1 TOU-DER) as follows: Baseline distribution energy unit charges are multiplied by a single 2 factor, where the factor is derived such that the sum of the residential class revenues equal the allocated revenue requirement. This will ensure alignment with the proposed revenue allocation 4 presented by SDG&E witness Parsons in Chapter 5. In this proceeding, SDG&E is proposing a change in the non-baseline distribution energy unit charges to remove the seasonal differential 6 that currently exists in residential distribution rates. This change uses the average of the current summer and winter differential to create an annual non-baseline distribution energy unit charge. 8 The non-baseline differential is then added to the baseline distribution energy unit charge to 9 obtain the non-baseline rate. 10

In this proceeding, per Scoping Memo and Ruling issued 4/11/2007, SDG&E is also proposing to increase residential Tier 14 and Tier 24 total rates in compliance with Senate Bill (SB) 1, the California Solar Initiative (CSI). This increase to Tier 14 and Tier 24 total rates avoids the cost shifting of CSI to upper tiers (Tier 344 and Tier 444), which results when the residential TRAC adjustment is applied to maintain rate caps under the current rate structure. Under SB 1 guidelines, CSI is not included in low-income rates. To enable implementation of CSI exemptions, SDG&E We-currently separately identifies CSI surcharges utilizing the 2006 Rate Design Settlement Component.

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SDG&E is proposing no changes to Minimum Bills (under schedule DR, DR-LI, DM, DS, DT, and DT-RV), to the unit Discount Charges (under schedules DS and DT), or to Metering Charges (under schedule DR-TOU/DR-TOU-DER, EV-TOU, EV-TOU-2, EV-TOU-3). Present and proposed distribution rates are illustrated in Attachment SMC-3. Residential bill impacts are presented in Attachment SMC-14 and Attachment SMC-15.

## 2. Total Rate Adjustment Component (TRAC)

As described in the testimony of SDG&E witness Hansen in Chapter 2, SDG&E proposes to continue the RDSC component, renamed as TRAC, to mitigate rate fluctuations that occur from setting distribution and commodity rates at their cost-based levels, to pass through AB1X subsidies and cost recovery, and to provide the inverted tiered rate structure.

SDG&E proposes that the rate structure of TRAC correspond to the Total Utility Distribution Company (UDC) rate structure under each rate schedule. TRAC will continue to

<sup>&</sup>lt;sup>1</sup> For this reason, we will not require a memo account to identify CSI.