

**ORA DATA REQUEST**  
**ORA-SDG&E-DR-11**  
**SDG&E SECOND AMENDED GRC Phase 2 APPLICATION – A.15-04-012**  
**SDG&E RESPONSE**  
**DATE RECEIVED: MARCH 30, 2016**  
**DATE RESPONDED: APRIL 14, 2016**

1. Please demonstrate how residential customers who have distributed energy resources such as solar panels or smart cars can conduct analysis such as a rate comparison to select their best rate. Whatever format would be least burdensome for SDG&E such as a user guide, sandbox login information, or Webex-like demo would be acceptable to ORA.

**SDG&E Response:**

SDG&E currently provides an on-line rate comparison tool through its MyAccount system (Whenergy). This on-line tool is available for SDG&E customers, including residential customers who have installed solar or have purchased an electric vehicle. The rate comparison tool allows customers the ability to compare monthly and annual energy costs under their existing rate versus any applicable rate options.

Residential customers thinking about purchasing an electric vehicle can also request a specialized rate comparison / bill impact analysis through SDG&E's MyAccount. SDG&E's "Green Button" functionality allows customers the ability to send their data to a third party vendor (PEV4ME), who can provide a projected energy analysis and rate comparison for the customer.

SDG&E can provide a WebEx demonstration for the ORA team to show the existing functionality of both of these tools.

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2. On pages CS-41 to CS-42, SDG&E states “substantial on-going costs are incurred with these rates remaining open. Specifically, there are incremental costs associated with customizing the IT billing system to accommodate these rates.” Please provide cost data associated with supporting this statement. If such data is not available, please provide an estimate of the annual costs associated with maintaining these legacy rate schedules, as well as the incremental costs associated with customizing the IT billing system to accommodate new rates.

**SDG&E Response:**

For the four legacy rate schedules that SDG&E proposes to eliminate in Chapter 2 (Swartz), on-going IT maintenance costs can be broken up into five categories:

- 1) **Regulatory Implementation** - IT coding and system testing to ensure rates are being calculated and applied correctly when there are billing system upgrades or changes (regression testing) due to a Regulatory implementation (e.g. GRC Phase 2, Rate Design Window, Smart Pricing Program, etc.).
- 2) **Rate Entry** - Manual rate entry of charges and codes into SDG&E’s billing system when there is an approved rate change. This includes updates to SDG&E’s bill impact calculator system.
- 3) **Bill Verification** - Monthly sample bill calculation verification and review related to these rates to ensure overall accuracy.
- 4) **Customer Eligibility** - Maintenance of IT coding to ensure new customers cannot elect these closed rate schedules. This includes system edits and validations that identify any changes to customers’ accounts on these rates that would impact eligibility.
- 5) **On-Line System Maintenance** – Includes changes to customer facing systems and testing to ensure that the presentments of bill calculations (e.g. rate comparisons, bill-to-date and bill forecasting, etc.) in SDG&E’s MyAccount system are accurate. This includes any payments made to SDG&E’s on-line tool vendors.

The table below captures the estimated annual costs that SDG&E incurred in 2015 for the four legacy rate schedules. These costs were determined based upon the time and labor to complete the functions over the course of the year. SDG&E notes that for 2015, most of the functions below involved changes to all rates and not just legacy rates. However, the figures below represent a portion of the total costs that are attributable to legacy rates.

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**Response to Question 2 (Continued)**

Legacy Rate Costs	(\$000s)
	2015
Regulatory Implementation	\$95
Rate Entry	\$54
Bill Verification	\$29
Customer Eligibility	\$34
On-Line System Maintenance	\$59
<b>Total</b>	<b>\$271</b>

Based upon recent implementations, SDG&E estimates that the one-time incremental costs associated with customizing the IT billing system to accommodate new rates can range from \$50k to \$200k depending upon the rate design and complexity. If a new rate is designed so that it is similar to an existing rate design, then existing components and calculations can be leveraged to keep the implementation costs on the lower end of the range. This is similar with the on-going maintenance costs. The more outdated a rate is, such as with SDG&E's four legacy rate schedules, the more expensive it is to maintain.