

In the Matter of the Application of San Diego Gas & Electric Company (U 902 E) for Approval of its Proposals for Dynamic Pricing and Recovery of Incremental Expenditures Required for Implementation.

Application 10-07-009
(Filed July 6, 2010)

Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design

Application 19-03-002
(Filed March 4, 2019)

Application: 10-07-009/A.19-03-002

Exhibit No.: _____

CHAPTER 7

REVISED PREPARED DIRECT TESTIMONY

OF WILLIAM G. SAXE

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

JANUARY 15, 2020



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**REVISED PREPARED DIRECT TESTIMONY OF
WILLIAM G. SAXE
(CHAPTER 7)**

I. PURPOSE AND OVERVIEW

The purpose of my revised prepared direct testimony is to provide San Diego Gas and Electric Company’s (“SDG&E”) updated cost study and proposed rates for street lighting. Specifically, my testimony describes the updated cost study for street lighting used to develop street lighting distribution rates, as presented in the Lighting Model, that reflect:

- Updated street lighting determinants;
- Updated street lighting facilities and maintenance costs;
- Updated adjustment factors such as escalation factors;
- Updated marginal distribution costs and revenue allocations as presented in the direct testimony workpapers of SDG&E witness William G. Saxe (Chapter 5);
- Authorized distribution revenue requirement.¹

In addition, the proposed street lighting rates presented in the Street Lighting Model reflect the proposed non-distribution street lighting rates presented in the direct testimony workpapers of SDG&E witness Gwendolyn R. Morien (Chapter 3). As required by the November 1, 2019 “Administrative Law Judge’s Ruling Directing San Diego Gas & Electric Company to File/Serve Supplemental Information,” the non-distribution street lighting rates and authorized distribution revenue requirement used to develop the illustrative proposed street lighting rates in this proceeding reflect the authorized revenue requirements adopted in SDG&E’s 2019 General Rate Case (“GRC”) Phase 1 decision, Decision (“D.”) 19-09-051.

¹ Authorized distribution revenues being recovered in currently authorized rates effective January 1, 2020 per SDG&E Advice Letter (“AL”) 3487-E.

1 My testimony is organized as follows:

- 2 • **Section II — Background:** Describes the street lighting rate schedules and the
3 variation between rates within each schedule, and the street lighting rate
4 components including the composition of distribution rates;
- 5 • **Section III — Street Lighting Cost Study:** Describes the updated cost study for
6 street lighting, which provides the basis for street lighting distribution charges per
7 lamp;
- 8 • **Section IV — Street Lighting Model:** Describes three updates to the Lighting
9 Model, specifically (a) updates to the calculation of series street lighting
10 transformer costs; (b) updates to the Schedule OL-2 commodity rates; and (c)
11 updates to identify separate rate calculations for street lights in the new school
12 customer class;
- 13 • **Section V — Summary and Conclusion;** and
- 14 • **Section VI — Statement of Qualifications.**

15 My testimony also contains the following attachments:

- 16 • **Attachment A** — Comparison of Present and Illustrative Proposed Street
17 Lighting Distribution Rates;
- 18 • **Attachment B** — Comparison of Present and Illustrative Proposed Street
19 Lighting Utility Distribution Company (“UDC”) Rates; and
- 20 • **Attachment C** — Comparison of Present and Illustrative Proposed Street
21 Lighting Total Rates.

1 **II. BACKGROUND**

2 **A. Street Lighting Rate Schedules**

3 Street lighting consists of six different rate schedules, each offering a distinctly different
4 set of services. A summary of these schedules is provided below:

- 5 • Schedule LS-1 — Utility-Owned Street and Highway Street Light Installations:
6 A schedule that provides utility-owned unmetered street lighting services on
7 public and private streets;
- 8 • Schedule LS-2 — Customer-Owned Street and Highway Street Light
9 Installations: A schedule that provides customer-owned unmetered street lighting
10 services on highways and other thoroughfares accessible to the public;
- 11 • Schedule LS-3 — Customer-Owned Street and Highway Street Light
12 Installations, Metered: A schedule that provides customer-owned metered street
13 lighting service and is closed to new customers;
- 14 • Schedule OL-1 — Outdoor Area Lighting Service: A schedule that provides
15 utility-owned unmetered outdoor lighting of areas where street and highway
16 lighting services are not applicable;
- 17 • Schedule OL-2 — Customer-Owned Installations of Outdoor Area Lighting
18 Service, Metered: A schedule that provides customer-owned metered lighting for
19 sports and recreation areas; and
- 20 • Schedule DWL — Residential Walkway Lighting: A schedule that provides
21 utility-owned unmetered lighting along residential walkways for home-owners
22 associations and other residential projects.

1 **B. Street Lighting Rate Variation**

2 Street lighting rate schedules LS-1, LS-2, OL-1 and DWL include rates for unmetered
3 lights. The lighting rates presented in these tariffs are on a per-lamp basis per month and vary
4 depending on lamp type (*i.e.*, high pressure sodium vapor, low pressure sodium vapor, metal
5 halide, incandescent, induction, and Light Emitting Diode (“LED”)), lamp and ballast wattage,
6 and service level (which includes the ownership of the street light and service options).

7 Street lighting rates for SDG&E-owned lights on rate schedule LS-1 are dependent on the
8 installation service selected. Schedule LS-1 has three installation service options:

- 9 • Class A — Applicable to conventional street lighting equipment mounted on
10 poles in standard positions and supplied from overhead lines;
- 11 • Class B — Applicable to street lighting service where the customer pays the
12 utility, in advance, for the difference between 1) estimated cost for the utility to
13 install a concrete pole street lighting system, and 2) the cost for the utility to
14 install the wood pole overhead system that would have been installed otherwise;
15 and
- 16 • Class C — Applicable to street lighting service where the customer pays the
17 utility, in advance, for the difference between 1) the estimated cost to the utility of
18 the concrete pole street light system, and 2) the fixed investment of a concrete
19 pole street light system, as determined by the utility. Pursuant to Decision (“D.”)
20 17-08-030, LS-1 Class C was closed to new installations on July 1, 2018, per
21 SDG&E AL 3226-E-A.

22 Street lighting rates for customer-owned lights on rate schedule LS-2 are dependent on
23 the maintenance service selected. Schedule LS-2 has two maintenance service options:

- 24 • Rate A — Utility service that does not include maintenance service; and

- Rate B — Utility service with limited maintenance service.

Lighting rate schedules LS-3 and OL-2 include rates for customer-owned metered lights which are charged based on kilowatt-hour consumption. Lights on rate schedule LS-3 are subject to a monthly minimum charge while lights on rate schedule OL-2 are subject to a monthly basic service fee.

C. Street Lighting Rate Components

SDG&E's street lighting rates consist of nine different rate components including transmission, distribution, public purpose programs ("PPP"), nuclear decommissioning ("ND"), ongoing competition transition charge ("CTC"), local generation charge ("LGC"), reliability services ("RS"), Department of Water Resources Bond Charge ("DWR-BC"), and the electric energy commodity charge ("EECC"). With the exception of distribution, the monthly per lamp rate for each rate component is based on a kilowatt-hour per lamp usage assuming dusk to dawn operational hours of 4,165 hours per year. The assumption of dusk to dawn operations benefits street lighting customers because they receive lower cost allocations (since they are operating less during peak hours) resulting in lower rates. In addition, because street lighting is primarily unmetered, street lighting customers are not charged metering costs associated with customer costs, which results in lower rates.

The distribution rate cost components for street lighting includes facilities costs, maintenance costs, marginal distribution demand, and customer costs. Facilities and maintenance costs are directly assigned to street lighting and, therefore, are excluded from the marginal distribution costs and revenue allocations presented in the direct testimony of SDG&E witness Saxe (Chapter 5). The distribution street lighting cost study including facilities and maintenance costs is described below.

1 **III. STREET LIGHTING COST STUDY**

2 The proposed street lighting distribution rates reflected in my testimony are based on the
3 updated street lighting cost study used in the development of the proposed street lighting
4 distribution rates. The updated cost study includes updated street lighting determinants, updated
5 street lighting facilities and maintenance costs, updated adjustment factors such as escalation
6 factors, updated street lighting marginal distribution customer and demand marginal costs,
7 revenue allocations as addressed in the direct testimony of SDG&E witness Saxe (Chapter 5),
8 and the currently authorized distribution revenue requirement.

9 Facilities costs reflect costs specific to street lighting that are included in the development
10 of distribution rates. Facilities costs are collected in rates for SDG&E-owned street light
11 installations. For rate schedule LS-1 Class A service, facilities costs include the cost for a
12 standard street light assembly, which includes materials, labor and transportation. For LS-1
13 Class B and Class C, facilities costs include an average of the costs for a variety of underground
14 and ornamental assemblies, and factors in Contributions in Aid of Construction (“CIAC”) made
15 by customers.

16 Maintenance costs are collected in rates for SDG&E-owned street light installations and
17 for customer-owned street light installations where customers have opted to receive limited
18 maintenance service. Maintenance service includes costs for renewal of lamps, replacement of
19 glassware and luminaire equipment, and cleaning of glassware at the time of lamp replacement.

20 The customer, demand, facilities and maintenance costs are escalated into 2020 dollars
21 based on the escalation factors consistent with SDG&E’s Test Year (“TY”) 2019 GRC Phase 1.²

² Application (“A.”) 17-10-007, SDG&E Direct Testimony of Scott R. Wilder (Cost Escalation) (October 6, 2017), Ex. SDG&E-39/Wilder.

1 ³ Facilities and maintenance costs are directly assigned to street lighting whereas customer and
2 demand costs are scaled by a multiplier in the Lighting Model to ensure recovery of the street
3 lighting authorized distribution revenue requirement. Illustrative street lighting rates reflecting
4 the updated costs are presented in Attachments A, B, and C, attached herein.

5 **IV. UPDATES TO LIGHTING MODEL**

6 The Lighting Model presents the proposed street lighting rates in this proceeding. The
7 distribution rates are developed in this model whereas the non-distribution rates (transmission,
8 PPP, ND, CTC, LGC, RS, DWR-BC, and EECC) are developed in the Consolidated Model for
9 street lighting customers, as presented in the direct testimony of SDG&E witness Morien
10 (Chapter 3), with the proposed rates by lighting type then presented in the Lighting Model. The
11 development of the distribution rates reflects changes to the street lighting determinants, costs
12 and adjustment factors from the lighting cost study. The Lighting Model also reflects the three
13 updates described below.

14 **A. Update to Series Street Lighting Transformer Costs**

15 SDG&E is proposing to revise the calculation of series street lighting costs to correctly
16 account for the cost of equipment needed to serve series lighting. The differences between the
17 costs for series lighting and non-series lighting pertains to the type of transformer which is
18 specifically required for series street lighting. Instead of utilizing a standard 25 kilovolt amps
19 (“KVA”) transformer, series lighting requires a Regulated-Output (“RO”) Station transformer.
20 The RO Station transformer is also called a constant-current transformer and its function is to
21 adjust voltage to maintain a constant current for the series street lights. This type of transformer

³ Costs are escalated into 2020 dollars because SDG&E is proposing that the rates to recover updated 2019 GRC Phase 2 costs be implemented in 2020, as stated in the direct testimony of SDG&E witness Stein (Chapter 1).

1 has a significantly greater cost than the cost for a standard 25 KVA transformer used for non-
2 series street lighting.

3 In the current Lighting Model, the transformer costs for series street lighting were based
4 on the incremental RO transformer capital and operations and maintenance (“O&M”) costs that
5 occurred during the previous GRC period annualized into a per lamp cost. This approach
6 underestimated the series street lighting transformer costs because it only used a sample of RO
7 capital and O&M transformer costs over a set time period instead of correctly calculating the
8 marginal capital costs of RO transformers. In addition, the current calculation incorrectly
9 annualized the costs twice, which resulted in costs that were exceptionally low.

10 Consistent with marginal cost calculations for standard 25 KVA transformers used to
11 serve non-series street lights, the marginal cost of RO transformers should reflect the current cost
12 of these transformers. SDG&E is proposing to base RO transformer costs on the average price
13 of RO transformers purchased by SDG&E in 2017. This cost is converted to a per lamp cost by
14 dividing the cost of the RO transformers by the cost of the standard 25 KVA transformers and
15 then multiplying this factor by the per lamp standard KVA transformer cost to calculate a
16 proposed RO transformer cost per lamp.

17 **B. Update to Schedule OL-2 Commodity Rate**

18 SDG&E proposes changes to the commodity rate for Schedule OL-2. In SDG&E’s 2009
19 Rate Design Window (“RDW”) proceeding (A.08-11-014), SDG&E proposed and the California
20 Public Utilities Commission (“CPUC”) adopted through settlement in D.09-09-036 Schedule
21 OL-2, a cost-based outdoor lighting tariff for customer-owned facilities, controlled for dusk to
22 dawn operations and used to light sports and recreational areas, including their safety and
23 security lighting. The commodity rate for Schedule OL-2 was designed to reflect the average
24 rate associated with providing service to these customer-owned facilities based on the estimated

1 load shape of these customers. The average commodity rate was based on the marginal energy
2 and capacity costs for SDG&E's medium/large commercial & industrial ("M/L C&I") customer
3 class during summer semi-peak and winter on-peak periods, which captured the evening hours
4 when Schedule OL-2 lighting was expected to occur during SDG&E's time-of-use ("TOU")
5 periods that existed at that time.

6 Pursuant to D.17-08-030 at 18-26, SDG&E's standard TOU periods were changed to
7 reflect an on-peak period of 4 p.m. to 9 p.m. for both summer and winter months. The change in
8 SDG&E's TOU periods prevents the calculation of the commodity rate for Schedule OL-2 based
9 on the TOU periods used in the 2009 settlement that adopted Schedule OL-2. For this reason,
10 SDG&E proposes to use the commodity rate developed for other street lighting rate schedules
11 (Schedules LS-1, LS-2, LS-3, OL-1, and DWL) as the commodity rate also for Schedule OL-2.

12 **C. Update to Identify Separate School Street Lighting Rates**

13 As addressed in the direct testimony of SDG&E witness Morien (Chapter 3), SDG&E is
14 proposing a separate school customer class, which includes schools taking service on street
15 lighting rates. Schools currently take service on Schedule LS-1, LS-2, OL-1, and OL-2.
16 Because the marginal distribution, marginal commodity and CTC costs to serve school lighting
17 customers is different than the costs for non-school lighting customers, the Lighting Model has
18 been modified to identify separate rates developed for school accounts on lighting rate schedules.
19 The direct testimony workpapers of SDG&E witness Saxe (Chapter 5) presents the proposed
20 updated marginal distribution costs, including the distribution costs for school accounts on
21 lighting rates. The direct testimony workpapers of SDG&E witness Montoya (Chapter 6)
22 presents the proposed updated marginal commodity and CTC costs, including the commodity
23 and CTC costs for school accounts on lighting rates. The resulting total school lighting rates are
24 slightly higher than the total non-school lighting rates by approximately 1-2%. For this reason,

1 for simplicity purposes SDG&E does not propose to adopt separate lighting rates for schools in
2 this proceeding but instead proposes that the lighting rates developed for non-school accounts
3 also be applied for school accounts.

4 **V. SUMMARY AND CONCLUSION**

5 SDG&E recommends that the CPUC adopt the proposed street lighting rates in this filing
6 based on the Street Lighting Cost Study and Lighting Model addressed in my testimony. The
7 Street Lighting Cost Study incorporates changes to determinants, costs, and load factors used to
8 develop streetlighting distribution rates. The Lighting Model reflects updates to: (a) series street
9 lighting transformer costs; (b) Schedule OL-2 commodity rate; and (c) present separate lighting
10 rates for non-schools and schools.

11 This concludes my revised prepared direct testimony.

1 **VI. STATEMENT OF QUALIFICATIONS**

2 My name is William G. Saxe. My business address is 8330 Century Park Court, San
3 Diego, California 92123. I am employed as the Rates & Cost Studies Project Manager in the
4 Customer Pricing Department of SDG&E. I have worked for SDG&E since February 2001.
5 Prior to joining SDG&E, I was employed by Sempra Energy, the parent company of SDG&E,
6 from April 1999 through January 2001. In addition, I was employed by the Illinois Commerce
7 Commission (“ICC”) from September 1990 through April 1999.

8 I received a Bachelor of Science degree in Economics from the University of Wisconsin-
9 Madison in 1985. I received a Master of Business Administration degree, with a concentration
10 in Finance, from the University of Wisconsin-Madison in 1990.

11 I have previously testified before this CPUC on rate design, marginal cost and other
12 issues. In addition, I have previously submitted testimony before the Federal Energy Regulatory
13 Commission (“FERC”) and the ICC.

**SDG&E 2019 GRC Phase 2 Revised Prepared Direct Testimony
Revision Log – January 15, 2020**

Witness	Page	Line	Revision Detail
Saxe (Chapter 7)	Cover Page	NA	Changed caption and “Prepared Direct Testimony” to “Revised Prepared Direct Testimony”.
Saxe (Chapter 7)	Cover Page	NA	Changed “March 2019” to “January 15, 2020”.
Saxe (Chapter 7)	Page WGS- 1	Line 1	Changed “Prepared Direct Testimony” to “Revised Prepared Direct Testimony”.
Saxe (Chapter 7)	Page WGS-1	Line 5	Changed “my testimony” to “my revised prepared direct testimony”.
Saxe (Chapter 7)	Page WGS-1	Lines 17-22	Added the following paragraph to the page: “As required by the November 1, 2019 “Administrative Law Judge’s Ruling Directing San Diego Gas & Electric Company to File/Serve Supplemental Information”, the non-distribution street lighting rates and authorized distribution revenue requirement used to develop the illustrative proposed street lighting rates in this proceeding reflect the authorized revenue requirements adopted in SDG&E’s 2019 General Rate Case (“GRC”) Phase 1 decision, Decision (“D.”) 19-09-051”.
Saxe (Chapter 7)	WGS-1	Footnote 1	Changed “Advice Letter (“AL”) 3326-E” to “Advice Letter (“AL”) 3487-E”.

Saxe (Chapter 7)	WGS-6	Line 21	Change “2019 General Rate Case (“GRC”) Phase 1” to “2019 GRC Phase 1”.
Saxe (Chapter 7)	WGS-10	Line 11	Changed “prepared direct testimony” to “revised prepared direct testimony”.
Saxe (Chapter 7)	Attachment A	Comparison of Present and Illustrative Proposed Street Lighting Distribution Rates	Replaced entire attachment with revised present (1/1/20) and illustrative proposed street lighting distribution rates from the Chapter 7 revised workpapers (Street Lighting Model).
Saxe (Chapter 7)	Attachment B	Comparison of Present and Illustrative Proposed Street Lighting Utility Distribution Company (“UDC”) Rates	Replaced entire attachment with revised present (1/1/20) and illustrative proposed street lighting UDC rates from the Chapter 7 revised workpapers (Street Lighting Model).
Saxe (Chapter 7)	Attachment C	Comparison of Present and Illustrative Proposed Street Lighting Total Rates	Replaced entire attachment with revised present (1/1/20) and illustrative proposed street lighting total rates from the Chapter 7 revised workpapers (Street Lighting Model).

ATTACHMENT A

Comparison of Present and Illustrative Proposed Street Lighting Distribution Rates

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
1	LS-1, Mercury Vapor, Class A, Reactor Ballast					
2	175	7000	11.74	12.72	0.98	8.3%
3	LS-1, Mercury Vapor, Class A, Regulator Ballast					
4	175	7000	12.10	13.21	1.11	9.2%
5	400	20000	19.97	22.62	2.65	13.3%
6	LS-1, HPSV, Class A, Reactor Ballast					
7	70	5800	9.52	9.02	(0.50)	-5.3%
8	100	9500	10.39	10.09	(0.30)	-2.9%
9	150	16000	11.45	11.55	0.10	0.9%
10	LS-1, HPSV, Class A, Regulator Ballast					
11	200	22000	13.74	14.15	0.41	3.0%
12	250	30000	15.71	16.47	0.76	4.8%
13	400	50000	18.67	20.76	2.09	11.2%
14	LS-1, HPSV, Class B, 1-Lamp, Reactor Ballast					
15	70	5800	9.66	9.38	(0.28)	-2.9%
16	100	9500	10.59	10.51	(0.08)	-0.8%
17	150	16000	11.51	11.81	0.30	2.6%
18	LS-1, HPSV, Class B, 1-Lamp, Regulator Ballast					
19	200	22000	13.78	14.32	0.54	3.9%
20	250	30000	15.76	16.65	0.89	5.6%
21	400	50000	18.61	20.87	2.26	12.1%
22	LS-1, HPSV, Class B, 2-Lamp, Reactor Ballast					
23	70	5800	8.51	8.21	(0.30)	-3.5%
24	100	9500	9.41	9.28	(0.13)	-1.4%
25	150	16000	10.44	10.74	0.30	2.9%
26	LS-1, HPSV, Class B, 2-Lamp, Regulator Ballast					
27	200	22000	12.73	13.34	0.61	4.8%
28	250	30000	14.79	15.75	0.96	6.5%
29	400	50000	17.66	19.96	2.30	13.0%
30	LS-1, HPSV, Class C, 1-Lamp, Reactor Ballast					
31	70	5800	14.35	13.17	(1.18)	-8.2%
32	100	9500	15.10	14.18	(0.92)	-6.1%
33	150	16000	16.05	15.50	(0.55)	-3.4%
34	LS-1, HPSV, Class C, 1-Lamp, Regulator Ballast					
35	200	22000	19.33	18.89	(0.44)	-2.3%
36	250	30000	20.70	20.77	0.07	0.3%
37	400	50000	25.66	26.59	0.93	3.6%
38	LS-1, HPSV, Class C, 2-Lamp, Reactor Ballast					
39	70	5800	9.38	9.09	(0.29)	-3.1%
40	100	9500	10.07	10.35	0.28	2.8%
41	150	16000	11.42	11.60	0.18	1.6%
42	LS-1, HPSV, Class C, 2-Lamp, Regulator Ballast					
43	200	22000	13.10	13.60	0.50	3.8%
44	250	30000	15.74	16.58	0.84	5.3%
45	400	50000	18.10	20.30	2.20	12.2%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
46	LS-1, LPSV, Class A					
47	55	8000	13.62	12.01	(1.61)	-11.8%
48	90	13500	15.75	14.27	(1.48)	-9.4%
49	135	22500	17.43	16.63	(0.80)	-4.6%
50	180	33000	19.95	18.51	(1.44)	-7.2%
51	LS-1, LPSV, Class B, 1-Lamp					
52	55	8000	13.80	12.32	(1.48)	-10.7%
53	90	13500	15.92	14.57	(1.35)	-8.5%
54	135	22500	17.56	16.80	(0.76)	-4.3%
55	180	33000	20.08	18.67	(1.41)	-7.0%
56	LS-1, LPSV, Class B, 2-Lamp					
57	55	8000	13.15	11.69	(1.46)	-11.1%
58	90	13500	15.28	13.95	(1.33)	-8.7%
59	135	22500	17.16	16.51	(0.65)	-3.8%
60	180	33000	19.67	18.38	(1.29)	-6.6%
61	LS-1, LPSV, Class C, 1-Lamp					
62	55	8000	16.88	15.19	(1.69)	-10.0%
63	90	13500	18.33	17.01	(1.32)	-7.2%
64	135	22500	21.27	19.95	(1.32)	-6.2%
65	180	33000	22.35	21.14	(1.21)	-5.4%
66	LS-1, LPSV, Class C, 2-Lamp					
67	55	8000	13.26	11.72	(1.54)	-11.6%
68	90	13500	15.41	14.01	(1.40)	-9.1%
69	135	22500	17.49	16.80	(0.69)	-3.9%
70	180	33000	19.74	18.40	(1.34)	-6.8%
71	LS-1, Metal Halide, Class A					
72	100	8500	8.53	9.29	0.76	8.9%
73	175	12000	10.03	11.34	1.31	13.1%
74	250	18000	11.73	13.64	1.91	16.3%
75	400	32000	15.41	18.41	3.00	19.5%
76	LS-1, Metal Halide, Class B					
77	100	8500	8.98	9.95	0.97	10.8%
78	175	12000	10.48	12.01	1.53	14.6%
79	250	18000	12.19	14.31	2.12	17.4%
80	400	32000	15.86	19.08	3.22	20.3%
81	LS-1, Metal Halide, Class C					
82	100	8500	20.76	20.15	(0.61)	-2.9%
83	175	12000	22.26	22.21	(0.05)	-0.2%
84	250	18000	23.97	24.51	0.54	2.3%
85	400	32000	27.64	29.28	1.64	5.9%
86	LS-1 Pole in Non-Standard Position					
87	30-foot		8.26	5.86	(2.40)	-29.1%
88	35-foot		8.63	5.90	(2.73)	-31.6%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
89	LS-1, LED, Rate A, Energy, 1-Lamp					
90	2.5		10.47	10.72	0.25	2.4%
91	7.5		10.47	10.72	0.25	2.4%
92	12.5		10.47	10.72	0.25	2.4%
93	17.5		10.47	10.72	0.25	2.4%
94	22.5		10.47	10.72	0.25	2.4%
95	27.5		10.47	10.72	0.25	2.4%
96	32.5		10.47	10.72	0.25	2.4%
97	37.5		10.47	10.72	0.25	2.4%
98	42.5		10.47	10.72	0.25	2.4%
99	47.5		10.47	10.72	0.25	2.4%
100	52.5		10.47	10.72	0.25	2.4%
101	57.5		10.47	10.72	0.25	2.4%
102	62.5		10.47	10.72	0.25	2.4%
103	67.5		10.47	10.72	0.25	2.4%
104	72.5		10.47	10.72	0.25	2.4%
105	77.5		10.47	10.72	0.25	2.4%
106	82.5		10.47	10.72	0.25	2.4%
107	87.5		10.47	10.72	0.25	2.4%
108	92.5		10.47	10.72	0.25	2.4%
109	97.5		10.47	10.72	0.25	2.4%
110	102.5		10.47	10.72	0.25	2.4%
111	107.5		10.47	10.72	0.25	2.4%
112	112.5		10.47	10.72	0.25	2.4%
113	117.5		10.47	10.72	0.25	2.4%
114	122.5		10.47	10.72	0.25	2.4%
115	127.5		10.47	10.72	0.25	2.4%
116	132.5		10.47	10.72	0.25	2.4%
117	137.5		10.47	10.72	0.25	2.4%
118	142.5		10.47	10.72	0.25	2.4%
119	147.5		10.47	10.72	0.25	2.4%
120	152.5		10.47	10.72	0.25	2.4%
121	157.5		10.47	10.72	0.25	2.4%
122	162.5		10.47	10.72	0.25	2.4%
123	167.5		10.47	10.72	0.25	2.4%
124	172.5		10.47	10.72	0.25	2.4%
125	177.5		10.47	10.72	0.25	2.4%
126	182.5		10.47	10.72	0.25	2.4%
127	187.5		10.47	10.72	0.25	2.4%
128	192.5		10.47	10.72	0.25	2.4%
129	197.5		10.47	10.72	0.25	2.4%
130	202.5		10.47	10.72	0.25	2.4%
131	207.5		10.47	10.72	0.25	2.4%
132	212.5		10.47	10.72	0.25	2.4%
133	217.5		10.47	10.72	0.25	2.4%
134	222.5		10.47	10.72	0.25	2.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	PROPOSED 2021 DISTRIBUTION RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
135	227.5		10.47	10.72	0.25	2.4%
136	232.5		10.47	10.72	0.25	2.4%
137	237.5		10.47	10.72	0.25	2.4%
138	242.5		10.47	10.72	0.25	2.4%
139	247.5		10.47	10.72	0.25	2.4%
140	252.5		10.47	10.72	0.25	2.4%
141	257.5		10.47	10.72	0.25	2.4%
142	262.5		10.47	10.72	0.25	2.4%
143	267.5		10.47	10.72	0.25	2.4%
144	272.5		10.47	10.72	0.25	2.4%
145	277.5		10.47	10.72	0.25	2.4%
146	282.5		10.47	10.72	0.25	2.4%
147	287.5		10.47	10.72	0.25	2.4%
148	292.5		10.47	10.72	0.25	2.4%
149	297.5		10.47	10.72	0.25	2.4%
150	302.5		10.47	10.72	0.25	2.4%
151	307.5		10.47	10.72	0.25	2.4%
152	312.5		10.47	10.72	0.25	2.4%
153	317.5		10.47	10.72	0.25	2.4%
154	322.5		10.47	10.72	0.25	2.4%
155	327.5		10.47	10.72	0.25	2.4%
156	332.5		10.47	10.72	0.25	2.4%
157	337.5		10.47	10.72	0.25	2.4%
158	342.5		10.47	10.72	0.25	2.4%
159	347.5		10.47	10.72	0.25	2.4%
160	352.5		10.47	10.72	0.25	2.4%
161	357.5		10.47	10.72	0.25	2.4%
162	362.5		10.47	10.72	0.25	2.4%
163	367.5		10.47	10.72	0.25	2.4%
164	372.5		10.47	10.72	0.25	2.4%
165	377.5		10.47	10.72	0.25	2.4%
166	382.5		10.47	10.72	0.25	2.4%
167	387.5		10.47	10.72	0.25	2.4%
168	392.5		10.47	10.72	0.25	2.4%
169	397.5		10.47	10.72	0.25	2.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
170	LS-1, LED, Rate B, Energy, 1-Lamp					
171	2.5		10.47	10.72	0.25	2.4%
172	7.5		10.47	10.72	0.25	2.4%
173	12.5		10.47	10.72	0.25	2.4%
174	17.5		10.47	10.72	0.25	2.4%
175	22.5		10.47	10.72	0.25	2.4%
176	27.5		10.47	10.72	0.25	2.4%
177	32.5		10.47	10.72	0.25	2.4%
178	37.5		10.47	10.72	0.25	2.4%
179	42.5		10.47	10.72	0.25	2.4%
180	47.5		10.47	10.72	0.25	2.4%
181	52.5		10.47	10.72	0.25	2.4%
182	57.5		10.47	10.72	0.25	2.4%
183	62.5		10.47	10.72	0.25	2.4%
184	67.5		10.47	10.72	0.25	2.4%
185	72.5		10.47	10.72	0.25	2.4%
186	77.5		10.47	10.72	0.25	2.4%
187	82.5		10.47	10.72	0.25	2.4%
188	87.5		10.47	10.72	0.25	2.4%
189	92.5		10.47	10.72	0.25	2.4%
190	97.5		10.47	10.72	0.25	2.4%
191	102.5		10.47	10.72	0.25	2.4%
192	107.5		10.47	10.72	0.25	2.4%
193	112.5		10.47	10.72	0.25	2.4%
194	117.5		10.47	10.72	0.25	2.4%
195	122.5		10.47	10.72	0.25	2.4%
196	127.5		10.47	10.72	0.25	2.4%
197	132.5		10.47	10.72	0.25	2.4%
198	137.5		10.47	10.72	0.25	2.4%
199	142.5		10.47	10.72	0.25	2.4%
200	147.5		10.47	10.72	0.25	2.4%
201	152.5		10.47	10.72	0.25	2.4%
202	157.5		10.47	10.72	0.25	2.4%
203	162.5		10.47	10.72	0.25	2.4%
204	167.5		10.47	10.72	0.25	2.4%
205	172.5		10.47	10.72	0.25	2.4%
206	177.5		10.47	10.72	0.25	2.4%
207	182.5		10.47	10.72	0.25	2.4%
208	187.5		10.47	10.72	0.25	2.4%
209	192.5		10.47	10.72	0.25	2.4%
210	197.5		10.47	10.72	0.25	2.4%
211	202.5		10.47	10.72	0.25	2.4%
212	207.5		10.47	10.72	0.25	2.4%
213	212.5		10.47	10.72	0.25	2.4%
214	217.5		10.47	10.72	0.25	2.4%
215	222.5		10.47	10.72	0.25	2.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
216	227.5		10.47	10.72	0.25	2.4%
217	232.5		10.47	10.72	0.25	2.4%
218	237.5		10.47	10.72	0.25	2.4%
219	242.5		10.47	10.72	0.25	2.4%
220	247.5		10.47	10.72	0.25	2.4%
221	252.5		10.47	10.72	0.25	2.4%
222	257.5		10.47	10.72	0.25	2.4%
223	262.5		10.47	10.72	0.25	2.4%
224	267.5		10.47	10.72	0.25	2.4%
225	272.5		10.47	10.72	0.25	2.4%
226	277.5		10.47	10.72	0.25	2.4%
227	282.5		10.47	10.72	0.25	2.4%
228	287.5		10.47	10.72	0.25	2.4%
229	292.5		10.47	10.72	0.25	2.4%
230	297.5		10.47	10.72	0.25	2.4%
231	302.5		10.47	10.72	0.25	2.4%
232	307.5		10.47	10.72	0.25	2.4%
233	312.5		10.47	10.72	0.25	2.4%
234	317.5		10.47	10.72	0.25	2.4%
235	322.5		10.47	10.72	0.25	2.4%
236	327.5		10.47	10.72	0.25	2.4%
237	332.5		10.47	10.72	0.25	2.4%
238	337.5		10.47	10.72	0.25	2.4%
239	342.5		10.47	10.72	0.25	2.4%
240	347.5		10.47	10.72	0.25	2.4%
241	352.5		10.47	10.72	0.25	2.4%
242	357.5		10.47	10.72	0.25	2.4%
243	362.5		10.47	10.72	0.25	2.4%
244	367.5		10.47	10.72	0.25	2.4%
245	372.5		10.47	10.72	0.25	2.4%
246	377.5		10.47	10.72	0.25	2.4%
247	382.5		10.47	10.72	0.25	2.4%
248	387.5		10.47	10.72	0.25	2.4%
249	392.5		10.47	10.72	0.25	2.4%
250	397.5		10.47	10.72	0.25	2.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
251	LS-1, LED, Rate B, Energy, 2-Lamp					
252	2.5		9.28	10.33	1.05	11.3%
253	7.5		9.28	10.33	1.05	11.3%
254	12.5		9.28	10.33	1.05	11.3%
255	17.5		9.28	10.33	1.05	11.3%
256	22.5		9.28	10.33	1.05	11.3%
257	27.5		9.28	10.33	1.05	11.3%
258	32.5		9.28	10.33	1.05	11.3%
259	37.5		9.28	10.33	1.05	11.3%
260	42.5		9.28	10.33	1.05	11.3%
261	47.5		9.28	10.33	1.05	11.3%
262	52.5		9.28	10.33	1.05	11.3%
263	57.5		9.28	10.33	1.05	11.3%
264	62.5		9.28	10.33	1.05	11.3%
265	67.5		9.28	10.33	1.05	11.3%
266	72.5		9.28	10.33	1.05	11.3%
267	77.5		9.28	10.33	1.05	11.3%
268	82.5		9.28	10.33	1.05	11.3%
269	87.5		9.28	10.33	1.05	11.3%
270	92.5		9.28	10.33	1.05	11.3%
271	97.5		9.28	10.33	1.05	11.3%
272	102.5		9.28	10.33	1.05	11.3%
273	107.5		9.28	10.33	1.05	11.3%
274	112.5		9.28	10.33	1.05	11.3%
275	117.5		9.28	10.33	1.05	11.3%
276	122.5		9.28	10.33	1.05	11.3%
277	127.5		9.28	10.33	1.05	11.3%
278	132.5		9.28	10.33	1.05	11.3%
279	137.5		9.28	10.33	1.05	11.3%
280	142.5		9.28	10.33	1.05	11.3%
281	147.5		9.28	10.33	1.05	11.3%
282	152.5		9.28	10.33	1.05	11.3%
283	157.5		9.28	10.33	1.05	11.3%
284	162.5		9.28	10.33	1.05	11.3%
285	167.5		9.28	10.33	1.05	11.3%
286	172.5		9.28	10.33	1.05	11.3%
287	177.5		9.28	10.33	1.05	11.3%
288	182.5		9.28	10.33	1.05	11.3%
289	187.5		9.28	10.33	1.05	11.3%
290	192.5		9.28	10.33	1.05	11.3%
291	197.5		9.28	10.33	1.05	11.3%
292	202.5		9.28	10.33	1.05	11.3%
293	207.5		9.28	10.33	1.05	11.3%
294	212.5		9.28	10.33	1.05	11.3%
295	217.5		9.28	10.33	1.05	11.3%
296	222.5		9.28	10.33	1.05	11.3%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
297	227.5		9.28	10.33	1.05	11.3%
298	232.5		9.28	10.33	1.05	11.3%
299	237.5		9.28	10.33	1.05	11.3%
300	242.5		9.28	10.33	1.05	11.3%
301	247.5		9.28	10.33	1.05	11.3%
302	252.5		9.28	10.33	1.05	11.3%
303	257.5		9.28	10.33	1.05	11.3%
304	262.5		9.28	10.33	1.05	11.3%
305	267.5		9.28	10.33	1.05	11.3%
306	272.5		9.28	10.33	1.05	11.3%
307	277.5		9.28	10.33	1.05	11.3%
308	282.5		9.28	10.33	1.05	11.3%
309	287.5		9.28	10.33	1.05	11.3%
310	292.5		9.28	10.33	1.05	11.3%
311	297.5		9.28	10.33	1.05	11.3%
312	302.5		9.28	10.33	1.05	11.3%
313	307.5		9.28	10.33	1.05	11.3%
314	312.5		9.28	10.33	1.05	11.3%
315	317.5		9.28	10.33	1.05	11.3%
316	322.5		9.28	10.33	1.05	11.3%
317	327.5		9.28	10.33	1.05	11.3%
318	332.5		9.28	10.33	1.05	11.3%
319	337.5		9.28	10.33	1.05	11.3%
320	342.5		9.28	10.33	1.05	11.3%
321	347.5		9.28	10.33	1.05	11.3%
322	352.5		9.28	10.33	1.05	11.3%
323	357.5		9.28	10.33	1.05	11.3%
324	362.5		9.28	10.33	1.05	11.3%
325	367.5		9.28	10.33	1.05	11.3%
326	372.5		9.28	10.33	1.05	11.3%
327	377.5		9.28	10.33	1.05	11.3%
328	382.5		9.28	10.33	1.05	11.3%
329	387.5		9.28	10.33	1.05	11.3%
330	392.5		9.28	10.33	1.05	11.3%
331	397.5		9.28	10.33	1.05	11.3%
332	LS-2, Mercury Vapor, Rate A, Regulator Ballast					
333	175	7000	4.19	5.75	1.56	37.2%
334	250	10000	5.82	7.99	2.17	37.3%
335	400	20000	9.17	12.59	3.42	37.3%
336	700	35000	15.55	21.35	5.80	37.3%
337	1000	55000	21.97	30.17	8.20	37.3%
338	LS-2, Mercury Vapor, Rate A, Reactor Ballast					
339	175	7000	3.83	5.26	1.43	37.3%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
340	LS-2, Mercury Vapor, Rate A, Series Service					
341	175	7000	5.87	8.50	2.63	44.8%
342	250	10000	7.09	10.27	3.18	44.9%
343	400	20000	12.62	18.28	5.66	44.8%
344	700	35000	22.12	32.05	9.93	44.9%
345	LS-2, Mercury Vapor, Rate B, Regulator Ballast					
346	175	7000	5.67	7.51	1.84	32.5%
347	250	10000	7.31	9.75	2.44	33.4%
348	400	20000	10.66	14.35	3.69	34.6%
349	LS-2, Mercury Vapor, Rate B, Series Service					
350	175	7000	7.36	10.26	2.90	39.4%
351	LS-2, HPSV, Rate A, Energy, Regulator Ballast					
352	50	4000	1.16	1.59	0.43	37.1%
353	70	5800	2.01	2.76	0.75	37.3%
354	100	9500	2.81	3.86	1.05	37.4%
355	150	16000	3.85	5.28	1.43	37.1%
356	200	22000	4.90	6.73	1.83	37.3%
357	250	30000	6.24	8.57	2.33	37.3%
358	310	37000	7.64	10.48	2.84	37.2%
359	400	50000	9.49	13.03	3.54	37.3%
360	1000	140000	21.97	30.17	8.20	37.3%
361	LS-2, HPSV, Rate A, Energy, Reactor Ballast					
362	50	4000	1.00	1.37	0.37	37.0%
363	70	5800	1.65	2.27	0.62	37.6%
364	100	9500	2.33	3.20	0.87	37.3%
365	150	16000	3.41	4.68	1.27	37.2%
366	LS-2, HPSV, Rate A, Series Service					
367	50	4,000	1.82	2.63	0.81	44.5%
368	70	5800	3.06	4.44	1.38	45.1%
369	100	9500	3.43	4.97	1.54	44.9%
370	150	16000	4.94	7.15	2.21	44.7%
371	200	22000	6.61	9.57	2.96	44.8%
372	250	30000	8.88	12.86	3.98	44.8%
373	LS-2, HPSV, Rate B, Regulator Ballast					
374	50	4000	2.64	3.35	0.71	26.9%
375	70	5800	3.50	4.52	1.02	29.1%
376	100	9500	4.30	5.62	1.32	30.7%
377	150	16000	5.34	7.04	1.70	31.8%
378	200	22000	6.39	8.49	2.10	32.9%
379	250	30000	7.73	10.33	2.60	33.6%
380	310	37000	9.12	12.24	3.12	34.2%
381	400	50000	10.98	14.79	3.81	34.7%
382	1000	140000	23.46	31.93	8.47	36.1%
383	LS-2, HPSV, Rate B, Reactor Ballast					
384	50	4000	2.48	3.13	0.65	26.2%
385	70	5800	3.14	4.03	0.89	28.3%
386	100	9500	3.82	4.96	1.14	29.8%
387	150	16000	4.90	6.44	1.54	31.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
388	LS-2, HPSV, Rate B, Series Service					
389	50	4,000	3.30	4.39	1.09	33.0%
390	70	5800	4.55	6.20	1.65	36.3%
391	100	9500	4.92	6.73	1.81	36.8%
392	150	16000	6.42	8.91	2.49	38.8%
393	200	22000	8.10	11.33	3.23	39.9%
394	250	30000	10.37	14.62	4.25	41.0%
395	LS-2, LPSV, Rate A					
396	35	4800	1.34	1.83	0.49	36.6%
397	55	8000	1.75	2.41	0.66	37.7%
398	90	13500	2.89	3.97	1.08	37.4%
399	135	22500	4.11	5.64	1.53	37.2%
400	180	33000	4.69	6.43	1.74	37.1%
401	LS-2, LPSV, Rate A, Series Service					
402	35	4800	1.42	2.05	0.63	44.4%
403	55	8,000	2.04	2.96	0.92	45.1%
404	90	13,500	3.69	5.34	1.65	44.7%
405	135	22,500	5.25	7.60	2.35	44.8%
406	180	33,000	6.21	9.00	2.79	44.9%
407	LS-2, Incandescent Lamps, Rate A, Energy Only					
408		1000	1.46	2.00	0.54	37.0%
409		2,500	3.23	4.43	1.20	37.2%
410		4000	5.88	8.08	2.20	37.4%
411		6000	8.07	11.09	3.02	37.4%
412		10000	12.12	16.64	4.52	37.3%
413	LS-2, Incandescent Lamps, Rate B					
414		6000	9.56	12.85	3.29	34.4%
415	LS-2, Metal Halide, Rate A					
416	50	2100	1.36	1.86	0.50	36.8%
417	100	8500	2.63	3.61	0.98	37.3%
418	175	12000	4.13	5.67	1.54	37.3%
419	250	18000	5.74	7.88	2.14	37.3%
420	400	32000	8.85	12.15	3.30	37.3%
421	LS-2, Metal Halide, Rate B					
422	50	2100	2.84	3.62	0.78	27.5%
423	100	8500	4.12	5.37	1.25	30.3%
424	175	12000	5.61	7.43	1.82	32.4%
425	250	18000	7.23	9.64	2.41	33.3%
426	400	32000	10.34	13.91	3.57	34.5%
427	LS-2, Induction, Rate A, Five-Lamp					
428	55	3500	5.48	7.53	2.05	37.4%
429	87	6000	8.67	11.91	3.24	37.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
430	LS-2, Induction, Rate A, Single-Lamp					
431	40		0.80	1.10	0.30	37.5%
432	50		1.00	1.37	0.37	37.0%
433	55		1.10	1.51	0.41	37.3%
434	70		1.40	1.92	0.52	37.1%
435	80		1.60	2.19	0.59	36.9%
436	85		1.69	2.33	0.64	37.9%
437	100		1.99	2.74	0.75	37.7%
438	150		2.99	4.11	1.12	37.5%
439	165		3.29	4.52	1.23	37.4%
440	200		3.99	5.48	1.49	37.3%
441	250		4.98	6.84	1.86	37.3%
442	300		5.98	8.21	2.23	37.3%
443	400		7.98	10.95	2.97	37.2%
444	LS-2, LED, Rate A, Energy, 1-Lamp					
445	2.5		0.05	0.07	0.02	40.0%
446	7.5		0.15	0.21	0.06	40.0%
447	12.5		0.25	0.34	0.09	36.0%
448	17.5		0.35	0.48	0.13	37.1%
449	22.5		0.45	0.62	0.17	37.8%
450	27.5		0.55	0.75	0.20	36.4%
451	32.5		0.65	0.89	0.24	36.9%
452	37.5		0.75	1.03	0.28	37.3%
453	42.5		0.85	1.16	0.31	36.5%
454	47.5		0.95	1.30	0.35	36.8%
455	52.5		1.05	1.44	0.39	37.1%
456	57.5		1.15	1.57	0.42	36.5%
457	62.5		1.25	1.71	0.46	36.8%
458	67.5		1.35	1.85	0.50	37.0%
459	72.5		1.45	1.98	0.53	36.6%
460	77.5		1.55	2.12	0.57	36.8%
461	82.5		1.64	2.26	0.62	37.8%
462	87.5		1.74	2.40	0.66	37.9%
463	92.5		1.84	2.53	0.69	37.5%
464	97.5		1.94	2.67	0.73	37.6%
465	102.5		2.04	2.81	0.77	37.7%
466	107.5		2.14	2.94	0.80	37.4%
467	112.5		2.24	3.08	0.84	37.5%
468	117.5		2.34	3.22	0.88	37.6%
469	122.5		2.44	3.35	0.91	37.3%
470	127.5		2.54	3.49	0.95	37.4%
471	132.5		2.64	3.63	0.99	37.5%
472	137.5		2.74	3.76	1.02	37.2%
473	142.5		2.84	3.90	1.06	37.3%
474	147.5		2.94	4.04	1.10	37.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
475	152.5		3.04	4.17	1.13	37.2%
476	157.5		3.14	4.31	1.17	37.3%
477	162.5		3.24	4.45	1.21	37.3%
478	167.5		3.34	4.59	1.25	37.4%
479	172.5		3.44	4.72	1.28	37.2%
480	177.5		3.54	4.86	1.32	37.3%
481	182.5		3.64	5.00	1.36	37.4%
482	187.5		3.74	5.13	1.39	37.2%
483	192.5		3.84	5.27	1.43	37.2%
484	197.5		3.94	5.41	1.47	37.3%
485	202.5		4.04	5.54	1.50	37.1%
486	207.5		4.14	5.68	1.54	37.2%
487	212.5		4.24	5.82	1.58	37.3%
488	217.5		4.34	5.95	1.61	37.1%
489	222.5		4.44	6.09	1.65	37.2%
490	227.5		4.54	6.23	1.69	37.2%
491	232.5		4.64	6.36	1.72	37.1%
492	237.5		4.74	6.50	1.76	37.1%
493	242.5		4.83	6.64	1.81	37.5%
494	247.5		4.93	6.78	1.85	37.5%
495	252.5		5.03	6.91	1.88	37.4%
496	257.5		5.13	7.05	1.92	37.4%
497	262.5		5.23	7.19	1.96	37.5%
498	267.5		5.33	7.32	1.99	37.3%
499	272.5		5.43	7.46	2.03	37.4%
500	277.5		5.53	7.60	2.07	37.4%
501	282.5		5.63	7.73	2.10	37.3%
502	287.5		5.73	7.87	2.14	37.3%
503	292.5		5.83	8.01	2.18	37.4%
504	297.5		5.93	8.14	2.21	37.3%
505	302.5		6.03	8.28	2.25	37.3%
506	307.5		6.13	8.42	2.29	37.4%
507	312.5		6.23	8.55	2.32	37.2%
508	317.5		6.33	8.69	2.36	37.3%
509	322.5		6.43	8.83	2.40	37.3%
510	327.5		6.53	8.97	2.44	37.4%
511	332.5		6.63	9.10	2.47	37.3%
512	337.5		6.73	9.24	2.51	37.3%
513	342.5		6.83	9.38	2.55	37.3%
514	347.5		6.93	9.51	2.58	37.2%
515	352.5		7.03	9.65	2.62	37.3%
516	357.5		7.13	9.79	2.66	37.3%
517	362.5		7.23	9.92	2.69	37.2%
518	367.5		7.33	10.06	2.73	37.2%
519	372.5		7.43	10.20	2.77	37.3%
520	377.5		7.53	10.33	2.80	37.2%
521	382.5		7.63	10.47	2.84	37.2%
522	387.5		7.73	10.61	2.88	37.3%
523	392.5		7.83	10.74	2.91	37.2%
524	397.5		7.93	10.88	2.95	37.2%
525						

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT A
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING DISTRIBUTION RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT DISTRIBUTION RATE (\$/Lamp) (C)	2021 DISTRIBUTION RATE (\$/Lamp) (D)		
526	LS-2, Non-standard Lamp					
527	Energy Charge (\$/kWh/lamp/month)		0.05798	0.07527	0.02	29.8%
528						
529	LS-3 (CLOSED)					
530	Energy Charge (\$/kWh)		0.06680	0.07733	0.01	15.8%
531	Minimum Charge (\$/month)		7.58	7.58	0.00	0.0%
532						
533	OL-1, HPSV, Rate A, Street Light Luminaire — Reactor Ballast					
534	100	9500	12.38	10.21	(2.17)	-17.5%
535	150	16000	13.44	11.67	(1.77)	-13.2%
536	OL-1, HPSV, Rate A, Street Light Luminaire — Regulator Ballast					
537	250	30000	18.13	16.61	(1.52)	-8.4%
538	400	50000	21.01	20.90	(0.11)	-0.5%
539	1000	140000	33.82	39.15	5.33	15.8%
540	OL-1, HPSV, Rate B, Directional Luminaire					
541	250	30000	19.29	17.31	(1.98)	-10.3%
542	400	50000	22.80	21.84	(0.96)	-4.2%
543	1000	140000	38.11	40.50	2.39	6.3%
544	OL-1, LPSV, Rate A, Street Light Luminaire					
545	55	8000	16.77	12.19	(4.58)	-27.3%
546	90	13000	19.20	14.47	(4.73)	-24.6%
547	135	22500	21.02	16.85	(4.17)	-19.8%
548	180	33000	24.13	18.75	(5.38)	-22.3%
549	OL-1 Pole in Non-Standard Position					
550	30-foot		13.91	6.20	(7.71)	-55.4%
551	35-foot		14.54	6.24	(8.30)	-57.1%
552	OL-2					
553	Energy Charge (\$/kwh)		0.13205	0.15362	0.02	16.3%
554	Basic Service Fee (\$/month)		11.47	11.47	0.00	0.0%
555						
556	DWL, Facilities Charges					
557	\$ of Utility Investment		0.01150	0.00790	(0.00)	-31.3%
558	DWL, Energy and Lamp Maintenance Charge					
559	50 Watt HPSV		2.66	3.37	0.71	26.7%
560	DWL, Minimum Charge		59.58	61.74	2.16	3.6%

ATTACHMENT B

Comparison of Present and Illustrative Proposed Street Lighting Utility
Distribution Company (“UDC”) Rates

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
1	LS-1, Mercury Vapor, Class A, Reactor Ballast					
2	175	7000	13.17	14.05	0.88	6.7%
3	LS-1, Mercury Vapor, Class A, Regulator Ballast					
4	175	7000	13.66	14.67	1.01	7.4%
5	400	20000	23.43	25.85	2.42	10.3%
6	LS-1, HPSV, Class A, Reactor Ballast					
7	70	5800	10.14	9.61	(0.53)	-5.2%
8	100	9500	11.27	10.91	(0.36)	-3.2%
9	150	16000	12.71	12.73	0.02	0.2%
10	LS-1, HPSV, Class A, Regulator Ballast					
11	200	22000	15.57	15.85	0.28	1.8%
12	250	30000	18.06	18.66	0.60	3.3%
13	400	50000	22.23	24.09	1.86	8.4%
14	LS-1, HPSV, Class B, 1-Lamp, Reactor Ballast					
15	70	5800	10.28	9.97	(0.31)	-3.0%
16	100	9500	11.47	11.33	(0.14)	-1.2%
17	150	16000	12.77	12.99	0.22	1.7%
18	LS-1, HPSV, Class B, 1-Lamp, Regulator Ballast					
19	200	22000	15.61	16.02	0.41	2.6%
20	250	30000	18.11	18.84	0.73	4.0%
21	400	50000	22.17	24.20	2.03	9.2%
22	LS-1, HPSV, Class B, 2-Lamp, Reactor Ballast					
23	70	5800	9.13	8.80	(0.33)	-3.6%
24	100	9500	10.29	10.10	(0.19)	-1.8%
25	150	16000	11.70	11.92	0.22	1.9%
26	LS-1, HPSV, Class B, 2-Lamp, Regulator Ballast					
27	200	22000	14.56	15.04	0.48	3.3%
28	250	30000	17.14	17.94	0.80	4.7%
29	400	50000	21.22	23.29	2.07	9.8%
30	LS-1, HPSV, Class C, 1-Lamp, Reactor Ballast					
31	70	5800	14.97	13.76	(1.21)	-8.1%
32	100	9500	15.98	15.00	(0.98)	-6.1%
33	150	16000	17.31	16.68	(0.63)	-3.6%
34	LS-1, HPSV, Class C, 1-Lamp, Regulator Ballast					
35	200	22000	21.16	20.59	(0.57)	-2.7%
36	250	30000	23.05	22.96	(0.09)	-0.4%
37	400	50000	29.22	29.92	0.70	2.4%
38	LS-1, HPSV, Class C, 2-Lamp, Reactor Ballast					
39	70	5800	10.00	9.68	(0.32)	-3.2%
40	100	9500	10.95	11.17	0.22	2.0%
41	150	16000	12.68	12.78	0.10	0.8%
42	LS-1, HPSV, Class C, 2-Lamp, Regulator Ballast					
43	200	22000	14.93	15.30	0.37	2.5%
44	250	30000	18.09	18.77	0.68	3.8%
45	400	50000	21.66	23.63	1.97	9.1%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
46	LS-1, LPSV, Class A					
47	55	8000	14.29	12.63	(1.66)	-11.6%
48	90	13500	16.81	15.27	(1.54)	-9.2%
49	135	22500	18.95	18.05	(0.90)	-4.7%
50	180	33000	21.71	20.15	(1.56)	-7.2%
51	LS-1, LPSV, Class B, 1-Lamp					
52	55	8000	14.47	12.94	(1.53)	-10.6%
53	90	13500	16.98	15.57	(1.41)	-8.3%
54	135	22500	19.08	18.22	(0.86)	-4.5%
55	180	33000	21.84	20.31	(1.53)	-7.0%
56	LS-1, LPSV, Class B, 2-Lamp					
57	55	8000	13.82	12.31	(1.51)	-10.9%
58	90	13500	16.34	14.95	(1.39)	-8.5%
59	135	22500	18.68	17.93	(0.75)	-4.0%
60	180	33000	21.43	20.02	(1.41)	-6.6%
61	LS-1, LPSV, Class C, 1-Lamp					
62	55	8000	17.55	15.81	(1.74)	-9.9%
63	90	13500	19.39	18.01	(1.38)	-7.1%
64	135	22500	22.79	21.37	(1.42)	-6.2%
65	180	33000	24.11	22.78	(1.33)	-5.5%
66	LS-1, LPSV, Class C, 2-Lamp					
67	55	8000	13.93	12.34	(1.59)	-11.4%
68	90	13500	16.47	15.01	(1.46)	-8.9%
69	135	22500	19.01	18.22	(0.79)	-4.2%
70	180	33000	21.50	20.04	(1.46)	-6.8%
71	LS-1, Metal Halide, Class A					
72	100	8500	9.51	10.21	0.70	7.4%
73	175	12000	11.58	12.78	1.20	10.4%
74	250	18000	13.89	15.66	1.77	12.7%
75	400	32000	18.73	21.51	2.78	14.8%
76	LS-1, Metal Halide, Class B					
77	100	8500	9.96	10.87	0.91	9.1%
78	175	12000	12.03	13.45	1.42	11.8%
79	250	18000	14.35	16.33	1.98	13.8%
80	400	32000	19.18	22.18	3.00	15.6%
81	LS-1, Metal Halide, Class C					
82	100	8500	21.74	21.07	(0.67)	-3.1%
83	175	12000	23.81	23.65	(0.16)	-0.7%
84	250	18000	26.13	26.53	0.40	1.5%
85	400	32000	30.96	32.38	1.42	4.6%
86	LS-1 Pole in Non-Standard Position					
87	30-foot		8.26	5.86	(2.40)	-29.1%
88	35-foot		8.63	5.90	(2.73)	-31.6%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
89	LS-1, LED, Rate A, Energy, 1-Lamp					
90	2.5		10.49	10.74	0.25	2.4%
91	7.5		10.53	10.77	0.24	2.3%
92	12.5		10.55	10.80	0.25	2.4%
93	17.5		10.59	10.84	0.25	2.4%
94	22.5		10.65	10.88	0.23	2.2%
95	27.5		10.68	10.93	0.25	2.3%
96	32.5		10.71	10.95	0.24	2.2%
97	37.5		10.75	10.98	0.23	2.1%
98	42.5		10.79	11.02	0.23	2.1%
99	47.5		10.81	11.03	0.22	2.0%
100	52.5		10.85	11.08	0.23	2.1%
101	57.5		10.90	11.12	0.22	2.0%
102	62.5		10.93	11.15	0.22	2.0%
103	67.5		10.97	11.19	0.22	2.0%
104	72.5		11.01	11.23	0.22	2.0%
105	77.5		11.05	11.26	0.21	1.9%
106	82.5		11.09	11.31	0.22	2.0%
107	87.5		11.11	11.32	0.21	1.9%
108	92.5		11.16	11.36	0.20	1.8%
109	97.5		11.19	11.40	0.21	1.9%
110	102.5		11.24	11.44	0.20	1.8%
111	107.5		11.26	11.46	0.20	1.8%
112	112.5		11.30	11.50	0.20	1.8%
113	117.5		11.35	11.54	0.19	1.7%
114	122.5		11.39	11.59	0.20	1.8%
115	127.5		11.41	11.60	0.19	1.7%
116	132.5		11.45	11.64	0.19	1.7%
117	137.5		11.50	11.67	0.17	1.5%
118	142.5		11.52	11.70	0.18	1.6%
119	147.5		11.55	11.74	0.19	1.6%
120	152.5		11.60	11.77	0.17	1.5%
121	157.5		11.65	11.83	0.18	1.5%
122	162.5		11.67	11.85	0.18	1.5%
123	167.5		11.71	11.88	0.17	1.5%
124	172.5		11.76	11.92	0.16	1.4%
125	177.5		11.79	11.96	0.17	1.4%
126	182.5		11.81	11.98	0.17	1.4%
127	187.5		11.86	12.02	0.16	1.3%
128	192.5		11.90	12.05	0.15	1.3%
129	197.5		11.95	12.11	0.16	1.3%
130	202.5		11.97	12.13	0.16	1.3%
131	207.5		12.02	12.16	0.14	1.2%
132	212.5		12.05	12.21	0.16	1.3%
133	217.5		12.07	12.23	0.16	1.3%
134	222.5		12.12	12.26	0.14	1.2%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
135	227.5		12.15	12.30	0.15	1.2%
136	232.5		12.21	12.34	0.13	1.1%
137	237.5		12.23	12.36	0.13	1.1%
138	242.5		12.28	12.41	0.13	1.1%
139	247.5		12.32	12.44	0.12	1.0%
140	252.5		12.36	12.49	0.13	1.1%
141	257.5		12.40	12.51	0.11	0.9%
142	262.5		12.43	12.55	0.12	1.0%
143	267.5		12.48	12.60	0.12	1.0%
144	272.5		12.52	12.63	0.11	0.9%
145	277.5		12.54	12.65	0.11	0.9%
146	282.5		12.58	12.68	0.10	0.8%
147	287.5		12.63	12.74	0.11	0.9%
148	292.5		12.68	12.78	0.10	0.8%
149	297.5		12.69	12.79	0.10	0.8%
150	302.5		12.74	12.83	0.09	0.7%
151	307.5		12.78	12.87	0.09	0.7%
152	312.5		12.79	12.89	0.10	0.8%
153	317.5		12.84	12.93	0.09	0.7%
154	322.5		12.88	12.96	0.08	0.6%
155	327.5		12.93	13.02	0.09	0.7%
156	332.5		12.95	13.04	0.09	0.7%
157	337.5		12.99	13.07	0.08	0.6%
158	342.5		13.04	13.12	0.08	0.6%
159	347.5		13.07	13.15	0.08	0.6%
160	352.5		13.10	13.17	0.07	0.5%
161	357.5		13.14	13.21	0.07	0.5%
162	362.5		13.19	13.26	0.07	0.5%
163	367.5		13.23	13.30	0.07	0.5%
164	372.5		13.26	13.33	0.07	0.5%
165	377.5		13.31	13.36	0.05	0.4%
166	382.5		13.34	13.41	0.07	0.5%
167	387.5		13.37	13.43	0.06	0.4%
168	392.5		13.41	13.46	0.05	0.4%
169	397.5		13.45	13.51	0.06	0.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
170	LS-1, LED, Rate B, Energy, 1-Lamp					
171	2.5		10.49	10.74	0.25	2.4%
172	7.5		10.53	10.77	0.24	2.3%
173	12.5		10.55	10.80	0.25	2.4%
174	17.5		10.59	10.84	0.25	2.4%
175	22.5		10.65	10.88	0.23	2.2%
176	27.5		10.68	10.93	0.25	2.3%
177	32.5		10.71	10.95	0.24	2.2%
178	37.5		10.75	10.98	0.23	2.1%
179	42.5		10.79	11.02	0.23	2.1%
180	47.5		10.81	11.03	0.22	2.0%
181	52.5		10.85	11.08	0.23	2.1%
182	57.5		10.90	11.12	0.22	2.0%
183	62.5		10.93	11.15	0.22	2.0%
184	67.5		10.97	11.19	0.22	2.0%
185	72.5		11.01	11.23	0.22	2.0%
186	77.5		11.05	11.26	0.21	1.9%
187	82.5		11.09	11.31	0.22	2.0%
188	87.5		11.11	11.32	0.21	1.9%
189	92.5		11.16	11.36	0.20	1.8%
190	97.5		11.19	11.40	0.21	1.9%
191	102.5		11.24	11.44	0.20	1.8%
192	107.5		11.26	11.46	0.20	1.8%
193	112.5		11.30	11.50	0.20	1.8%
194	117.5		11.35	11.54	0.19	1.7%
195	122.5		11.39	11.59	0.20	1.8%
196	127.5		11.41	11.60	0.19	1.7%
197	132.5		11.45	11.64	0.19	1.7%
198	137.5		11.50	11.67	0.17	1.5%
199	142.5		11.52	11.70	0.18	1.6%
200	147.5		11.55	11.74	0.19	1.6%
201	152.5		11.60	11.77	0.17	1.5%
202	157.5		11.65	11.83	0.18	1.5%
203	162.5		11.67	11.85	0.18	1.5%
204	167.5		11.71	11.88	0.17	1.5%
205	172.5		11.76	11.92	0.16	1.4%
206	177.5		11.79	11.96	0.17	1.4%
207	182.5		11.81	11.98	0.17	1.4%
208	187.5		11.86	12.02	0.16	1.3%
209	192.5		11.90	12.05	0.15	1.3%
210	197.5		11.95	12.11	0.16	1.3%
211	202.5		11.97	12.13	0.16	1.3%
212	207.5		12.02	12.16	0.14	1.2%
213	212.5		12.05	12.21	0.16	1.3%
214	217.5		12.07	12.23	0.16	1.3%
215	222.5		12.12	12.26	0.14	1.2%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
216	227.5		12.15	12.30	0.15	1.2%
217	232.5		12.21	12.34	0.13	1.1%
218	237.5		12.23	12.36	0.13	1.1%
219	242.5		12.28	12.41	0.13	1.1%
220	247.5		12.32	12.44	0.12	1.0%
221	252.5		12.36	12.49	0.13	1.1%
222	257.5		12.40	12.51	0.11	0.9%
223	262.5		12.43	12.55	0.12	1.0%
224	267.5		12.48	12.60	0.12	1.0%
225	272.5		12.52	12.63	0.11	0.9%
226	277.5		12.54	12.65	0.11	0.9%
227	282.5		12.58	12.68	0.10	0.8%
228	287.5		12.63	12.74	0.11	0.9%
229	292.5		12.68	12.78	0.10	0.8%
230	297.5		12.69	12.79	0.10	0.8%
231	302.5		12.74	12.83	0.09	0.7%
232	307.5		12.78	12.87	0.09	0.7%
233	312.5		12.79	12.89	0.10	0.8%
234	317.5		12.84	12.93	0.09	0.7%
235	322.5		12.88	12.96	0.08	0.6%
236	327.5		12.93	13.02	0.09	0.7%
237	332.5		12.95	13.04	0.09	0.7%
238	337.5		12.99	13.07	0.08	0.6%
239	342.5		13.04	13.12	0.08	0.6%
240	347.5		13.07	13.15	0.08	0.6%
241	352.5		13.10	13.17	0.07	0.5%
242	357.5		13.14	13.21	0.07	0.5%
243	362.5		13.19	13.26	0.07	0.5%
244	367.5		13.23	13.30	0.07	0.5%
245	372.5		13.26	13.33	0.07	0.5%
246	377.5		13.31	13.36	0.05	0.4%
247	382.5		13.34	13.41	0.07	0.5%
248	387.5		13.37	13.43	0.06	0.4%
249	392.5		13.41	13.46	0.05	0.4%
250	397.5		13.45	13.51	0.06	0.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
251	LS-1, LED, Rate B, Energy, 2-Lamp					
252	2.5		9.30	10.35	1.05	11.3%
253	7.5		9.34	10.38	1.04	11.1%
254	12.5		9.36	10.41	1.05	11.2%
255	17.5		9.40	10.45	1.05	11.2%
256	22.5		9.46	10.49	1.03	10.9%
257	27.5		9.49	10.54	1.05	11.1%
258	32.5		9.52	10.56	1.04	10.9%
259	37.5		9.56	10.59	1.03	10.8%
260	42.5		9.60	10.63	1.03	10.7%
261	47.5		9.62	10.64	1.02	10.6%
262	52.5		9.66	10.69	1.03	10.7%
263	57.5		9.71	10.73	1.02	10.5%
264	62.5		9.74	10.76	1.02	10.5%
265	67.5		9.78	10.80	1.02	10.4%
266	72.5		9.82	10.84	1.02	10.4%
267	77.5		9.86	10.87	1.01	10.2%
268	82.5		9.90	10.92	1.02	10.3%
269	87.5		9.92	10.93	1.01	10.2%
270	92.5		9.97	10.97	1.00	10.0%
271	97.5		10.00	11.01	1.01	10.1%
272	102.5		10.05	11.05	1.00	10.0%
273	107.5		10.07	11.07	1.00	9.9%
274	112.5		10.11	11.11	1.00	9.9%
275	117.5		10.16	11.15	0.99	9.7%
276	122.5		10.20	11.20	1.00	9.8%
277	127.5		10.22	11.21	0.99	9.7%
278	132.5		10.26	11.25	0.99	9.6%
279	137.5		10.31	11.28	0.97	9.4%
280	142.5		10.33	11.31	0.98	9.5%
281	147.5		10.36	11.35	0.99	9.6%
282	152.5		10.41	11.38	0.97	9.3%
283	157.5		10.46	11.44	0.98	9.4%
284	162.5		10.48	11.46	0.98	9.4%
285	167.5		10.52	11.49	0.97	9.2%
286	172.5		10.57	11.53	0.96	9.1%
287	177.5		10.60	11.57	0.97	9.2%
288	182.5		10.62	11.59	0.97	9.1%
289	187.5		10.67	11.63	0.96	9.0%
290	192.5		10.71	11.66	0.95	8.9%
291	197.5		10.76	11.72	0.96	8.9%
292	202.5		10.78	11.74	0.96	8.9%
293	207.5		10.83	11.77	0.94	8.7%
294	212.5		10.86	11.82	0.96	8.8%
295	217.5		10.88	11.84	0.96	8.8%
296	222.5		10.93	11.87	0.94	8.6%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
297	227.5		10.96	11.91	0.95	8.7%
298	232.5		11.02	11.95	0.93	8.4%
299	237.5		11.04	11.97	0.93	8.4%
300	242.5		11.09	12.02	0.93	8.4%
301	247.5		11.13	12.05	0.92	8.3%
302	252.5		11.17	12.10	0.93	8.3%
303	257.5		11.21	12.12	0.91	8.1%
304	262.5		11.24	12.16	0.92	8.2%
305	267.5		11.29	12.21	0.92	8.1%
306	272.5		11.33	12.24	0.91	8.0%
307	277.5		11.35	12.26	0.91	8.0%
308	282.5		11.39	12.29	0.90	7.9%
309	287.5		11.44	12.35	0.91	8.0%
310	292.5		11.49	12.39	0.90	7.8%
311	297.5		11.50	12.40	0.90	7.8%
312	302.5		11.55	12.44	0.89	7.7%
313	307.5		11.59	12.48	0.89	7.7%
314	312.5		11.60	12.50	0.90	7.8%
315	317.5		11.65	12.54	0.89	7.6%
316	322.5		11.69	12.57	0.88	7.5%
317	327.5		11.74	12.63	0.89	7.6%
318	332.5		11.76	12.65	0.89	7.6%
319	337.5		11.80	12.68	0.88	7.5%
320	342.5		11.85	12.73	0.88	7.4%
321	347.5		11.88	12.76	0.88	7.4%
322	352.5		11.91	12.78	0.87	7.3%
323	357.5		11.95	12.82	0.87	7.3%
324	362.5		12.00	12.87	0.87	7.2%
325	367.5		12.04	12.91	0.87	7.2%
326	372.5		12.07	12.94	0.87	7.2%
327	377.5		12.12	12.97	0.85	7.0%
328	382.5		12.15	13.02	0.87	7.2%
329	387.5		12.18	13.04	0.86	7.1%
330	392.5		12.22	13.07	0.85	7.0%
331	397.5		12.26	13.12	0.86	7.0%
332	LS-2, Mercury Vapor, Rate A, Regulator Ballast					
333	175	7000	5.75	7.21	1.46	25.4%
334	250	10000	8.01	10.03	2.02	25.2%
335	400	20000	12.63	15.82	3.19	25.3%
336	700	35000	21.40	26.80	5.40	25.2%
337	1000	55000	30.19	37.86	7.67	25.4%
338	LS-2, Mercury Vapor, Rate A, Reactor Ballast					
339	175	7000	5.26	6.59	1.33	25.3%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
340	LS-2, Mercury Vapor, Rate A, Series Service					
341	175	7000	7.42	9.94	2.52	34.0%
342	250	10000	8.96	12.02	3.06	34.2%
343	400	20000	15.94	21.38	5.44	34.1%
344	700	35000	27.97	37.50	9.53	34.1%
345	LS-2, Mercury Vapor, Rate B, Regulator Ballast					
346	175	7000	7.23	8.97	1.74	24.1%
347	250	10000	9.50	11.79	2.29	24.1%
348	400	20000	14.12	17.58	3.46	24.5%
349	LS-2, Mercury Vapor, Rate B, Series Service					
350	175	7000	8.91	11.70	2.79	31.3%
351	LS-2, HPSV, Rate A, Energy, Regulator Ballast					
352	50	4000	1.59	1.99	0.40	25.2%
353	70	5800	2.76	3.45	0.69	25.0%
354	100	9500	3.86	4.84	0.98	25.4%
355	150	16000	5.28	6.61	1.33	25.2%
356	200	22000	6.73	8.43	1.70	25.3%
357	250	30000	8.59	10.76	2.17	25.3%
358	310	37000	10.51	13.17	2.66	25.3%
359	400	50000	13.05	16.36	3.31	25.4%
360	1000	140000	30.19	37.86	7.67	25.4%
361	LS-2, HPSV, Rate A, Energy, Reactor Ballast					
362	50	4000	1.36	1.71	0.35	25.7%
363	70	5800	2.27	2.86	0.59	26.0%
364	100	9500	3.21	4.02	0.81	25.2%
365	150	16000	4.67	5.86	1.19	25.5%
366	LS-2, HPSV, Rate A, Series Service					
367	50	4,000	2.28	3.06	0.78	34.2%
368	70	5800	3.85	5.18	1.33	34.5%
369	100	9500	4.33	5.82	1.49	34.4%
370	150	16000	6.23	8.35	2.12	34.0%
371	200	22000	8.35	11.19	2.84	34.0%
372	250	30000	11.23	15.05	3.82	34.0%
373	LS-2, HPSV, Rate B, Regulator Ballast					
374	50	4000	3.07	3.75	0.68	22.1%
375	70	5800	4.25	5.21	0.96	22.6%
376	100	9500	5.35	6.60	1.25	23.4%
377	150	16000	6.77	8.37	1.60	23.6%
378	200	22000	8.22	10.19	1.97	24.0%
379	250	30000	10.08	12.52	2.44	24.2%
380	310	37000	11.99	14.93	2.94	24.5%
381	400	50000	14.54	18.12	3.58	24.6%
382	1000	140000	31.68	39.62	7.94	25.1%
383	LS-2, HPSV, Rate B, Reactor Ballast					
384	50	4000	2.84	3.47	0.63	22.2%
385	70	5800	3.76	4.62	0.86	22.9%
386	100	9500	4.70	5.78	1.08	23.0%
387	150	16000	6.16	7.62	1.46	23.7%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
388	LS-2, HPSV, Rate B, Series Service					
389	50	4,000	3.76	4.82	1.06	28.2%
390	70	5800	5.34	6.94	1.60	30.0%
391	100	9500	5.82	7.58	1.76	30.2%
392	150	16000	7.71	10.11	2.40	31.1%
393	200	22000	9.84	12.95	3.11	31.6%
394	250	30000	12.72	16.81	4.09	32.2%
395	LS-2, LPSV, Rate A					
396	35	4800	1.84	2.30	0.46	25.0%
397	55	8000	2.42	3.03	0.61	25.2%
398	90	13500	3.95	4.97	1.02	25.8%
399	135	22500	5.63	7.06	1.43	25.4%
400	180	33000	6.45	8.07	1.62	25.1%
401	LS-2, LPSV, Rate A, Series Service					
402	35	4800	1.78	2.39	0.61	34.3%
403	55	8,000	2.58	3.47	0.89	34.5%
404	90	13,500	4.65	6.24	1.59	34.2%
405	135	22,500	6.62	8.88	2.26	34.1%
406	180	33,000	7.83	10.52	2.69	34.4%
407	LS-2, Incandescent Lamps, Rate A, Energy Only					
408		1000	2.00	2.51	0.51	25.5%
409		2,500	4.43	5.56	1.13	25.5%
410		4000	8.09	10.14	2.05	25.3%
411		6000	11.11	13.93	2.82	25.4%
412		10000	16.66	20.89	4.23	25.4%
413	LS-2, Incandescent Lamps, Rate B					
414		6000	12.60	15.69	3.09	24.5%
415	LS-2, Metal Halide, Rate A					
416	50	2100	1.88	2.35	0.47	25.0%
417	100	8500	3.61	4.53	0.92	25.5%
418	175	12000	5.68	7.11	1.43	25.2%
419	250	18000	7.90	9.90	2.00	25.3%
420	400	32000	12.17	15.25	3.08	25.3%
421	LS-2, Metal Halide, Rate B					
422	50	2100	3.36	4.11	0.75	22.3%
423	100	8500	5.10	6.29	1.19	23.3%
424	175	12000	7.16	8.87	1.71	23.9%
425	250	18000	9.39	11.66	2.27	24.2%
426	400	32000	13.66	17.01	3.35	24.5%
427	LS-2, Induction, Rate A, Five-Lamp					
428	55	3500	7.53	9.44	1.91	25.4%
429	87	6000	11.93	14.96	3.03	25.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
430	LS-2, Induction, Rate A, Single-Lamp					
431	40		1.10	1.38	0.28	25.5%
432	50		1.36	1.71	0.35	25.7%
433	55		1.51	1.89	0.38	25.2%
434	70		1.92	2.41	0.49	25.5%
435	80		2.20	2.75	0.55	25.0%
436	85		2.33	2.93	0.60	25.8%
437	100		2.74	3.43	0.69	25.2%
438	150		4.10	5.15	1.05	25.6%
439	165		4.51	5.66	1.15	25.5%
440	200		5.47	6.87	1.40	25.6%
441	250		6.85	8.59	1.74	25.4%
442	300		8.22	10.30	2.08	25.3%
443	400		10.98	13.75	2.77	25.2%
444	LS-2, LED, Rate A, Energy, 1-Lamp					
445	2.5		0.07	0.09	0.02	28.6%
446	7.5		0.21	0.26	0.05	23.8%
447	12.5		0.33	0.42	0.09	27.3%
448	17.5		0.47	0.60	0.13	27.7%
449	22.5		0.63	0.78	0.15	23.8%
450	27.5		0.76	0.96	0.20	26.3%
451	32.5		0.89	1.12	0.23	25.8%
452	37.5		1.03	1.29	0.26	25.2%
453	42.5		1.17	1.46	0.29	24.8%
454	47.5		1.29	1.61	0.32	24.8%
455	52.5		1.43	1.80	0.37	25.9%
456	57.5		1.58	1.97	0.39	24.7%
457	62.5		1.71	2.14	0.43	25.1%
458	67.5		1.85	2.32	0.47	25.4%
459	72.5		1.99	2.49	0.50	25.1%
460	77.5		2.13	2.66	0.53	24.9%
461	82.5		2.26	2.85	0.59	26.1%
462	87.5		2.38	3.00	0.62	26.1%
463	92.5		2.53	3.17	0.64	25.3%
464	97.5		2.66	3.35	0.69	25.9%
465	102.5		2.81	3.53	0.72	25.6%
466	107.5		2.93	3.68	0.75	25.6%
467	112.5		3.07	3.86	0.79	25.7%
468	117.5		3.22	4.04	0.82	25.5%
469	122.5		3.36	4.22	0.86	25.6%
470	127.5		3.48	4.37	0.89	25.6%
471	132.5		3.62	4.55	0.93	25.7%
472	137.5		3.77	4.71	0.94	24.9%
473	142.5		3.89	4.88	0.99	25.4%
474	147.5		4.02	5.06	1.04	25.9%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
475	152.5		4.17	5.22	1.05	25.2%
476	157.5		4.32	5.42	1.10	25.5%
477	162.5		4.44	5.58	1.14	25.7%
478	167.5		4.58	5.75	1.17	25.5%
479	172.5		4.73	5.92	1.19	25.2%
480	177.5		4.86	6.10	1.24	25.5%
481	182.5		4.98	6.26	1.28	25.7%
482	187.5		5.13	6.43	1.30	25.3%
483	192.5		5.27	6.60	1.33	25.2%
484	197.5		5.42	6.80	1.38	25.5%
485	202.5		5.54	6.95	1.41	25.5%
486	207.5		5.69	7.12	1.43	25.1%
487	212.5		5.82	7.31	1.49	25.6%
488	217.5		5.94	7.46	1.52	25.6%
489	222.5		6.09	7.63	1.54	25.3%
490	227.5		6.22	7.81	1.59	25.6%
491	232.5		6.38	7.98	1.60	25.1%
492	237.5		6.50	8.14	1.64	25.2%
493	242.5		6.64	8.33	1.69	25.5%
494	247.5		6.78	8.50	1.72	25.4%
495	252.5		6.92	8.68	1.76	25.4%
496	257.5		7.06	8.84	1.78	25.2%
497	262.5		7.19	9.02	1.83	25.5%
498	267.5		7.34	9.20	1.86	25.3%
499	272.5		7.48	9.37	1.89	25.3%
500	277.5		7.60	9.53	1.93	25.4%
501	282.5		7.74	9.69	1.95	25.2%
502	287.5		7.89	9.89	2.00	25.3%
503	292.5		8.04	10.07	2.03	25.2%
504	297.5		8.15	10.21	2.06	25.3%
505	302.5		8.30	10.39	2.09	25.2%
506	307.5		8.44	10.57	2.13	25.2%
507	312.5		8.55	10.72	2.17	25.4%
508	317.5		8.70	10.90	2.20	25.3%
509	322.5		8.84	11.07	2.23	25.2%
510	327.5		8.99	11.27	2.28	25.4%
511	332.5		9.11	11.42	2.31	25.4%
512	337.5		9.25	11.59	2.34	25.3%
513	342.5		9.40	11.78	2.38	25.3%
514	347.5		9.53	11.94	2.41	25.3%
515	352.5		9.66	12.10	2.44	25.3%
516	357.5		9.80	12.28	2.48	25.3%
517	362.5		9.95	12.46	2.51	25.2%
518	367.5		10.09	12.64	2.55	25.3%
519	372.5		10.22	12.81	2.59	25.3%
520	377.5		10.37	12.97	2.60	25.1%
521	382.5		10.50	13.16	2.66	25.3%
522	387.5		10.63	13.32	2.69	25.3%
523	392.5		10.77	13.48	2.71	25.2%
524	397.5		10.91	13.67	2.76	25.3%
525						

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT B
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING UTILITY DISTRIBUTION COMPANY ("UDC") RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)	PRESENT UDC RATE (\$/Lamp) (C)	2021 UDC RATE (\$/Lamp) (D)		
526	LS-2, Non-standard Lamp					
527	Energy Charge (\$/kWh/lamp/month)		0.07951	0.09539	0.02	20.0%
528						
529	LS-3 (CLOSED)					
530	Energy Charge (\$/kWh)		0.08833	0.09745	0.01	10.3%
531	Minimum Charge (\$/month)		7.58	7.58	0.00	0.0%
532						
533	OL-1, HPSV, Rate A, Street Light Luminaire — Reactor Ballast					
534	100	9500	13.26	11.03	(2.23)	-16.8%
535	150	16000	14.70	12.85	(1.85)	-12.6%
536	OL-1, HPSV, Rate A, Street Light Luminaire — Regulator Ballast					
537	250	30000	20.48	18.80	(1.68)	-8.2%
538	400	50000	24.57	24.23	(0.34)	-1.4%
539	1000	140000	42.04	46.84	4.80	11.4%
540	OL-1, HPSV, Rate B, Directional Luminaire					
541	250	30000	21.64	19.50	(2.14)	-9.9%
542	400	50000	26.36	25.17	(1.19)	-4.5%
543	1000	140000	46.33	48.19	1.86	4.0%
544	OL-1, LPSV, Rate A, Street Light Luminaire					
545	55	8000	17.44	12.81	(4.63)	-26.5%
546	90	13000	20.26	15.47	(4.79)	-23.6%
547	135	22500	22.54	18.27	(4.27)	-18.9%
548	180	33000	25.89	20.39	(5.50)	-21.2%
549	OL-1 Pole in Non-Standard Position					
550	30-foot		13.91	6.20	(7.71)	-55.4%
551	35-foot		14.54	6.24	(8.30)	-57.1%
552	OL-2					
553	Energy Charge (\$/kwh)		0.15358	0.17374	0.02	13.1%
554	Basic Service Fee (\$/month)		11.47	11.47	0.00	0.0%
555						
556	DWL, Facilities Charges					
557	\$ of Utility Investment		0.01150	0.00790	(0.00)	-31.3%
558	DWL, Energy and Lamp Maintenance Charge					
559	50 Watt HPSV		3.09	3.77	0.68	22.0%
560	DWL, Minimum Charge		59.58	61.74	2.16	3.6%

ATTACHMENT C

Comparison of Present and Illustrative Proposed Street Lighting Total Rates

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
1	LS-1, Mercury Vapor, Class A, Reactor Ballast					
2	175	7000	17.90	18.49	0.59	3.3%
3	LS-1, Mercury Vapor, Class A, Regulator Ballast					
4	175	7000	18.81	19.51	0.70	3.7%
5	400	20000	34.72	36.46	1.74	5.0%
6	LS-1, HPSV, Class A, Reactor Ballast					
7	70	5800	12.19	11.53	(0.66)	-5.4%
8	100	9500	14.16	13.63	(0.53)	-3.7%
9	150	16000	16.87	16.64	(0.23)	-1.4%
10	LS-1, HPSV, Class A, Regulator Ballast					
11	200	22000	21.57	21.49	(0.08)	-0.4%
12	250	30000	25.75	25.89	0.14	0.5%
13	400	50000	33.87	35.04	1.17	3.5%
14	LS-1, HPSV, Class B, 1-Lamp, Reactor Ballast					
15	70	5800	12.33	11.89	(0.44)	-3.6%
16	100	9500	14.36	14.05	(0.31)	-2.2%
17	150	16000	16.93	16.90	(0.03)	-0.2%
18	LS-1, HPSV, Class B, 1-Lamp, Regulator Ballast					
19	200	22000	21.61	21.66	0.05	0.2%
20	250	30000	25.80	26.07	0.27	1.0%
21	400	50000	33.81	35.15	1.34	4.0%
22	LS-1, HPSV, Class B, 2-Lamp, Reactor Ballast					
23	70	5800	11.18	10.72	(0.46)	-4.1%
24	100	9500	13.18	12.82	(0.36)	-2.7%
25	150	16000	15.86	15.83	(0.03)	-0.2%
26	LS-1, HPSV, Class B, 2-Lamp, Regulator Ballast					
27	200	22000	20.56	20.68	0.12	0.6%
28	250	30000	24.83	25.17	0.34	1.4%
29	400	50000	32.86	34.24	1.38	4.2%
30	LS-1, HPSV, Class C, 1-Lamp, Reactor Ballast					
31	70	5800	17.02	15.68	(1.34)	-7.9%
32	100	9500	18.87	17.72	(1.15)	-6.1%
33	150	16000	21.47	20.59	(0.88)	-4.1%
34	LS-1, HPSV, Class C, 1-Lamp, Regulator Ballast					
35	200	22000	27.16	26.23	(0.93)	-3.4%
36	250	30000	30.74	30.19	(0.55)	-1.8%
37	400	50000	40.86	40.87	0.01	0.0%
38	LS-1, HPSV, Class C, 2-Lamp, Reactor Ballast					
39	70	5800	12.05	11.60	(0.45)	-3.7%
40	100	9500	13.84	13.89	0.05	0.4%
41	150	16000	16.84	16.69	(0.15)	-0.9%
42	LS-1, HPSV, Class C, 2-Lamp, Regulator Ballast					
43	200	22000	20.93	20.94	0.01	0.0%
44	250	30000	25.78	26.00	0.22	0.9%
45	400	50000	33.30	34.58	1.28	3.8%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE	% CHANGE
	WATTS (A)	LUMENS (B)	PRESENT TOTAL RATE (\$/Lamp) (C)	2021 TOTAL RATE (\$/Lamp) (D)		
46	LS-1, LPSV, Class A					
47	55	8000	16.48	14.69	(1.79)	-10.9%
48	90	13500	20.34	18.59	(1.75)	-8.6%
49	135	22500	23.96	22.76	(1.20)	-5.0%
50	180	33000	27.49	25.59	(1.90)	-6.9%
51	LS-1, LPSV, Class B, 1-Lamp					
52	55	8000	16.66	15.00	(1.66)	-10.0%
53	90	13500	20.51	18.89	(1.62)	-7.9%
54	135	22500	24.09	22.93	(1.16)	-4.8%
55	180	33000	27.62	25.75	(1.87)	-6.8%
56	LS-1, LPSV, Class B, 2-Lamp					
57	55	8000	16.01	14.37	(1.64)	-10.2%
58	90	13500	19.87	18.27	(1.60)	-8.1%
59	135	22500	23.69	22.64	(1.05)	-4.4%
60	180	33000	27.21	25.46	(1.75)	-6.4%
61	LS-1, LPSV, Class C, 1-Lamp					
62	55	8000	19.74	17.87	(1.87)	-9.5%
63	90	13500	22.92	21.33	(1.59)	-6.9%
64	135	22500	27.80	26.08	(1.72)	-6.2%
65	180	33000	29.89	28.22	(1.67)	-5.6%
66	LS-1, LPSV, Class C, 2-Lamp					
67	55	8000	16.12	14.40	(1.72)	-10.7%
68	90	13500	20.00	18.33	(1.67)	-8.4%
69	135	22500	24.02	22.93	(1.09)	-4.5%
70	180	33000	27.28	25.48	(1.80)	-6.6%
71	LS-1, Metal Halide, Class A					
72	100	8500	12.76	13.26	0.50	3.9%
73	175	12000	16.66	17.56	0.90	5.4%
74	250	18000	20.94	22.29	1.35	6.4%
75	400	32000	29.59	31.73	2.14	7.2%
76	LS-1, Metal Halide, Class B					
77	100	8500	13.21	13.92	0.71	5.4%
78	175	12000	17.11	18.23	1.12	6.5%
79	250	18000	21.40	22.96	1.56	7.3%
80	400	32000	30.04	32.40	2.36	7.9%
81	LS-1, Metal Halide, Class C					
82	100	8500	24.99	24.12	(0.87)	-3.5%
83	175	12000	28.89	28.43	(0.46)	-1.6%
84	250	18000	33.18	33.16	(0.02)	-0.1%
85	400	32000	41.82	42.60	0.78	1.9%
86	LS-1 Pole in Non-Standard Position					
87	30-foot		8.26	5.86	(2.40)	-29.1%
88	35-foot		8.63	5.90	(2.73)	-31.6%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
89	LS-1, LED, Rate A, Energy, 1-Lamp					
90	2.5		10.56	10.81	0.25	2.4%
91	7.5		10.74	10.97	0.23	2.1%
92	12.5		10.83	11.07	0.24	2.2%
93	17.5		11.01	11.24	0.23	2.1%
94	22.5		11.21	11.41	0.20	1.8%
95	27.5		11.39	11.59	0.20	1.8%
96	32.5		11.49	11.68	0.19	1.7%
97	37.5		11.67	11.84	0.17	1.5%
98	42.5		11.85	12.02	0.17	1.4%
99	47.5		11.94	12.09	0.15	1.3%
100	52.5		12.12	12.27	0.15	1.2%
101	57.5		12.31	12.45	0.14	1.1%
102	62.5		12.48	12.61	0.13	1.0%
103	67.5		12.59	12.72	0.13	1.0%
104	72.5		12.77	12.89	0.12	0.9%
105	77.5		12.95	13.05	0.10	0.8%
106	82.5		13.14	13.23	0.09	0.7%
107	87.5		13.23	13.31	0.08	0.6%
108	92.5		13.42	13.48	0.06	0.4%
109	97.5		13.59	13.66	0.07	0.5%
110	102.5		13.78	13.83	0.05	0.4%
111	107.5		13.87	13.91	0.04	0.3%
112	112.5		14.05	14.09	0.04	0.3%
113	117.5		14.24	14.26	0.02	0.1%
114	122.5		14.42	14.44	0.02	0.1%
115	127.5		14.51	14.52	0.01	0.1%
116	132.5		14.70	14.69	(0.01)	-0.1%
117	137.5		14.89	14.85	(0.04)	-0.3%
118	142.5		14.98	14.95	(0.03)	-0.2%
119	147.5		15.15	15.12	(0.03)	-0.2%
120	152.5		15.34	15.29	(0.05)	-0.3%
121	157.5		15.53	15.48	(0.05)	-0.3%
122	162.5		15.62	15.57	(0.05)	-0.3%
123	167.5		15.80	15.73	(0.07)	-0.4%
124	172.5		15.99	15.90	(0.09)	-0.6%
125	177.5		16.16	16.07	(0.09)	-0.6%
126	182.5		16.25	16.16	(0.09)	-0.6%
127	187.5		16.45	16.33	(0.12)	-0.7%
128	192.5		16.63	16.49	(0.14)	-0.8%
129	197.5		16.82	16.69	(0.13)	-0.8%
130	202.5		16.91	16.77	(0.14)	-0.8%
131	207.5		17.10	16.94	(0.16)	-0.9%
132	212.5		17.27	17.12	(0.15)	-0.9%
133	217.5		17.36	17.21	(0.15)	-0.9%
134	222.5		17.55	17.37	(0.18)	-1.0%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
135	227.5		17.72	17.54	(0.18)	-1.0%
136	232.5		17.92	17.71	(0.21)	-1.2%
137	237.5		18.01	17.80	(0.21)	-1.2%
138	242.5		18.21	17.98	(0.23)	-1.3%
139	247.5		18.39	18.15	(0.24)	-1.3%
140	252.5		18.57	18.33	(0.24)	-1.3%
141	257.5		18.68	18.41	(0.27)	-1.4%
142	262.5		18.85	18.59	(0.26)	-1.4%
143	267.5		19.04	18.77	(0.27)	-1.4%
144	272.5		19.22	18.93	(0.29)	-1.5%
145	277.5		19.31	19.02	(0.29)	-1.5%
146	282.5		19.49	19.18	(0.31)	-1.6%
147	287.5		19.68	19.37	(0.31)	-1.6%
148	292.5		19.88	19.55	(0.33)	-1.7%
149	297.5		19.96	19.62	(0.34)	-1.7%
150	302.5		20.15	19.80	(0.35)	-1.7%
151	307.5		20.33	19.97	(0.36)	-1.8%
152	312.5		20.41	20.05	(0.36)	-1.8%
153	317.5		20.60	20.23	(0.37)	-1.8%
154	322.5		20.78	20.39	(0.39)	-1.9%
155	327.5		20.97	20.58	(0.39)	-1.9%
156	332.5		21.06	20.67	(0.39)	-1.9%
157	337.5		21.24	20.83	(0.41)	-1.9%
158	342.5		21.43	21.01	(0.42)	-2.0%
159	347.5		21.61	21.18	(0.43)	-2.0%
160	352.5		21.71	21.26	(0.45)	-2.1%
161	357.5		21.89	21.44	(0.45)	-2.1%
162	362.5		22.08	21.62	(0.46)	-2.1%
163	367.5		22.26	21.79	(0.47)	-2.1%
164	372.5		22.36	21.89	(0.47)	-2.1%
165	377.5		22.55	22.05	(0.50)	-2.2%
166	382.5		22.72	22.23	(0.49)	-2.2%
167	387.5		22.82	22.32	(0.50)	-2.2%
168	392.5		23.00	22.48	(0.52)	-2.3%
169	397.5		23.19	22.66	(0.53)	-2.3%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
170	LS-1, LED, Rate B, Energy, 1-Lamp					
171	2.5		10.56	10.81	0.25	2.4%
172	7.5		10.74	10.97	0.23	2.1%
173	12.5		10.83	11.07	0.24	2.2%
174	17.5		11.01	11.24	0.23	2.1%
175	22.5		11.21	11.41	0.20	1.8%
176	27.5		11.39	11.59	0.20	1.8%
177	32.5		11.49	11.68	0.19	1.7%
178	37.5		11.67	11.84	0.17	1.5%
179	42.5		11.85	12.02	0.17	1.4%
180	47.5		11.94	12.09	0.15	1.3%
181	52.5		12.12	12.27	0.15	1.2%
182	57.5		12.31	12.45	0.14	1.1%
183	62.5		12.48	12.61	0.13	1.0%
184	67.5		12.59	12.72	0.13	1.0%
185	72.5		12.77	12.89	0.12	0.9%
186	77.5		12.95	13.05	0.10	0.8%
187	82.5		13.14	13.23	0.09	0.7%
188	87.5		13.23	13.31	0.08	0.6%
189	92.5		13.42	13.48	0.06	0.4%
190	97.5		13.59	13.66	0.07	0.5%
191	102.5		13.78	13.83	0.05	0.4%
192	107.5		13.87	13.91	0.04	0.3%
193	112.5		14.05	14.09	0.04	0.3%
194	117.5		14.24	14.26	0.02	0.1%
195	122.5		14.42	14.44	0.02	0.1%
196	127.5		14.51	14.52	0.01	0.1%
197	132.5		14.70	14.69	(0.01)	-0.1%
198	137.5		14.89	14.85	(0.04)	-0.3%
199	142.5		14.98	14.95	(0.03)	-0.2%
200	147.5		15.15	15.12	(0.03)	-0.2%
201	152.5		15.34	15.29	(0.05)	-0.3%
202	157.5		15.53	15.48	(0.05)	-0.3%
203	162.5		15.62	15.57	(0.05)	-0.3%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
204	167.5		15.80	15.73	(0.07)	-0.4%
205	172.5		15.99	15.90	(0.09)	-0.6%
206	177.5		16.16	16.07	(0.09)	-0.6%
207	182.5		16.25	16.16	(0.09)	-0.6%
208	187.5		16.45	16.33	(0.12)	-0.7%
209	192.5		16.63	16.49	(0.14)	-0.8%
210	197.5		16.82	16.69	(0.13)	-0.8%
211	202.5		16.91	16.77	(0.14)	-0.8%
212	207.5		17.10	16.94	(0.16)	-0.9%
213	212.5		17.27	17.12	(0.15)	-0.9%
214	217.5		17.36	17.21	(0.15)	-0.9%
215	222.5		17.55	17.37	(0.18)	-1.0%
216	227.5		17.72	17.54	(0.18)	-1.0%
217	232.5		17.92	17.71	(0.21)	-1.2%
218	237.5		18.01	17.80	(0.21)	-1.2%
219	242.5		18.21	17.98	(0.23)	-1.3%
220	247.5		18.39	18.15	(0.24)	-1.3%
221	252.5		18.57	18.33	(0.24)	-1.3%
222	257.5		18.68	18.41	(0.27)	-1.4%
223	262.5		18.85	18.59	(0.26)	-1.4%
224	267.5		19.04	18.77	(0.27)	-1.4%
225	272.5		19.22	18.93	(0.29)	-1.5%
226	277.5		19.31	19.02	(0.29)	-1.5%
227	282.5		19.49	19.18	(0.31)	-1.6%
228	287.5		19.68	19.37	(0.31)	-1.6%
229	292.5		19.88	19.55	(0.33)	-1.7%
230	297.5		19.96	19.62	(0.34)	-1.7%
231	302.5		20.15	19.80	(0.35)	-1.7%
232	307.5		20.33	19.97	(0.36)	-1.8%
233	312.5		20.41	20.05	(0.36)	-1.8%
234	317.5		20.60	20.23	(0.37)	-1.8%
235	322.5		20.78	20.39	(0.39)	-1.9%
236	327.5		20.97	20.58	(0.39)	-1.9%
237	332.5		21.06	20.67	(0.39)	-1.9%
238	337.5		21.24	20.83	(0.41)	-1.9%
239	342.5		21.43	21.01	(0.42)	-2.0%
240	347.5		21.61	21.18	(0.43)	-2.0%
241	352.5		21.71	21.26	(0.45)	-2.1%
242	357.5		21.89	21.44	(0.45)	-2.1%
243	362.5		22.08	21.62	(0.46)	-2.1%
244	367.5		22.26	21.79	(0.47)	-2.1%
245	372.5		22.36	21.89	(0.47)	-2.1%
246	377.5		22.55	22.05	(0.50)	-2.2%
247	382.5		22.72	22.23	(0.49)	-2.2%
248	387.5		22.82	22.32	(0.50)	-2.2%
249	392.5		23.00	22.48	(0.52)	-2.3%
250	397.5		23.19	22.66	(0.53)	-2.3%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020	PROPOSED	CHANGE	% CHANGE
	WATTS (A)	LUMENS (B)	PRESENT TOTAL RATE (\$/Lamp) (C)	2021 TOTAL RATE (\$/Lamp) (D)		
251	LS-1, LED, Rate B, Energy, 2-Lamp					
252	2.5		9.37	10.42	1.05	11.2%
253	7.5		9.55	10.58	1.03	10.8%
254	12.5		9.64	10.68	1.04	10.8%
255	17.5		9.82	10.85	1.03	10.5%
256	22.5		10.02	11.02	1.00	10.0%
257	27.5		10.20	11.20	1.00	9.8%
258	32.5		10.30	11.29	0.99	9.6%
259	37.5		10.48	11.45	0.97	9.3%
260	42.5		10.66	11.63	0.97	9.1%
261	47.5		10.75	11.70	0.95	8.8%
262	52.5		10.93	11.88	0.95	8.7%
263	57.5		11.12	12.06	0.94	8.5%
264	62.5		11.29	12.22	0.93	8.2%
265	67.5		11.40	12.33	0.93	8.2%
266	72.5		11.58	12.50	0.92	7.9%
267	77.5		11.76	12.66	0.90	7.7%
268	82.5		11.95	12.84	0.89	7.4%
269	87.5		12.04	12.92	0.88	7.3%
270	92.5		12.23	13.09	0.86	7.0%
271	97.5		12.40	13.27	0.87	7.0%
272	102.5		12.59	13.44	0.85	6.8%
273	107.5		12.68	13.52	0.84	6.6%
274	112.5		12.86	13.70	0.84	6.5%
275	117.5		13.05	13.87	0.82	6.3%
276	122.5		13.23	14.05	0.82	6.2%
277	127.5		13.32	14.13	0.81	6.1%
278	132.5		13.51	14.30	0.79	5.8%
279	137.5		13.70	14.46	0.76	5.5%
280	142.5		13.79	14.56	0.77	5.6%
281	147.5		13.96	14.73	0.77	5.5%
282	152.5		14.15	14.90	0.75	5.3%
283	157.5		14.34	15.09	0.75	5.2%
284	162.5		14.43	15.18	0.75	5.2%
285	167.5		14.61	15.34	0.73	5.0%
286	172.5		14.80	15.51	0.71	4.8%
287	177.5		14.97	15.68	0.71	4.7%
288	182.5		15.06	15.77	0.71	4.7%
289	187.5		15.26	15.94	0.68	4.5%
290	192.5		15.44	16.10	0.66	4.3%
291	197.5		15.63	16.30	0.67	4.3%
292	202.5		15.72	16.38	0.66	4.2%
293	207.5		15.91	16.55	0.64	4.0%
294	212.5		16.08	16.73	0.65	4.0%
295	217.5		16.17	16.82	0.65	4.0%
296	222.5		16.36	16.98	0.62	3.8%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
297	227.5		16.53	17.15	0.62	3.8%
298	232.5		16.73	17.32	0.59	3.5%
299	237.5		16.82	17.41	0.59	3.5%
300	242.5		17.02	17.59	0.57	3.3%
301	247.5		17.20	17.76	0.56	3.3%
302	252.5		17.38	17.94	0.56	3.2%
303	257.5		17.49	18.02	0.53	3.0%
304	262.5		17.66	18.20	0.54	3.1%
305	267.5		17.85	18.38	0.53	3.0%
306	272.5		18.03	18.54	0.51	2.8%
307	277.5		18.12	18.63	0.51	2.8%
308	282.5		18.30	18.79	0.49	2.7%
309	287.5		18.49	18.98	0.49	2.7%
310	292.5		18.69	19.16	0.47	2.5%
311	297.5		18.77	19.23	0.46	2.5%
312	302.5		18.96	19.41	0.45	2.4%
313	307.5		19.14	19.58	0.44	2.3%
314	312.5		19.22	19.66	0.44	2.3%
315	317.5		19.41	19.84	0.43	2.2%
316	322.5		19.59	20.00	0.41	2.1%
317	327.5		19.78	20.19	0.41	2.1%
318	332.5		19.87	20.28	0.41	2.1%
319	337.5		20.05	20.44	0.39	1.9%
320	342.5		20.24	20.62	0.38	1.9%
321	347.5		20.42	20.79	0.37	1.8%
322	352.5		20.52	20.87	0.35	1.7%
323	357.5		20.70	21.05	0.35	1.7%
324	362.5		20.89	21.23	0.34	1.6%
325	367.5		21.07	21.40	0.33	1.6%
326	372.5		21.17	21.50	0.33	1.6%
327	377.5		21.36	21.66	0.30	1.4%
328	382.5		21.53	21.84	0.31	1.4%
329	387.5		21.63	21.93	0.30	1.4%
330	392.5		21.81	22.09	0.28	1.3%
331	397.5		22.00	22.27	0.27	1.2%
332	LS-2, Mercury Vapor, Rate A, Regulator Ballast					
333	175	7000	10.90	12.05	1.15	10.6%
334	250	10000	15.13	16.73	1.60	10.6%
335	400	20000	23.92	26.43	2.51	10.5%
336	700	35000	40.52	44.78	4.26	10.5%
337	1000	55000	57.14	63.20	6.06	10.6%
338	LS-2, Mercury Vapor, Rate A, Reactor Ballast					
339	175	7000	9.99	11.03	1.04	10.4%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
340	LS-2, Mercury Vapor, Rate A, Series Service					
341	175	7000	12.50	14.72	2.22	17.8%
342	250	10000	15.10	17.79	2.69	17.8%
343	400	20000	26.80	31.60	4.80	17.9%
344	700	35000	47.09	55.48	8.39	17.8%
345	LS-2, Mercury Vapor, Rate B, Regulator Ballast					
346	175	7000	12.38	13.81	1.43	11.6%
347	250	10000	16.62	18.49	1.87	11.3%
348	400	20000	25.41	28.19	2.78	10.9%
349	LS-2, Mercury Vapor, Rate B, Series Service					
350	175	7000	13.99	16.48	2.49	17.8%
351	LS-2, HPSV, Rate A, Energy, Regulator Ballast					
352	50	4000	3.00	3.32	0.32	10.7%
353	70	5800	5.23	5.77	0.54	10.3%
354	100	9500	7.32	8.09	0.77	10.5%
355	150	16000	10.01	11.05	1.04	10.4%
356	200	22000	12.73	14.07	1.34	10.5%
357	250	30000	16.28	17.99	1.71	10.5%
358	310	37000	19.89	21.99	2.10	10.6%
359	400	50000	24.69	27.31	2.62	10.6%
360	1000	140000	57.14	63.20	6.06	10.6%
361	LS-2, HPSV, Rate A, Energy, Reactor Ballast					
362	50	4000	2.56	2.84	0.28	10.9%
363	70	5800	4.32	4.78	0.46	10.6%
364	100	9500	6.10	6.74	0.64	10.5%
365	150	16000	8.83	9.77	0.94	10.6%
366	LS-2, HPSV, Rate A, Series Service					
367	50	4,000	3.83	4.52	0.69	18.0%
368	70	5800	6.46	7.63	1.17	18.1%
369	100	9500	7.29	8.61	1.32	18.1%
370	150	16000	10.46	12.33	1.87	17.9%
371	200	22000	14.06	16.56	2.50	17.8%
372	250	30000	18.92	22.28	3.36	17.8%
373	LS-2, HPSV, Rate B, Regulator Ballast					
374	50	4000	4.48	5.08	0.60	13.4%
375	70	5800	6.72	7.53	0.81	12.1%
376	100	9500	8.81	9.85	1.04	11.8%
377	150	16000	11.50	12.81	1.31	11.4%
378	200	22000	14.22	15.83	1.61	11.3%
379	250	30000	17.77	19.75	1.98	11.1%
380	310	37000	21.37	23.75	2.38	11.1%
381	400	50000	26.18	29.07	2.89	11.0%
382	1000	140000	58.63	64.96	6.33	10.8%
383	LS-2, HPSV, Rate B, Reactor Ballast					
384	50	4000	4.04	4.60	0.56	13.9%
385	70	5800	5.81	6.54	0.73	12.6%
386	100	9500	7.59	8.50	0.91	12.0%
387	150	16000	10.32	11.53	1.21	11.7%

**SAN DIEGO GAS AND ELECTRIC COMPANY ("SDG&E")
TEST YEAR ("TY") 2019 GENERAL RATE CASE ("GRC") PHASE 2, APPLICATION ("A.") 19-03-002**

**ATTACHMENT C
COMPARISON OF PRESENT AND PROPOSED NON-SCHOOL LIGHTING TOTAL RATES**

LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
388	LS-2, HPSV, Rate B, Series Service					
389	50	4,000	5.31	6.28	0.97	18.3%
390	70	5800	7.95	9.39	1.44	18.1%
391	100	9500	8.78	10.37	1.59	18.1%
392	150	16000	11.94	14.09	2.15	18.0%
393	200	22000	15.55	18.32	2.77	17.8%
394	250	30000	20.41	24.04	3.63	17.8%
395	LS-2, LPSV, Rate A					
396	35	4800	3.46	3.83	0.37	10.7%
397	55	8000	4.61	5.09	0.48	10.4%
398	90	13500	7.48	8.29	0.81	10.8%
399	135	22500	10.64	11.77	1.13	10.6%
400	180	33000	12.23	13.51	1.28	10.5%
401	LS-2, LPSV, Rate A, Series Service					
402	35	4800	2.98	3.52	0.54	18.1%
403	55	8,000	4.34	5.13	0.79	18.2%
404	90	13,500	7.82	9.23	1.41	18.0%
405	135	22,500	11.13	13.13	2.00	18.0%
406	180	33,000	13.19	15.56	2.37	18.0%
407	LS-2, Incandescent Lamps, Rate A, Energy Only					
408		1000	3.76	4.17	0.41	10.9%
409		2,500	8.38	9.28	0.90	10.7%
410		4000	15.29	16.91	1.62	10.6%
411		6000	21.06	23.28	2.22	10.5%
412		10000	31.54	34.89	3.35	10.6%
413	LS-2, Incandescent Lamps, Rate B					
414		6000	22.55	25.04	2.49	11.0%
415	LS-2, Metal Halide, Rate A					
416	50	2100	3.57	3.94	0.37	10.4%
417	100	8500	6.86	7.58	0.72	10.5%
418	175	12000	10.76	11.89	1.13	10.5%
419	250	18000	14.95	16.53	1.58	10.6%
420	400	32000	23.03	25.47	2.44	10.6%
421	LS-2, Metal Halide, Rate B					
422	50	2100	5.05	5.70	0.65	12.9%
423	100	8500	8.35	9.34	0.99	11.9%
424	175	12000	12.24	13.65	1.41	11.5%
425	250	18000	16.44	18.29	1.85	11.3%
426	400	32000	24.52	27.23	2.71	11.1%
427	LS-2, Induction, Rate A, Five-Lamp					
428	55	3500	14.23	15.74	1.51	10.6%
429	87	6000	22.58	24.98	2.40	10.6%

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	WATTS (A)	LUMENS (B)				
430	LS-2, Induction, Rate A, Single-Lamp					
431	40		2.09	2.31	0.22	10.5%
432	50		2.56	2.84	0.28	10.9%
433	55		2.85	3.15	0.30	10.5%
434	70		3.61	4.00	0.39	10.8%
435	80		4.18	4.61	0.43	10.3%
436	85		4.45	4.92	0.47	10.6%
437	100		5.21	5.75	0.54	10.4%
438	150		7.77	8.60	0.83	10.7%
439	165		8.53	9.44	0.91	10.7%
440	200		10.34	11.45	1.11	10.7%
441	250		12.99	14.36	1.37	10.5%
442	300		15.56	17.20	1.64	10.5%
443	400		20.79	22.97	2.18	10.5%
444	LS-2, LED, Rate A, Energy, 1-Lamp		0.00	0.00		
445	2.5		0.14	0.16	0.02	14.3%
446	7.5		0.42	0.46	0.04	9.5%
447	12.5		0.61	0.69	0.08	13.1%
448	17.5		0.89	1.00	0.11	12.4%
449	22.5		1.19	1.31	0.12	10.1%
450	27.5		1.47	1.62	0.15	10.2%
451	32.5		1.67	1.85	0.18	10.8%
452	37.5		1.95	2.15	0.20	10.3%
453	42.5		2.23	2.46	0.23	10.3%
454	47.5		2.42	2.67	0.25	10.3%
455	52.5		2.70	2.99	0.29	10.7%
456	57.5		2.99	3.30	0.31	10.4%
457	62.5		3.26	3.60	0.34	10.4%
458	67.5		3.47	3.85	0.38	11.0%
459	72.5		3.75	4.15	0.40	10.7%
460	77.5		4.03	4.45	0.42	10.4%
461	82.5		4.31	4.77	0.46	10.7%
462	87.5		4.50	4.99	0.49	10.9%
463	92.5		4.79	5.29	0.50	10.4%
464	97.5		5.06	5.61	0.55	10.9%
465	102.5		5.35	5.92	0.57	10.7%
466	107.5		5.54	6.13	0.59	10.6%
467	112.5		5.82	6.45	0.63	10.8%
468	117.5		6.11	6.76	0.65	10.6%
469	122.5		6.39	7.07	0.68	10.6%
470	127.5		6.58	7.29	0.71	10.8%
471	132.5		6.87	7.60	0.73	10.6%
472	137.5		7.16	7.89	0.73	10.2%
473	142.5		7.35	8.13	0.78	10.6%
474	147.5		7.62	8.44	0.82	10.8%

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LINE NO.	DESCRIPTION		1/1/2020 PRESENT TOTAL RATE (\$/Lamp) (C)	PROPOSED 2021 TOTAL RATE (\$/Lamp) (D)	CHANGE (E)	% CHANGE (F)
	WATTS (A)	LUMENS (B)				
475	152.5		7.91	8.74	0.83	10.5%
476	157.5		8.20	9.07	0.87	10.6%
477	162.5		8.39	9.30	0.91	10.8%
478	167.5		8.67	9.60	0.93	10.7%
479	172.5		8.96	9.90	0.94	10.5%
480	177.5		9.23	10.21	0.98	10.6%
481	182.5		9.42	10.44	1.02	10.8%
482	187.5		9.72	10.74	1.02	10.5%
483	192.5		10.00	11.04	1.04	10.4%
484	197.5		10.29	11.38	1.09	10.6%
485	202.5		10.48	11.59	1.11	10.6%
486	207.5		10.77	11.90	1.13	10.5%
487	212.5		11.04	12.22	1.18	10.7%
488	217.5		11.23	12.44	1.21	10.8%
489	222.5		11.52	12.74	1.22	10.6%
490	227.5		11.79	13.05	1.26	10.7%
491	232.5		12.09	13.35	1.26	10.4%
492	237.5		12.28	13.58	1.30	10.6%
493	242.5		12.57	13.90	1.33	10.6%
494	247.5		12.85	14.21	1.36	10.6%
495	252.5		13.13	14.52	1.39	10.6%
496	257.5		13.34	14.74	1.40	10.5%
497	262.5		13.61	15.06	1.45	10.7%
498	267.5		13.90	15.37	1.47	10.6%
499	272.5		14.18	15.67	1.49	10.5%
500	277.5		14.37	15.90	1.53	10.6%
501	282.5		14.65	16.19	1.54	10.5%
502	287.5		14.94	16.52	1.58	10.6%
503	292.5		15.24	16.84	1.60	10.5%
504	297.5		15.42	17.04	1.62	10.5%
505	302.5		15.71	17.36	1.65	10.5%
506	307.5		15.99	17.67	1.68	10.5%
507	312.5		16.17	17.88	1.71	10.6%
508	317.5		16.46	18.20	1.74	10.6%
509	322.5		16.74	18.50	1.76	10.5%
510	327.5		17.03	18.83	1.80	10.6%
511	332.5		17.22	19.05	1.83	10.6%
512	337.5		17.50	19.35	1.85	10.6%
513	342.5		17.79	19.67	1.88	10.6%
514	347.5		18.07	19.97	1.90	10.5%
515	352.5		18.27	20.19	1.92	10.5%
516	357.5		18.55	20.51	1.96	10.6%
517	362.5		18.84	20.82	1.98	10.5%
518	367.5		19.12	21.13	2.01	10.5%
519	372.5		19.32	21.37	2.05	10.6%
520	377.5		19.61	21.66	2.05	10.5%
521	382.5		19.88	21.98	2.10	10.6%
522	387.5		20.08	22.21	2.13	10.6%
523	392.5		20.36	22.50	2.14	10.5%
524	397.5		20.65	22.82	2.17	10.5%
525						

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	WATTS (A)	LUMENS (B)				
526	LS-2, Non-standard Lamp					
527	Energy Charge (\$/kWh/lamp/month)		0.15005	0.16173	0.01	7.8%
528						
529	LS-3 (CLOSED)					
530	Energy Charge (\$/kWh)		0.15887	0.16379	0.00	3.1%
531	Minimum Charge (\$/month)		7.58	7.58	0.00	0.0%
532						
533	OL-1, HPSV, Rate A, Street Light Luminaire — Reactor Ballast					
534	100	9500	16.15	13.75	(2.40)	-14.9%
535	150	16000	18.86	16.76	(2.10)	-11.1%
536	OL-1, HPSV, Rate A, Street Light Luminaire — Regulator Ballast					
537	250	30000	28.17	26.03	(2.14)	-7.6%
538	400	50000	36.21	35.18	(1.03)	-2.8%
539	1000	140000	68.99	72.18	3.19	4.6%
540	OL-1, HPSV, Rate B, Directional Luminaire					
541	250	30000	29.33	26.73	(2.60)	-8.9%
542	400	50000	38.00	36.12	(1.88)	-4.9%
543	1000	140000	73.28	73.53	0.25	0.3%

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	WATTS (A)	LUMENS (B)				
544	OL-1, LPSV, Rate A, Street Light Luminaire					
545	55	8000	19.63	14.87	(4.76)	-24.2%
546	90	13000	23.79	18.79	(5.00)	-21.0%
547	135	22500	27.55	22.98	(4.57)	-16.6%
548	180	33000	31.67	25.83	(5.84)	-18.4%
549	OL-1 Pole in Non-Standard Position					
550	30-foot		13.91	6.20	(7.71)	-55.4%
551	35-foot		14.54	6.24	(8.30)	-57.1%
552	OL-2					
553	Energy Charge (\$/kwh)		0.23300	0.24000	0.01	3.0%
554	Basic Service Fee (\$/month)		11.47	11.47	0.00	0.0%
555						
556	DWL, Facilities Charges					
557	\$ of Utility Investment		0.01150	0.00790	(0.00)	-31.3%
558	DWL, Energy and Lamp Maintenance Charge					
559	50 Watt HPSV		4.50	5.10	0.60	13.3%
560	DWL, Minimum Charge		59.58	61.74	2.16	3.6%