SDG&E SECOND AMENDED GRC Phase 2 APPLICATION – A.15-04-012 SDG&E RESPONSE

DATE RECEIVED: JUNE 02, 2016 DATE RESPONDED: JUNE 16, 2016

- 1. SDG&E-07, page JJS-6 presents SDG&E's calculation of the RPS premium that it has included in its marginal cost of energy. This calculation is based on a "Green Value" of \$0.079131/kWh.
 - a. The calculation presented in SDG&E-07 is as follows: (\$0.079131/kWh \$0.03238/kWh) x 25% = \$0.01144/kWh. However, the calculation actually yields a result of approximately \$0.01169/kWh (not \$0.01144/kWh). Please explain (or correct) this discrepancy and identify the correct formula, inputs, and resulting RPS premium.
 - b. In SDG&E's Chapter 7 Workpapers, the Excel file "Chapter 7 WP MEC (R)" on sheet "Price Summary" indicates that SDG&E's proposed "Green Adder" is \$78.13/MWh, not the adder of \$79.13/MWh shown in SDG&E-07. Please verify that the "Green Adder" is intended to be the same as the "Green Value" discussed in SDG&E-07 and explain (or correct) the apparent discrepancy between SDG&E's testimony and workpapers and identify the correct formula, inputs, and resulting Green Adder, Green Value, and RPS premium.
 - c. SDG&E-07 explains that the "Green Value" was calculated by the Commission's Energy Division.
 - i. Please explain in detail what SDG&E means by "Green Value."
 - ii. Please state whether this "Green Value" is the same as the Green Adder that was used in the 2016 market price benchmark calculation used in SDG&E's November 2016 ERRA update PCIA calculations.
 - iii. If the answer to (b) is anything other than an unequivocal "yes," please fully explain the source and derivation of the "Green Value."
 - iv. Please identify what categories of renewable power prices are included in the calculation of the "Green Value." Specifically, does the "Green Value" represent the price of all PG&E, SCE, and SDG&E renewable power projects coming online in the 2015-2016 time period? (If not, please identify the utilities and time frames associated with the included projects.) In addition, does the "Green Value" consist of a mix of RPS resources from Buckets 1, 2, and 3? (If not, please identify what types of RPS resources are included.)

SDG&E Response:

- a. SDG&E inadvertently transcribed the numbers incorrectly on page JJS-6 line 10. The workpapers and all other tables were not impacted and have the correct value.
- b. Please refer to response 1a. The \$78.13/MWh is the "Green Adder", which SDG&E used interchangeable with the term "Green Value" on page JJS-6 line 8.

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c.

- i. The \$78.13/MWh is the "Green Adder", which SDG&E used interchangeable with the term "Green Value" on page JJS-6 line 8.
- ii. Yes.
- iii. N/A.
- iv. The Green Adder includes RPS costs for all 3 IOUs for 2015-2016 and does not exclude any RPS resources.

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- 2. With regard to SDG&E's implementation of mandatory TOU rates for Schedule PA customers, please:
 - a. Identify the month and year in which SDG&E first began conducting outreach and education for Schedule PA customers about SDG&E's implementation of mandatory TOU rates.
 - b. Provide the full schedule of outreach and education activities conducted for Schedule PA customers in preparation for SDG&E's implementation of mandatory TOU rates.
 - c. Provide samples of all written outreach and education materials provided to Schedule PA customers in preparation for SDG&E's implementation of mandatory TOU rates.
 - d. Provide any studies that SDG&E conducted or reviewed over the last five years regarding education of, or outreach to, small and medium non-residential customers pursuant to the implementation of TOU rates.
 - e. Provide any studies that SDG&E conducted or reviewed over the last five years regarding small and medium non-residential customer acceptance of new rate structures, such as TOU rates.

SDG&E Response:

- a. SDG&E staff first began informal conversations with Schedule PA customers about mandatory TOU rates in February 2014 at the Farm Bureau Centennial Dinner.
- b. Following is the schedule of outreach and education activities conducted for Schedule PA customers in preparation for implementation of mandatory TOU rates.

Date	Activity
September 2015	Posted information on SDGE.com/Whenergy
October 1, 2015	Presentation to Farm Bureau
October 22, 2015	SD Flower & Plant Fall Meeting Presentation
November 5, 2015	Booth at the Farm Bureau & Flower & Plant
	Expo
November 10, 2015	Farm Bureau General Membership Meeting
	Update
December 2015 through January 2016	Pre-transition postcard
February 4, 2016	Farm Bureau General Membership Meeting
	Update
February 2016 through March 2016	Personalized Rate Communication
March 3, 2016	Farm Bureau General Membership Meeting

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	Update
April 20, 2016	Flower & Plant Association Spring Member
	Meeting Presentation
May 5, 2016	Farm Bureau General Membership Meeting
	Update
June 2, 2016	Farm Bureau General Membership Meeting

c. Attached are the following samples of written outreach and education materials provided to Schedule PA customers in preparation for SDG&E's implementation of mandatory TOU rates as described in the response to question 2.

Attachment 1: Presentation to Farm Bureau

Attachment 2: Postcard

Attachment 3: Personalized Rate Comparison for customers with 12 months of data

Attachment 4: Personalized Communication applicable to customers with less than 12 months of data

Attachment 5: Personalized Rate Comparison applicable to customers with both Schedule PA and other affected rates

d. Attached are the following studies conducted over the last five years regarding education of, or outreach to, small and medium non-residential customers pursuant to the implementation of TOU rates.

Attachment 1: Whenergy Focus Groups, conducted with residential and small business customers, September 2013. The objective was to obtain feedback on rate comparison letters/emails, wireframes of the microsite, and various communications and materials related to Whenergy (TOU) pricing.

Attachment 2: CPP-D default messaging focus groups conducted with Medium Business customers, December 2014. The objective was to better understand how to communicate the nuances of CPPD to medium business customers.

e. Attached are the following studies conducted over the last five years regarding small and medium non-residential customer acceptance of new rate structures, such as TOU rates.

Attachment 1: SPP incentives/messaging, online panel survey conducted with Small Business customers, February 2013. The objective was to understand how many customers would be interested in enrolling in TOU or TOU Plus, if they

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understand the concept of bill protection and Reduce Your Use days.

Attachment 2: SPP TOU rates, online panel survey conducted with Small Business and Residential customers, April 2014. The objective was to understand which segments would be most interested in TOU and why, as well as test two different peak periods (11-6 and 2-9).

Attachment 3: SPP default messaging, online panel survey conducted with Small Business customers, May 2015. The objective was to measure general awareness and perceptions of TOU, and to get a sense of what communications/tools would be needed to help them prepare for the transition.

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- 3. With regard to SDG&E's proposal in this proceeding for new TOU periods, please:
 - a. Identify the month and year in which SDG&E expects to begin conducting outreach and education for customers regarding the new TOU periods. If the date depends on the date of the GRC II decision, please specify the number of days from this decision (or from the proposed decision) that outreach and education would begin.
 - b. Specify SDG&E's planned implementation date of the new TOU periods. If the date depends on the date of the GRC II decision, please specify the implementation date based on the number of days from this decision.
 - c. State whether SDG&E plans to begin developing outreach and education materials before or after the Commission has issued a decision setting new TOU periods.
 - d. Provide all written materials that SDG&E has developed to-date to educate customers on its proposed changes to its TOU periods.

SDG&E Response:

- a. The date SDG&E will begin conducting customer outreach and education regarding new TOU periods depends on the adoption of the GRC Phase II decision. Typically, the development and implementation of outreach and education materials takes between 60 and 90 days. SDG&E is already having strategy discussions about the communications as we want to provide customers as much advanced notification as possible.
- b. SDG&E feels that an early winter implementation date would be most appropriate for introducing a change to TOU periods. SDG&E's proposed change to the winter on-peak period is small, moving from 5 p.m. 8 p.m. weekdays to 4 p.m. to 9 p.m. every day. This implementation date also allows sufficient time for customer education and outreach ahead of summer months, where TOU period differences and differentials are greater, and therefore have the potential to have the biggest impact on customers. SDG&E anticipates that 60-90 days from a final decision is needed for education and outreach to impacted customers of the TOU period change.
- c. SDG&E plans to refine outreach and education materials after the Commission has issued a decision setting the new TOU periods.
- d. SDG&E has not developed any written materials to formally educate customers on its proposed changes to TOU periods.

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- 4. SDG&E's Smart Pricing Program presentation, Customer Outreach and Education Quarterly Briefing, dated April 5, 2016, provides (i) Metrics with Target Goals and Current Levels and (ii) Tracking Statistics, with these data provided on a combined basis for Small Business and Small Agribusiness (pages 15-18).
 - a. Please provide these same data points for Small Agribusiness customers only, separately providing results for PA customers with loads <20 kW and for PA customers with loads of at least 20 kW, if the results are available at that level of detail.
 - b. Please provide these data on a quarterly basis, starting from the first quarter in which these metrics and statistics were tracked for the PA customer transition to TOU rates. If available, please provide these data separately for PA customers with loads <20 kW and for PA customers with loads of at least 20 kW. If not available at that level of detail, please provide the data for all PA customers. If not available at that level of detail, please provide the data for Small Business and Small Agribusiness combined. If available, please provide these data in a spreadsheet format.

SDG&E Response:

Attached is an excel file that provides quarterly data for the metrics contained in the Customer Outreach and Education Quarterly Briefing dated April 5, 2016 (pages 15-18).

Slide 15 contains data for Small Business and Agribusiness customers. Survey results are not available by customer type; therefore, information for Agribusiness customers could not be identified separately.

Slides 16-18 contain data for all Agribusiness customers. Data broken out between PA customers with loads <20kW and loads with at least 20 kW is not readily available.