

DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
NAVAL FACILITIES ENGINEERING COMMAND SOUTHWEST
1 AVENUE OF THE PALMS, SUITE 161
SAN FRANCISCO, CA 94130

January 8, 2016

BY E-MAIL

Thomas R. Brill, Esq.
San Diego Gas and Electric Company
101 Ash Street, HQ-12
San Diego, CA 92101

Re: Application of San Diego Gas & Electric Company (U902E) for Authority to Update Marginal Costs, Cost Allocation and Electric Rate Design; Application No. 15-04-012; Federal Executive Agencies (FEA's) First Set of Data Requests

Dear Mr. Brill:

FEA hereby requests that the materials identified in the enclosed Set of Data Requests be provided to our consultant, Maurice Brubaker.

The responses to this data request may be forwarded electronically to our consultant at mbrubaker@consultbai.com. Please also send copies to Larry Allen at larry.r.allen@navy.mil, Kay Davoodi at khojasteh.davoodi@navy.mil, and me at rita.liotta@navy.mil. To the extent the responses cannot be sent by e-mail, they may be sent by overnight delivery service to us at the following addresses as the responses become available:

Maurice Brubaker
Brubaker & Associates, Inc.
Mailing Address:
PO Box 412000
St. Louis, MO 63141-2000
(636) 898-6725, Ext. 130

Physical Street Address
16690 Swingley Ridge Road, Suite 140
Chesterfield, MO 63017

Larry Allen
Utility Rates and Studies Office
1322 Patterson Ave SE, Suite 1000
Washington Navy Yard, DC 20374-5065
(202) 685-3320

Rita Liotta
Federal Executive Agencies

1 Avenue of the Palms, Suite 161
San Francisco, CA 94130
(415) 743-4702

We request that your responses to this first set of data requests be delivered to Mr. Brubaker's office, if possible, no later than 10 business days from your receipt of this letter. Please inform me as soon as possible if this deadline cannot be met.

If you have any questions regarding this request, I can be reached at (415) 743-4702. Thank you.

Yours truly,

/s/ RITA M. LIOTTA

RITA M. LIOTTA
Associate Counsel

electronic copy to:
JYork@semprautilities.com
LOrtiz@semprautilities.com

**San Diego Gas & Electric Company
Application No. 15-04-012**

**Federal Executive Agencies' First Set of Data Requests to
San Diego Gas & Electric Company with Regard to the December 1, 2015 Filing**

<u>Item No.</u>	<u>Description</u>
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.
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.
1-3.	Referring to Appendix B to SDG&E's application, please provide the following information: <ul style="list-style-type: none">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.
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: <ul style="list-style-type: none">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; andc. Customers currently in the Agricultural class who will remain in the Agricultural class.

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<u>Item No.</u>	<u>Description</u>
1-5.	<p>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:</p> <p>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.</p>
1-6.	<p>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.</p>
1-7.	<p>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.</p>
1-8.	<p>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.</p>
1-9.	<p>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.</p>
1-10.	<p>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.</p>

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<u>Item No.</u>	<u>Description</u>
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.
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.
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.
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.
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.
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.
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.
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.

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<u>Item No.</u>	<u>Description</u>
1-19.	<p>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.</p> <ul style="list-style-type: none">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.

(END OF FIRST SET OF FEA DATA REQUESTS TO SDG&E)