-APND
23	22	21	20	19	18	17	16	15	14	13	. 12	11	10	9	HE 8		

		200	2000	00000	00000	-									
66,79838	60.98689	53.54836	53,12339	52.96845	52.50822	49.57438	51.58223	50.6671	50.08881	47.01943	46.25275	46.48373	50.87524	Energy	DLAP_SCE-APND
-0.80955	-0.0352	-0.42664	-1.08505	-1.19935	-1.54307	-1.38771	-1.39234	-1.23475	-1.26546	-0.67406	0.14495	0.05092	-0.68192	Congestion	DLAP_SCE-APND
65.75504	60.23205	52.17926	51.09806	50.86864	50.15128	47.48272	49.73596	48.92061	48.20225	45.83756	46.0138	46.15813	50	LMP	DLAP_SCE-APND
0.18556	-0.19057	-0.72549	-0.62944	-0.85009	-0.8136	-0.76724	-0.68971	-0.74432	-0.71401	-0.67597	-0.70009	-0.65571	-0.57412	Loss	DLAP_SCE-APND
66.26996	56,04956	46.80549	44.64143	43.37176	43.50816	42.62444	42.31334	42.0522	42.50054	40,7208	40.94097	43.42436	51.26059	Energy	DLAP_SCE-APND
	0	0	0	-0.758	-3.91167	-2.75761	-2.50002	-2.86001	-5.10351	-3.10419	-3.75063	-1.7204	0	Congestion	DLAP_SCE-APND
66.45552	55.85899	46.08	44.01199	41.76367	38.78289	39.09959	39.12362	38.44786	36.68302	36.94065	36.49025	41.04826	50.68647	LMP	DLAP_SCE-APND
-0.21109	-0.42104	-0.53888	-0.46847	-0.61653	-0.44786	-0.49936	-0.4382	-0.5558	-0.66863	-0.32445	-0.6083	-0.80991	-0.76658	Loss	DLAP_SCE-APND
70.36341	61.9179	53.88755	47.32016	45.00211	44.786	44.58535	42.96102	44.82259	44.87464	42.13661	42.24315	43.08057	50.76658	Energy	DLAP_SCE-APND
0.23768	3.4595	2.25379	1.47861	0	-0.91874	0	-1.35415	-3.60174	-3.66803	-4.69788	-5.10142	-2.27304	0	Congestion	DLAP_SCE-APND
70.39	64.95636	55.60246	48.3303	44.38558	43,4194	44,08599	41.16866	40.66506	40.53798	37.11427	36.53343	39.99762	50	LMP	DLAP_SCE-APND
0.00628	-0.31191	-0.27547	-0.37688	-0.42307	-0.40054	-0.52729	-0.51048	-0.68707	-0.78222	-0.77316	-1.11345	-0.85124	-0.67674	Loss	DLAP_SCE-APND
62.77254	57.76105	52.97452	48.94549	48.07574	48.84683	51.19293	49.08455	49.78776	46,56043	46.57598	51.07562	46.01309	46.35185	Energy	DLAP_SCE-APND
0	2.30323	2.11017	2,82504	0.36741	6.11391	4.2777	1.93697	-1.34968	-2.07936	-1.87841	3.41782	1.4264	0	Congestion	DLAP_SCE-APND
62.77881	59.75237	54.80923	51.39364	48.02007	54,5602	54.94334	50.51104	47.75101	43.69886	43.92441	53.38	46.58825	45.67511	LMP	DLAP_SCE-APND
-0.33786	-0.50284	-0.62864	-0.66156	-0.82823	-0.70893	-0.82722	-0.81881	-0.86524	-0.86598	-0.85943	-0.83677	-0.84351	-0.67799	Loss	DLAP_SCE-APND
63.74737	55.25742	52.3866	45.31203	42.69211	38.32069	38.2973	37.05	37.4563	37.65147	35.51359	32,68632	28.7887	25.29799	Energy	DLAP_SCE-APND
0	0	0	0	0	-0.83693	-2,88563	-3.76706	-5.76702	-7.01549	-6.95099	-6.24159	-2,45775	0	Congestion	DLAP_SCE-APND
63.40951	54.75458	51.75796	44.65048	41.86388	36.77482	34.58445	32,46414	30.82404	29.77	27.70317	25.60797	25.48744	24.62	LMP	DLAP_SCE-APND
-0.30215	-0.13815	-0.0562	-0.15679	-0.45913	-0.36646	-0.27636	-0.38739	-0.46522	-0.50195	-0.38263	-0.6589	-0.81587	-0.86896	Loss	DLAP_SCE-APND
62.94805	62.79761	62.44356	58.07019	56.68314	52.35186	49.34921	47.24243	48.97025	46.05078	42.04678	38.08651	35.31915	35.75969	Energy	DLAP_SCE-APND
1,4241	1.12689	0.90155	1.22221	1.14087	0.91946	2.18925	0.61396	0.08696	-0.54277	-4.79833	-4.60162	-5.38025	-3.05566	Congestion	DLAP_SCE-APND
64.07	63.78635	63.28891	59.13562	57.36487	52,90485	51.26211	47.469	48.592	45.00606	36.86583	32.82599	29.12302	31.83507	LMP	DLAP_SCE-APND
0.3552	0.42992	0.23434	-0.29038	0.16566	0.16812	0.07847	0.25483	-0.04995	-0.44308	-0.31324	0.11721	-0.22204	-0.36517	Loss	DLAP_SCE-APND
63.42923	67.17537	71.01126	76.41669	78.8855	73.09605	65.39012	59.26345	55.50321	56.08656	50.52183	48.83675	44.40786	43.99661	Energy	DLAP_SCE-APND
1.10666	1.80944	1.53122	2.2722	6.18715	6.28016	4.58224	1.22343	2.3149	0.91874	0.63278	0.88313	0	0	Congestion	DLAP_SCE-APND
64.8911	69.41474	72.77683	78.39851	85.23831	79.54432	70.05083	60.74171	57.76816	56.56222	50.84137	49.83709	44.18582	43.63143	LMP	DLAP_SCE-APND
0.18591	0.06066	0.27208	-0.03919	-0.09371	-0.25198	0.13078	0.36001	0.08625	-0.48364	-0.21528	-0.29527	-0.64777	-0.75463	Loss	DLAP_SCE-APND
77.46135	75.81951	93.82238	97.97432	93.71208	89.99135	76.93111	75.00293	66.3447	62.81096	58.18499	54.67933	52.23917	50.64651	Energy	DLAP_SCE-APND
1.07526	-1.7647	-2.75267	-2.15167	0.32254	1.41881	-1.02643	-1.72794	-2.01265	-1.17027	-1.25171	-1.04666	-0.56856	-0.40671	Congestion	DLAP_SCE-APND
78.72251	74.11547	91.34179	95.78346	93.94091	91.15819	76.03546	73.635	64.41829	61.15705	56.718	53.3374	51.02284	49.48516	LMP	DLAP_SCE-APND
-0.83771	-0.9084	-1.13459	-1.26535	-1.24568	-1.41327	-1.34592	-1.29404	-0.91399	-0.29215	-0.72688	-0.61153	-0.53242	-0,39156	Loss	DLAP_SCE-APND
85.4803	84.89703	90.76738	92.36162	81.41701	75.98246	71.2127	66.3612	61.3417	58.43057	53,44738	49.71816	51.19387	49.56486	Energy	DLAP_SCE-APND
0	0	0	-0.18627	0.6106	0.09665	-0.81654	-0.42232	-0.80605	-1.01285	-0.37568	-0.31932	0	0	Congestion	DLAP_SCE-APND
84.64259	83.98863	89.63278	90.91	80.78192	74.66584	69.05025	64.64483	59.62166	57.12557	52.34482	48.7873	50.66145	49.1733	LMP	DLAP_SCE-APND
-0.1079	-0.2401	-0.59958	-0.80033	-0.74786	-0.8197	-0.72707	-0.60507	-0.51486	-0.8586	-0.91501	-0.93856	-1.03205	-0.68272	Loss	DLAP_SCE-APND
77.07387	72.75817	74.94734	75.50308	69.24652	66.64254	61.61598	60.50678	56.57794	53,32942	49.46002	44.48167	46.91118	48.76562	Energy	DLAP_SCE-APND
-0.38492	0	-0.50262	-2,0244	-1.69393	-1.54061	-1.24237	-1.19263	-1.17275	-0.51982	-2.88352	-2,82467	-2.14767	0	Congestion	DLAP_SCE-APND
76.58105	72.51807	73.84514	72.67835	66.80472	64.28223	59.64654	58.70908	54.89033	51.95099	45.66149	40.71845	43.73147	48.0829	LMP	DLAP_SCE-APND
0.72542	0.74318	0.25529	-0.08625	-0.13353	-0.22838	0.12021	0.06173	-0.22633	-0.41266	-0.34422	-0.30584	-0.23396	-0.10378	Loss	DLAP_SCE-APND
78.00245	70.11141	68.99651	71.87445	63.58648	60.0987	57.24293	56.11744	53,88799	50.94594	52,15505	47.78799	46.79126	49,41905	Energy	DLAP_SCE-APND
1.58784	1.73541	1.33456	1.99962	0.09363	-0.5651	-0.21862	0.86584	0.9783	0.3434	0	0	0	0	Congestion	DLAP_SCE-APND
80.31571	72.59	70.58636	73,78781	63.54657	59.30523	57.14452	57.045	54.63996	50.87667	51.81082	47.48214	46.5573	49.31527	LMP	DLAP_SCE-APND
-0.54617	-0.53653	-0.87772	-0.97112	-0.71495	-0.64497	-0.6502	-0.75784	-0.78403	-0.73456	-0.80624	-0.93629	-0.8319	-0.86799	Loss	DLAP_SCE-APND

VICTORVL_5_N101	ATCTORAL P NIOT	WITTORWI E MICH	VICTORVL 5 N101	VICTORVL_5_N101	VICTORVL_5_N101	VICTORVL_5_N101		OFF-PEAK PRICES - SINK	DLAP_SCE-APND																																			
Congestion	LMP	No.	Loss	Energy	Congestion	LMP	ΗE	ES - SINK	Loss	Energy	Congestion	LMP																																
-2.40891	42.05023	42 65623	-2.01921	46.31221	-2.07689	42.21611	00		-0.92536	40.40887	-0.26528	39.21823	-0.38937	46.91175	-0.05638	46.466	-0.31667	49.47959	0	49.16292	-0.53816	42.04405	0	41.50589	-0.61089	44.26775	-0.1449	43.51196	-0.53668	32.13624	0	31.59957	-0.40462	24.37462	0	23.97	-0.5973	27.0273	0	26.43	-0.73418	43.9627	-0.58314	42,64538
-3,9802	39.38213	20 20212	-1.92917	44.45102	-3.25414	39.2677	9		-0.78043	40.85999	-0.32114	39.75842	-0.1959	44.52233	-0.37701	43.94942	-0.24276	43.34926	-0.3709	42.7356	-0.47103	40.25887	-0.04031	39.74753	-0.35929	43.28758	-0.21788	42.71041	-0.64322	32.3225	0	31.67928	-0.57334	26.54334	0	25.97	-0.7673	28.41867	-0.01137	27.64	-0.79579	41.44732	1.37037	42.0219
-9,17278	35,39070	2E 20679	-1.95513	43.25511	-3.90184	37.39814	10		-0.6487	44.73819	-0.56202	43.52746	-0.11768	45.26031	-0.65139	44,49124	-0.08874	46.706	0.97356	47.59083	-0.2776	40.82355	-0.27653	40.26941	-0.37147	44.75538	0.09378	44.47769	-0.95201	40.3396	0	39.38758	-0.89149	35.23661	0	34.34512	-0.95026	33.81705	-0.67659	32.1902	-0.74534	42.83577	0.67908	42.7695
-8,92223	37.22	37 31606	-2.26456	48.70019	-12.72363	33.71199	11		-0.52837	45.15961	-0.62948	44.00176	-0.00891	44.52529	-0.61677	43.89961	0.2353	48.02056	-0.11053	48.14532	-0.19619	44.58893	0.04885	44,44158	-0.31065	47.06817	0.41672	47.17423	-1.06591	43.32951	0	42.2636	-1.04897	39.58374	0	38.53477	-1.1415	38.3053	-1.08369	36.0801	-0.86741	44.4824	0.30254	43,91753
-13.13146	37.54033	375355	-2.39397	52.15617	-14.1624	35,5998	12		-0.49208	47.31494	-0.72684	46.09603	0.04482	49.7999	-0.80947	49.03525	0.17812	52.38817	-0.52687	52.03942	-0.11547	46.18737	0.34913	46.42103	-0.2496	48.00043	-1.06124	46.6896	-0.81076	42.448	0	41.63724	-1.05511	41.05484	0	39.99973	-1.17265	42.18165	-1.44016	39.56884	-1.04478	45.03371	1.01176	45,00069
-16.91182	37,43363	37 43595	-2.72737	59.54955	-19.39685	37.42533	13		-0.28066	46.77745	-0.49138	46.00541	0.27755	48.69214	-0.78414	48.18555	0.21372	54,79967	1.77637	56.78976	-0.17476	45.98969	1.82757	47.6425	-0.15531	48.53462	-0.78939	47.58992	-0.66796	44.23601	0	43.56805	-1.16472	42.97855	0	41.81383	-0.97676	41.56408	-1.2966	39.29072	-0.97997	46.22493	0.26213	45.50709
-22.51811	37.87	37 97	-2.60274	62.26659	-19.62955	40.0343	14		-0.217	47.17334	-0.49201	46.46433	0.43163	51.38496	-0.91615	50.90044	0.23904	56.91356	1.09884	58.25144	-0.1296	47.99824	2.07982	49.94847	-0.2534	50.67992	-0.95577	49.47075	-0.74554	44.64286	0	43.89732	-1.15564	42,80152	0	41.64588	-1.02181	42.04994	-1.37677	39.65136	-0.80119	46.31164	0.56779	46.07823
-14.32017	49.2931	40 3031	-2.72239	67.55313	-25.97025	38.86049	15		-0.04467	49.62819	-0.72217	48.86135	0.72515	56.21313	-0.9417	55.99659	0.12453	59.30207	-0.06535	59.36125	-0.18071	51.6315	1.68577	53.13657	-0.27779	52.41374	-0.0566	52.07935	-0.68454	44.74146	0	44.05692	-1.31338	45.44554	-0.06605	44.06611	-1.03114	43.1438	-1.01243	41.10023	-1.23699	44.81856	0.01281	43.59438
-26.78338	37.11049	27 11040	-3.29955	71.88557	-29.04179	39.54423	16		-0.24105	51.28669	-0.8005	50.24515	0.67156	58.90861	-1.14603	58.43413	-0.04073	58.18197	1.91482	60.05606	-0.17442	52.85372	1.94168	54.62098	-0.49317	54.79688	1.25994	55,56365	-0.83177	46,46742	0	45,63565	-1.61896	47.3381	0	45.71914	-1,10417	43.81622	-1.51915	41.1929	-1.27904	47.37167	0.04319	46,13583
-20.16127	45,9900/	4E 00667	-2,82607	74.76368	-34.28882	37.64879	17		-0.15121	60.48205	-1.21645	59.1144	0.78551	60.89194	-1.0184	60.65904	0.12905	61.4513	3.41206	64.99241	-0.09906	55.03338	2.05414	56.98847	-0.44675	57.27578	2.5787	59.40773	-0.63527	45.70294	0	45.06767	-1.51059	46.91268	0	45,40209	-0.98054	44.36823	-0.69769	42.69	-1,38813	47.05541	-0.22317	45,4441
-14.71317	9205076	בס הבסשה	-2.81383	80.85731	-26.25841	51.78506	18		-0.38704	60.47511	-1.10807	58.98	0.50393	59.99168	-0.23841	60.25721	-0.22835	65.24299	0.56537	65.58	-0.26137	55.61053	1.53084	56.88	-0.26316	59.80958	2.80972	62.35614	-0.63068	56.81818	0	56.1875	-1.93528	56.42209	-0.30543	54.18138	-1.09627	45.678	-0.50478	44.07695	-1.35811	47.4862	-0.94863	45.17946
-10.78581	58.99524	E0 00E34	-2.41308	79.11737	-20.66935	56.03494	19		-0.37477	62.46157	-0.42538	61.66142	0.49027	59.06848	0	59.55875	-0.08587	61.33249	0	61.24662	-0.05594	55.93847	1.26634	57.14887	-0.36411	60.68441	2.55932	62.87962	-0.33721	54.38916	0	54.05195	-1.5618	59.83905	0	58.27725	-1.04965	51.96307	-0.35792	50.5555	-1.27607	48.15345	-1.27366	45.60373
-14.72266	45./8129	AE 70130	-2.19901	71.16526	-17.94295	51.02331	20		-0.31674	64.6398	-0.36344	63.95963	0.36275	55.80779	0	56.17054	-0.05801	58.00674	0.10728	58.05602	-0.21321	57.62516	1.72528	59.13723	-0.28251	58.85603	2.66741	61.24093	-0.33192	60.34933	0	60.01741	-1.10338	60.62507	0	59.52169	-0.78692	58.72564	0.82878	58.7675	-1.17017	50.65667	1.67294	51.15944
-11,13884	53,60258	5 60050	-2.21249	74.99968	-21.81098	50.97621	21		-0.31396	62.7927	-0.51132	61.96741	0.23241	55.33483	0	55.56723	-0.06595	59.95426	2.96475	62.85306	-0.34739	64.33224	4.11884	68.10369	-0.23384	64.95656	4.26546	68.98818	-0.01861	62.04286	0.04972	62.07397	-0.88506	63.67335	0	62.78829	-0.59995	65.21165	3.76627	68.37798	-1.01608	58.06155	-1.02493	56.02054
-4.31978	51,4994/	E1 400.47	-1.86171	64.86808	-21.83944	41.16692	22		-0.29862	56.34334	-0.79133	55.2534	0.08063	53.75331	-0.12518	53.70876	-0.1285	55.87122	2.1412	57.88391	-0.37685	53.8351	2.24209	55.70035	-0.43862	54.82688	2.62469	57.01296	0.1682	50.96933	0	51.13753	-0.40884	53.09547	0	52.68663	-0.61412	51.60686	0	50.99274	-0.70743	49,12731	-0.57066	47.84922
0	50./401/	50 74017	-1.66902	58.15405	-12.12335	44.36168	23		-0.45801	48.72498	-0.33506	47.9319	-0.3803	48.13861	0	47.75831	0	50.51414	0	50.51414	-0.38501	48.73501	0	48.35	-0.28829	45.04505	0	44.75676	-0.32926	44.49503	0	44.16577	-0.86803	44.28706	0	43,41904	-0.60563	46.23152	0	45.62589	-0.58601	44.39504	0	43.80902

7C207.1-	-2,09203	-2.02/04	-2.02995	-2.525/3	-2.8/66/	-2./9/56	-2.91894	-2./35/5	-2.60179	5 -2.3197	-2,43715	-2.36913	-2.14402	-2.15322	-1.7068	Loss	VICTORVL_5_N101
1 76353	5,95//	77.07387	72./581/	74.94/34	/5.50308	69.24652	66.64254		_	UT	53.32942	49.46002	44.48167	46.91118	48.76562	Energy	VICTORVL_5_N101
-19.02927	-14.60555	-7.49724	-1.0327	-8.98415	-34.15879	-29.41576	-26.6736				-17.43222	-5.52105	-3.69816	-3,48802	0	Congestion	VICTORVL_5_N101
37.37712	53.27011	67.54959	69.69552	63.43747	38,46762	37.0332	37.05				33.46004	41.56983	38.6395	41.26993	47.05882	LMP	VICTORVL_5_N101
-1.32733	-1.17057	-1.28704	-1.04466	-1.49722	-2.02686	-1.94575	-1.98927	-1.71729	-1.75648	8 -1.86991	-1,90028	-1.73676	-1.47187	-1.25401	-1.04768	Loss	VICTORVL_5_N101
56.96709	64.31696	78.00245	70.11141	68.99651	71.87445	63.58648	60.0987	57.24293	56.11744	4 53.88799	50.94594	52.15505	47.78799	46.79126	49,41905	Energy	VICTORVL_5_N101
0	-1.34493	-17.22872	-14.94164	-10.85741	-16.48008	-9.2125	-10.69133	-11.9553	-7.53507	-5.34335	-0.49449	-3.73956	-1.15159	-0.282	0	Congestion	VICTORVL_5_N101
55,63976	61.80146	59.48668	54.12511	56.64188	53,36751	52.42823	47.4181	43.57034	46.82589	5 46.67473	48,55116	46.67873	45.16453	45.25525	48.37137	LMP	VICTORVL_5_N101
-1.79527	-1.8193	-2.05919	-1.6096	-1.98342	-1.95674	-1.58774	-1.50046	-1.48051	-1.56678	1.62597	-1.55581	-1.49507	-1.56454	-1.32965	-1.30368	Loss	VICTORVL_5_N101
56,81231	60.44185	73.80617	58,95987	56,99482	48.3145	46.42504	44.78971	43.93211	42.57547	3 44.54705	45.62503	39.13785	40.53207	34.8077	34.03868	Energy	VICTORVL_5_N101
0	0	0	-0.04714	0	0	0	0		-0.8212	5 -0.72718	-0.2616	-1.41278	-0.672	-2.17849	-1.96609	Congestion	VICTORVL_5_N101
55.01704	58.62255	71.74697	57.30312	55.0114	46.35776	44.83731	43.28925	42.4516	40.1875	42.1939	43.80763	36.23	38.29553	31.29956	30.76891	LMP	VICTORVL_5_N101
-1.91358	-1,42163	-1.57189	-1.32535	-1.45748	-1.75038	-1.57875	-1.63492		-1.6902	-1.81908	-1.6999	-1.55419	-1.57042	-1.53367	-1.52271	Loss	VICTORVL_5_N101
49.44647	57.7898	66.04586	58.38534	51.13956	47.18014	42.21266	41.18176	40.09626	40.82612	43.31144	40.37763	35,89345	36.3524	36.95597	36.25489	Energy	VICTORVL_5_N101
-3.35992	0	0	0	0	0	0	-0.1004	-1.24221	-2.96591	-4.10579	-4.49811	-1.91626	-2.0947	-3.13035	-3.35107	Congestion	VICTORVL_5_N101
44.17297	56.36817	64.47397	57.06	49.68208	45.42976	40.63391	39.44644	37.18604	36.17	37.38657	34.17962	32,423	32.68727	32.29195	31.38112	LMP	VICTORVL_5_N101
-1,88288	-1.65725	-1.56937	-1.42566	-1.63366	-1.48237	-1.67899	-1.86771	-2.08404	-2.12625	-2.00687	-2.09459	-2.12502	-2.17849	-1.95575	-1.86987	Loss	VICTORVL_5_N101
50.21004	55.79962	59.67188	50.1994	47.21558	41.29173	41.5592	43.53626	44.91462	45.43278	41.89704	43.72836	44.73726	45.67066	43.2687	51.51152	Energy	VICTORVL_5_N101
0	0	-12,37409	0	-4.44315	-1.9012	-6.7541	-10.71005	-11.91516	-12.37447	-8.8654	-10.59432	-10.69561	-9.4711	-3.43155	-0.36699	Congestion	VICTORVL_5_N101
48.32717	54.14237	45.72843	48.77374	41.13877	37.90816	33.12611	30.95851	30.91542	30.93206	31.02477	31.03945	31.91663	34.02106	37.8814	49.27467	LMP	VICTORVL_5_N101
-1.98006	-1.87132	-1.55323	-1.31887	-1.46907	-1.55824	-1.69275	-1.76225	-1.60537	-1.61905	-2,12582	-1.80977	-1.91528	-1.79666	-1.60381	-1.28981	Loss	VICTORVL_5_N101
47.1442	60.36527	63.13936	58.35686	55.22811	48.69508	48.08937	50.34988	51.95364	51.23568	58,40168	52.15489	53.95164	51.62808	49.50045	54.19366	Energy	VICTORVL_5_N101
0	-0.65693	-5.95245	-0.57729	-0.63819	-1.01891	-2.56989	-2.59646	-4.00679	-3.74363	-11.60863	-4.77622	-5.66548	-5,8388	-1.17148	-0.29313	Congestion	VICTORVL_5_N101
45.16414	57.83701	55,63369	56.46071	53.12086	46.11793	43.82674	45.99118	46.34148	45.873	44.66722	45.56889	46.37088	43.99263	46.72516	52,61072	LMP	VICTORVL_5_N101
-1.65671	-1.15099	-0.90641	-0.95968	-1.11016	-1.36851	-1.60799	-1.79164	-1.85567	-2.07128	-1.83078	-1.94901	-1.99209	-1.99744	-1,70307	-1.42024	Loss	VICTORVL_5_N101
47.88175	65.02743	71.3712	59,9802	58.42964	50.68539	49,62929	47.90487	55.72594	51.01673	48.95125	47.07742	46.54421	45.81291	48.65919	63.40367	Energy	VICTORVL_5_N101
0	0	-12.05048	0.51532	-0.5073	-0.69792	-2.18664	-3.52473	-9.99747	-6.6516	-3.11069	-3.14418	-0.46199	-0.50394	-0.48636	-0.74326	Congestion	VICTORVL_5_N101
46.22504	63.87645	58.41431	59.53584	56.81217	48.61897	45.83466	42.5885	43.87279	42.29385	44.00979	41.98424	44.09013	43.31153	46.46976	61.24016	LMP	VICTORVL_5_N101
-1.44623	-1.63702	-1.54062	-1.27222	-1.34548	-1.66017	-1.84974	-1.79992	-1.81019	-1.81067	-1.64137	-1.76372	-1.92376	-1.81029	-1.98193	-2.10724	Loss	VICTORVL_5_N101
49.87013	58.05033	63.40011	54.83719	52.35328	46.50338	44,89661	43.16355	43.93672	43.94828	41.24057	43.87354	46.35565	43.93909	49.7972	59.1922	Energy	VICTORVL_5_N101
0	0	-10.40154	-6.58017	-0.51647	-1.13905	-2.63382	-2.95357	-3.70474	-3.85196	-1.80481	-3.50126	-4.10579	-2.22697	-0.53767	-0.56191	Congestion	VICTORVL_5_N101
48.4239	56.41331	51.45794	46.9848	50.49133	43.70416	40.41305	38.41005	38.42179	38.28565	37.79438	38.60856	40.3261	39.90182	47.2776	56.52305	LMP	VICTORVL_5_N101
-1.23782	-1.08149	-1.16655	-0.97239	-1.29425	-1.69374	-1,48666	-1.33546	-1.31212	-1.48005	-1.26562	-1.50554	-2.16753	-1.85276	-1.80855	-2.06253	Loss	VICTORVL_5_N101
51.57587	62.15463	69.02688	64.39684	59.64293	59.01516	51.98112	47.69508	48.77769	48.05361	45.20061	48.25453	65,09087	53.24014	54.97104	63.07423	Energy	VICTORVL_5_N101
-0.05576	-1.46296	-13,2643	-12.31687	-4.94636	-10.76214	-4.41038	-0.46964	-1.94141	-1.13377	-0.41184	-0.23014	-27.92665	-13.53787	-9.3885	-0.26643	Congestion	VICTORVL_5_N101
50.28229	59.61018	54.59603	51.10758	53.40231	46.55929	46.08408	45,88998	45.52416	45.43979	43.52316	46.51886	34.9967	37.8495	43.77399	60.74528	LMP	VICTORVL_5_N101
-1.53963	-1.34555	-1.78258	-1.36105	-1.32798	-1.48877	-1.39214	-1.72731	-1.60735	-1.73171	-1.88751	-1.67674	-1.88484	-2,14403	-2.05762	-1.56978	Loss	VICTORVL_5_N101
50.47956	58.24885	69.90496	56.9477	53.76428	51.69357	47.03177	46.55831	42.07727	44.40287	44.10066	39.9223	44.98424	35.79345	36.74326	35,43524	Energy	VICTORVL_5_N101
0	0	-2.41464	-1.4071	-6.66056	0	0	0	0	0	0	-0.91658	-6.06648	-2.433	-1.82798		Congestion	VICTORVL_5_N101
48.93993	56.9033	65.70774	54.17955	45.77574	50.2048	45.63963	44.831	40.46992	42.67116	42.21315	37.32899	37.03292	31.21642	32.85766	33,86546	LMP	VICTORVL_5_N101
-1.31328	-1.57695	-1.747	-1.5826	-1.75779	-2.00815	-2.08643	-2.05982	-1.87916	-1.93155	-1.92577	-1,84189	-1.7497	-1.62525	-1,45371	-1.47166	Loss	VICTORVL_5_N101
51.90825	56,92973	65.67661	57.75907	62.33307	64.15824	58.93877	52.14725	50.78801	49.40028	49.76152	46.39516	44.52161	41.673	38.15518	38.32454	Energy	VICTORVL_5_N101
-1.06214	0	-11.9364	-8.17658	-0.70034	-19.87174	-14.37944	-11.15804	-11.37416	-0.40859	-0.9662	-2.68578	-4.82236	-4.49173	-4.36634	-2.83371	Congestion	VICTORVL_5_N101
49.53283	55.35277	51.99322	47.99989	59.87494	42.27835	42.47289	38.92939	37.53469	47.06013	46.86955	41.8675	37.94955	35.55602	32.33513	34.01916	LMP	VICTORVL_5_N101
-1.34911	-1.64343	-2.02985	-1.8584	-2.50845	-3.13077	-2.76376	-2.61375	-2,49905	-2.38539	-2.21735	-1.80542	-1.81254	-1.80875	-1.76446	-1.80936	Loss	VICTORVL_5_N101
52.08928	57.46268	66.77127	62.36234	72.28949	77.49419	68.9217	66.50762	66.11232	62.7735	56.56502	52.48323	47.95083	46.37831	45.12679	46.87449	Energy	VICTORVL_5_N101

0	0	0	0	0	-0.30543	0	0	-1.33512	0	. 0	0	0	0	0	0	Congestion	VICTORVL_5_N101
42.53772	51,43889	61.45752	58.35769	57.17023	52.96266	44.34656	44.69663	41.87904	40.72564	40.91128	39.16222	37.80247	33.60515	25.48957	23.58244	LMP	VICTORVL_5_N101
-1.50715	-1.6411	-1.96939	-1.94382	-2.06293	-2.0144	-1.94777	-1.98487	-1.89401	-1,83758	-1.80804	-1.99097	-1.83482	-1.56235	-1.23337	-0.9892	Loss	VICTORVL_5_N101
46,23152	51.60686	65.21165	58.72564	51.96307	45.678	44.36823	43.81622	43.1438	42,04994	41.56408	42.18165	38.3053	33.81705	28.41867	27.0273	Energy	VICTORVL_5_N101
0	0	-26.25313	-12.55713	-6.09342	-8.5936	-11.56356	-13.58188	-17.26219	-24.09195	-23.30244	-27.40255	-20.61992	-12.87375	-0.2163	0	Congestion	VICTORVL_5_N101
44.72437	49.96576	36.98913	44.22469	43.80672	35.07	30.85691	28.24947	23.9876	16.12041	16.4536	12.78813	15.85055	19.38096	26.969	26.0381	LMP	VICTORVL_5_N101
-1.45172	-1.73419	-2.15989	-2.23396	-2.31618	-2,47403	-2.54099	-2.46333	-2.33057	-2,1998	-2.3436	-2.31924	-2.13515	-1.96188	-1.91072	-1.85962	Loss	VICTORVL_5_N101
44.39504	49.12731	58.06155	50.65667	48.15345	47.4862	47.05541	47.37167	44.81856	46.31164	46.22493	45.03371	44.4824	42.83577	41.44732	43.9627	Energy	VICTORVL_5_N101
0	-10.5315	-18.40394	-5.67098	-7.62115	-9.73392	-13.65949	-17.19706	-17.43499	-35.78375	-35.72406	-34.09387	-27.3313	-25.17062	-9.13126	-10.7705	Congestion	VICTORVL_5_N101
42.94332	36.86162	37.49772	42.75173	38.21612	35.27825	30.85492	27.71128	25.053	8.32808	8.15726	8.6206	15.01595	15.70327	30.40535	31.33258	LMP	VICTORVL_5_N101
-1.71533	-1.64599	-1.73676	-1.97598	-2.04555	-2.09306	-2.07636	-1.99006	-1.86895	-1.87243	-1.91522	-1,98352	-1.79614	-1.67435	-1.61299	-1.47538	Loss	VICTORVL_5_N101
45.86451	56.56317	66.79838	60.98689	53.54836	53.12339	52.96845	52.50822	49.57438	51.58223	50.6671	50.08881	47.01943	46.25275	46.48373	50.87524	Energy	VICTORVL_5_N101
0	-11.87145	-13.11819	-0.4695	-5.81594	-14.00049	-15.43889	-19.85097	-17.82562	-29.63203	-29.03952	-30.62909	-23.00295	-19.66236	-11.15435	-10.64413	Congestion	VICTORVL_5_N101
44.14917	43.04574	51.94343	58.54142	45.68687	37.02984	35.4532	30.66719	29.8798	20.07777	19.71236	17.47621	22.22033	24.91604	33.71639	38.75574	LMP	VICTORVL_5_N101
-1.59186	-1.51933	-1.2525	-1.362	-1.63351	-1.61156	-1.90402	-1.87085	-1.92236	-1.8364	-1.88394	-1.85727	-1.77136	-1.73999	-1.72395	-1.73261	Loss	VICTORVL_5_N101
47.37674	62.26775	66.26996	56.04956	46.80549	44.64143	43.37176	43.50816	42.62444	42.31334	42.0522	42.50054	40.7208	40.94097	43.42436	51.26059	Energy	VICTORVL_5_N101
0	0	0	0	0	0	-0.758	-3.91167	-2,75761	-2.50002	-2.86001	-5.10351	-3.10419	-3.75063	-1.7204	0	Congestion	VICTORVL_5_N101
45.78488	60.74842	65.01746	54.68755	45.17197	43.02988	40.70974	37.72564	37.94447	37.97693	37.30825	35.53976	35.84526	35.45035	39.98002	49.52798	LMP	VICTORVL_5_N101
-2.08543	-1.43268	-1.69576	-1.66559	-1.65435	-1.59942	-1.75508	-1.64812	-1.71208	-1.61104	-1.78842	-1.88025	-1.45371	-1.69817	-1.85677	-1.95959	Loss	VICTORVL_5_N101
52.00563	59.20182	70.36341	61.9179	53.88755	47.32016	45.00211	44.786	44.58535	42.96102	44.82259	44.87464	42.13661	42.24315	43.08057	50.76658	Energy	VICTORVL_5_N101
-0.01712	0	-1.5453	-14.49532	-9.21404	-6.07391	0	-1.15791	-0.10985	-1.58788	-3.97875	-3.8979	-5.02423	-5.10142	-2.27304	-0.58788	Congestion	VICTORVL_5_N101
49.90308	57.76913	67.12236	45.75699	43.01916	39.64682	43.24703	41.97996	42.76343	39.76209	39.05542	39.0965	35.65866	35,44355	38.95076	48.2191	LMP	VICTORVL_5_N101
-1.56549	1.4837	-1.46888	-1.62309	-1.6581	-1.75225	-1.79803	-1.83664	-2.05284	-1.99283	-2.14585	-2.15109	-2.11921	-2.41077	-1.96476	-1.76137	Loss	VICTORVL_5_N101
50.01563	55.56944	62.77254	57.76105	52.97452	48.94549	48.07574	48.84683	51.19293	49.08455	49.78776	46.56043	46.57598	51.07562	46.01309	46.35185	Energy	VICTORVL_5_N101
0	0	-0.02252	-9.79456	-8.88384	-10.50364	-9.88795	-10.82304	-14.85038	-11.33172	-9.79997	-6.45837	-5.40111	-17.76309	-5.83347	0	Congestion	VICTORVL_5_N101
48.45014	54.08574	61.28114	46.3434	42.43258	36.6896	36.38976	36.18716	34.28971	35.76	37.84194	37.95097	39.05567	30.90176	38.21487	44.59048	LMP	VICTORVL_5_N101
-2.04541	-1.74645	-1.70843	-1.62457	-1.75495	-1.67655	-1.77172	-1.59031	-1.6621	-1.6265	-1.64808	-1.63407	-1.5697	-1.39571	-1.27534	-1.01445	Loss	VICTORVL_5_N101
49.64591	53.90277	63.74737	55.25742	52.3866	45.31203	42,69211	38.32069	38.2973	37.05	37.4563	37.65147	35.51359	32.68632	28.7887	25,29799	Energy	VICTORVL_5_N101
0	0	0	0	0	0	0	-0.83693	-2.88563	-3.76706	-5.76702	-7.01549	-6.95099	-6.24159	-2.45775	0	Congestion	VICTORVL_5_N101
47.6005	52.15632	62.03894	53,63285	50.63164	43.63549	40.92039	35.89345	33.74957	31.65644	30.0412	29.00191	26.9929	25.04903	25.05561	24.28354	LMP	VICTORVL_5_N101
-1.36043	-1.76262	-1.80661	-1.70182	-1.70471	-1.78275	-2.17096	-2.0679	-1,90981	-1.89915	-1.98819	-1.82361	-1.48846	-1.52727	-1.48694	-1,47688	Loss	VICTORVL_5_N101
49.29111	55.60308	62.94805	62.79761	62.44356	58.07019	56.68314	52.35186	49.34921	47.24243	48.97025	46.05078	42.04678	38.08651	35.31915	35,75969	Energy	VICTORVL_5_N101
0	-6.86944	-12.20656	-9,65905	-7.72759	-10.93203	-10.39696	-8.36187	-4.43886	-4.09993	-5.09224	-3.63602	-4.79833	-4.60162	-5.38025	-3.05566	Congestion	VICTORVL_5_N101
47.93068	46.97103	48.93488	51.43675	53.01127	45.35541	44.11521	41.92209	43.00054	41.24335	41.88982	40.59115	35.76	31.95762	28.45196	31.22715	LMP	VICTORVL_5_N101
-1.41487	-1.47075	-1.35104	-1.39725	-1.83209	-2.61345	-2.57956	-2.55836	-2,45213	-1.82531	-1.99257	-2.12568	-1.90973	-1.42115	-1.4477	-1.40349	Loss	VICTORVL_5_N101
53.39113	59.5444	63,42923	67.17537	71.01126	76.41669	78.8855	73.09605	65.39012	59.26345	55.50321	56.08656	50.52183	48.83675	44,40786	43.99661	Energy	VICTORVL_5_N101
-10.16026	-11.89229	-10.75264	-16.60535	-15.126	-22.48456	-30,47344	-33.74524	-25.81821	-10.98977	-18.48524	-12,38338	-4.51825	-3.23196	-1.07817	0	Congestion	VICTORVL_5_N101
41.81601	46.18137	51.32554	49.17277	54.05317	51.31869	45.83251	36.79244	37.11978	46.44836	35.02541	41.5775	44.09385	44.18364	41.88199	42.59311	LMP	VICTORVL_5_N101
-1.56653	1.9501	-2.18441	-2.15327	-2.64579	-3.19396	-3.12061	-3.38367	-2.53873	-2.28009	-2.1562	-2.30516	-2.01902	-1.83176	-1.95374	-1.80302	Loss	VICTORVL_5_N101
58.45243	66,78431	77.46135	75.81951	93.82238	97.97432	93.71208	89.99135	76.93111	75.00293	66.3447	62,81096	58.18499	54.67933	52.23917	50.64651	Energy	VICTORVL_5_N101
-14.65385	-20.40337	-19.34033	-31.24718	-49.11829	-59.89449	-61.24289	-57.55851	-45.49984	-36.79056	-37.39334	-26.11411	-23.30324	-19.40029	-10.5697	-6.5176	Congestion	VICTORVL_5_N101
42.23206	44.43084	55.93661	42.41906	42.0583	34.88586	29.34858	29.04917	28.89254	35.93228	26.79515	34.39169	32.86274	33.44728	39.71573	42.32589	LMP	VICTORVL_5_N101
-2.0773	-2.29957	-2.94907	-2.97989	-3.43101	-3.87919	-3.67191	-3.80672	-3,60336	-3.36451	-2.82172	-2.20283	-2.29289	-2.07325	-1.83274	-1.41756	Loss	VICTORVL_5_N101
61.64086	73.00225	85.4803	84.89703	90.76738	92.36162	81.41701	75.98246	71.2127	66.3612	61.3417	58.43057	53.44738	49.71816	51.19387	49.56486	Energy	VICTORVL_5_N101
-6.71056	-0.54841	-0.81806	-0.63001	-1.64936	-4.53025	-15.40925	-12.80257	-14,98271	-7.80151	-14.61153	-17.58469	-8.27542	-5.78749	-2.32894	0	Congestion	VICTORVL_5_N101
52.85301	70.15427	81.71317	81.28713	85.68701	83.95219	62.33585	59.37317	52.62663	55.19517	43,90846	38.64305	42.87907	41.85742	47.03218	48.14731	LMP	VICTORVL_5_N101

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4.63 2.11 3.13 8.90 - 9.31 16.02 61.57	17 36.09 23.43 16.62	60.48205 -1.62697	-1.08388 34.03186 -24.82323	-26.69108 61.4513 -1.62231 37.35564 -22.45243 60.89194	57.27578 -2.02756 -37.01726 -16.3321 55.03338 -1.68402 -33.1379	46.91268 -2.56612 44.04393 0 45.70294 -1.65902 35.74683 -19.50139
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San Diego Community Power

Energy Risk Management Policy

Version: 1.0

Approval Date: June 25, 2020

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Energy Risk Management Policy

1.0 General Provisions

1.1 Background and Purpose of Policy

San Diego Community Power (SDCP) participates in energy markets for purposes of fulfilling its role as a Community Choice Aggregator serving retail electricity customers located within the San Diego region. This Energy Risk Management Policy (Policy) has been developed to facilitate the achievement of SDCP's organizational objectives while adhering to policies established by SDCP's Board of Directors (Board), power supply and related contract commitments, good utility practice, and applicable laws and regulations.

This Policy defines SDCP's general energy risk management framework and provides management with the authority to establish processes for monitoring, measuring, reporting, and controlling market and credit risks to which SDCP is exposed in its normal course of business.

1.2 Scope of Business and Related Market Risks

SDCP provides electric energy to retail customers within its service territory, which requires completion of the following business activities: bilateral purchases and sales of electricity under short-, medium-and long- term contracts; scheduling of load and generation of electricity into California Independent System Operator (CAISO) markets; retail marketing of electricity to consumers within its service territory; compliance with voluntary objectives and regulatory requirements that relate to carbon-free and Renewables Portfolio Standard (RPS) compliance; participation in the CAISO-administered Congestion Revenue Rights ("CRRs") market; management of the balance between load and generation over the short-, medium- and long-term planning horizons; and compliance with California Public Utilities Commission (CPUC) Resource Adequacy (RA) requirements. Participation in such activities expose SDCP to certain risks, which include, but are not limited to, the following:

- Market Price Risk
- Counterparty Credit and Performance Risk
- Load and Generation Volumetric Risk
- Operational Risk
- Liquidity Risk
- Regulatory/Legislative Risk

To mitigate SDCP's exposure to such risks, this Policy has been drafted to focus on the following areas of concern:

- Risk Management Goals and Principles
- Definitions of Risks
- Internal Control Principles
- Risk Management Business Practices
- Risk Management Governance

This Policy does not address the following types of general business risk, which should be treated separately in other policies, ordinances and regulations pertaining to SDCP: fire, accident and casualty;

health, safety, and workers' compensation; general liability; and other such typically insurable perils. The term "risk management," as used herein, is therefore understood to refer solely to market risks as defined herein, and not those other categories of risk.

1.3 Policy Administration

This version of the Energy Risk Management Policy was adopted by the SDCP Board of Directors on June 25, 2020. This Policy may be amended as needed by SDCP's Board. SDCP's Finance and Risk Management Committee (FRMC) may periodically recommend policy updates to the Board.

1.4 Policy Distribution and Acknowledgment

This Policy shall be distributed to all SDCP employees and third-party contractors who are engaged in the planning, procurement, sale and scheduling of electricity on SDCP's behalf and/or in other SDCP departments providing oversight and support for these activities. All such employees and contractors are required to confirm in writing on an annual basis that they have:

- Read SDCP's Risk Management Policy
- Understand the terms and agreements of said Policy
- Will comply with said Policy
- Understand that any violation of said Policy shall be subject to employee discipline up to and including termination of employment.

1.5 Policy Interpretation

Questions about the interpretation of any matters of the Policy should be referred to the Risk Management Committee. All legal matters stemming from this Policy will be referred to General Counsel.

2.0 Risk Management Goals

The goals of SDCP's energy risk management practices are to:

- [1] assist in achieving the business objectives of retail rate stability and competitiveness;
- [2] avoid losses and excessive costs, which would materially impact the financial condition of SDCP;
- [3] establish the parameters for energy procurement and sales activity to minimize costs while ensuring compliance with approved risk limits and policy objectives;
- [4] assist in assuring that market activities and transactions are undertaken in compliance with established procurement authorities, applicable laws, regulations and orders; and
- [5] encourage the development and maintenance of a corporate culture at SDCP in which the proper balance is struck between control and facilitation and in which professionalism, discipline, technical skills, and analytical rigor come together to achieve SDCP objectives.

3.0 Risk Management Principles

3.1 General Risk Management Principles

SDCP manages its energy resources and transactions with the objectives of reducing greenhouse gas emissions, supporting local economic development and providing customers with stable, competitive electric rates while contemporaneously minimizing risks. SDCP's risk management principles include the identification of relevant risks, systematic risk measurement and reporting, and strict adherence to established risk policies. SDCP will not engage in transactions without proper authorization or if such transactions are determined to be inconsistent with this Policy.

It is the policy of SDCP that all personnel, including the Board, management, and agents, adhere to standards of integrity, ethics, conflicts of interest, compliance with statutory law and regulations and other applicable SDCP standards of personal conduct while employed by or affiliated with SDCP.

3.2 Conflicts of Interest

All SDCP Directors, management, employees, consultants, and agents participating in any transaction or activity within the coverage of this Policy are obligated to give notice in writing to SDCP of any interest such person has in any counterparty that seeks to do business with SDCP, and to identify any real or potential conflict of interest such person has or may have with regard to any existing or potential contract or transaction with SDCP. Further, all persons are prohibited from personally participating in any transaction or similar activity that is within the coverage of this Policy, or prohibited by California Government Code § 1090, and that is directly or indirectly related to the trading of electricity and/or environmental attributes as a commodity.

If there is any doubt as to whether a prohibited condition exists, then it is the employee's responsibility to discuss the possible prohibited condition with her/his manager or supervisor.

3.3 Adherence to Statutory Requirements

Compliance is required with rules promulgated by the state of California, California Public Utilities Commission, California Energy Commission, Federal Energy Regulatory Commission(FERC), Commodity Futures Trading Commission(CFTC), and other regulatory agencies.

Congress, FERC and CFTC have enacted laws, regulations, and rules that prohibit, among other things, any action or course of conduct that actually or potentially operates as a fraud or deceit upon any person in connection with the purchase or sale of electric energy or transmission services. These laws also prohibit any person or entity from making any untrue statement of fact or omitting to state a material fact where the omission would make a statement misleading. Violation of these laws can lead to both civil and criminal actions against the individual involved, as well as SDCP. This Policy is intended to comply with these laws, regulations and rules and to avoid improper conduct on the part of anyone employed by SDCP. These procedures may be modified from time to time by legal requirements, auditor recommendations, FRMC and ROC requests, and other considerations.

In the event of an investigation or inquiry by a regulatory agency, SDCP will provide legal counsel to employees. However, SDCP will not appoint legal counsel to an employee if SDCP's General Counsel and Chief Executive Officer determine that the employee was not acting in good faith within the scope of employment. SDCP employees are prohibited from working for another power supplier, CCA or utility in a related position while they are simultaneously employed by SDCP unless an exception is authorized

by the Board. For clarity, this prohibition is not intended to prevent SDCP staff from performing non-CCA activities on behalf of SDCP in the normal course of its business.

3.4 System of Records

SDCP will maintain a set of records for all transactions executed in association with SDCP's procurement activities. The records will be maintained in US dollars and transactions will be separately recorded and categorized by type of transaction. This system of record shall be auditable.

4.0 Definitions of Market Risks

The term "market risks," as used herein, refers specifically to those categories of risk which relate to SDCP's participation in wholesale and retail markets as a Load Serving Entity (LSE) as well as SDCP's interests in certain long-term contracting opportunities. Market risks include market price risk, counterparty credit and performance risk, load and generation volumetric risk, operational risk and liquidity risk, as well as regulatory and legislative risk. These categories are defined and explained as follows.

4.1 Market Price Risk

Market price risk is defined as exposure to changes in wholesale energy prices. Market price risk is a function of price volatility and the volume of energy that is contracted at fixed prices over a defined period of time. Prices in electricity markets exhibit high volatility, and appropriate forward procurement and hedging approaches are necessary to manage exposure to pricing volatility within the CAISO or bilateral energy markets.

Market price risk is also impacted by market liquidity, which may be an issue for certain energy or capacity products that SDCP procures. Illiquid markets are characterized by relatively few buyers or sellers, making it more difficult to buy or sell a commodity and often resulting in higher premiums on purchases or deeper discounts on sales.

Another dimension of market price risk is congestion or "basis" risk. Congestion risks arise from the locational differences in prices between the point of delivery of SDCP's load (meaning, power consumed by customers) and its contracted supply.

For SDCP, market price risk manifests in two types of exposure. The first type of market price risk exposure is the potential for variations in power costs that are related to SDCP's "open positions", meaning the volume of energy that will ultimately be required for delivery to SDCP customers but that has not yet been purchased. Increases in market prices will increase SDCP's costs when those open positions are eventually filled at the higher prices. Incurrence of higher than anticipated power costs can reduce funds available for financial reserves or other planned uses and can lead to the need for rate increases. Market price risk exposure related to open positions are monitored through net open position valuations and value at risk metrics as described in Section 6.1 of this Policy.

The second type of market price risk exposure is the potential for wholesale trading positions, long-term supply contracts and generation resources to move "out of the money," that is, become less valuable when compared to similar positions, contracts or resources obtainable at present prices. These same positions can also be "in the money" if such positions become more valuable when compared to similar positions, contracts or resources obtainable at present market prices. This

valuation methodology is commonly referred to as "Mark to Market." Transaction valuation and reporting of positions shall be based on objective, market observed prices. If SDCP is "out of the money" on a substantial portion of its contracts, it may have to charge higher retail rates relative to competitors. Such a situation could erode SDCP's competitive position and market share if other market participants (e.g., Direct Access providers or SDG&E) are able to procure power at a lower cost and offer lower retail electric rates.

4.2 Counterparty Credit and Performance Risk

Performance and credit risk refer to the inability or unwillingness of a counterparty to perform according to its contractual obligations. Failure to perform may arise if an energy supplier fails to deliver energy as agreed. There are four general performance and credit risk scenarios:

- [1] counterparties and wholesale suppliers may fail to deliver energy or environmental attributes, requiring SDCP to purchase replacement products elsewhere, possibly at higher costs;
- [2] counterparties may fail to take delivery of energy or environmental attributes sold to them, necessitating a quick resale of the product elsewhere, possibly at a lower price;
- [3] counterparties may fail to pay for delivered energy or environmental attributes; and
- [4] counterparties and suppliers may refuse to extend credit to SDCP, possibly resulting in higher collateral posting costs, which could impact SDCP's cash position and/or bank lines of credit.

An important subcategory of credit risk is concentration risk. When a portfolio of positions and resources is concentrated with one or a very small number of counterparties, generating resources, or geographic locations, it becomes more likely that major losses will be sustained in the event of non-performance by a counterparty/supplier or as a result of unexpected price fluctuations at one location.

4.3 Load and Generation Volumetric Risk

Energy deliveries must be planned in consideration of forecasted load. SDCP forecasts load over the long and short term and enters into long- and short-term fixed price energy contracts to hedge its load consistent with the provisions of its Integrated Resource Plan (IRP).

Load forecasting risk arises from inaccurate load forecasts and may result in the over- or under-procurement of energy and/or customer rate revenues that deviate from approved budgets. Energy delivery risk occurs if a generator fails to deliver expected or forecasted energy volumes. Variations in wind speed and cloud cover, for example, can also impact the respective amount of electricity generated by wind and solar resources. Furthermore, the occasional oversupply of power on California's electric grid can lead to curtailment of energy deliveries or reduced revenue resulting from low or negative prices at certain energy delivery points. In general, weather is an important variable that can result in higher or lower electricity usage due to its impact of customer electricity usage (heating and cooling needs, for example) as well as energy production (by generators that are commonly impacted by ambient weather conditions).

In the CAISO markets this situation can result from both the oversupply and undersupply of electricity relative to SDCP's load as well as the over- or under-scheduling of generation or load into the day ahead market (relative to actual energy consumed or delivered in the real-time market). Load and generation

volumetric risk may result in unanticipated open positions and imbalance energy costs, which are assessed when actual and scheduled loads do not align. More specifically, imbalance energy costs result from temporal pricing differences that often exist in the day-ahead and real-time energy markets during discrete scheduling intervals. For example, if SDCP's actual load is higher than scheduled in the day-ahead market, and real-time prices are comparatively high during such instances, then SDCP bears the risk of higher-than-anticipated energy costs due to such variation.

4.4 Operational Risk

Operational risk consists of the potential for failure to execute and control business activities relative to plan. Operational risk includes the potential for:

- [1] organizational structure that proves to be ineffective in addressing risk, i.e., the lack of sufficient authority to make and execute decisions, inadequate supervision, ineffective internal checks and balances, incomplete, inaccurate and untimely forecasts or reporting, failure to separate incompatible functions, etc.;
- [2] absence, shortage or loss of key personnel or lack of cross-functional training;
- [3] lack or failure of facilities, equipment, systems and tools, such as computers, software, communications links and data services;
- [4] exposure to litigation or sanctions resulting from violating laws and regulations, not meeting contractual obligations, failure to address legal issues and/or receive competent legal advice, not drafting and analyzing contracts effectively, etc.; and
- [5] errors or omissions in the conduct of business, including failure to execute transactions, violation of guidelines and directives, etc.

4.5 Liquidity Risk

Liquidity Risk is the risk that SDCP will be unable to meet its financial obligations. This can be caused by unexpected financial events and/or inaccurate pro forma calculations, rate analyses, and debt analyses. Some unexpected financial events impacting liquidity could include:

- [1] breach of SDCP credit covenants or thresholds SDCP has credit covenants included in its banking agreements and may, eventually, have similar covenants within its energy contracts. Breach of credit covenants or thresholds could result in the withdrawal of SDCP's line of credit or may trigger the requirement to post collateral;
- [2] contractual requirements to post collateral (with counterparties) due to a decline in market prices below the contract price; and
- [3] from time to time SDCP may be the subject of legal or other claims arising from the normal course of business. Payment of a claim by SDCP could reduce SDCP's liquidity if the cause of loss is not covered by SDCP's insurance policies.

4.6 Regulatory/Legislative Risk

Regulatory risk encompasses market structure and operational risks associated with shifting state and federal regulatory policies, rules, and requirements that could negatively impact SDCP. An example is the potential increase in exit fees for customers served by Community Choice Aggregators that could result in higher overall electricity costs for SDCP customers (relative to SDG&E or DA service options).

Legislative risk is associated with actions by federal and state legislative bodies, which may impose adverse changes or requirements that could infringe upon SDCP's autonomy, increase its costs, or otherwise negatively impact SDCP's ability to fulfill its goals and objectives.

5.0 Internal Control Principles

Internal controls are based on proven principles that meet or exceed the requirements of financial institutions and credit rating agencies while also being considerate of good utility practice. The required controls shall include all customary and usual business practices designed to prevent errors and improprieties, ensure accurate and timely reporting of results of operations as well as information pertinent to management, and facilitate attainment of business objectives. These controls shall remain fully integrated in all activities of the business and shall be consistent with stated objectives. There shall be active participation by senior management in risk management processes.

The required controls include the following:

- [1] Segregation of duties and functions between front, middle, and back office activities. In general terms, the designation of responsibilities shall be organized as follows:
- Front office is responsible for planning (e.g. preparation of the IRP and other planning activities)
 and procurement (e.g. solicitation management, contract negotiation, structuring and pricing as
 well as contract execution), contract management, compliance and oversight of scheduling
 coordinator functions with the CAISO;
- Middle office is responsible for controls and reporting (e.g., risk monitoring, risk measurement, risk reporting, procurement compliance, counterparty credit review, approval and monitoring); and
- Back office is responsible for settlements and processing (e.g., verification, validation, reconciliation and analysis of transactions, tracking, processing and settlement of transactions).
- [2] Delegation of authority as defined in section 6.5 (below) that is commensurate with responsibility and capability, and relevant training to ensure adequate knowledge to operate in and comply with rules associated with the markets in which such personnel may transact (e.g., CAISO). Contract origination, commercial approval, legal review, invoice validation, and transaction auditing shall be performed by separate staff or contractors for each transaction. No individual staff member shall perform all of these functions on a single transaction.
- [3] Defining authorized products and transactions. In general terms, authorized and prohibited transactions are defined as follows:
- Authorized transactions are those transactions directly related to the procurement and/or administration of electric energy, reserve capacity, transmission and distribution service, ancillary services, congestion revenue rights, renewable energy, renewable energy credits,

scheduling activities, tolling agreements, and bilateral purchases of energy products. All transactions must be consistent with this Policy and the Board approved IRP.

- It is the expressed intent of this Policy to prohibit the acquisition of risk beyond that encountered in the efficient optimization of SDCP's generation portfolio and execution of procurement strategies. Prohibited transactions are those transactions that are not related to serving retail electric load and/or reducing financial exposure. Speculative buying and selling of energy products or maintenance of open positions that do not conform with agreed upon thresholds is prohibited. Speculation is defined as buying energy in excess of forecasted load plus reasonable planning reserves, intentionally under procuring energy relative to minimum load hedging targets or selling energy or environmental attributes that are not yet owned by SDCP. In no event shall speculative transactions be permitted. Any financial derivatives transaction including, but not limited to futures, swaps, options, and swap options are also prohibited. If any questions arise as to whether a proposed transaction(s) constitutes speculation, SDCP shall conduct an analysis of the transaction and the Board shall review the transaction(s) to determine whether the transaction(s) would constitute speculation and document its finding in the meeting minutes.
- [4] Defining proper process for executing power supply contracts. SDCP will ensure power supply contracts are approved by pertinent technical personnel. Legal review will be required of various forms of agreement used by SDCP.
- [5] Accurately capturing transactions and other data, with standardization of electronic and hard copy documentation.
- [6] Summarizing and reporting of transactions and other activity at regular intervals.
- [7] Measuring risk and performance in a timely manner and at regular intervals.
- [8] Regularly reviewing compliance to ensure that this Policy and related risk management guidelines are adhered to, with specific guidelines for resolving instances of noncompliance.
- [9] Ensuring active participation by senior management in risk management processes.

6.0 Risk Management Business Practices

6.1 Risk Measurement Metrics and Reporting

A vital element of this Policy is the regular identification, measurement and communication of risk. To effectively communicate risk, all risk management activities must be monitored on a frequent basis using risk measurement methodologies that quantify the risks associated with SDCP's procurement-related business activities and performance relative to stated goals.

SDCP measures and updates its risks using a variety of tools that model programmatic financial projections, market exposure and risk metrics, as well as through short-term budget updates. The following items are measured, monitored and reported:

- [1] Mark-to-Market Valuation marking to market is the process of determining the current value of contracted supply. A mark-to-market valuation shall be performed at least once per quarter.
- [2] Exposure Reporting calculates the notional dollar risk exposure and value at risk of open portfolio positions at current market prices. The exposure risk calculations shall be performed at least once per quarter.
- [3] Open Position Monitoring on a monthly basis, SDCP shall calculate/monitor its open positions for all energy and capacity products. If energy open positions for the month following the then current month (prompt month) exceed 10% of load, SDCP will solicit market energy to close open positions and make a commercial decision to close the position. Open positions for terms beyond the prompt month will be monitored monthly and addressed in accordance with SDCP's planning models and related policies.
- [4] Counterparty Credit Exposure calculates the notional and mark-to-market exposure to each SDCP counterparty by deal and in aggregate. Counterparty credit exposure shall be reported on a quarterly basis. Counterparty exposure reporting includes contingent collateral posting risks arising from changes in market prices and other factors.
- [5] Reserve Requirement Targets no less than once per year, SDCP staff will monitor SDCP's reserves to ensure that they meet the targeted thresholds.

Consistent with the above, the Middle Office will develop reports and provide feedback to the Risk Oversight Committee. If a limit or control established by this Policy is violated, the Middle Office will send notification to the responsible party and the Risk Oversight Committee. The Risk Oversight Committee will discuss the cause and potential remediation of any violation to determine next steps for curing the violation.

Risk measurement methodologies shall be re-evaluated on a periodic basis to ensure SDCP adjusts its methods to reflect the evolving competitive landscape.

6.2 Market Price Risk

SDCP manages market price risk using its planning models which define forecasted load, energy under contract and SDCP's open positions across various energy product types including renewable energy (Portfolio Content Category I, II and III), carbon-free energy and system power relative to SDCP's procurement targets.

SDCP determines the quantity of energy it intends to place under contract each year through the use of its planning models and in consideration of stated procurement targets. The planning models include an outline of the delivery term and quantity of each energy product that SDCP intends to fill in the upcoming year. The planning models inform SDCP's solicitation planning, including solicitation timing and strategy as well as the person/team responsible for related solicitations.

In general, SDCP will seek to purchase some long-term renewable energy each year for purposes of diversifying market exposure while also avoiding potential "planning cliffs", which can occur when a significant portion of long-term contracts expire at or near the same point in time.

For products generally purchased through short- and medium-term contracts, SDCP follows a similar temporal diversification strategy, with multiple procurement cycles occurring throughout the year.

Congestion risk is managed through the contracting process with a preference for day-ahead energy delivery at the SP 15 trading hub. Once energy is procured, SDCP manages congestion risks through the application of CRRs consistent with its Congestion Revenue Rights Risk Management Guidelines. CRRs are financial instruments used to hedge against transmission congestion costs encountered in the CAISO day-ahead market. SDCP uses a third-party scheduling coordinator to manage its CRR portfolio. SDCP primarily uses CRRs to reduce its exposure to congestion charges.

6.3 Counterparty Credit and Performance Risk

SDCP shall evaluate and monitor the financial strength of its suppliers in consideration of adopted Credit Guidelines. Generally, SDCP manages its exposure to energy suppliers by exhibiting a preference for counterparties with Investment Grade Credit ratings as determined by Moody's or Standard and Poor's and through the use of security requirements in the form of cash and letters of credit. SDCP measures its mark-to-market counterparty credit exposure consistent with industry best practices.

6.4 Load and Generation Volumetric Risk

SDCP manages energy delivery risks by ensuring that contracts include appropriate contractual penalties for non-delivery, acquiring energy from a geographically and technologically diverse portfolio of generating assets (with a range of generation profiles that are generally complementary to the manner in which SDCP's customers use electric power). Due to known production variability and supply uncertainty related to renewable and other carbon-free energy products, SDCP includes planning margins in its procurement of such products to ensure that related targets/mandates are achieved.

SDCP manages load forecasting and related weather risks by contracting with qualified data management and scheduling coordinators, which independently or jointly provide the systems and data necessary to forecast and schedule load using good utility practice. Load variability is also considered in establishing appropriate planning margins for renewable and other carbon free energy sources.

SDCP's load scheduling strategy, as executed by its scheduling coordinator, shall be in accordance with adopted Load Bidding/Scheduling Guidelines. This strategy shall ensure that price risk in the day-ahead and real-time CAISO markets is managed effectively and is consistent with good utility practice.

6.5 Operational Risk

Operational risks are managed through:

- Adherence to this Policy, and oversight of procurement activity including delegation of authority;
- Conformance with applicable human resources policies and guidelines;
- Staff resources, expertise and/or training reinforcing a culture of compliance;
- Use of qualified, highly experienced contractors on an as-needed basis in the event that necessary expertise does not exist within SDCP's own organization;
- Ongoing and timely internal and external audits; and
- Cross-training amongst staff

In order to ensure proper controls for executing energy transactions and to facilitate the efficient operation of SDCP in its ordinary course of business, the Board delegates transactional authority that is commensurate with responsibility and capability. Accordingly, by approving this Policy, the Board delegates the following energy procurement authority by product type, tenor, volume, and notional value to its Chief Executive Officer:

Delegation of Authority per Transaction by Position/Title	Product Type	Tenor Limit	Volumetric Limit	Notional Value Limit
	System Power	3 years	1,500,000 MWh	\$ 50,000,000
Chief Executive Officer	Resource Adequacy	3 years	10,000 MW	\$ 50,000,000
	Renewables	3 years	2,500,000 MWh	\$ 50,000,000
	GHG-free	3 years	5,000,000 MWh	\$ 50,000,000
Risk Oversight Committee*				
SDCP Board	All Products	Any	Unlimited	Unlimited

^{*} Limits delegated to the Risk Oversight Committee will be adopted following its formation. Any changes to the delegation of authority will require Board approval.

6.6 Liquidity Risk

SDCP manages liquidity risk through adherence to its loan and power purchase agreement credit covenants; limiting commitments to provide security consistent with adopted Credit Guidelines; ensuring it has adequate loan facilities, prudent cash and investment management; and adherence to any applicable reserve policies. SDCP monitors its liquidity (defined as unrestricted cash, investments, and unused bank lines of credit) no less than weekly. SDCP utilizes scenario and sensitivity analyses while preparing budget, rate, and pro forma analyses to identify potential financial outcomes and ensure sufficient liquidity under adverse conditions.

6.7 Regulatory/Legislative Risk

SDCP manages its regulatory and legislative risk through active participation in working groups and advocacy coalitions such as the California Community Choice Association. SDCP regularly participates in regulatory rulemaking proceedings and legislative affairs to protect SDCP's interests.

7.0 Risk Management Policy Governance

7.1 SDCP Board of Directors

The SDCP Board is responsible for adopting this Policy. The Board also approves SDCP's annual budget, contracting authorities and delegated responsibilities for the management of SDCP's operations to its Chief Executive Officer and staff.

7.2 Finance and Risk Management Committee

The FRMC is responsible for reviewing and recommending approval of substantive changes to this Policy, as needed, and for initiating and overseeing a review of the implementation of this Policy as it deems necessary. The Chief Executive Officer and Risk Oversight Committee may make reports and seek approval for any substantive changes to this Policy from the FRMC, which will recommend changes to the Board.

7.3 Risk Oversight Committee (ROC)

To ensure with implementation and compliance with this Policy, the Chief Executive Officer will establish a Risk Oversight Committee prior to the commencement of retail electric service by SDCP. The members of the ROC will be selected by the Chief Executive Officer. The ROC will have authority to:

- Meet once per quarter, or as otherwise called to order by the Chair of the ROC.
- No less than once per quarter, provide a report to the FRMC regarding its meetings, deliberations and any other areas of concern.
- From time to time, adopt and/or adapt risk management guidelines defining internal controls, strategies and processes for managing market risks incurred through or attendant upon wholesale trading, retail marketing, long-term contracting, CRR trading and load and generation scheduling.
- Specify the categories of permitted transactions and set risk limits for wholesale trading. The ROC will receive and review information and reports regarding risk management, wholesale trading transactions, and the administration of supply contracts.
- Have direct responsibility for enforcing compliance with this Policy. Any gross violations to this Policy, as determined by the Chair of the ROC, shall be reported to the FRMC for appropriate action.



SAN DIEGO COMMUNITY POWER Staff Report – Item 2

To: San Diego Community Power Board of Directors

From: John Dalessi, Pacific Energy Advisors, Inc.

CC: Bill Carnahan, Interim CEO

Subject: Approval of 2021 Rates

Date: January 15, 2021

RECOMMENDATION

Approve the rates contained in Attachment A to become effective as of March 1, 2021.

BACKGROUND

San Diego Community Power (SDCP) will begin serving its first phase of customers in March 2021. These customers currently receive bundled (generation and delivery) electric service from SDG&E under a wide variety of rate schedules. Once the customers begin receiving generation service from SDCP, the customers will be charged SDCP's rates for generation service and SDG&E's rates for delivery services. SDG&E will include SDCP's generation charges in the bills sent to customers and collect and remit the funds to SDCP.

Consistent with good utility practice, rates must produce the revenue needed to operate a viable enterprise. Fiscal Year 2022 was used as the proforma "test year" for rate setting purposes, meaning that the rates were designed to recover a revenue requirement consistent with estimated FY 2022 sales and expenditures. The proposed rates were designed to yield revenues sufficient to collect SDCP's projected annual power supply and other operating costs, debt service costs, plus a planned reserve margin contribution, designed to begin accrual of reserves to provide a buffer against unplanned variances in revenues and/or operating costs. This 5% planned reserve margin contribution is at the low end of the recommended range, given the challenging competitive rate environment anticipated when SDCP commences service.

ANALYSIS AND DISCUSSION

The preliminary rates would yield projected revenues of \$23.1 million for the remainder of FY 2021 and \$274.8 million in FY 2022, using electric load forecasts reflective of the planned phased-in customer enrollment schedule. Operating costs were projected based on contracts SDCP has executed to date and the expected cost of procuring energy and other wholesale services needed to supply SDCP's customers with a default resource mix of 50% renewable energy and an overall carbon free energy content of 55%.

The pro forma projections of annual SDCP revenues and expenses assuming adoption of the preliminary rates are shown in Figure 1.

Year Type Fiscal

Annual Pro Forma Projections San Diego Community Power 31-Dec-20

Year Endin	g: 2021	2022	2023	2024	2025
I. Revenue	23,114,008	274,840,664	410,201,167	410,981,215	413,036,121
II. Operating Expenses					
II. Operating Expenses	26 065 777	242 026 440	260 OAE 41E	254 726 200	240 479 402
Power Supply Staff	26,965,777 1,500,000	243,836,448 4,500,000	368,945,415 4,635,000	354,726,299 4,774,050	349,478,402 4,917,272
Professional/Technical services	630,010	4,500,000 830,335	4,635,000 909,753	932,573	956,491
·	240,000	300,000	309,000	318,270	327,818
Legal Communications, Mktg, Enrollment	687,998	3,301,253	•	·	1,698,317
Other General and Administrative	365,000		1,660,276 432,600	1,677,597	458,945
	410,000	420,000 895,000	921,850	445,578 949,506	977,991
Regulatory and CalCCA Fees	410,000	•	•	•	•
Data Management	- 22.664	1,531,297	8,190,524	8,771,773	8,902,686
Utility Service Fees	23,664	733,527	3,046,375	3,145,725	3,256,294
Uncollectibles/Other	64,454	1,281,739	1,945,254	1,878,707	1,854,871
Subtotal Operating Expenses	30,886,903	257,629,598	390,996,046	377,620,077	372,829,087
Operating Margin	(7,772,894)	17,211,066	19,205,120	33,361,138	40,207,034
III. Financing					
Interest	375,000	857,820	715,471	545,067	370,354
Principal	-	2,752,650	6,724,411	6,894,461	7,068,812
Subtotal Financing	375,000	3,610,470	7,439,883	7,439,528	7,439,165
Operating Margin Less Financing	(8,147,894)	13,600,595	11,765,238	25,921,609	32,767,869
IV. Cash From Financing	35,000,000	-	-	-	-
V. Other Uses					
CPUC and CAISO Deposits	1,275,000	-	-	-	-
Collateral Deposits	5,000,000	-	-	-	-
Subtotal Other Uses	6,275,000	-	-	-	-
VI. Net Surplus/(Deficit)	20,577,106	13,600,595	11,765,238	25,921,609	32,767,869
VII. Cumulative Net Surplus	19,874,606	33,475,201	45,240,439	71,162,048	103,929,917
VIII. Program Average Rate (\$/MWh)	98.9	79.0	76.0	75.9	75.9
IX. Power Supply (\$/MWh)	115.4	70.1	68.3	65.5	64.3
				71.1	
X. Program Average Cost (\$/MWh)	160.6	75.1	73.8	/1.1	69.9
XI. Annual Sales (MWh)	233,670	3,477,830	5,399,104	5,411,981	5,439,041

The preliminary SDCP rates for the PowerOn product (e.g., base portfolio offering) are structured like SDG&E's generation rates with most of the same rate schedules, time-of-use periods, and mix of energy and demand charges. The SDCP rates were designed such that each rate component is an equal percentage of the corresponding SDG&E generation rate, after accounting for the Power Cost Indifference Adjustment ("PCIA") and the Electric Franchise Fee Equivalent Surcharge ("FFS") that SDG&E will assess on customer bills. In other words, SDCP rates are proportional to the various SDG&E rates with regards to time of use, on-peak, off-peak, etc. This rate design approach is typical for CCA programs and has the advantages of ensuring comparability and compatibility with SDG&E's billing process.

For customers electing the Power100 100% renewable energy product, an additional charge of 0.75 cents per kWh will apply. This premium is based on the estimated incremental cost to SDCP of offering a 100% renewable energy product relative to the default PowerOn product. The SDCP Power100 rate would be about 10% more than the PowerOn rate, and the impact to a customer's total electric bill (including SDCP generation charges and SDG&E delivery charges) would be approximately 3%.

Important Considerations to Note

- SDG&E commodity rates (first column titled "SDG&E EECC") in Attachment A vs. SDCP's proposed rates (third column titled "SDCP Rate") shows that SDCP is more cost effective than SDG&E on commodity (energy) costs, which is the area where SDCP competes with the incumbent utility and over which SDCP has control.
- 2. The proposed SDCP rates in Attachment A were designed with reference to the currently effective SDG&E generation rates and PCIA charges.
- 3. The CPUC decision on 2021 rates, expected on January 14, 2021, will affect SDG&E's current rates. Currently, it is anticipated that their rates will increase which improves SDCP's competitiveness. However, more information on how SDG&E will apply the decision to each rate type is necessary to make an accurate comparison. That information will become available on or before February 1 when SDG&E's consolidated rate filing is approved by the California Public Utilities Commission (CPUC). An accurate and current rate comparison between SDCP and SDG&E will not be possible until that time.
- 4. An additional rate increase by SDG&E is expected in March for under-collections in 2020 and again after March for under-collections in these first months of 2021. After the results of the various CPUC cases are known, staff intends to reevaluate SDCP's rates in March and will provide an update to the Board with any recommended changes to SDCP's rates.
- 5. Even when 2021 SDG&E rates are known, comparison between SDCP rates and SDG&E rates will be difficult because each entity delivers a different product which impacts the quality offered and the cost of the energy mix. For example, SDCP will offer its PowerOn product that is 50% renewable and an additional 5% greenhouse gas free power, resulting in a 55% carbon free base portfolio offering for its inaugural year of service. As of SDG&E's 2019 power content label, SDG&E

¹ SDG&E generation rates can be found at: https://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_EECC.pdf

offers customers 31.3% renewable as their base portfolio with 7.8% of their retail sales covered by unbundled renewable energy credits. The only comparison that is valid is to note that SDCP plans to offer its base product with 50% renewables while SDG&E offers 31%.

FISCAL IMPACT

Adoption of the proposed rates would yield projected revenues of \$23.1 million during the current fiscal year ending June 30, 2021.

ATTACHMENTS

Attachment A: SDCP Rates Effective March 1, 2021

San Diego Community Power Generation Rates Effective March 1, 2021 (Proposed)

Generation Rates Effective March 1,	2021 (Proposea)	SDG&E EECC (1) (\$/kWh)	SDG&E PCIA (2)	SDCP Rate	SDCP+PCIA+ FFS (3)
Schedule DR, DM, DS, DT, DT-RV					
Summer		0.13526	0.03265		0.14937
Winter		0.06897	0.03265	0.04275	0.07616
Schedule DR-LI and medical baseline	customers	(\$/kWh)			
Summer		0.13526	0.03265	0.11523	0.14937
Winter		0.06897	0.03265	0.04275	0.07616
Schedule E-LI (Non-Residential CARE) E-LI for Schedules (TOU-A, TOU-A-2,		(\$/kWh)			
Summer		0.06716		0.07342	0.07416
Winter		0.04662		0.05097	0.05148
E-LI for Schedules AL-TOU, AL-TOU-2,	, DG-R	(\$/kWh)			
Summer		0.07416		0.08108	0.08190
Winter		0.05121		0.05599	0.05655
Schedules DR-TOU, DR-TOU-CARE, D	R-TOU-MB	(\$/kWh)			
	On-Peak Energy: Up to 130% of Baseline	0.20079	0.03265	0.18687	0.22173
	On-Peak Energy: Above 130% of Baseline	0.20079	0.03265	0.18687	0.22173
	Off-Peak Energy: Up to 130% of Baseline	0.12433	0.03265	0.10328	0.13730
	Off-Peak Energy: Above 130% of Baseline	0.12433	0.03265	0.10328	0.13730
Winter					
	On-Peak Energy: Up to 130% of Baseline	0.06471	0.03265		0.07146
	On-Peak Energy: Above 130% of Baseline	0.06471	0.03265	0.03810	0.07146
	Off-Peak Energy: Up to 130% of Baseline	0.05845	0.03265	0.03125	0.06454
	Off-Peak Energy: Above 130% of Baseline	0.05845	0.03265	0.03125	0.06454
Schedules DR-SES, DR-SES-CARE, DR-	SES-MB	(\$/kWh)			
Summer: On-Peak End	ergy	0.31473	0.03265	0.31144	0.34755
Summer: Off-Peak En	ergy	0.10080	0.03265	0.07755	0.11131
Summer: Super Off-Po		0.05143	0.03265		0.05680
Winter: On-Peak Ener		0.06839	0.03265		0.07552
Winter: Off-Peak Ener		0.06069	0.03265		0.06702
Winter: Super Off-Pea	ak Energy	0.05216	0.03265	0.02438	0.05760
Schedule EV-TOU		(\$/kWh)			
Summer	0.0.15				004755
	On-Peak Energy	0.31473	0.03265		0.34755
	Off-Peak Energy Super Off-Peak Energy	0.10080 0.05143	0.03265 0.03265		0.11131 0.05680
Winter	Super Officean Lifetgy	0.03143	0.03203	0.02338	0.03060
	On-Peak Energy	0.06839	0.03265	0.04212	0.07552
	Off-Peak Energy	0.06069	0.03265		0.06702
	Super Off-Peak Energy	0.05216	0.03265		0.05760
Schedules EV-TOU-2, EV-TOU-2-CARE Summer	E, EV-TOU-2-MB	(\$/kWh)			

San Diego Community Power Generation Rates Effective March 1, 2021 (Proposed)

	ites Effective March	n 1, 2021 (Proposed)	SDG&E	SDG&E		SDCP+PCIA+
			EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
		On Book Energy	(\$/kWh)	0.02265	0.21144	0.24755
		On-Peak Energy Off-Peak Energy	0.31473 0.10080	0.03265 0.03265		
		Super Off-Peak Energy	0.05143	0.03265		
	Winter	Super Off Fear Energy	0.03143	0.03203	0.02550	0.03000
		On-Peak Energy	0.06839	0.03265	0.04212	0.07552
		Off-Peak Energy	0.06069	0.03265		
		Super Off-Peak Energy	0.05216	0.03265	0.02438	0.05760
Schedule EV-TOU-5, EV-TOU-5-CARE, EV-TOU-5-MB			(\$/kWh)			
	Summer					
		On-Peak Energy	0.31473	0.03265		
		Off-Peak Energy	0.10080	0.03265		
		Super Off-Peak Energy	0.05143	0.03265	0.02358	0.05680
	Winter					0.07550
		On-Peak Energy	0.06839	0.03265		
		Off-Peak Energy Super Off-Peak Energy	0.06069 0.05216	0.03265 0.03265		
		Super Off-reak Effergy	0.03216	0.03203	0.02436	0.03760
Schedule TOU-DR-1, TOU-DR-1-CARE, TOU-DR-1-MB			(\$/kWh)			
	Summer	On Book France	0.20050	0.02265	0.20405	0.22000
		On-Peak Energy Off-Peak Energy	0.29050 0.09313	0.03265 0.03265		
		Super Off-Peak Energy	0.04751	0.03265		
	Winter	Super on Fear Energy	0.04731	0.03203	0.01323	0.03240
		On-Peak Energy	0.07852	0.03265	0.05319	0.08670
		Off-Peak Energy	0.06969	0.03265		
		Super Off-Peak Energy	0.05989	0.03265	0.03283	0.06614
Schedule TOU-DR-2, TOU-DR-2-CARE, TOU-DR-2-MB (\$/kWh)						
	Summer					
		On-Peak Energy	0.29050	0.03265	0.28495	0.32080
		Off-Peak Energy	0.07584	0.03265	0.05026	0.08374
	Winter					
		On-Peak Energy	0.07852	0.03265		
		Off-Peak Energy	0.06536	0.03265	0.03881	0.07218
Schedule TOU-DR, TOU-DR-CARE, TOU-DR-MB (\$/kW			(\$/kWh)			
	Summer	0.0.15	2.42	0.0005=	0.4000	0.04=05
		On-Peak Energy	0.19473	0.03265		
		Off-Peak Energy Super Off-Peak Energy	0.14580 0.09735	0.03265 0.03265		
	Winter	Super On-reak Lifergy	0.03/33	0.03203	0.07378	0.10730
	· · · · · · · · · · · · · · · · · · ·	On-Peak Energy	0.06756	0.03265	0.04121	0.07460
		Off-Peak Energy	0.06004	0.03265		
		Super Off-Peak Energy	0.05160	0.03265		
Schedule TOU-A			(\$/kWh)			
On-Peak Energy: Summer			(4) (41)			
		-	0.20131	0.02744	0.19265	0.22230
			0.20030	0.02744		
	Off-Peak Energy:	Summer				

Generation Ra	tes Effective March 1, 20	21 (Proposed)				i
			SDG&E	SDG&E		SDCP+PCIA+
			EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
			(\$/kWh)			. ,
				0.02744	0.09046	0.11000
			0.10693	0.02744		0.11808
			0.10640	0.02744	0.08888	0.11749
	On Peak Energy: Winter					
			0.07116	0.02744	0.05036	0.07858
			0.07082	0.02744		0.07821
	Off Deals Francis Minter		0.07002	0.02744	0.04333	0.07021
	Off-Peak Energy: Winter					
			0.05955	0.02744	0.03766	0.06576
			0.05932	0.02744	0.03741	0.06550
Schedule TOU-	Δ_2		(\$/kWh)			
Jenedale 100			() / KVVII)			
	On-Peak Energy: Summe					
		Secondary	0.25282	0.02744	0.24896	0.27918
		Primary	0.25160	0.02744	0.24763	0.27784
	Off-Peak Energy: Summe	er				
		Secondary	0.09906	0.02744	0.08086	0.10939
		•				
		Primary	0.09858	0.02744	0.08034	0.10886
	Super Off-Peak Energy: S	Summer				
		Secondary	0.05455	0.02744	0.03220	0.06024
		Primary	0.05430	0.02744	0.03193	0.05997
	On Peak Energy: Winter	· ····································		****	0.0000	
	• • • • • • • • • • • • • • • • • • • •	Carandam	0.07402	0.02744	0.05020	0.07042
		Secondary	0.07102	0.02744		0.07842
		Primary	0.07069	0.02744	0.04984	0.07806
	Off-Peak Energy: Winter					
		Secondary	0.06285	0.02744	0.04127	0.06940
		Primary	0.06259	0.02744		0.06912
		•	0.00233	0.02744	0.04033	0.00912
	Super Off-Peak Energy: \	Winter				
		Secondary	0.05357	0.02744	0.03113	0.05916
		Primary	0.05340	0.02744	0.03094	0.05897
		•				
Schedule TOU-	Λ 2		(\$/kWh)			
Schedule 100-			(\$/KVVII)			
	On-Peak Energy: Summe					
		Secondary	0.19952	0.02744	0.19069	0.22032
		Primary	0.19856	0.02744	0.18964	0.21926
	Off-Peak Energy: Summe	· er				
		Secondary	0.12341	0.02744	0.10748	0.13628
		-				
		Primary	0.12282	0.02744	0.10684	0.13563
	Super Off-Peak Energy: S	Summer				
		Secondary	0.05427	0.02744	0.03189	0.05993
		Primary	0.05402	0.02744	0.03162	0.05965
	On Peak Energy: Winter	•				
		Carandam	0.07402	0.02744	0.05022	0.07044
		Secondary	0.07103	0.02744		0.07844
		Primary	0.07070	0.02744	0.04985	0.07807
	Off-Peak Energy: Winter					
		Secondary	0.06286	0.02744	0.04128	0.06941
		Primary	0.06260	0.02744		0.06913
		-	0.00200	0.02744	0.04100	0.00313
	Super Off-Peak Energy: \					
		Secondary	0.05358	0.02744	0.03114	0.05917
		Primary	0.05340	0.02744	0.03094	0.05897
Schedule A-TC			(\$/kWh)			
Julieudie A-10	C			0.00=11	0.04000	0.00001
	Summer		0.06249	0.02744	0.04088	0.06901

Generation Ra	ites Effective March 1, 20	J21 (Proposed)				i
			SDG&E EECC (1) (\$/kWh)	SDG&E PCIA (2)	SDCP Rate	SDCP+PCIA+ FFS (3)
	Winter		0.06249	0.02744	0.04088	0.06901
Schedule TOU	-M					
	Summer					
		On-Peak Energy	0.26079	0.02744	0.25768	0.28799
		Off-Peak Energy	0.09993	0.02744	0.08181	0.11035
		Super Off-Peak Energy	0.05629	0.02744	0.03410	0.06216
	Winter					
		On-Peak Energy	0.07098	0.02744	0.05016	0.07838
		Off-Peak Energy	0.06282	0.02744	0.04124	0.06937
		Super Off-Peak Energy	0.05356	0.02744	0.03112	0.05915
Schedule OL-T	ou					
	Summer					
		On-Peak Energy	0.31990	0.03024	0.31950	0.35326
		Off-Peak Energy	0.11866	0.03024	0.09949	0.13104
		Super Off-Peak Energy	0.06002	0.03024	0.03538	0.06628
	Winter					
		On-Peak Energy	0.07981	0.03024	0.05701	0.08813
		Off-Peak Energy	0.07083	0.03024	0.04720	0.07822
		Super Off-Peak Energy	0.06087	0.03024	0.03631	0.06722
Schedule AL-T	ou		(\$/kW)			
Maximum On-	Peak Demand: Summer					
	Secondary		9.78000		10.69000	10.79758
	Primary		9.73000		10.64000	10.74703
	Secondary Substation		9.78000		10.69000	10.79758
	Primary Substation		9.73000		10.64000	10.74703
	Transmission		9.32000		10.19000	10.29252
Maximum On-	Peak Demand: Winter					
	Secondary		0.00000		0.00000	0.00000
	Primary		0.00000		0.00000	0.00000
	Secondary Substation		0.00000		0.00000	0.00000
	Primary Substation		0.00000		0.00000	0.00000
	Transmission		0.00000		0.00000	0.00000
On Peak Energ			(\$/kWh)			
	Secondary		0.11957	0.03024		0.13204
	Primary		0.11899	0.03024	0.09985	0.13140
	Secondary Substation		0.11957	0.03024	0.10048	0.13204
	Primary Substation		0.11899	0.03024	0.09985	0.13140
	Transmission		0.11388	0.03024	0.09426	0.12575
Off-Peak Energ						
	Secondary		0.10008	0.03024	0.07918	0.11052
	Primary		0.09962	0.03024	0.07867	0.11001
	Secondary Substation		0.10008	0.03024	0.07918	0.11052
	Primary Substation		0.09962	0.03024	0.07867	0.11001
C	Transmission		0.09538	0.03024	0.07404	0.10533
Super Off-Peak	K Energy: Summer		0.07407	0.0000	0.05464	0.000.5
	Secondary		0.07487	0.03024	0.05161	0.08267
	Primary		0.07462	0.03024		0.08240
	Secondary Substation		0.07487	0.03024	0.05161	0.08267

Generation nates Effective March 1, 2021 (Hoposeu)	SDG&E	SDG&E		SDCP+PCIA+
	EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
	(\$/kWh)			
Primary Substation	0.07462	0.03024		0.08240
Transmission	0.07161	0.03024	0.04805	0.07908
On Peak Energy: Winter				0.4000.4
Secondary	0.09955	0.03024		0.10994
Primary	0.09910	0.03024		0.10943
Secondary Substation	0.09955	0.03024		0.10994
Primary Substation	0.09910	0.03024		0.10943
Transmission Off Book Francis Winter	0.09492	0.03024	0.07353	0.10481
Off-Peak Energy: Winter	0.00035	0.02024	0.00025	0.0075.0
Secondary	0.08835	0.03024		0.09756
Primary	0.08799	0.03024		0.09717
Secondary Substation	0.08835	0.03024		0.09756
Primary Substation	0.08799	0.03024		0.09717
Transmission	0.08437	0.03024	0.06200	0.09317
Super Off-Peak Energy: Winter	0.07504	0.02024	0.05370	0.00200
Secondary	0.07594	0.03024		0.08386
Primary	0.07569	0.03024		0.08358
Secondary Substation	0.07594	0.03024		0.08386
Primary Substation	0.07569	0.03024 0.03024		0.08358
Transmission	0.07264	0.03024	0.04918	0.08022
Schedule AL-TOU-2	(\$/kW)			
Maximum On-Peak Demand: Summer				
Secondary	16.92000		18.50000	18.68612
Primary	16.84000		18.41000	18.59524
Secondary Substation	16.92000		18.50000	18.68612
Primary Substation	16.84000		18.41000	18.59524
Transmission	16.11000		17.61000	17.78721
Maximum On-Peak Demand: Winter				
Secondary	0.00000		0.00000	0.00000
Primary	0.00000		0.00000	0.00000
Secondary Substation	0.00000		0.00000	0.00000
Primary Substation	0.00000		0.00000	0.00000
Transmission	0.00000		0.00000	0.00000
On Peak Energy: Summer	(\$/kWh)			
Secondary	0.10930	0.03024		0.12070
Primary	0.10877	0.03024		0.12012
Secondary Substation	0.10930	0.03024		0.12070
Primary Substation	0.10877	0.03024		0.12012
Transmission	0.10410	0.03024	0.08357	0.11496
Off-Peak Energy: Summer				
Secondary	0.09156	0.03024		0.10111
Primary	0.09114	0.03024		0.10064
Secondary Substation	0.09156	0.03024		0.10111
Primary Substation	0.09114	0.03024		0.10064
Transmission	0.08726	0.03024	0.06516	0.09636
Super Off-Peak Energy: Summer	0.00700	0.0000	0.04222	0.07:00
Secondary	0.06790	0.03024		0.07498
Primary	0.06767	0.03024		0.07472
Secondary Substation	0.06790	0.03024		0.07498
Primary Substation	0.06767	0.03024	0.04374	0.07472

Generation nates Effective March 1, 2021 (170posed)	SDG&E	SDG&E		SDCP+PCIA+
	EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
	(\$/kWh)	0.00004	0.04076	0.07474
Transmission	0.06494	0.03024	0.04076	0.07171
On Peak Energy: Winter	0.00020	0.02024	0.00046	0.00000
Secondary	0.09028	0.03024		0.09969
Primary	0.08987	0.03024		0.09924
Secondary Substation	0.09028	0.03024		0.09969
Primary Substation	0.08987	0.03024		0.09924
Transmission Off Book Energy Winter	0.08608	0.03024	0.06387	0.09506
Off-Peak Energy: Winter Secondary	0.08012	0.03024	0.05735	0.08847
Primary	0.07979	0.03024		0.08847
,	0.08012	0.03024		0.08811
Secondary Substation	0.07979	0.03024		0.08847
Primary Substation Transmission	0.07651	0.03024		0.08449
Super Off-Peak Energy: Winter	0.07651	0.03024	0.05341	0.08449
Secondary	0.06887	0.03024	0.04505	0.07605
Primary	0.06864	0.03024		0.07580
Secondary Substation	0.06887	0.03024		0.07580
Primary Substation	0.06864	0.03024		0.07580
Transmission	0.06587	0.03024		0.07380
11 41151111551011	0.00367	0.03024	0.04177	0.07273
Schedule DG-R	(\$/kWh)			
On Peak Energy: Summer				
Secondary	0.31819	0.03024	0.31763	0.35137
Primary	0.31772	0.03024	0.31712	0.35085
Secondary Substation	0.31819	0.03024	0.31763	0.35137
Primary Substation	0.31772	0.03024	0.31712	0.35085
Transmission	0.31354	0.03024	0.31255	0.34624
Off-Peak Energy: Summer				
Secondary	0.16574	0.03024		0.18302
Primary	0.16521	0.03024		0.18244
Secondary Substation	0.16574	0.03024		0.18302
Primary Substation	0.16521	0.03024		0.18244
Transmission	0.16034	0.03024	0.14506	0.17706
Super Off-Peak Energy: Summer				
Secondary	0.10615	0.03024		0.11722
Primary	0.10595	0.03024		0.11700
Secondary Substation	0.10615	0.03024		0.11722
Primary Substation	0.10595	0.03024		0.11700
Transmission	0.10353	0.03024	0.08295	0.11433
On Peak Energy: Winter				
Secondary	0.07980	0.03024		0.08812
Primary	0.07943	0.03024		0.08771
Secondary Substation	0.07980	0.03024		0.08812
Primary Substation	0.07943	0.03024		0.08771
Transmission	0.07609	0.03024	0.05295	0.08403
Off-Peak Energy: Winter				
Secondary	0.07082	0.03024		0.07821
Primary	0.07056	0.03024		0.07793
Secondary Substation	0.07082	0.03024		0.07821
Primary Substation	0.07056	0.03024		0.07793
Transmission	0.06763	0.03024	0.04370	0.07468

deficiation rates effective water 1, 2	ozi (Hoposca)	SDG&E	SDG&E	CDCD D-4-	SDCP+PCIA+
		EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
Super Off Book Energy: Winter		(\$/kWh)			
Super Off-Peak Energy: Winter Secondary		0.06087	0.03024	0.03631	0.06722
Primary		0.06067	0.03024		0.06722
Secondary Substation		0.06087	0.03024		0.06722
Primary Substation		0.06067	0.03024		0.06722
Transmission		0.05822	0.03024		0.06429
1141131111331011		0.03022	0.03024	0.03541	0.00423
Schedule A6-TOU		(\$/kW)			
Maximum Demand at Time of System F	Peak: Summer				
Primary		9.73000		10.64000	10.74703
Primary Substation		9.73000		10.64000	10.74703
Transmission		9.32000		10.19000	10.29252
Maximum Demand at Time of System F	Peak: Winter				
Primary		0.00000		0.00000	0.00000
Primary Substation		0.00000		0.00000	0.00000
Transmission		0.00000		0.00000	0.00000
On Peak Energy: Summer		(\$/kWh)			
Primary		0.11899	0.03024	0.09985	0.13140
Primary Substation		0.11899	0.03024	0.09985	0.13140
Transmission		0.11388	0.03024	0.09426	0.12575
Off-Peak Energy: Summer					
Primary		0.09962	0.03024	0.07867	0.11001
Primary Substation		0.09962	0.03024	0.07867	0.11001
Transmission		0.09538	0.03024	0.07404	0.10533
Super Off-Peak Energy: Summer					
Primary		0.07462	0.03024		0.08240
Primary Substation		0.07462	0.03024		0.08240
Transmission		0.07161	0.03024	0.04805	0.07908
On Peak Energy: Winter					
Primary		0.09910	0.03024		0.10943
Primary Substation		0.09910	0.03024		0.10943
Transmission		0.09492	0.03024	0.07353	0.10481
Off-Peak Energy: Winter					
Primary		0.08799	0.03024		0.09717
Primary Substation		0.08799	0.03024		
Transmission		0.08437	0.03024	0.06200	0.09317
Super Off-Peak Energy: Winter					
Primary		0.07569	0.03024		0.08358
Primary Substation		0.07569	0.03024		0.08358
Transmission		0.07264	0.03024	0.04918	0.08022
Schedule TOU-PA < 20kW		(\$/kW)			
On Peak Demand		0.00000		0.00000	0.00000
On-Peak Energy: Summ	ner	(\$/kWh)			
	Secondary	0.15021	0.02228	0.14194	0.16587
	Primary	0.14946	0.02228	0.14112	0.16505
Off-Peak Energy: Sumn	•				
	Secondary	0.08297	0.02228	0.06843	0.09162
	Primary	0.08255	0.02228	0.06797	0.09116
On Peak Energy: Winte	er				
	Secondary	0.05635	0.02228	0.03933	0.06223

Generation Ra	ites Effective March 1, 2	2021 (Proposed)				Ī
			SDG&E	SDG&E		SDCP+PCIA+
			EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
			(\$/kWh)			
		Primary	0.05608	0.02228	0.03903	0.06193
	Off-Peak Energy: Wint					5.55=55
	on reak Energy. Will	Secondary	0.04568	0.02228	0.02766	0.05044
		•	0.04551			
		Primary	0.04551	0.02228	0.02747	0.05025
Cabadula TOU	DA 2 >= 2014W		(¢ (lan)			
Schedule 100	-PA-2 >= 20kW		(\$/kW)			
	On Peak Demand					
	Summer					
		Secondary	7.15000		7.82000	7.89865
		Primary	7.11000		7.77000	7.84821
	Winter					
		Secondary	0.00000		0.00000	0.00000
		Primary	0.00000		0.00000	0.00000
	On-Peak Energy: Sumi	mer	(\$/kWh)			
		Secondary	0.07534	0.02228	0.06009	0.08320
		Primary	0.07500	0.02228	0.05971	0.08282
	Off-Peak Energy: Sum	mer ,				
		Secondary	0.06242	0.02228	0.04596	0.06893
		Primary	0.06213	0.02228		0.06860
	Super Off-Peak Energy	,	0.00213	0.02220	0.04304	0.00000
	Super Off-reak Lifetgy		0.04933	0.02220	0.02165	0.05447
		Secondary		0.02228		0.05447
	0.5.15.145.4	Primary	0.04909	0.02228	0.03139	0.05421
	On Peak Energy: Wint					
		Secondary	0.06556	0.02228		0.07239
		Primary	0.06526	0.02228	0.04907	0.07207
	Off-Peak Energy: Wint	er				
		Secondary	0.05818	0.02228	0.04133	0.06425
		Primary	0.05794	0.02228	0.04106	0.06398
	Super Off-Peak Energy	y: Winter				
		Secondary	0.05000	0.02228	0.03238	0.05521
		Primary	0.04984	0.02228	0.03221	0.05504
		,				
Schedule TOU	-PA-3 < 20kW		(\$/kW)			
	On Peak Demand		,			
	Summer					
	Sammer	Secondary	0.00000		0.00000	0.00000
		Primary	0.00000		0.00000	0.00000
	Winter	Filliary	0.00000		0.00000	0.00000
	winter	Casaradamı	0.00000		0.00000	0.00000
		Secondary	0.00000		0.00000	0.00000
		Primary	0.00000		0.00000	0.00000
	O = P = 1 5		(A /:			
	On-Peak Energy: Sumi		(\$/kWh)			
		Secondary	0.17277	0.02228		0.19078
		Primary	0.17194	0.02228	0.16570	0.18987
	Off-Peak Energy: Sum	mer				
		Secondary	0.08917	0.02228		0.09847
		Primary	0.08874	0.02228	0.07474	0.09800
	Super Off-Peak Energy	y: Summer				
		Secondary	0.04456	0.02228	0.02644	0.04921
		Primary	0.04434	0.02228		
		,	-			

Generation R	ates Effective March 1,	2021 (Proposed)				Ì
			SDG&E	SDG&E		SDCP+PCIA+
			EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
			(\$/kWh)			
	On Peak Energy: Win	nter				
		Secondary	0.05531	0.02228	0.03819	0.06108
		Primary	0.05506	0.02228	0.03791	0.06080
	Off-Peak Energy: Wir	nter				
	07	Secondary	0.04909	0.02228	0.03139	0.05421
		Primary	0.04889	0.02228		0.05399
	Super Off-Peak Energ	•	0.0.000	0.02220	0.0011	0.0000
	Super on reak Energ	Secondary	0.04219	0.02228	0.02384	0.04659
		Primary	0.04205	0.02228		0.04643
Schodulo TOI	J-PA-3 >= 20kW	Filliary	(\$/kW)	0.02220	0.02303	0.04043
Scriedule 100	On Peak Demand		(\$/KW)			
	Summer	6 1	4 76000		4 02000	4 02026
		Secondary	1.76000		1.92000	1.93936
		Primary	1.75000		1.91000	1.92925
	Winter					
		Secondary	0.00000		0.00000	0.00000
		Primary	0.00000		0.00000	0.00000
	On-Peak Energy: Sun	nmer	(\$/kWh)			
		Secondary	0.11847	0.02228	0.10724	0.13082
		Primary	0.11792	0.02228	0.10664	0.13022
	Off-Peak Energy: Sun	nmer				
		Secondary	0.09523	0.02228	0.08183	0.10516
		Primary	0.09478	0.02228	0.08134	0.10466
	Super Off-Peak Energ	gy: Summer				
	,	Secondary	0.03779	0.02228	0.01903	0.04173
		Primary	0.03761	0.02228		0.04153
	On Peak Energy: Win	•	0.007.01	0.02220	0.0200	0.0 . 200
	on reak Energy. wiii	Secondary	0.06599	0.02228	0.04986	0.07287
		Primary	0.06568	0.02228		0.07253
	Off-Peak Energy: Wir	•	0.00300	0.02220	0.04333	0.07233
	Off Feak Effergy. Wil	Secondary	0.05856	0.02228	0.04174	0.06467
		Primary	0.05830	0.02228		0.06440
	Comes Off Deals Enems	•	0.03632	0.02226	0.04146	0.06440
	Super Off-Peak Energ		0.05033	0.02220	0.02274	0.05557
		Secondary	0.05033	0.02228		0.05557
		Primary	0.05016	0.02228	0.03256	0.05539
			(4 (1)			
Schedule PA-			(\$/kW)			
	On Peak Demand					
	Summer					
		Secondary	3.99000		4.36000	4.40389
		Primary	3.97000		4.34000	4.38367
		Transmission	3.80000		4.15000	4.19180
	Winter					
		Secondary	0.00000		0.00000	0.00000
		Primary	0.00000		0.00000	0.00000
		Transmission	0.00000		0.00000	0.00000
	On-Peak Energy: Sum	nmer	(\$/kWh)			
	5 ,	Secondary	0.08262	0.02228	0.06805	0.09124
		Primary	0.08223	0.02228		0.09081
		Transmission	0.07870	0.02228		
		1141151111551011	0.07.070	0.02220	0.00070	0.00051

Ceneration na	ees Encetive March 1, 20	zz (Hoposca)	SDG&E EECC (1) (\$/kWh)	SDG&E PCIA (2)	SDCP Rate	SDCP+PCIA+ FFS (3)
	Off-Peak Energy: Summ	ner				
		Secondary	0.06879	0.02228	0.05293	0.07597
		Primary	0.06847	0.02228	0.05258	0.07561
		Transmission	0.06556	0.02228	0.04939	0.07239
	Super Off-Peak Energy:					
		Secondary	0.05503	0.02228		0.06077
		Primary	0.05484	0.02228		0.06055
		Transmission	0.05263	0.02228	0.03526	0.05812
	On Peak Energy: Winte					
		Secondary	0.07317	0.02228		0.08080
		Primary	0.07283	0.02228		0.08042
		Transmission	0.06977	0.02228	0.05400	0.07705
	Off-Peak Energy: Winte					
		Secondary	0.06494	0.02228		0.07172
		Primary	0.06467	0.02228		0.07141
	0 000 0 1 5	Transmission	0.06201	0.02228	0.04551	0.06847
	Super Off-Peak Energy:		0.05504	0.02220	0.02072	0.06463
		Secondary	0.05581	0.02228		0.06162
		Primary	0.05562	0.02228		0.06142
		Transmission	0.05338	0.02228	0.03608	0.05895
Schedules LS-1	, LS-2, LS-3, OL-1, DWL a	and LS-2 DS	(\$/kWh)			
	Energy: Summer		0.06452	0.02146	0.04908	0.07125
	Energy: Winter		0.06452	0.02146	0.04908	0.07125
Schedule OL-2			(\$/kWh)			
Scriedule OL-2	Energy: Summer		0.07336	0.02146	0.05874	0.08101
	Energy: Winter		0.07336	0.02146		0.08101
	Lifergy. Willeen		0.07330	0.02140	0.03074	0.00101
Schedule LS-2	AD		(\$/kWh)			
	Summer					
		On-Peak Energy	0.19952	0.02146		0.22032
		Off-Peak Energy	0.12341	0.02146		0.13628
		Super Off-Peak Energy	0.05427	0.02146	0.03787	0.05993
	Winter		0.07400		0.05.00	
		On-Peak Energy	0.07103	0.02146		
		Off-Peak Energy	0.06286	0.02146		
		Super Off-Peak Energy	0.05358	0.02146	0.03712	0.05917
TOU GRANDFA	THERING COMMODITY	RATES				
Schedule DR-S	ES		(\$/kWh)			
	Summer		,			
		On-Peak Energy	0.26265	0.03265	0.25450	0.29004
		Semi-Peak Energy	0.26264	0.03265		0.29003
		Off-Peak Energy	0.08682	0.03265	0.06227	0.09588
	Winter					
		Semi-Peak Energy	0.08176	0.03265	0.05674	0.09029
		Off-Peak Energy	0.07684	0.03265	0.05136	0.08486
Schedule EV-To	ου		(\$/kWh)			

Generation	Rates Effective ivial	rch 1, 2021 (Proposed)	SDG&E	SDG&E		SDCP+PCIA+
			EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
	Summer		(\$/kWh)			
		On-Peak Energy	0.23010	0.03265	0.21891	0.25409
		Off-Peak Energy	0.21691	0.03265	0.20449	0.23953
		Super Off-Peak Energy	0.06169	0.03265	0.03479	0.06812
	Winter					
		On-Peak Energy	0.07393	0.03265		
		Off-Peak Energy	0.06856	0.03265		
		Super Off-Peak Energy	0.06088	0.03265	0.03391	0.06723
Schedules E\	/-TOU-2, EV-TOU-2 Summer	-CARE, EV-TOU-2-MB	(\$/kWh)			
	Summer	On-Peak Energy	0.22718	0.03265	0.21572	0.25087
		Off-Peak Energy	0.20140	0.03265		
		Super Off-Peak Energy	0.06169	0.03265		
	Winter	,				
		On-Peak Energy	0.07125	0.03265	0.04525	0.07868
		Off-Peak Energy	0.07062	0.03265	0.04456	0.07799
		Super Off-Peak Energy	0.06088	0.03265	0.03391	0.06723
Schedule TO	U-DR, TOU-DR-CAF	RE, TOU-DR-MB	(\$/kWh)			
	Summer	On Book Energy	0.22505	0.02265	0.21438	0.24952
		On-Peak Energy Semi-Peak Energy	0.22595 0.14809	0.03265 0.03265		0.24952
		Off-Peak Energy	0.14809	0.03265		0.10333
	Winter	OII-r eak Lifeigy	0.11230	0.03203	0.09083	0.12474
	VVIIICEI	On-Peak Energy	0.07394	0.03265	0.04819	0.08165
		Semi-Peak Energy	0.06281	0.03265		0.06936
		Off-Peak Energy	0.05604	0.03265		0.06189
Schedule TO	11.84		/¢ / AA/ a\			
Schedule 10	Summer		(\$/kWh)			
	Summer	On-Peak Energy	0.17827	0.02744	0.16746	0.19686
		Semi-Peak Energy	0.16704	0.02744		
		Off-Peak Energy	0.06379	0.02744		
	Winter	C,				
		On-Peak Energy	0.07838	0.02744	0.05825	0.08655
		Semi-Peak Energy	0.06661	0.02744	0.04538	0.07355
		Off-Peak Energy	0.05881	0.02744	0.03686	0.06495
Schedule OL	-TOU		(\$/kWh)			
000	Summer		(47)			
		On-Peak Energy	0.21870	0.03024	0.20886	0.24151
		Semi-Peak Energy	0.20021	0.03024	0.18865	0.22109
		Off-Peak Energy	0.07364	0.03024	0.05027	0.08132
	Winter					
		On-Peak Energy	0.08685	0.03024		0.09591
		Semi-Peak Energy	0.07378	0.03024		0.08147
		Off-Peak Energy	0.06583	0.03024	0.04173	0.07269
Schedule TO	U-A					
	On-Peak Energy	v: Summer	(\$/kWh)			

Generation Rates Effective March 1, 2021 (Proposed)	SDG&E	SDG&E		SDCP+PCIA+
	EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
	(\$/kWh)	I CIA (2)	SDCI Nate	113 (3)
Secondary	0.21017	0.02744	0.20233	0.23208
Primary	0.20907	0.02744		0.23087
Off-Peak Energy: Summer	0.20307	0.02711	0.20113	0.23007
Secondary	0.12400	0.02744	0.10813	0.13693
Primary	0.12336	0.02744		0.13623
Super Off-Peak Energy: Summer				0.2002
Secondary	0.05714	0.02744	0.03503	0.06310
Primary	0.05684	0.02744		0.06277
On Peak Energy: Winter				
Secondary	0.07625	0.02744	0.05592	0.08420
Primary	0.07588	0.02744		0.08379
Off-Peak Energy: Winter				
Secondary	0.06482	0.02744	0.04343	0.07158
Primary	0.06453	0.02744		0.07126
Super Off-Peak Energy: Winter				
Secondary	0.05720	0.02744	0.03510	0.06317
Primary	0.05701	0.02744		0.06296
·				
Schedule AL-TOU				
Maximum On-Peak Demand: Summer	(\$/kW)			
Secondary	5.80000		6.34000	6.40380
Primary	5.77000		6.31000	6.37347
Secondary Substation	5.80000		6.34000	6.40380
Primary Substation	5.77000		6.31000	6.37347
Transmission	5.51000		6.02000	6.08061
Maximum On-Peak Demand: Winter				
Secondary	0.00000		0.00000	0.00000
Primary	0.00000		0.00000	0.00000
Secondary Substation	0.00000		0.00000	0.00000
Primary Substation	0.00000		0.00000	0.00000
Transmission	0.00000		0.00000	0.00000
On Peak Energy: Summer	(\$/kWh)			
Secondary	0.11701	0.03024	0.09768	0.12921
Primary	0.11639	0.03024		0.12853
Secondary Substation	0.11701	0.03024		
Primary Substation	0.11639	0.03024		0.12853
Transmission	0.11123	0.03024	0.09137	0.12283
Semi-Peak Energy: Summer				
Secondary	0.11103	0.03024		0.12261
Primary	0.11050	0.03024		0.12203
Secondary Substation	0.11103	0.03024		0.12261
Primary Substation	0.11050	0.03024		0.12203
Transmission	0.10580	0.03024	0.08543	0.11683
Off-Peak Energy: Summer				
Secondary	0.08603	0.03024		0.09500
Primary	0.08572	0.03024		0.09466
Secondary Substation	0.08603	0.03024		0.09500
Primary Substation	0.08572	0.03024		0.09466
Transmission	0.08224	0.03024	0.05967	0.09081
On Peak Energy: Winter	0.44004	0.02021	0.0000	0.43346
Secondary	0.11084	0.03024	0.09094	0.12240

Generation Rates Effective March 1, 2021 (Proposed)	CDCGE	CDCGE		CDCD DCIA
	SDG&E	SDG&E		SDCP+PCIA+
	EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
	(\$/kWh)			
Primary	0.11030	0.03024		0.12180
Secondary Substation	0.11084	0.03024		
Primary Substation	0.11030	0.03024		
Transmission	0.10558	0.03024	0.08519	0.11659
Semi-Peak Energy: Winter				
Secondary	0.09416	0.03024		
Primary	0.09375	0.03024		
Secondary Substation	0.09416	0.03024		
Primary Substation	0.09375	0.03024	0.07225	0.10352
Transmission	0.08985	0.03024	0.06799	0.09922
Off-Peak Energy: Winter				
Secondary	0.08402	0.03024	0.06162	0.09278
Primary	0.08373	0.03024	0.06130	0.09246
Secondary Substation	0.08402	0.03024	0.06162	0.09278
Primary Substation	0.08373	0.03024	0.06130	0.09246
Transmission	0.08036	0.03024	0.05762	0.08874
Schedule DG-R				
On Peak Energy: Summer	(\$/kWh)			
Secondary	0.22419	0.03024	0.21486	0.24757
Primary	0.22368	0.03024		
Secondary Substation	0.22419	0.03024		
Primary Substation	0.22368	0.03024		
Transmission	0.21939	0.03024		0.24226
Semi-Peak Energy: Summer	0.21333	0.03024	0.20301	0.24220
Secondary	0.20886	0.03024	0.19810	0.23064
Primary	0.20836	0.03024		
Secondary Substation	0.20836	0.03024		
Primary Substation	0.20836	0.03024		
Transmission				
	0.20412	0.03024	0.19292	0.22541
Off-Peak Energy: Summer	0.10467	0.02024	0.00410	0.11550
Secondary	0.10467	0.03024		
Primary	0.10440	0.03024		
Secondary Substation	0.10467	0.03024		
Primary Substation	0.10440	0.03024		
Transmission	0.10130	0.03024	0.08051	0.11186
On Peak Energy: Winter				
Secondary	0.09040	0.03024		
Primary	0.08996	0.03024		0.09934
Secondary Substation	0.09040	0.03024		
Primary Substation	0.08996	0.03024		0.09934
Transmission	0.08611	0.03024	0.06390	0.09509
Semi-Peak Energy: Winter				
Secondary	0.07680	0.03024		0.08480
Primary	0.07646	0.03024	0.05335	0.08443
Secondary Substation	0.07680	0.03024	0.05372	0.08480
Primary Substation	0.07646	0.03024	0.05335	0.08443
Transmission	0.07328	0.03024	0.04988	0.08093
Off-Peak Energy: Winter				
Secondary	0.06852	0.03024	0.04467	0.07566
, Primary	0.06829	0.03024		
,				

Generation Rates Effective March 1, 2	ozi (Proposed)	SDG&E	SDG&E	CDCD D-4-	SDCP+PCIA+
		EECC (1)	PCIA (2)	SDCP Rate	FFS (3)
Cocondany Substation		(\$/kWh) 0.06852	0.02024	0.04467	0.07566
Secondary Substation Primary Substation		0.06829	0.03024 0.03024		0.07566 0.07541
Transmission		0.06554	0.03024		0.07341
Transmission		0.00554	0.03024	0.04141	0.07237
Schedule A6-TOU		(\$/kW)			
Maximum Demand at Time of System I	Peak: Summer				
Primary		5.77000		6.31000	6.37347
Primary Substation		5.77000		6.31000	6.37347
Transmission		5.51000		6.02000	6.08061
Maximum Demand at Time of System I	Peak: Winter	0.00000		0.00000	0.0000
Primary		0.00000		0.00000	0.00000
Primary Substation		0.00000		0.00000	0.00000
Transmission		0.00000		0.00000	0.00000
On Peak Energy: Summer		(\$/kWh)	0.02024	0.00701	0.12052
Primary Substation		0.11639	0.03024 0.03024		0.12853
Primary Substation Transmission		0.11639			0.12853
		0.11123	0.03024	0.09137	0.12283
Semi-Peak Energy: Summer Primary		0.11050	0.03024	0.09057	0.12203
Primary Substation		0.11050	0.03024		0.12203
Transmission		0.11030	0.03024		0.12203
Off-Peak Energy: Summer		0.10380	0.03024	0.00545	0.11085
Primary		0.08572	0.03024	0.06348	0.09466
Primary Substation		0.08572	0.03024		0.09466
Transmission		0.08224	0.03024		0.09081
On Peak Energy: Winter		0.0022	0.0002	0.00007	0.03001
Primary		0.11030	0.03024	0.09035	0.12180
Primary Substation		0.11030	0.03024		0.12180
Transmission		0.10558	0.03024		0.11659
Semi-Peak Energy: Winter					
Primary		0.09375	0.03024	0.07225	0.10352
Primary Substation		0.09375	0.03024	0.07225	0.10352
Transmission		0.08985	0.03024	0.06799	0.09922
Off-Peak Energy: Winter					
Primary		0.08373	0.03024	0.06130	0.09246
Primary Substation		0.08373	0.03024	0.06130	0.09246
Transmission		0.08036	0.03024	0.05762	0.08874
Schedule PA-T-1		(\$/kW)			
On Peak Demand		(7) ((1))			
Summer					
	Secondary	2.06000		2.25000	2.27266
	Primary	2.05000		2.24000	2.26255
	Transmission	1.96000		2.14000	2.16156
Winter					
	Secondary	0.00000		0.00000	0.00000
	Primary	0.00000		0.00000	0.00000
	Transmission	0.00000		0.00000	0.00000
On-Peak Energy: Sumn	ner	(\$/kWh)			
	Secondary	0.08094	0.02228	0.06621	0.08938
	Primary	0.08051	0.02228	0.06574	0.08891

Transmission 0.07694 0.02228 0.06184 0.08497		,	SDG&E EECC (1) (\$/kWh)	SDG&E PCIA (2)	SDCP Rate	SDCP+PCIA+ FFS (3)
Secondary 0.07705 0.02228 0.06196 0.08509		Transmission		0.02228	0.06184	0.08497
Primary	Semi-Peak Energy: Summer					
Off-Peak Energy: Summer Transmission 0.07343 0.02228 0.04745 0.07043 Off-Peak Energy: Summer Secondary 0.06378 0.02228 0.04745 0.07013 Primary 0.06355 0.02228 0.04745 0.07013 On Peak Energy: Winter 0.06373 0.02228 0.04348 0.06733 On Peak Energy: Winter 0.08218 0.02228 0.06756 0.09074 Semi-Peak Energy: Winter 0.07828 0.02228 0.06330 0.08644 Semi-Peak Energy: Winter 0.06982 0.02228 0.0535 0.07710 Primary 0.06982 0.02228 0.05055 0.07710 Off-Peak Energy: Winter 0.06662 0.02228 0.0555 0.07550 Off-Peak Energy: Winter 0.06662 0.02228 0.04582 0.06879 Secondary 0.06229 0.02228 0.04582 0.06879 Schedule TOU-PA < 20kW		· ·				
Off-Peak Energy: Summer		•				
Secondary 0.06378 0.02228 0.04715 0.07018 Primary 0.06355 0.02228 0.04720 0.07018 Transmission 0.06097 0.02228 0.0438 0.06733 On Peak Energy: Winter 0.08218 0.02228 0.06714 0.09032 Fransmission 0.07828 0.02228 0.06714 0.09032 Semi-Peak Energy: Winter 0.06982 0.02228 0.05405 0.07710 Primary 0.06981 0.02228 0.05301 0.07710 Secondary 0.06982 0.02228 0.05331 0.07676 Off-Peak Energy: Winter 0.06662 0.02228 0.05955 0.07366 Frimary 0.06208 0.02228 0.04582 0.06879 Off-Peak Energy: Winter 0.06208 0.02228 0.04582 0.06879 Schedule TOU-PA < 20kW	Off Back Farance Comm		0.07343	0.02228	0.05800	0.08109
Primary	Off-Peak Energy: Sumr		0.06279	0 02220	0.04745	0.07042
Transmission		· ·				
On Peak Energy: Winter Secondary 0.08218 0.02228 0.06756 0.09974 Primary 0.08179 0.02228 0.06714 0.09032 Transmission 0.07828 0.02228 0.06330 0.08644 Semi-Peak Energy: Winter Secondary 0.06982 0.02228 0.05035 0.07710 Primary 0.06981 0.02228 0.05035 0.07710 O.07662 0.02228 0.05035 0.07710 O.07662 0.02228 0.05035 0.07356 O.07710 O.06879 O.06879 O.02228 0.05035 0.07356 O.07710 O.06879 O.02228 0.05035 O.07356 O.07710 O.06879 O.02228 0.05035 O.07356 O.07710 O.06879 O.0		•				
Secondary 0.08218 0.02228 0.06756 0.09074	On Peak Energy: Winte		0.00037	0.02220	0.04430	0.00733
Primary 0.08179 0.02228 0.06714 0.09032 0.07828 0.02228 0.06844	on reak Energy. White		0.08218	0.02228	0.06756	0.09074
Transmission 0.07828 0.02228 0.06330 0.08644		· ·				
Semi-Peak Energy: Winter Secondary 0.06982 0.02228 0.05405 0.07710 Primary 0.06951 0.02228 0.05371 0.07676 Transmission 0.06662 0.02228 0.05055 0.07356 Off-Peak Energy: Winter Secondary 0.06229 0.02228 0.04582 0.06879 Primary 0.06208 0.02228 0.04582 0.06855 Primary 0.06208 0.02228 0.04585 0.06557 Primary 0.05957 0.0228 0.04285 0.06557 Schedule TOU-PA < 20kW Summer Secondary 0.00000 0.00000 0.00000 Primary 0.00000 0.00000 0.00000 0.00000 Primary 0.00000 0.00000 0.00000 0.00000 Winter Secondary 0.00000 0.00000 0.00000 0.00000 Primary 0.00000 0.00000 0.00000 0.00000 0.00000 Primary 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 Primary 0.0808 0.02228 0.18452 0.20888 Semi-Peak Energy: Summer Secondary 0.8935 0.02228 0.07540 0.09866 0		•				
Primary 0.06951 0.02228 0.05371 0.07676 Tansmission 0.06662 0.02228 0.05055 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.07356 0.06229 0.02228 0.04582 0.06879 0.06208 0.02228 0.04585 0.06879 0.05957 0.0228 0.04585 0.06879 0.05957 0.0228 0.04585 0.06879 0.05957 0.0228 0.04285 0.06879 0.00000 0.00000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.00000000	Semi-Peak Energy: Wir	nter				
Transmission 0.06662 0.02228 0.05055 0.07356 Off-Peak Energy: Winter Secondary 0.06229 0.02228 0.04582 0.06879 Primary 0.06208 0.02228 0.04559 0.06855 Transmission 0.05957 0.02228 0.04559 0.06579 Schedule TOU-PA < 20kW		Secondary	0.06982	0.02228	0.05405	0.07710
Secondary 0.06229 0.04582 0.06878 0.		Primary	0.06951	0.02228	0.05371	0.07676
Secondary 0.06229 0.02228 0.04582 0.06879 0.06208 0.02228 0.04582 0.06879 0.06208 0.02228 0.04589 0.06855 0.06579 0.06557 0.02228 0.04589 0.06579 0.06557 0.02228 0.04589 0.06579 0.06579 0.05957 0.02228 0.04589 0.06579 0.05957 0.02228 0.04285 0.06579 0.06579 0.05957 0.02228 0.04285 0.06579 0.06579 0.06583 0.06583 0.06583 0.06583 0.06529 0.06228 0.03336 0.05620 0.06004 0.06008 0.		Transmission	0.06662	0.02228	0.05055	0.07356
Primary 0.06208 0.02228 0.04559 0.06855 Transmission 0.05957 0.02228 0.04285 0.06579 Schedule TOU-PA < 20kW Cykw) Cykw) Colopote Schedule TOU-PA < 20kW On Peak Demand (\$/kw) Cykw) 0.00000 0.00208 <td< td=""><td>Off-Peak Energy: Winter</td><td>er</td><td></td><td></td><td></td><td></td></td<>	Off-Peak Energy: Winter	er				
Schedule TOU-PA < 20kW (\$/kW) 0.02228 0.04285 0.06579 Schedule TOU-PA < 20kW (\$/kW) 0.00000 0.00208 0.002288 0.02548 0.09818 0.09818		· · · · · · · · · · · · · · · · · · ·				
Schedule TOU-PA < 20kW (\$/kW) Company Company </td <td></td> <td>•</td> <td></td> <td></td> <td></td> <td></td>		•				
On Peak Demand Summer (\$/kW) Secondary 0.00000 0.02000 0.02088 0.2028 0.18562 0.20288 0.03454 0.05454 0.05454 0.05454 0.05454 0.05454 0.05454 0.05454 </td <td></td> <td>Transmission</td> <td>0.05957</td> <td>0.02228</td> <td>0.04285</td> <td>0.06579</td>		Transmission	0.05957	0.02228	0.04285	0.06579
Secondary 0.00000	Schedule TOU-PA < 20kW					
Primary 0.000000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.0000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.0000000 0.000000 0.000000 0.000000 0.000000 0.000000 0.00000000			(\$/kW)			
Winter Secondary Primary 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 On-Peak Energy: Summer (\$/kWh) 0.19016 0.02228 0.18562 0.20999 0.20999 0.18916 0.02228 0.18452 0.20888 Semi-Peak Energy: Summer Secondary 0.08935 0.02228 0.07540 0.09866 0.00228 0.07489 0.09815 0.09866 0.02228 0.07489 0.09815 Off-Peak Energy: Summer Secondary 0.04904 0.02228 0.03133 0.05415 0.00228 0.03135 0.05415 0.00228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05961 0.02228 0.03336 0.05620 0.00228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.03310 0.05594 Secondary 0.04540 0.02228 0.02735 0.05013 0.05013 0.05013 Primary 0.04525 0.02228 0.02719 0.04997		Secondary	0.00000		0.00000	0.00000
Secondary Primary 0.00000 0.00000 0.00000 0.00000 0.00000 0.00000 On-Peak Energy: Summer Secondary Primary 0.19016 0.02228 0.18562 0.20999 0.18916 0.02228 0.18452 0.20888 0.02228 0.18452 0.20888 Semi-Peak Energy: Summer Secondary Primary 0.08935 0.02228 0.07540 0.09866 0.09888 0.02228 0.07489 0.09815 0.09866 0.00228 0.07489 0.09815 Off-Peak Energy: Summer Secondary Primary 0.04904 0.02228 0.03133 0.05415 0.05415 0.00000 0.00000 0.00000 0.05415 0.05415 0.00000 0.00000 0.00000 On Peak Energy: Winter Secondary Primary 0.05990 0.02228 0.04321 0.06615 0.0583 0.06615 0.00000 0.00000 0.00000 0.00000 Semi-Peak Energy: Winter Secondary Primary 0.05089 0.02228 0.03336 0.05620 0.05594 0.00000 0.00000 0.000000 Off-Peak Energy: Winter Secondary Primary 0.05066 0.02228 0.03310 0.05594 0.05594 0.00000 0.000000000000000000000000000		Primary	0.00000		0.00000	0.00000
Primary 0.00000	Winter					
On-Peak Energy: Summer (\$/kWh) Company Company<		· ·				
Secondary Primary 0.19016 0.02228 0.18562 0.20999 Primary 0.18916 0.02228 0.18452 0.20888 Semi-Peak Energy: Summer 0.08935 0.02228 0.07540 0.09866 Primary 0.08888 0.02228 0.07489 0.09815 Off-Peak Energy: Summer 0.04904 0.02228 0.03133 0.05415 Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997					0.00000	0.00000
Primary 0.18916 0.02228 0.18452 0.20888 Semi-Peak Energy: Summer 0.08935 0.02228 0.07540 0.09866 Primary 0.08888 0.02228 0.07489 0.09815 Off-Peak Energy: Summer 0.04904 0.02228 0.03133 0.05415 Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997	On-Peak Energy: Sumn			0.00000	0.40563	0.2000
Semi-Peak Energy: Summer 0.08935 0.02228 0.07540 0.09866 Primary 0.08888 0.02228 0.07489 0.09815 Off-Peak Energy: Summer Secondary 0.04904 0.02228 0.03133 0.05415 Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03310 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997		•				
Secondary Primary 0.08935 0.02228 0.07540 0.09866 Primary 0.08888 0.02228 0.07489 0.09815 Off-Peak Energy: Summer Secondary Primary 0.04904 0.02228 0.03133 0.05415 On Peak Energy: Winter 0.04878 0.02228 0.03105 0.05387 Secondary Primary 0.05990 0.02228 0.04321 0.06615 Semi-Peak Energy: Winter 0.05961 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary Primary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997	Sami Book Engrave Sur	•	0.18916	0.02228	0.18452	0.20888
Primary 0.08888 0.02228 0.07489 0.09815 Off-Peak Energy: Summer Secondary 0.04904 0.02228 0.03133 0.05415 Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997	Selli-reak Lileigy. Sui		0.08935	0 02228	0.07540	0.09866
Off-Peak Energy: Summer Secondary 0.04904 0.02228 0.03133 0.05415 Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997		· ·				
Secondary Primary 0.04904 0.02228 0.03133 0.05415 Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997	Off-Peak Energy: Sumr	•	0.00000	0.02220	0.07.103	0.03010
Primary 0.04878 0.02228 0.03105 0.05387 On Peak Energy: Winter Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997			0.04904	0.02228	0.03133	0.05415
Secondary 0.05990 0.02228 0.04321 0.06615 Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997		· ·	0.04878	0.02228	0.03105	0.05387
Primary 0.05961 0.02228 0.04289 0.06583 Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997	On Peak Energy: Winte	er				
Semi-Peak Energy: Winter Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997		Secondary	0.05990	0.02228	0.04321	0.06615
Secondary 0.05089 0.02228 0.03336 0.05620 Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997		Primary	0.05961	0.02228	0.04289	0.06583
Primary 0.05066 0.02228 0.03310 0.05594 Off-Peak Energy: Winter Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997	Semi-Peak Energy: Wir					
Off-Peak Energy: Winter Secondary Primary O.04540 O.02228 O.02735 O.05013 O.04997		Secondary				
Secondary 0.04540 0.02228 0.02735 0.05013 Primary 0.04525 0.02228 0.02719 0.04997			0.05066	0.02228	0.03310	0.05594
Primary 0.04525 0.02228 0.02719 0.04997	Off-Peak Energy: Wint					
		· ·				
Schedule TOU-PA >= 20kW (\$/kW)		Primary	0.04525	0.02228	0.02719	0.04997
(y/kt/)	Schedule TOU-PA >= 20kW		(\$/kW)			
On Peak Demand	On Peak Demand					

	1, 1911 (. 10 p 0300)	SDG&E EECC (1) (\$/kWh)	SDG&E PCIA (2)	SDCP Rate	SDCP+PCIA+ FFS (3)
Summer					
	Secondary	0.90000		0.98000	0.98990
	Primary	0.89000		0.97000	0.97979
Winter					
	Secondary	0.00000		0.00000	0.00000
	Primary	0.00000		0.00000	0.00000
On-Peak Energy: Summer		(\$/kWh)			
	Secondary	0.15431	0.02228	0.14642	0.17040
	Primary	0.15351	0.02228	0.14555	0.16952
Semi-Peak Energy: Summer					
	Secondary	0.09154	0.02228	0.07780	0.10109
	Primary	0.09107	0.02228	0.07728	0.10056
Off-Peak Energy: Summer					
	Secondary	0.04279	0.02228	0.02450	0.04725
	Primary	0.04257	0.02228	0.02426	0.04701
On Peak Energy: Winter					
	Secondary	0.07511	0.02228	0.05984	0.08295
	Primary	0.07475	0.02228	0.05944	0.08254
Semi-Peak Energy: Winter					
	Secondary	0.06381	0.02228	0.04748	0.07046
	Primary	0.06353	0.02228	0.04718	0.07016
Off-Peak Energy: W		0.05503	0.00000	0.00006	0.00007
	Secondary	0.05693	0.02228		0.06287
	Primary	0.05673	0.02228	0.03974	0.06265
Power100					
Customers electing the 100% renewable Power100 option will pay the applicable rate for PowerOn service					
plus the following energy charge:					
Summer				0.0075	
Winter				0.0075	
1) For reference, SDG&E Generation service rate, effective as of 1/11/2021.					

¹⁾ For reference

²⁾ For reference, SDG&E Power Charge Indifference Adjusment surcharge, effective as of 1/11/2021.

³⁾ For reference, includes SDCP Generation Service plus added SDG&E fees (PCIA and Franchise Fees).