



ORA

Office of Ratepayer Advocates
California Public Utilities Commission

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ORA DATA REQUEST

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

Date: 8/29/2018

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Response Due Date: ASAP and no later than September 13, 2018

Re: Data Request No. ORA-011

INSTRUCTIONS

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

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

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

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

DATA REQUESTS

SUBJECT: TOU BILL COMPARISON

Background:

Commission Decision (D.) 12-12-036 adopted a Code of Conduct providing guidance for utility interactions with community choice aggregators (CCA). Code of Conduct #3.a states:

The electrical corporation and CCA(s) shall share equally the costs of the design, preparation, and distribution of the notice to customers, as well as the design and preparation of the detailed tariff comparison to be posted on their Web sites. Each entity will be responsible for its own costs for posting the detailed tariff comparison in its Web site.

Further, Code of Conduct #3.b states that the “Commission’s Public Advisor’s office must review and approve the wording of the comparison before it is distributed to customers...”

Focus: Cost Responsibility

1. How does SDG&E interpret the significance of Code of Conduct #3 in this proceeding? Please indicate how SDG&E’s proposal for TOU bill comparisons will ensure that Code is upheld. Please reference and respond to both subsections of Code of Conduct 3.a and 3.b.

2. For the current proceeding, what does SDG&E believe is the CCA cost responsibility for TOU rate comparisons as it relates to Code of Conduct #3?

3. In the August 17, 2018 testimony of Todd Cahill; SDG&E discusses its TOU coordination with an emerging CCA, Solana Energy Alliance.¹ Further it states that the only other potential CCAs in its territory to be affected by the TOU mass default would have to file an implementation plan by January 1, 2019.²
 - a) Which CCAs, including potential CCAs, has SDG&E been in communication with regarding the default TOU roll-out?
 - b) Does SDG&E expect any CCAs to file an implementation plan by January 1, 2019? If so, which?
 - c) Please describe in detail the content of the discussions SDG&E has had with CCAs or potential CCAs. Please provide any relevant supporting material such as meeting agenda, notes, email conversations, presentations, etc.
 - d) Of the CCAs SDG&E has been in communication with, which are in agreement with SDG&E's proposal to use its TOU rates to approximate a CCA TOU bill?
 - e) For the CCAs that SDG&E has been in contact with, what has been their position on offering bill protection for TOU rates?
 - f) What obligation does SDG&E have to incorporate actual CCA rates into its rate comparison model? Please cite to authorizing Commission Decisions or statute.
4. As the number of CCAs and rates proliferate, what are the future implications for cost responsibility for TOU and/or other alternate CCA rate comparisons?
5. Focusing solely on #3 of the Code of Conduct, what does SDG&E believe to be the minimum and maximum of CCA financial responsibility for TOU rate comparisons? If costs or cost responsibility cannot be approximated, please describe the cost categories which would influence this.
6. SDG&E states that for additional costs incurred, "above and beyond any costs currently anticipated to develop a rate comparison tool for CCA customers, those cost should be recovered through distribution rates."³
 - a. What types of activities would constitute additional costs?

¹ Prepared Phase 2b Testimony of Todd Cahill; A. 17-12-011 August 17, 2018, p. 3, line 1.

² Ibid, p. 4, lines 9 – 11.

³ Ibid, p. 3, lines 19 – 21.

- b. What are the current costs SDG&E will incur for TOU rate comparison tools and what activities do these costs already include?
7. Focusing solely on CCA customer contributions to ME&O, describe the rate comparison services that a CCA should expect without making further financial contributions?

Focus: Bill Comparisons

8. Under rule #3 of the Code of Conduct, will SDG&E provide the Commission's Public Advisor's Office with default TOU bill comparisons to be approved?
9. Regarding notifying CCA customers for TOU/Tiered bill comparisons:
- a) How will CCA customers be notified of TOU bill comparisons?
 - b) Will CCA customers need to access SDG&E's website in order to compare their different rate options?
 - c) If the answer to 8.b above is yes, how will customers be directed to SDG&E's website?
 - d) Will SDG&E allow a CCA to provide SDG&E's rate comparison tools on that CCA's website?
 - e) Have any CCAs indicated they would like SDG&E's TOU rate comparison on their own website?
 - f) In the absence of SDG&E's TOU rate comparison on a CCA website, does SDG&E expect the CCA to inform customers that in order to compare their generation rate structure options (tiered or TOU), they must go to SDG&E's website and use SDG&E's bill comparison tools?
 - g) How will CCA customers be informed that the TOU bill comparisons and tools on the SDG&E website are all approximations? If available, please provide examples of how these tools inform customers of these approximations.

END OF REQUEST