

**PUBLIC ADVOCATES OFFICE (PAO) DATA REQUEST
CAL ADVOCATES-AB 10821083-SDG&E-03
SDG&E AB 1082/1083 TRANSPORTATION ELECTRIFICATION PROGRAMS
(A.18-07-023)
SDG&E RESPONSE
DATE RECEIVED: JANUARY 24, 2020
DATE RESPONDED: FEBRUARY 4, 2020**

PAO DATA REQUEST

Question 1

Provide all of San Diego Gas & Electric Company's (SDG&E's) workpapers used to develop the two tables in SDG&E's Advice Letter (AL) 3490-E, p. 3. Provide the workpapers in .xls format with live formulas.

SDG&E Response

Please see the Excel spreadsheet "AL3490-E Table Workpapers."

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Question 2

Provide the maximum per EVSE rebate a program participant could receive, based on the assumptions SDG&E used to develop AL 3490-E.

SDG&E Response

SDG&E objects that this question calls for a hypothetical, given that SDG&E has not yet proposed a rebate for site-host ownership. The maximum amount that a site-host owner could receive could change. Notwithstanding and without waiving this objection, applying the assumptions to develop AL 3490-E, the maximum rebate a program participant could receive is \$7,080 for level 2 charging stations and \$55,080 for DCFC charging. This would include both the cost of the equipment and the cost for maintenance on the equipment.

Actual rebates for the program will be proposed in a separate advice letter, however, per Ordering Paragraph 26 of Decision 19-11-017. SDG&E's intention in providing the tables in AL 3490-E were not to propose or show the final rebate amounts, but to illustrate the programmatic changes required to account for offering the site-host ownership option. SDG&E needed to estimate (non-final) rebate amounts in AL 3490-E so as to be able to request programmatic changes consistent with the timing provided in D.19-11-017. SDG&E anticipates filing the separate advice letter containing the proposed rebate amounts in or around the Spring of 2020.

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Question 3

Provide the methodology SDG&E will use to determine rebate amounts for AL 3490-E.

SDG&E Response

SDG&E did not determine rebate amounts in AL 3490-E. SDG&E has yet to determine the methodology that will be used for rebate amounts. AL 3490-E addresses programmatic changes based on offering site host ownership pursuant to D.19-11-017¹. To request programmatic changes, SDG&E had to estimate rebate amounts. But AL 3490-E does not contain SDG&E's actual rebate amount methodology or proposal.

D.19-11-017 Ordering Paragraph 26 requires a separate advice letter to propose rebate amounts. SDG&E will propose its rebate amounts in that separate advice letter. It has thus not yet finalized the methodology for making that determination. Potential options for determining rebate amounts currently being considered are market data, internal company data related to chargers owned through the Power Your Drive Pilot program, information gathered from an RFP/RFQ process, or a combination of these methods. SDG&E plans to incorporate feedback from upcoming PAC meetings before determining the methodology that will be used for proposed rebate amounts.

¹ D.19-11-017 at 44

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Question 4

Explain why SDG&E anticipates in the tables in AL 3490-E, p. 3 that site host ownership will increase ongoing O&M costs, given site host ownership should reduce SDG&E's EVSE maintenance responsibilities.

SDG&E Response

SDG&E objects to the extent that this question assumes the answer that "site host ownership should reduce SDG&E's EVSE maintenance responsibilities," without providing any evidence that this assumption is correct. Notwithstanding and without waiving this objection, for site host ownership sites, the upfront rebate payment assumes eight years of ongoing O&M costs (annual networking fees and EVSE maintenance). For utility ownership sites, the assumption is ongoing O&M costs for 18 months rather than eight years. This assumption is consistent with the program application that annual ongoing O&M costs for the life of the EVSE assets were assumed to be recovered in a post-2019 General Rate Case.

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Question 5

In the tables in SDG&E’s AL 3490-E, p. 3, SDG&E has a cost category titled “Ongoing O&M”. Separate the costs in this category into all relevant subcategories, including but not limited to: EVSE Rebates, Administration, Network Fees, Ongoing Maintenance, and Warranty.

- a. Provide the dollar amount for each of these subcategories.

SDG&E Response

SDG&E objects to the extent this question is overly broad and unduly burdensome. These costs are estimates and subject to change. Notwithstanding and without waving these objections, ongoing O&M consists of networking fees including sales tax and charger maintenance / warranty costs. The estimates used are consistent with the unit cost estimates in the Application testimony.

- a. As provided in Excel spreadsheet “AL3490-E Table Workpapers.”, the table below shows the dollar amounts for these subcategories

Annualized Estimate (dollars)	Per Nozzle
Network Communication Fees	360
Sales Tax @ 7.75%	28
Network Communication Fees Total	388
Charger Maintenance / Warranty	247
Total	635

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Question 6

If SDG&E has previously estimated “Ongoing O&M” costs for an annual rather than one-time rebate structure, provide these costs. Provide the costs separated into subcategories, per Question 5.

SDG&E Response

SDG&E objects to the extent this question is vague. Notwithstanding and without waiving this objection, SDG&E has not yet performed an EV program that has offered rebates or estimated annual ongoing O&M costs related to a rebate structure.

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Question 7

In the tables in SDG&E's AL 3490-E, p. 3, SDG&E has a cost category titled "EVSE Rebates Including Administration". Separate the costs in this category into all relevant subcategories, including but not limited to: EVSE Rebates, Administration, Network Fees, Ongoing Maintenance, and Warranty.

- a. Provide the dollar amount for each of these subcategories.

SDG&E Response

SDG&E objects to the extent this question is overly broad and unduly burdensome. These costs are estimates and subject to change. Notwithstanding and without waving these objections, the category "EVSE Rebates Including Administration" includes only the projected cost of the EVSE consistent with the cost estimates for "Chargers / EVSE" in the Application testimony for each scenario.

No additional costs were added to the advice letter tables for rebate administration. Due to the uncertainty around the number of sites that will choose site host ownership, SDG&E assumes the costs for administration of the rebates can be absorbed within the program's approved budget.

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Question 8

If SDG&E has previously estimated “EVSE Rebates Including Administration” costs for an annual rather than one-time rebate structure, provide these costs. Provide the costs separated into subcategories, per Question 7.

SDG&E Response

SDG&E has not previously estimated such costs, because SDG&E has yet to execute a program that has offered rebates for EVSEs.

END OF RESPONSES