

Proceeding: R.20-11-003 (Phase 2)

Exhibit No.: SDGE-9

Witness: Jenell McKay

**PREPARED PHASE 2 DIRECT TESTIMONY OF
SAN DIEGO GAS & ELECTRIC COMPANY
REGARDING PROPOSALS FOR INCREASING SUPPLY
DURING PEAK AND NET PEAK DEMAND HOURS
THROUGH ADDITION OF UTILITY-OWNED RESOURCES**



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

September 1, 2021

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1 **PREPARED PHASE 2 DIRECT TESTIMONY**
2 **OF SAN DIEGO GAS & ELECTRIC COMPANY**
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4 **DURING PEAK AND NET PEAK DEMAND HOURS**
5 **THROUGH ADDITION OF UTILITY-OWNED RESOURCES**
6

7 **I. INTRODUCTION**

8 The purpose of this testimony is to present the proposal of San Diego Gas & Electric
9 Company (SDG&E) for increasing supply during peak and net peak demand hours through
10 California Public Utilities Commission (Commission) approval of utility-owned energy storage
11 resources, as well as to provide comments regarding the *Energy Division Staff Concept Paper*
12 dated August 16, 2021 (Staff Paper).

13 **II. NEED FOR EXPEDITIOUS COMMISSION ACTION AND A NEAR-TERM**
14 **MARKET SIGNAL**

15 California is in a state of emergency arising from the lack of adequate resources to ensure
16 grid reliability.¹ The California Energy Commission’s (CEC) 2022 Stack Analysis projects a
17 shortfall of 600 megawatts (MW) to 5,200 MW of incremental resources needed to ensure
18 electric system reliability for peak and net-peak hours during summer 2022 without the use of
19 contingency resources. Additional resources are needed to provide electric system resilience
20 against climate-induced drought and extreme heat events in California as well as wildfire-related
21 outages and/or west-wide extreme weather events that compromise interstate energy transfers.²

22 The Emergency Proclamation signed by Governor Newsom on July 30, 2021 (Emergency
23 Proclamation) directs the Commission to develop solutions aimed at “accelerating plans for the

¹ Executive Department State of California, *Proclamation of a State of Emergency*, dated July 30, 2021. Available at: <https://www.gov.ca.gov/wp-content/uploads/2021/07/Energy-Emergency-Proc-7-30-21.pdf>

² *California Energy Commission Draft Preliminary 2022 Summer Supply Stack Analysis (2022 Stack Analysis)*, p. 4.

1 construction, procurement, and rapid deployment of new clean energy and storage projects to
2 mitigate the risk of capacity shortages and increase the availability of carbon-free energy at all
3 times of day.”³ The *Assigned Commissioner’s Amended Scoping Memo and Ruling For Phase 2*
4 (Amended Scoping Memo) issued on August 10, 2021, recognizes the urgency of this moment
5 and the need for the Commission to take decisive action to secure new resources for the State to
6 protect grid reliability. The Amended Scoping Memo identifies as a primary issue to be
7 addressed in this proceeding the question of how to increase peak and net peak supply resources
8 in 2022 and 2023 through, among other things, “expedited generation and energy procurement,
9 **including utility-owned generation** and third-party generation, and expedited contracting and
10 other processes.”⁴

11 It is beyond dispute that new clean energy and energy storage resources must be built as
12 quickly as possible and that the Commission and stakeholders must move beyond ‘business as
13 usual’ approaches to consider creative solutions for easing the State’s reliability challenges.
14 Indeed, the Staff Paper presents several novel concepts designed to address immediate concerns
15 related to grid reliability. In order to expedite the deployment of additional resources and ensure
16 that 2022 and 2023 online dates are feasible, projects must begin development *as soon as*
17 *possible*. Specifically, in certain cases, a Notice to Proceed (NTP) must be issued to developers
18 by November 1, 2021, to ensure that a 2022 commercial online date can be met. These resources
19 require engineering, design, ordering of long lead-time materials, securing of shipping, and
20 initiation of other pre-construction activities. It is necessary to have a Commission-approved
21 contract *before* taking on the risk associated with development of new resources – this is true

³ Amended Scoping Memo, p. 2.

⁴ *Id.* at p. 4 (emphasis added).

1 whether it is a third-party contract at issue or a utility-owned resource. As a practical matter, the
2 longer it takes to receive Commission approval for a project, the longer it takes to provide NTP
3 to the project developer, and the longer the project takes to come online.

4 It is generally the case that development on sites owned or controlled by an investor-
5 owned utility (IOU) allows for an expedited construction schedule for new resources as
6 compared to non-IOU properties where additional time is required for land acquisition and
7 permitting. Thus, broadly speaking, there is a comparatively higher likelihood that a project on
8 IOU property or to-be owned IOU property will be able to deliver value within the expedited
9 timeframe contemplated in this proceeding. Accordingly, as discussed in further detail below,
10 SDG&E offers a proposal intended to bring new energy storage resources online in expedited
11 fashion and that builds upon the recommendation in the Staff Paper to establish a new non-
12 bypassable charge (NBC) for resources procured in response to the current emergency.⁵

13 Specifically, SDG&E proposes that in its traditional role of ‘reliability steward’ for its
14 distribution service territory, SDG&E be authorized to request through its Utility Development
15 Team (UDT) function (which is separate from its energy/capacity supply function) Commission
16 approval of energy storage projects that could be brought online in the very near term, with costs
17 to be recovered through a new NBC such as that proposed by Commission staff in the Staff
18 Paper.⁶ As discussed below, this expedited process is warranted given the current reliability
19 emergency faced by the State.

⁵ Staff Paper, pp. 23-24.

⁶ *Id.*

1 SDG&E requests the following immediate actions from the Commission:

- 2 • Issue a ruling by September 15, 2021 directing SDG&E’s UDT function to
3 immediately enter into negotiations with developers of new energy storage
4 projects, including but not limited to those described in this testimony, with the
5 objective of presenting new energy storage projects capable of meeting peak and
6 net peak demand in 2022 and 2023 for Commission approval via a Tier 2 Advice
7 Letter (AL).⁷ This direction should be confirmed in the Phase 2 Decision issued
8 on November 18, 2021.⁸
- 9 • Establish a new NBC along the lines of the new NBC proposed in the Staff Paper
10 for utility-owned energy storage procured on an emergency basis through
11 SDG&E’s UDT function to meet peak and net peak demand in 2022 and 2023.

12 **III. SUMMARY OF PROPOSAL**

13 **A. IOUs’ Role as Regional Reliability Steward**

14 Historically, the investor-owned utilities (IOUs) have each played the role of ‘reliability
15 steward’ in their respective distribution service territories; the Commission has exercised its
16 broad jurisdiction over the IOUs to direct them to procure new resources when needed to support
17 regional reliability and has allocated the costs of such procurement through the Section 365.1

⁷ See Phase 1 Decision, D.21-02-028, p. 11 (establishing a Tier 2 AL approval process for utility-owned resources).

⁸ This process is similar to the approach taken in Phase 1 of the instant proceeding where the Commission issued its *Assigned Commissioner’s Ruling Directing the State’s Three Large Electric Investor-Owned Utilities to Seek Contracts for Additional Power Capacity to be Available by the Summer of 2021 and 2022* (Procurement Ruling) on December 28, 2020, setting parameters for procurement of new resources and providing guidance on the Commission approval process. and then followed up with a formal decision, D.21-02-028, confirming the direction set forth in the Procurement Ruling.

1 cost allocation mechanism (CAM).⁹ Commission-ordered CAM procurement confers upon
2 IOUs an obligation that is different from that of a load-serving entity (LSE) procuring solely on
3 behalf of its customers. When IOUs undertake CAM procurement, they act “‘*not as LSEs* for
4 their bundled customers, but as stewards for system reliability on behalf of all customers.’”¹⁰ In
5 the past, when the Commission has perceived a need for the IOU to step in as reliability steward
6 for its distribution service territory, it has generally ordered the IOU to conduct a solicitation
7 through its retail service provider energy/capacity supply function and to procure new reliability
8 resources through long-term contracts or utility ownership. This more typical approach can work
9 well and SDG&E proposes no modification to this approach here.

10 In certain cases, however, in response to exigent circumstances threatening reliability
11 similar to those faced by the State now, the Commission has established a separate more
12 expedited pathway for approval of new resources, directing an IOU’s UDT to bring projects
13 directly to the Commission for approval (upon a showing of public interest benefits and cost-
14 competitiveness) through a parallel track outside of an IOU capacity solicitation.¹¹ This
15 approach makes sense in an emergency circumstance such as that presented here since the IOU
16 energy/capacity solicitation process can be beset by delays that block new project from coming
17 online as quickly as they otherwise could. When time is of the essence, a parallel and direct
18 route for Commission approval of new utility-owned reliability resources can be more effective.

⁹ All statutory references herein are to the Public Utilities Code unless otherwise noted.

¹⁰ *Id.* (Emphasis in original).

¹¹ *See, e.g.*, Resolution E-4798.

1 ***B. Given the Current Emergency and the Need for Expedited Action, the***
2 ***Commission Should Direct SDG&E’s UDT Function to Seek Approval***
3 ***Through a Tier 2 Advice Letter of Utility-Owned Energy Storage Resources that***
4 ***Can Meet Peak and Net Peak Demand in 2022 and 2023***

5 In the current emergency situation, establishing a parallel track for expedited project
6 approval that is *not* tied to SDG&E’s (diminishing) role as retail service provider gives the
7 Commission another tool in its toolbox for exercising its jurisdiction to ensure that new
8 reliability resources are available to meet demand at the earliest possible date. Given the current
9 market conditions, with reduced supply for materials and more challenging shipping logistics,
10 developers must make commitments to procure materials and finalize shipping details with
11 greater advanced notice. In addition, materials and shipping costs have increased, which means
12 that project developers require a greater degree of certainty before they make financial outlays
13 for expensive, long lead-time equipment. To provide the market certainty developers require and
14 to incent them to take on the risk to invest in additional supply resources for 2022 and 2023,
15 Commission approval of new projects is required *as soon as possible*.

16 As discussed in more detail below, SDG&E’s UDT function has identified high-viability
17 energy storage projects through a recent UDT request for offers (RFO) that are capable of
18 meeting online dates in late 2022 and early 2023 if immediate action is taken by the
19 Commission. Accordingly, SDG&E requests that the Commission issue a ruling by ***September***
20 ***15, 2021***, directing SDG&E’s UDT function to seek Commission approval through a Tier 2 AL
21 of energy storage projects capable of meeting peak and net peak need in 2022 and/or 2023.

22 A ruling in September will provide a signal to the market to drive toward timelines
23 necessary to negotiate and execute contracts. The current procedural schedule contemplates a
24 final decision in mid-November (November 18, 2021), which means a final, non-appealable
25 decision in December at the earliest, and negotiation and filing of a contract for Commission

1 approval thereafter. This likely pushes any Commission approval of projects to late December
 2 2021 or January 2022 *at best*, jeopardizing the ability to provide timely NTP to developers to
 3 permit them to begin ordering materials and spending money and resources on engineering and
 4 design. A September ruling will help to ensure that contracts are ready for filing shortly after
 5 issuance of the Phase 2 Decision on November 18, 2021, which would allow for NTPs to be
 6 issued by early December and would improve the possibility of 2022 online dates being
 7 achieved.

8 To this end, SDG&E recommends the following additions to the procedural schedule
 9 included in the Amended Scoping Memo¹² to ensure a timely contract approval process:

R.20-11-003 Phase 2 Activity	Proposed Expedited Approval Activity	Date
Testimony with proposals seeking Commission Approval		September 1, 2021
Reply testimony		September 10, 2021
	Ruling Directing LSEs to File Contracts	September 15, 2021
Opening Briefs		September 20, 2021
Reply Briefs		September 27, 2021
Proposed Decision		October 29, 2021
Final Decision approving proposals		November 18, 2021
	Advice Letter Request Contract Approval Filing Due Date	November 19, 2021
	Commission Disposition of Advice Letter(s)	December 9, 2021

10
 11 ***C. The Commission Should Adopt the Staff Proposal’s Recommendation for a***
 12 ***New NBC for Emergency Procurement***

13 In the Staff Paper, Commission staff suggest adoption of a new, limited NBC that is
 14 specific to emergency procurement of resources that “can provide both mutual benefit to all

¹² Amended Scoping Memo, p. 6.

1 ratepayers and additional reserve margin” above resource adequacy (RA) and Integrated
2 Resource Plan (IRP) requirements.¹³ SDG&E supports development of a new NBC to recover
3 the costs of emergency procurement of utility-owned energy storage resources for reliability
4 purposes. New energy storage resources procured by SDG&E’s UDT function will provide
5 reliability benefits for all customers in its distribution service territory, regardless of bundled or
6 unbundled status. Consistent with its role as reliability steward for the region, SDG&E’s costs
7 incurred should be recovered from all benefitting customers in a manner similar to the CAM.

8 Accordingly, the Commission should direct that the Tier 2 AL submitted by SDG&E’s
9 UDT function include specific details regarding the benefits and costs of the project(s), as well as
10 details regarding the proposed regulatory accounting treatment. The proposed accounting
11 treatment should utilize a balancing account that tracks the approved revenue requirement
12 reduced by California Independent System Operator (CAISO) revenues received. Any RA
13 capacity credits should be allocated on a *pro rata* basis amongst the LSEs in SDG&E’s
14 distribution service territory by share of coincident peak, adjusted monthly.

15 **IV. OPPORTUNITIES TO INCREASE PEAK AND NET PEAK SUPPLY IN 2022**
16 **AND 2023 TO BE APPROVED IN PROPOSED EXPEDITED CONTRACT**
17 **APPROVAL PROCESS**

18 SDG&E’s UDT has identified high-viability energy storage projects through its recent
19 RFO process that are capable of meeting online dates in late 2022 and early 2023 if immediate
20 action is taken by the Commission. These projects would provide the full complement of

¹³ Staff Paper, pp. 22-23.

1 services – *i.e.*, capacity, energy, ancillary services,¹⁴ and would be dispatched in a least cost
2 fashion. The projects range in size from 10 MW to 30 MW (40 MWh to 120 MWh), with a
3 larger project exceeding 100MW (400 MWh) in size. A high-level summary of these projects is
4 provided below:

- 5 • The first project is a 20 MW/80 MWh 4-hour duration battery energy storage
6 project located on SDG&E substation property. The project has full capacity
7 deliverability status (FCDS) and can provide 20 MW of RA capacity. The
8 contract associated with this project has previously been submitted for
9 Commission approval but was denied due to the project’s inability to compress its
10 schedule sufficiently to meet an August 2021 online date. Nevertheless, it is
11 possible for this previously negotiated and submitted contract to be brought back
12 with relevant updates (*e.g.*, revised schedule, execution date, etc.) to meet a
13 December 2022 online date. In order for a December 2022 online date to be
14 achieved however, a notice to proceed must be issued to the developer by
15 November 2021. If the NTP is issued any later than November 2021, the online
16 date of December 2022 is at risk.
- 17 • The second project is a potential 30 MW/120 MWh 4-hour duration battery
18 energy storage project located adjacent to an SDG&E substation located in the
19 northwest portion of SDG&E’s service territory. This project would be adjacent
20 to an existing battery energy storage of 40 MW/160 MWh project approved by

¹⁴ To date, most large-scale energy storage resources deployed have offered ‘RA-Only’ contracts where the IOU purchases RA capacity, and the counterparty retains all other attributes including energy and ancillary services. See Slide 16 Lumen Study: https://lumenenergystrategy.com/uploads/1/3/6/3/136375767/2021-05-29_lumen_energy-storage-procurement-study-workshop01.pdf

1 the Commission and currently under construction. Upon completion of the
2 existing project, SDG&E will take ownership of the 40MW/160 MWh asset,
3 including the associated interconnection rights via the interconnection agreement
4 which has a capacity up to 70 MW. The remaining interconnection capacity
5 leaves the ability for SDG&E to develop an additional 30 MW/120 MWh battery
6 energy storage project on an adjacent parcel of land. This expansion project has
7 FCDS and can provide 30 MW of RA capacity. If Commission approval is
8 achieved in short order, SDG&E could utilize efficiencies with construction
9 already commencing and utilize existing contracts in place to begin mobilization
10 and construction of a subsequent 30 MW/120 MWh project to be online by late
11 2022 or early 2023.

- 12 • The third project is a 132 MW/528 MWh project located in eastern San Diego
13 being developed by a third-party that SDG&E would acquire (*i.e.*, build transfer).
14 The developer has the ability to execute a contract to obtain the interconnection
15 rights for 132 MW of FCDS via a transfer and acquisition process. In order for
16 this project to meet a December 2022 online date, a NTP is required to be issued
17 by January 1, 2022. If an NTP is not able to be issued by January 1, 2022, the
18 December 2022 online date is at risk. Alternatively, if the NTP is issued prior to
19 January 1, 2022, the project may be able to accelerate the December 2022 online
20 date.
- 21 • Finally, a selection of 10 MW/40 MWh and one 10 MW/60 MWh projects are
22 available at various SDG&E-owned property locations adjacent to SDG&E
23 substations. These projects could leverage existing contracts to accelerate

1 contract negotiations. Additionally, these projects are able to meet a second half
2 of 2023 online date if NTP is issued by December 2021. If an NTP is unable to
3 be issued by December 2021, then the online date pushes farther into 2023.

4 **V. COMMENTS ON STAFF CONCEPT PAPER**

5 **A. *New Non-bypassable Charge for Emergency Procurement***

6 The Staff Concepts Paper proposes the establishment of a new NBC for recovery of the
7 costs associated with emergency procurement ordered in the instant proceeding.¹⁵ SDG&E
8 generally supports this recommendation in the Staff Paper.

9 The emergency situation faced by the State that led to initiation of this proceeding is
10 analogous to the tree mortality crisis in California, which prompted the Governor to issue an
11 emergency proclamation citing the record drought and bark beetle infestation that caused
12 widespread tree mortality resulting in elevated wildfire risk. In response to the Governor's
13 emergency proclamation, the Commission required the IOUs to contract with bioenergy facilities
14 that received feedstock from high hazard zones (*i.e.*, areas with significant tree mortality).¹⁶
15 Because all LSE customers benefited from the actions the IOUs undertook to mitigate the
16 wildfire risk presented by the vast tree mortality, the Commission authorized allocation of the
17 cost associated with contracting for the energy from these bioenergy facilities through a NBC.¹⁷

18 Here, the Governor has issued a similar emergency proclamation due to severe drought
19 and extreme weather leading to a shortage of hydroelectric energy and projected a 5,000 MW
20 capacity shortfall in 2022. Comparably, *all* LSE customers will benefit from actions the

¹⁵ Staff Paper, pp. 22-24.

¹⁶ Resolution E-4770.

¹⁷ Resolution E-4805.

1 Commission orders the IOUs to undertake to address reliability concerns, which justifies IOU
2 recovery of associated costs through an NBC. SDG&E also supports the suggestion that the
3 eligibility be limited to “approved projects via Advice Letter.”¹⁸

4 ***B. New Energy Storage Resources at IOU Properties or Soon-to-Be IOU***
5 ***Properties***

6 As discussed above, SDG&E offers a proposal for expedited procurement of utility-
7 owned energy storage resources that will help the State to address the currently grid reliability
8 emergency. SDG&E’s proposal includes a new NBC very similar to the NBC concept described
9 in the Staff Paper for “new storage at IOU properties.”¹⁹ While SDG&E urges the Commission
10 to adopt its utility-owned energy storage proposal, it also offers these separate comments
11 outlining its concerns with the concept included in the Staff Paper.

12 First, the Staff Paper proposal appears to limit new energy storage at IOU properties to
13 those projects that can come online by June of 2022. A June of 2022 online date imposes a
14 significant limitation that would preclude the ability of resources to provide an increase to supply
15 when it is needed, 2022 *and* 2023.²⁰ Limiting projects to only June of 2022 fails to recognize the
16 significant needs that exist not only through the remainder of 2022, but through 2023 as well.
17 SDG&E suggests that at minimum, the June of 2022 deadline be pushed back to at least June of
18 2023.

19 Second, the Staff Paper suggests a Tier 3 Advice Letter process for filing utility-owned
20 projects. This approach is unduly limiting. As discussed above, timely notice to counterparties
21 (*i.e.*, NTP) to solidify purchase orders and pre-construction activities is critical to timely project

¹⁸ Staff Paper, p. 23.

¹⁹ *Id.*

²⁰ Amended Scoping Memo, p. 4.

1 deployments, and timely NTP is predicated on timely Commission approval. Providing timely
2 notice is even more critical in light of current market conditions. As seen in the past year, there
3 have been and continue to be extensive supply chain issues as a result of the COVID-19
4 pandemic, reduced amounts of available shipping vessels or containers, and impacts to shipping
5 routes that have resulted in delays in obtaining materials to complete projects in a timely fashion.
6 Utilizing a significantly lengthier Tier 3 Advice Letter process likely pushes Commission
7 approval of contracts into the first quarter of 2022 or later. For a counterparty trying to meet a
8 2022 in-service date, a delay in Commission approval diminishes the ability to provide NTP in a
9 timely fashion, making achieving an in-service date for resources in 2022 very unlikely. As
10 discussed above, SDG&E instead suggests a Tier 2 AL process similar to that previously
11 approved in Phase 1 of this proceeding.²¹ Again, an expeditious regulatory approval process
12 helps to ensure that approved projects can meet their intended online dates and provide necessary
13 reliability to the State.

14 Finally, the Staff Concept Paper appears to limit utility-owned projects to only those
15 projects that are on IOU-owned or controlled properties. Such a limitation diminishes the
16 available pool of resources that may be available to the region to ensure reliability. SDG&E
17 notes that there are other viable, potential utility-owned projects that exist on properties that may
18 not be currently owned or controlled by an IOU but may be acquired through the transaction
19 (*e.g.*, through a “Build/Transfer” agreement). These projects should also be eligible for cost
20 recovery through the proposed NBC.

²¹ See D.21-02-028, p. 11.

1 Accordingly, SDG&E suggests the following revisions to the staff concept, if adopted:
2 c. (edited) New storage at IOU **and/or to-be-controlled-by IOU** properties. Staff expects that
3 there will be significant challenges associated with LSEs successfully accelerating the online
4 dates of significant quantities of IRP resources by summer 2022. Given that IOU properties –
5 and in particular IOU substations -- can often avoid or expedite many of the challenges
6 associated with bringing new projects online (e.g., site control, interconnection, deliverability,
7 permitting, etc.), this concept would be for IOUs to be directed to submit project proposals via
8 Tier ~~3~~ **2** Advice Letters for Utility owned storage on utility-owned (~~or~~-controlled **or to-be-**
9 **controlled**) properties that could demonstrated to be brought online by June ~~2022~~ **2023**.

10 **VI. CONCLUSION**

11 This concludes SDG&E’s prepared direct testimony.

1 **STATEMENT OF QUALIFICATIONS**

2 My name is Jenell McKay. My business address is 8690 Balboa Avenue, San Diego,
3 California 92123. I am employed as the Development Manager in the Advanced Clean
4 Technology Department of SDG&E. My primary responsibilities include leading SDG&E’s
5 Development Team which oversees SDG&E’s clean technology programs, policy and projects.
6 Specific activities include, but not limited to, leading solicitations for utility-owned resources,
7 performing bid evaluations, and leading commercial negotiations of contracts. My prior roles at
8 SDG&E have included Policy and Strategy Manager in Advanced Clean Technology, Principal
9 Analyst in Business and Financial Planning, and Senior Advisor in Electric Rate Design.

10 Prior to joining SDG&E, I was employed by Midcontinent Independent System Operator,
11 Inc. (MISO) as a Senior Policy Analyst from July 2010 and August 2016 working on
12 transmission planning studies focusing on economic projects and system-wide GHG reduction
13 strategies, interregional planning with neighboring RTOs, and FERC tariff compliance. In
14 addition, I was employed by the Electric Reliability Council of Texas (ERCOT) as an Economist
15 from 2010 until 2013 focused on long-term transmission planning integrating renewables.

16 I received a Bachelor of Science degree in Economics from Tulane University in 2009. I
17 received a Master of Finance degree, with a concentration in Energy, from the AB Freeman
18 School of Business at Tulane University in 2010.

19 I have previously submitted testimony before the California Public Utilities Commission.

VERIFICATION

In accordance with Rules 1.11 and 13.7 of the Rules of Practice and Procedure of the California Public Utilities Commission, I hereby declare under penalty of perjury that factual statements in my testimony are true and correct of my own knowledge, except as to matters that are stated on information or belief, and as to those matters I believe them to be true. Insofar as statements in my testimony are in the nature of opinion or judgment, such statements represent my best professional judgment. I adopt this testimony as my sworn testimony in this proceeding.

Executed this 1st day of September, 2021, at San Diego, California

/s/ Jenell McKay _____
Jenell McKay
SDG&E Advanced Clean Technology Department
Development Manager