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*Public Advocates Office*  
California Public Utilities Commission



**PUBLIC ADVOCATES OFFICE DATA REQUEST**

**A.17-12-013: San Diego Gas and Electric Company (SDG&E)  
2018 Rate Design Window**

Date: 10/16/2018

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**Response Due Date: ASAP and no later than October 30, 2018**

**Re: Data Request No. Public Advocates Office-A1712011- SDGE-013**

**INSTRUCTIONS**

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

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

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

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

### **DATA REQUESTS**

#### **SUBJECT: SUPPLEMENTAL TESTIMONY ON GHG REDUCTIONS**

1. Please provide an estimate of the total California Alternative Rates for Energy (“CARE”) and Non-CARE annual residential load that SDG&E expects to be defaulted to time-of-use (TOU) rates. Please assume a 20% opt-out rate. Please indicate whether SDG&E used 2016 residential loads, or another year of load data. Please provide all underlying spreadsheets and formulas used to arrive at the final result.

Please see attached excel file [‘SDG&E Default TOU Ex-Ante Load Impact Protocol Tables\\_20181016.xlsx’](#).

To provide an estimate of the total CARE and Non-CARE annual residential load impact from Default TOU with 20% opt-out rate, SDG&E assumes a total of 750,000 eligible residential customers would be defaulted. Therefore, 20% of 750,000 is 150,000, subtracting this number from the total equals 600,000. SDG&E recently updated its elasticity to be -0.1 as requested by the CPUC’s Energy Division. All the data in the excel file have been updated to reflect this.

A total of 600,000 residential customers were used in the tab *‘TotalRes’* in the referenced excel file above. The estimated annual average peak hour load impact between 4-9pm is estimated to be approximately 23 MW. Residential loads between October 2016 to September 2017 were used as the inputs. Below is a snapshot of the calculation. **The actual calculations from this snapshot is stored in the tab called *‘TotalRes’* in the excel file [‘SDG&E Default TOU Ex-Ante Load Impact Protocol Tables\\_20181016.xlsx’](#).**