EVgo DATA REQUEST EVgo -SDG&E-DR-03

Application for Approval of Electric Vehicle High Power Charging Rate SDG&E RESPONSE

DATE RECEIVED: March 10, 2020 DATE RESPONDED: March 13, 2020

Question 1

SDG&E's rebuttal testimony proposes to base the subscription charge in SDG&E's EV-HP rate only on marginal distribution costs, and then "phase-in recovery of EPMC distribution costs in the subscription charge over ten years" (SDG&E Rebuttal [Saxe], at p. WS-2, line 11. Ms. Syz's rebuttal (p. BAS-3, line 22) says that this phase-in will occur "linearly," which is also shown in Mr. Saxe's rebuttal Attachment A.

- a. Does SDG&E's proposed Year 1 EV-HP subscription charge in Attachment A of Mr. Saxe's rebuttal include 0% or 10% recovery of EPMC distribution costs?
- b. Please explain how the "linear" phase-in will be adapted if subsequent GRC Phase 2 cases adopt different marginal distribution costs for SDG&E. For example, is it SDG&E's proposal to phase-in 10% recovery of EPMC distribution costs in Year 1, 20% in Year 2, 30% in Year 3, etc., such that the percentage recovery is phased-in over 10 years, while the SDG&E marginal distribution costs may change in each GRC Phase 2 case during these 10 years?

SDG&E Response

- a. SDG&E's proposed Year 1 EV-HP subscription charge shown in Attachment A of the rebuttal testimony of William Saxe includes 0% of current EPMC distribution costs.
- b. SDG&E objects to the extent that the question calls for speculation. Notwithstanding and without waiving that objection, SDG&E will linearly phase-in EPMC distribution costs so that the proportion of the EPMC distribution costs reflect recovery of the currently adopted EPMC distribution costs for that year. For example, in the sixth year that the EV-HP rate is offered, 50% of the current EPMC distribution scalar will be applied. This will be 50% of the then current EPMC distribution costs. Those current EPMC distribution costs could reflect future changes to SDG&E rates due to factors that include: a) changes to Commission authorized SDG&E distribution revenue requirements for SDG&E; and/or b) changes to marginal distribution costs, distribution revenue allocation, and/or distribution rate design in a future SDG&E GRC Phases 2 proceeding that impacts the Schedule AL-TOU allocated non-coincident demand charges and thus, the resulting EV-HP subscription charge.

(Note that 0% of the EPMC distribution costs will be applied in Year 1, see response above.)

END OF RESPONSES