

EVgo DATA REQUEST
EVgo -SDG&E-DR-02
Application for Approval of Electric Vehicle High Power Charging Rate
SDG&E RESPONSE
DATE RECEIVED: February 11, 2020
DATE RESPONDED: February 25, 2020

1. Please provide a summary of what SDG&E considers to be its 2016 GRC Phase 2 marginal demand-related distribution costs that apply to commercial and industrial customers, including AL-TOU customers, as adopted in D. 17-08-030. Please express this amount in \$/kW-year units. Please also provide the Equal Percent of Marginal Cost (EPMC) multiplier that applies to SDG&E's demand-related marginal distribution costs.

Given D. 17-08-030 adopted a "black box" revenue allocation / marginal cost settlement in SDG&E's last general rate case (A. 15-04-012) that did not include adoption of specific marginal cost values, we are seeking clarity on what marginal distribution capacity costs SDG&E considers to be its most recently adopted values.

As background, we are aware that SDG&E provided, in response to NRDC data request 1, Question 3, a spreadsheet attachment indicating marginal distribution revenues of \$785,241,243 and a distribution revenue requirement allocation of \$1,286,974,638 million, for an EPMC allocation factor of 1.64 (i.e. $1.64 = \$1,286,974,638 / \$785,241,243$). The spreadsheet notes, as the source for this data, SDG&E's 2016 GRC Phase 2 Chapter 6 workpapers. Looking at SDG&E witness Saxe's Chapter 6 rebuttal testimony workpapers in A. 15-04-012, we see the same amounts that SDG&E provided to NRDC (i.e. total distribution marginal cost revenues equal to \$785 million, in Attachment B.1, and distribution revenue requirement in column (D) equal to \$1,287 million).

- a. Please confirm that SDG&E is using marginal distribution capacity costs from Mr. Saxe's rebuttal testimony in A. 15-04-012, and provide those values in \$ per kW-year.
- b. Please provide the associated EPMC factor.
- c. Please provide the workpapers for the allocation of marginal distribution capacity costs to the AL-TOU customer class in SDG&E's current rates, based on the settlement adopted in D. 17-08-030.

SDG&E Response

- a. The EV-HP proposed rates presented in the Direct Testimony of William G. Saxe in Application (A.) 19-07-006 are based on SDG&E's then current June 1, 2019 electric rates, which are rates based on the marginal capacity costs in the SDG&E 2016 GRC Phase 2 (A.15-04-012) Rebuttal Testimony of William G. Saxe. The marginal capacity costs (Distribution Demand-Related Marginal Costs) presented in Attachment A of that rebuttal testimony is \$60.72/kW-year for Feeder & Local Distribution Demand costs and \$19.67/kW-year for Substation costs.
- b. The EPMC allocation factor used to develop the EPMC distribution rates was 163.90%, as presented in Attachment B.3 of the SDG&E 2016 GRC Phase 2 Rebuttal Testimony of William G. Saxe.
- c. The attached file provides the marginal distribution capacity cost rates adopted in D.17-08-030 for the Medium/Large Commercial & Industrial customer class, which is the basis for SDG&E's current Schedule AL-TOU rates.



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Q1c.xlsx

END OF RESPONSES