

**FEA DATA REQUEST
FEA-SDG&E-DR-01
SDG&E GRC Phase 2 APPLICATION – A.15-04-012
SDG&E RESPONSE**

DATE RECEIVED: JANUARY 8, 2016

DATE RESPONDED: FEBRUARY 1, 2016

- 1-1. Please provide a copy of all information requests received from other parties. Please provide those that have been received to date and provide additional requests as they are received.

SDG&E Response:

SDG&E has received the following data requests from the following intervenors:

AReM – DR-01

ORA – DR's 08, 001-006

UCAN – DR-01

These requests are downloaded on the enclosed CD.

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- 1-2. Please provide a copy of the responses to all data requests of other parties, including responses to informal data requests of ORA and other parties. Please provide the responses to those that have been received to date and provide additional responses when they are provided to the requesting party. Please include all attachments and all models and spreadsheets in the same format and detail as provided to the requesting party.

SDG&E Response:

SDG&E has responded to the following data requests:

AReM DR-01
ORA DR-08
ORA DR-001 (Amended)
ORA DR-002 (Amended) copies of all other DR's from intervenors;
ORA-DR-003 (Amended)
ORA DR-004 (Amended) (C)
ORA DR-005 (Amended)

These responses can be found on the enclosed CD.

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- 1-3. Referring to Appendix B to SDG&E's application, please provide the following information:
- a. All workpapers used to develop the data in the table. Please provide executable versions in native format with all formulas intact.
 - b. For each class, please provide the dollar amounts of revenue associated with the 2015 rates, the 2016 rates, the 2017 rates and the 2018 rates.
 - c. For the M/L C&I class, please provide information for Rate AL-TOU and A6-TOU customers separately, by voltage level, and further subdivided between direct access customers and bundled service customers.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-4. For every table in the Direct Testimony of Christopher Swartz, please provide a breakout of the M/L C&I class and the Agricultural class to show separately data for:
- a. M/L C&I customers who will continue to be M/L C&I customers after the rate changes;
 - b. M/L C&I customers on Schedule PA-T-1 that will move from the M/L C&I class to the Agricultural class; and
 - d. Customers currently in the Agricultural class who will remain in the Agricultural class.

SDG&E Response:

SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-5. Please provide a table in dollars (rather than in rates per kWh or percentage change) for the following tables in the Direct Testimony of Christopher Swartz:
- a. CS-6, CS-7, CS-8, CS-9, CS-10, CS-11, CS-12, CS-13, CS-14, and CS-15.
Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-6. For Rate AL-TOU, please provide the billing determinants at present rates and show the multiplication of these billing determinants times present rates and the revenues produced by those rates; the same information for the proposed 2016 rates and billing determinants, and the same information for the proposed 2017 and 2018 rates and billing determinants. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-7. For Rate A6-TOU, please provide the billing determinants at present rates and show the multiplication of these billing determinants times present rates and the revenues produced by those rates; the same information for the proposed 2016 rates and billing determinants, and the same information for the proposed 2017 and 2018 rates and billing determinants. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-8. Please provide a copy of all workpapers and supporting documents for the Chapter 6 direct testimony and attachments of William Saxe. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

Please see the response to Question 2, which is incorporated herein by reference.

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- 1-9. For all of the attachments to Chapter 6, please provide schedules that separately show information for AL-TOU, A6-TOU and other customers in the M/L C&I classes. Others may be shown as a group or on a more granular basis. Please subdivide AL-TOU and A6-TOU to show each voltage level separately. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-10. In Attachments B.1, B.2 and B.3 to Chapter 6, for AL-TOU customers by voltage level and A6-TOU customers by voltage level, please show the data for direct access customers and the data for bundled service customers separately. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-11. Please provide a copy of all workpapers and supporting documents for the Chapter 7 direct testimony and attachments of Jeffrey Shaughnessy. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

Please see the response to Question 2.

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- 1-12. For all attachments to Chapter 7, please provide the information separately for AL-TOU customers, by voltage level, and A6-TOU customers, by voltage level. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-13. Please further subdivide the information provided in response to the preceding question (FEA 1-12) to show separately, for each rate schedule and voltage level, the information for bundled service customers and for direct access customers. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-14. If not provided in response to other data requests, please provide the supporting workpapers, including spreadsheets in native format with all formulas intact, for the calculation of all marginal costs, revenue allocations, and rate designs.

SDG&E Response:

Please see the response to Question 2.

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- 1-15. If not provided in response to other data requests, please provide the consolidated rate model wherein the specific charges for each rate schedule and voltage level as proposed in this case are developed and applied to calculate revenues, by rate component, by rate schedule. Please provide executable versions in native format with all formulas intact.

SDG&E Response:

Please see the response to Question 2.

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- 1-16. In current allocations, please provide a detailed description of how the demands, energy, revenues, number of customers, etc. of direct access customers are treated in the allocations of: CARE, ESAP, EPIC, CSI, SGIP, LGC, EE, CTC, DR and other non-marginal cost items.

SDG&E Response:

The current allocation methodologies for CARE, ESAP, EPIC, CSI, SGIP, LGC, EE, CTC, and DR treat direct access customers the same as bundled customers.

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- 1-17. In proposed allocations, please provide a detailed description of how the demands, energy, revenues, number of customers, etc. of direct access customers are treated in the allocations of: CARE, ESAP, EPIC, CSI, SGIP, LGC, EE, CTC, DR and other non-marginal cost items.

SDG&E Response:

The proposed allocation methodology for the CARE, ESAP, EPIC, LGC, EE, and CTC components is the same as the current methodology, and thus the proposed allocations treat direct access customers the same way that the current allocations do. Updates were not proposed for CSI, SGIP, and DR allocations.

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- 1-18. If not provided in response to other requests, please provide detailed workpapers, including supporting information and models in native format with all formulas intact, supporting the column entitled “Cost-Based MSF (\$/Month)” in Table CS-17 on pages CS-24 and CS-25 of witness Swartz’s Direct Testimony.

SDG&E Response:

SDG&E objects to the data request to the extent it seeks the production of confidential information herein as calling for sensitive and confidential information that is protected under the trade secret privilege. Without waiving this objection, SDG&E provides the following responses subject to the terms of the Non-disclosure agreement that has been executed on behalf of the propounding party herein.

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- 1-19. In the Amended filing, the Attachments listed below, which were included with the initial filing, were omitted. Please provide comparable Attachments that would be applicable in the Amended filing.
- a. Please provide executable versions of all calculations in native format with all formulas intact for the bill impacts shown on Attachments CF-E-12, CF-E-13, CF-E-14, CF-E-15, CF-G-12, CF-G-13, CF-G-14 CF-G-15, CF-I-12, CF-I-13, CF-I-14, and CF-I-15.
 - b. Please provide typical bill impacts applicable to delivery service customers only, comparable to what are shown on Attachments CF-E-12, CF-E-13, CF-E-14, CF-E-15, CF-G-12, CF-G-13, CF-G-14 CF-G-15, CF-I-12, CF-I-13, CF-I-14, and CF-I-15 for bundled service customers. Please provide executable versions of all calculations in native format with all formulas intact.
 - c. Please provide typical bill impacts applicable to delivery service customers only, for Schedule A6-TOU comparable to what is shown on attachments CF-E-12, CF-E-13, CF-E-14, CF-E-15, CF-G-12, CF-G-13, CF-G-14 CF-G-15, CF-I-12, CF-I-13, CF-I-14, and CF-I-15 for AL-TOU bundled service customers. Please provide executable versions of all calculations in native format with all formulas intact.

SDG&E Response:

- a) Please see the attached files labeled “FEA 1-19 Attachment E – Illustrative ALTOU Bill Impacts for 2016.xlsx,” “FEA 1-19 Attachment G - Illustrative ALTOU Bill Impacts for 2017.xlsx,” and “FEA 1-19 Attachment I - Illustrative ALTOU Bill Impacts for 2018.xlsx.”

These files include a “Rate Input” tab that lists the rate components of schedule AL-TOU as well as three separate tabs for AL-TOU summer, winter, and annual bills under the proposed rates for 2016, 2017, and 2018 respectively.

- b) Please see the attached files labeled “FEA 1-19b Attachment E – Illustrative ALTOU Bill Impacts for 2016.xlsx,” “FEA 1-19b Attachment G - Illustrative ALTOU Bill Impacts for 2017.xlsx,” and “FEA 1-19b Attachment I - Illustrative ALTOU Bill Impacts for 2018.xlsx.”

These files include a “Rate Input” tab that lists the rate components of schedule AL-TOU as well as three separate tabs for AL-TOU summer, winter, and annual bills under the proposed rates for 2016, 2017, and 2018 respectively. These bills are applicable to delivery service customers only.

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Response to Question 1-19 Continued:

- c) Please see the attached files labeled “FEA 1-19c Attachment E – Illustrative ALTOU Bill Impacts for 2016.xlsx,” “FEA 1-19c Attachment G - Illustrative ALTOU Bill Impacts for 2017.xlsx,” and “FEA 1-19c Attachment I - Illustrative ALTOU Bill Impacts for 2018.xlsx.”

These files include a “Rate Input” tab that lists the rate components of schedule AL-TOU as well as three separate tabs for AL-TOU summer, winter, and annual bills under the proposed rates for 2016, 2017, and 2018 respectively. These bills are applicable to delivery service customers only.