

ENVIRONMENTAL DEFENSE FUND (EDF) DATA REQUEST
EDF-SDG&E DR-01
APPLICATION FOR APPROVAL OF ELECTRIC VEHICLE HIGH POWER
CHARGING RATE (A.19-07-006)
SDG&E RESPONSE
DATE RECEIVED: APRIL 27, 2020
DATE RESPONDED: MAY 7, 2020

EDF DATA REQUEST

Question 1

At page WS-5, lines 10-12, of the [Rebuttal Testimony of William G. Saxe](#), dated and served February 20, 2020, SDG&E witness William G. Saxe testifies:

“SDG&E agrees with EDF that commercial EV customers should have the option to take electric service on a dynamic pricing rate.”

With reference to this testimony, please respond to the following:

- a. Does SDG&E still agree that commercial electric vehicle (EV) customers should have the option to take electric service on a dynamic pricing rate?
- b. If the answer to Data Request Question 1(a) is no, please explain why SDG&E has changed its position.
- c. If the answer to Data Request Question 1(a) is yes, do you agree that there are commercial EV customers that would be interested in a dynamic rate?
- d. If the answer to Data Request Question 1(a) is yes, do you agree that a dynamic rate may create environmental benefits?

SDG&E Response

- a. SDG&E objects to the extent that the question misstates SDG&E’s position. Notwithstanding that objection, SDG&E agrees that, if the California Public Utilities Commission approves a dynamic pricing rate for SDG&E customers, commercial EV customers should have the option to take electric service on this dynamic pricing rate.
- b. N/A
- c. SDG&E objects to the extent that this question calls for speculation and/or information and knowledge that is not in SDG&E’s possession or control. Notwithstanding those objections, SDG&E assumes that there are may be some commercial EV customers that would be interested in a dynamic rate.
- d. SDG&E objects to the extent that the question is vague. Notwithstanding and without waiving that objection, SDG&E believes that dynamic rates may create environmental benefits.

ENVIRONMENTAL DEFENSE FUND (EDF) DATA REQUEST
EDF-SDG&E DR-01
APPLICATION FOR APPROVAL OF ELECTRIC VEHICLE HIGH POWER
CHARGING RATE (A.19-07-006)
SDG&E RESPONSE
DATE RECEIVED: APRIL 27, 2020
DATE RESPONDED: MAY 7, 2020

Question 2

At page WS-5, lines 12-15, of the [Rebuttal Testimony of William G. Saxe](#), dated and served February 20, 2020, SDG&E witness William G. Saxe testifies:

“SDG&E agrees to propose a dynamic pricing rate for commercial EV customers in a future SDG&E GRC Phase 2 or Rate Design Window (“RDW”) Application filed after the Commission issues a decision adopting the Final Transportation Electrification Framework (“TEF”).”

With reference to this testimony, please respond to the following:

- a. At this time, does SDG&E have a specific dynamic rate proposal?
- b. Are you familiar with D.19-10-055, the Decision Approving Application for Pacific Gas and Electric Company’s Commercial Electric Vehicle Rates?
- c. In D.19-10-055, the Commission ordered Pacific Gas and Electric Company (PG&E) to file an application for a dynamic rate option for commercial EV customers no later than 12 months after the effective date of that decision, is that correct?
- d. Would SDG&E agree to filing an application for a dynamic rate option for commercial EV customers no later than 12 months after the effective date of the final decision in A.19-07-006?
- e. If the answer to Data Request Question 2(d) is no, please explain why SDG&E would not agree to this commitment.
- f. If the answer to Data Request Question 2(d) is no, please explain why SDG&E should have a different requirement as to a dynamic rate option than PG&E.
- g. When do you expect the TEF to be approved?
- h. Would delays in approving the TEF lead to delays in SDG&E proposing its optional dynamic rate option?

SDG&E Response

- a. SDG&E does not have a specific dynamic rate proposal for commercial EV customers at this time.
- b. SDG&E is generally familiar with D.19-10-055.
- c. SDG&E objects to the extent that EDF seeks a legal conclusion and/or information that is publicly available. Notwithstanding those objections, SDG&E understands that D.19-10-005

ENVIRONMENTAL DEFENSE FUND (EDF) DATA REQUEST
EDF-SDG&E DR-01
APPLICATION FOR APPROVAL OF ELECTRIC VEHICLE HIGH POWER
CHARGING RATE (A.19-07-006)
SDG&E RESPONSE
DATE RECEIVED: APRIL 27, 2020
DATE RESPONDED: MAY 7, 2020

ordered PG&E to file an application for a dynamic rate option for commercial EV customers no later than 12 months after the effective date of the decision.

d. No, SDG&E does not agree to file an application for a dynamic rate option for commercial EV customers no later than 12 months after the effective date of the final decision in A.19-07-006.

e. SDG&E objects to the extent this question calls for legal analysis or a legal conclusion. Notwithstanding and without waiving those objections, filing a separate incremental application would be premature, duplicative, and could conflict with the planned development of utility Transportation Electrification Plans.

f. SDG&E objects to the extent that this question calls for a legal conclusion. Notwithstanding and without waiving that objection, unlike D.19-10-055, a final decision in A.19-07-006 will likely be issued after the release of the Draft TEF (or Final TEF), which could have implications for how SDG&E and other utilities should address dynamic rate options..

g. SDG&E objects to the extent that this question calls for information that is outside of SDG&E's possession or control. Notwithstanding and without waiving that objection, SDG&E is not aware when the Final TEF will be issued.

h. SDG&E objects to the extent that this question calls for information that is outside of SDG&E's possession or control. Notwithstanding and without waiving that objection, as the SDG&E does not know whether and how delays in the Commission's issuance of a Final TEF would impact the Final TEF's instructions or guidance on when and how SDG&E and other California utilities should propose optional dynamic rates.

END OF RESPONSES