**ORA DATA REQUEST**

**A.15-04-012: San Diego Gas & Electric Company (SDG&E)**

**SDG&E TY2016 General Rate Case Phase 2 Amended Application**

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| Date: 1/28/2016 |  |
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**Re: Data Request No.** **ORA-A.15-04-012 Amended-SDGE-009**

**Responses Due: 2/11/2016**

**Instructions**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the ORA contact(s) above with a copy to the ORA attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify ORA as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous.  Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

**Data Requests**

RE: This is a follow-up of ORA Data Request (DR) 005. It refers to SDG&E responses to that DR as well as the original investigative area: Chapter 6 Distribution MC WP.

Tab: Marginal Demand Cost Calculation

Column D, Weather Normalized Annual Peak Loads

From Column D, Ch. 6 WP and the CEC data provided by SDG&E in Response to DR 005:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| YEAR | Col D | % Diff LOADS | CEC Actuals | CEC W Normalized | Annual % Increase | Diff = CEC –SDG&E |
| 2011 | 4,251 |  | 4,371 | 4,359 |  | 108 |
| 2012 | 4,320 | 1.62% | 4,600 | 4,442 | 1.90% | 122 |
| 2013 | 4,413 | 2.16% | 4,604 | 4,541 | 2.23% | 128 |
| 2014 | 4,615 | 4.58% | 4,890 | 4,501 | -0.88% | -114 |
| 2015 | 4,654 | 0.84% | 4,711 | N/A |  |  |
| 2016 | 4,649 | -0.10% | N/A | N/A |  |  |

Note: Forecasted years are shown in yellow highlight. The CEC forecast starts one year earlier than the SDG&E forecast.

1. In response to ORA DR 005 Q. 1a. SDG&E stated that the weather normalized load forecast was “developed” from a California Energy Commission (CEC) weather normalized forecast. In response to ORA DR 005 Q. 1b, SDG&E provided a portion of the CEC load forecast. ORA has put the SDG&E and CEC forecasts side-by-side in the above table and added some calculated differences and annual growth rates. For the historical period 2011 to 2013, the CEC load estimates run systematically higher than what SDG&E filed for this proceeding (ranging from 108 to 128 MW more). In SDG&E's DR 005 1b, the table note on CEC loads states that the CEC loads include transmission and line losses. Do these types of loads factor into this systematic difference between CEC and SDG&E loads?? Delineate and explain all possible substantive differences between the CEC and SDG&E estimates.
2. Does SDG&E believe the historical differences in weather normalized loads (2011 to 2013) have a substantial systematic component? If yes, why not subtract out this difference and apply the CEC 2014 growth rate (-0.88%) to estimate the SDG&E forecast year of 2014?
3. If the SDG&E forecast is developed from the CED forecast, why are the 2014 results so divergent (-0.88% for CEC, 4.58% for SDG&E)? Explain why SDG&E predicts strong load growth while the CEC predicts load decline for 2014.
4. On this issue of the high load growth in the SDG&E forecast for 2014, on the initial DR 005 Response to Q 2 concludes, “This growth rate was due to lower than expected net peak demand in 2013versus the original CEC forecast for 2013.” If net peak demand was ultimately lower than expected, why then did SDG&E not respond by adjusting downward the ensuing forecast estimates? Did SDG&E make a conscious decision that these 2013 results were an independent aberration?
5. The cited CEC load forecast makes no projection at all for 2016. Explain how SDG&E can develop a projection from the CEC forecast where the CEC makes none.
6. For the year 2015, the CEC provides a raw, unadjusted load forecast, but not one that is weather normalized. Is this forecast, as well as the SDG&E forecasts, based on an expectation of average weather? If so, would this make the process of weather normalization moot (i.e., the raw forecast and normalized forecast being the same)? If not, explain.
7. In Q 1b of the original DR 005 ORA asks for SDG&E’s un-weather normalized load data. SDG&E refers to the CEC study and does not supply these. As detailed in the above table, the weather normalized data for SDG&E and the CEC do not match. This would imply that the raw un-normalized data would not match either – and that SDG&E surely has its raw annual peak loads on file and could easily provide them. Did SDG&E estimate its weather normalized peak loads directly from the CEC data, without reference to its own raw peak loads?

**END OF REQUEST**