

**ORA DATA REQUEST**  
**ORA-SDG&E-DR-013**  
**SDG&E SECOND AMENDED GRC Phase 2 APPLICATION – A.15-04-012**  
**SDG&E RESPONSE**  
**DATE RECEIVED: APRIL 18, 2016**  
**DATE RESPONDED: MAY 2, 2016**

1. Please provide the basis for the 75% Adjustment Factor (also called Winter Upper Tier Adjustment) used in the “Total Proposed Rate - Year X” tabs of SDG&E’s Consolidated Model.

**SDG&E Response:**

SDG&E makes no new rate design proposals related to residential tiered rates in its current GRC Phase 2 application (Prepared Direct Testimony of Christopher Swartz, page CS-5, lines 9-12). Specifically, the application includes no proposed changes to the current basis for the seasonal differential.

In SDG&E’s 2012 GRC Phase 2 application (A,11-10-002), SDG&E proposed to mitigate seasonal bill impacts between summer and winter by setting the non-TOU total residential rate differential to be 75% of the cost-based differential in the commodity rates. This was proposed in the Second Revised Prepared Direct Testimony of Cynthia Fang, dated March 30, 2012. Page CF-19 Lines 10-12 states “For SDG&E’s current non-TOU residential tiered rates, SDG&E proposes to set the Summer/Winter total rate differential at 75% of commodity rate differential to mitigate seasonal bill impacts.”

The 75% differential was approved in the 2012 GRC Phase 2 decision (D.14-01-002). Page 37 of the Decision provides a list of uncontested proposals in SDG&E’s 2012 GRC Phase 2 Application, including “Setting the Summer/Winter total rate differential at 75% of commodity rate differential for residential tiered rate schedules.” and then states “These proposals, as well as any other uncontested proposals in SDG&E’s Application and supporting testimony, are reasonable and should be approved.”