

AReM DATA REQUEST
AReM-SDG&E-DR-02
SDG&E GRC Phase 2 APPLICATION – A.15-04-012
SDG&E RESPONSE
DATE RECEIVED: JANUARY 29, 2016
DATE RESPONDED: FEBRUARY 12, 2016

1. In several responses to AReM-DACC's Data Request SDGE-01, SDG&E stated that A.15-04-012 is a "revenue neutral proceeding."
 - a. Please explain the meaning of the phrase.
 - b. Even if A.15-04-012 is a "revenue neutral proceeding," please provide the requested cost information.

SDG&E Response:

- a. A "Revenue Neutral Proceeding" is a proceeding where additional revenue requirements are not being requested. SDG&E is not requesting an increase or decrease in its revenue requirements in this proceeding, SDG&E's 2016 GRC Phase 2 proceeding (A.15-04-012). Instead, as is traditionally done in GRC Phase 2 proceedings SDG&E is proposing to update the revenue allocation and proposing rate changes to recover those allocated revenues. The direct testimony of Christopher Swartz (Chapter 2) in this proceeding presents the proposed revenue allocations and rates, including the resulting bill impacts that reflect this revenue neutral approach.
- b. SDG&E objects to the Data Request on the grounds that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Based upon ALJ McKinney's email ruling made on January 27th, 2016 Prehearing Conference in SDG&E's 2016 GRC Phase 2 proceeding (A.15-04-012), cost allocation for Demand Response programs is going to be addressed in SDG&E's Demand Response Bridge Funding filing. SDG&E filed its Demand Response Bridge Funding filing, Rulemaking (R.) 13-09-011, on February 1st, 2016.

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2. SDG&E's response to Question 3 in AReM-DACC's Data Request SDGE-01 was non-responsive and failed to provide the requested cost information. Therefore, please provide the information specified below for each of the following programs and tariffs:
- Peak Time Rebate for Residential (Schedule PTR)
 - Critical Peak Pricing for M/L C&I (Schedule CPP-D)
 - Critical Peak Pricing for M/L Agricultural (Schedule CPP-D-AG)
 - Smart Pricing Program rate for Small Commercial (Schedule EECC-TOU-A-P)
 - Smart Pricing Program rate for Residential (Schedule EECC-TOU-DR-P),
 - Smart Pricing Program rate for Agricultural (Schedule EECC-TOU-PA-P).
- a. The dollars that SDG&E is collecting for each such program and tariff.
 - b. The specific rate element (i.e., Generation, Transmission or Distribution), in which SDG&E is collecting these dollars for each of such program and tariff.
 - c. Whether each such program or tariff includes separate incentive payments to customers that are not included in the dollars specified in answer to Question 2.a and, for each such program or tariff, the estimated total dollars of the incentives and the specific rate element in which SDG&E collects those dollars (i.e., Generation, Transmission or Distribution).
 - d. Please provide specific references to the workpapers and testimony for your answers a through c.

SDG&E Response:

Please see objection and response to Question 1b above, which are incorporated herein by reference.

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3. The Energy Division table provided as a link to Question 1 in AReM-DACC’s Data Request SDGE-01 lists “TOU” as a category of SDG&E DR programs. However, the only “TOU” programs or tariffs noted by SDG&E were in answer to Question 2, which asked about programs that were not included in the Energy Division table.
- a. Please list each of the specific SDG&E programs and tariffs that are included within the category “TOU” in Energy Division’s table.
 - b. Specify the dollars that SDG&E is collecting for each of these TOU programs and tariffs.
 - c. Specify the rate element (i.e., Generation, Transmission or Distribution), in which SDG&E is collecting these dollars for each of these TOU programs and tariffs.
 - d. Specify whether the TOU program or tariff includes separate incentive payments to customers that are not included in the dollars specified in answer to Question 3.b and, for each such TOU program or tariff, the estimated total dollars of the incentives and the specific rate element in which SDG&E collects those dollars (i.e., Generation, Transmission or Distribution).
 - e. Please provide specific references to the workpapers and testimony for your answers b through c.

SDG&E Response:

Please see objection and response to Question 1b above, which are incorporated herein by reference.