

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

Application of San Diego Gas & Electric
Company (U 902 M) for Authority to
Implement Rate Relief and Increase Spend in
Support of the San Diego Unified Port District's
Energy Management Plan.

Application A.17-09-005
(Filed (September 13, 2017))

**RESPONSE OF SAN DIEGO UNIFIED PORT DISTRICT TO
APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)
FOR AUTHORITY TO IMPLEMENT RATE RELIEF AND INCREASE
SPEND IN SUPPORT OF THE SAN DIEGO UNIFIED PORT DISTRICT'S
ENERGY MANAGEMENT PLAN**

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September 26, 2017

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PORT DISTRICT

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Pursuant to Rule 2.6(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission"), the San Diego Unified Port District (the "District") hereby submits its Response in support of the above-captioned Application filed and served by San Diego Gas & Electric Company ("SDG&E") on September 13, 2017.

A.17-09-005 has not yet been noticed in the Commission's Daily Calendar as of September 26, 2017, such that the deadline for responses or protests has not been established. As referenced in the Application (at p. 4), the District is submitting this Response at this time and is attaching two pieces of testimony in support of the Application. Given the nature of the Application, the District is taking this step such that interested parties will have the benefit of having before them the Application, the testimony that SDG&E made available to all interested persons concurrent with the filing, and the testimony providing the District's analysis of the

issues during the response/protest period. The District reserves its right to submit additional testimony, as appropriate, during the course of this proceeding.

Specifically, attached as **Exhibit A** to this Response, the District submits the Prepared Direct Testimony of Stephen Shafer, dated September 26, 2017. Mr. Shafer is the District's Maritime Program Manager. In addition, attached as **Exhibit B** to this Response, the District is offering the Prepared Direct Testimony of Dr. Adam Borison, Managing Director of Berkeley Research Group, LLC, also dated September 26, 2017. These two pieces of testimony are intended to supplement the sworn testimony submitted to interested parties by SDG&E witnesses with the Application on September 13, 2017. In the event that this proceeding requires evidentiary hearings, Mr. Shafer and Dr. Borison are prepared to adopt the prepared testimony as their sworn testimony and to respond to questions from intervenors, the assigned ALJ, or Commissioners.

The Application is of critical importance to the District and reflects a lengthy period of cooperative work with SDG&E to develop the AB 628 Energy Management Plan. Such plan provides a long-term, five year solution to the Shore Power rate shock situation that the District would otherwise face in supplying electricity to the cruise business in San Diego and the related devastating economic impact to the San Diego region associated with a decline in cruise ship business. Equally important, the Application requests funding to facilitate the Energy Efficiency programs and the Enhanced Partnership Program ("EPP") that are components of the larger Energy Management Plan. The collaborative effort between the District and SDG&E results in the first submission of an AB 628 plan to the Commission and reflects major advancements in meeting the environmental goals of the District and the State of California.

Therefore, for the reasons stated in the Application, this Response and in the attached Prepared Testimony, the District strongly supports the proposals made in the Application and urges the Commission to grant the requested relief on an expedited basis.

Respectfully submitted,

PERKINS COIE LLP

By: /s/ James W. McTarnaghan
James W. McTarnaghan

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September 26, 2017

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