

Application: A.19-10-012

Exhibit No.: SDG&E-15

A.19-10-012

SDG&E POWER YOUR DRIVE EXTENSION APPLICATION

TURN-SDG&E-DR-07

DATE OF REQUEST: NOVEMBER 9-10, 2020

DATE OF RESPONSE: NOVEMBER 11, 2020



BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

A.19-10-012
SDG&E POWER YOUR DRIVE EXTENSION APPLICATION
TURN-SDG&E-DR-07
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QUESTION 1

At cross-examination of Ms. Reynolds and Mr. Schimka, TURN requested an updated count of those sites without utilization. TURN requested that this information be provided in the same format as that used to develop its TURN Exhibit-10.

SDG&E RESPONSE

The attached confidential file “TURN-SDG&E DR-07 Q1 (CONFIDENTIAL).xlsx” (alternatively, “TURN-SDG&E DR-07 Q1 (PUBLIC).xlsx”) shows updated hourly consumption (load in kW) data. This file is the same data requested by TURN answered by the “TURN DR 01 – Q2 (Confidential).xlsx” file provided by SDG&E during discovery. This file has been updated to reflect data as of 9/30/2020. This file is based on charging session data aggregated by site as defined within SDG&E’s data request response.¹ The underlying charging session data was used to develop Table 1 shown below. This table was referenced by Mr. Schimka during hearings.

Table 1: Site Count w/ no Utilization

Date	Site Count w/no Utilization
Feb-20	38
Mar-20	35
Apr-20	34
May-20	34
Jun-20	31
Jul-20	26
Aug-20	25
Sep-20	24

Although the attached excel file and Table 1 use the same underlying consumption data, the TURN file appears to use different metrics about PYD infrastructure usage. The attached excel file reflects consumption and aggregates sites differently than SDG&E typically reports on PYD program sites as requested by TURN. Table 1 uses SDG&E’s standard site definition and looks at utilization rather than consumption.

For a site to be “utilized” in SDG&E’s reports, it must have at least one charging session that lasted longer than 5 minutes. This approach reflects that a site can serve a customer even if the site has zero consumption. For example, a customer might begin a charging session, but if the price to charge is higher than their price threshold, there will be zero consumption during that session even though the site was in use.²

¹ The consumption data reflects load billed to site hosts and drivers through PYD. This is the majority of total PYD consumption, but in some cases, metered PYD site usage using facility meters may exceed the levels reported by the EVSP. This excess is billed to the EVSP servicing the site per the terms of the PYD contract since an appropriate driver and session is not identifiable. The load billed to the EVSP is not included in the data set.

² In PYD, participants can set a pricing threshold to help them charge during low cost, grid friendly hours. This means that a charging session can be initiated without consumption being registered because the price offered is higher than the price that the driver set on the app at the time the driver initiates the charging session.

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In addition, SDG&E's response to TURN DR-01 Q2 aggregated sites in the way that TURN requested. In the response to TURN DR-01, SDG&E explained that there are different ways to define a "site". Throughout the deployment of the Power Your Drive Pilot, it became apparent that there are multiple ways to define a "site" in the PYD context. These different definitions have impacts on the user experience, metrics, and deployment of the pilot.

For the purpose of this data request, each column is a different site based on how SDG&E's data warehouse aggregates user registrations. Within each of these sites, multiple "sites" may exist for the purpose of construction and deployment. This is usually due to a single construction job needing to span across multiple banks of chargers at a specific location. For example, WP170032 had chargers installed at three separate locations on the workplace campus. These three locations required three separate construction activities. An employee at this campus would not want to register at three separate locations, so they are combined into one. Therefore, one column (by user registration) can have multiple sites. Table 1 uses the construction and deployment definition of a site.

As far as SDG&E can tell, the data in Table 1 above does not line up with the TURN's Exhibit TURN-10, due in part to these nuances with how utilization is analyzed and how sites are defined in the PYD context. Any reconciliation of different site usage metrics will be a significant effort. From a big picture perspective, the SDG&E and TURN treatment of the data address the same issue and show the same trend. SDG&E's approach is more conservative in that it treats more sites as unutilized.

ATTACHMENT A

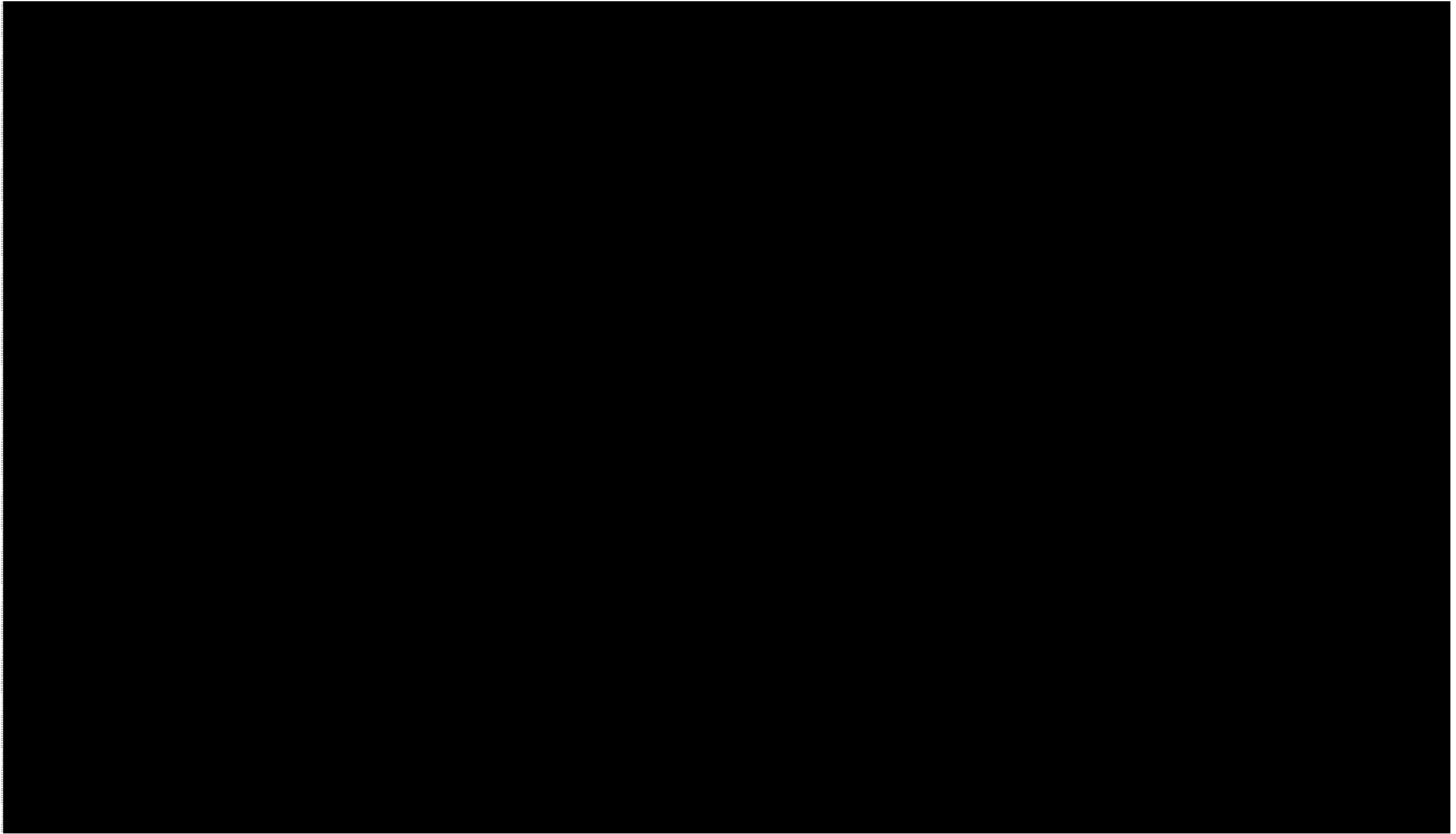
SDG&E Request for Confidentiality on the following information in its Response

Location of Protected Information	Legal Citations	Narrative Justification
<p>Yellow-shaded portions of the excel spreadsheet</p>	<p>California Public Records Act (CPRA) Exemption, Gov’t Code § 6254(k) (“Records, the disclosure of which is exempted or prohibited pursuant to federal or state law”)¹</p> <ul style="list-style-type: none"> • Cal. Civil Code § 1798.21 (requiring agencies to “ensure the security and confidentiality of” personal data) • Cal. Civil Code § 1798.24 (limiting disclosure of personal information) • Cal. Civil Code §§ 1798.80 <i>et seq.</i> (process for protecting customer records) • Cal. Civil Code § 1798.81.5 (security procedures and practices with respect to personal information about California residents) • <i>Britt v. Superior Court</i>, 20 Cal. 3d 844, 855-856 (1978) (even highly relevant information may be shielded from discovery if its disclosure would impair 	<p>Under Civil Code § 1798.81.5(b), a “business that owns, licenses, or maintains personal information about a California resident shall implement and maintain reasonable security procedures and practices appropriate to the nature of the information, to protect the personal information from unauthorized access, destruction, use, modification, or disclosure.” If publicly disclosed, such personal information could pose a risk of fraud, identity theft, or other personal, commercial, or financial damage to customers.</p> <p>Disclosure may also constitute an “unwarranted invasion of personal privacy.”</p> <p>Under D.14-05-016, utilities are required to treat as confidential “usage-related data”, including program participation data, if paired with individualized personal information of the customer.</p>

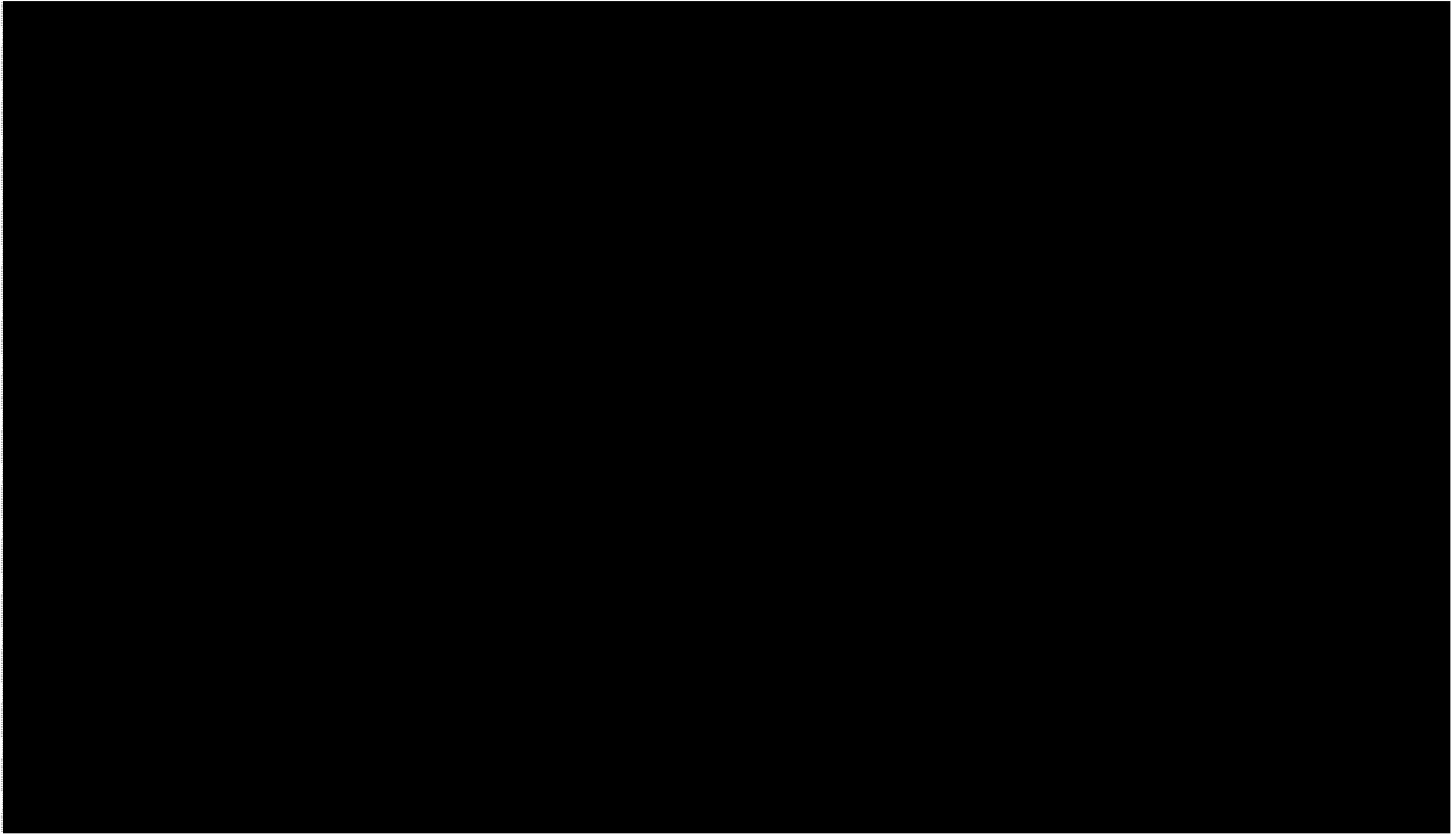
	<p>a person's inalienable right of privacy provided by the California Constitution)</p> <p>D.14-05-016 (Decision Adopting Rules to Provide Access to Energy Usage and Usage Related Data While Protecting Privacy of Personal Data)</p> <p>CPRA Exemption, Gov't Code § 6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy")</p> <p>CPRA Exemption, Gov't Code § 6255(a) (Balancing Test)²</p>	
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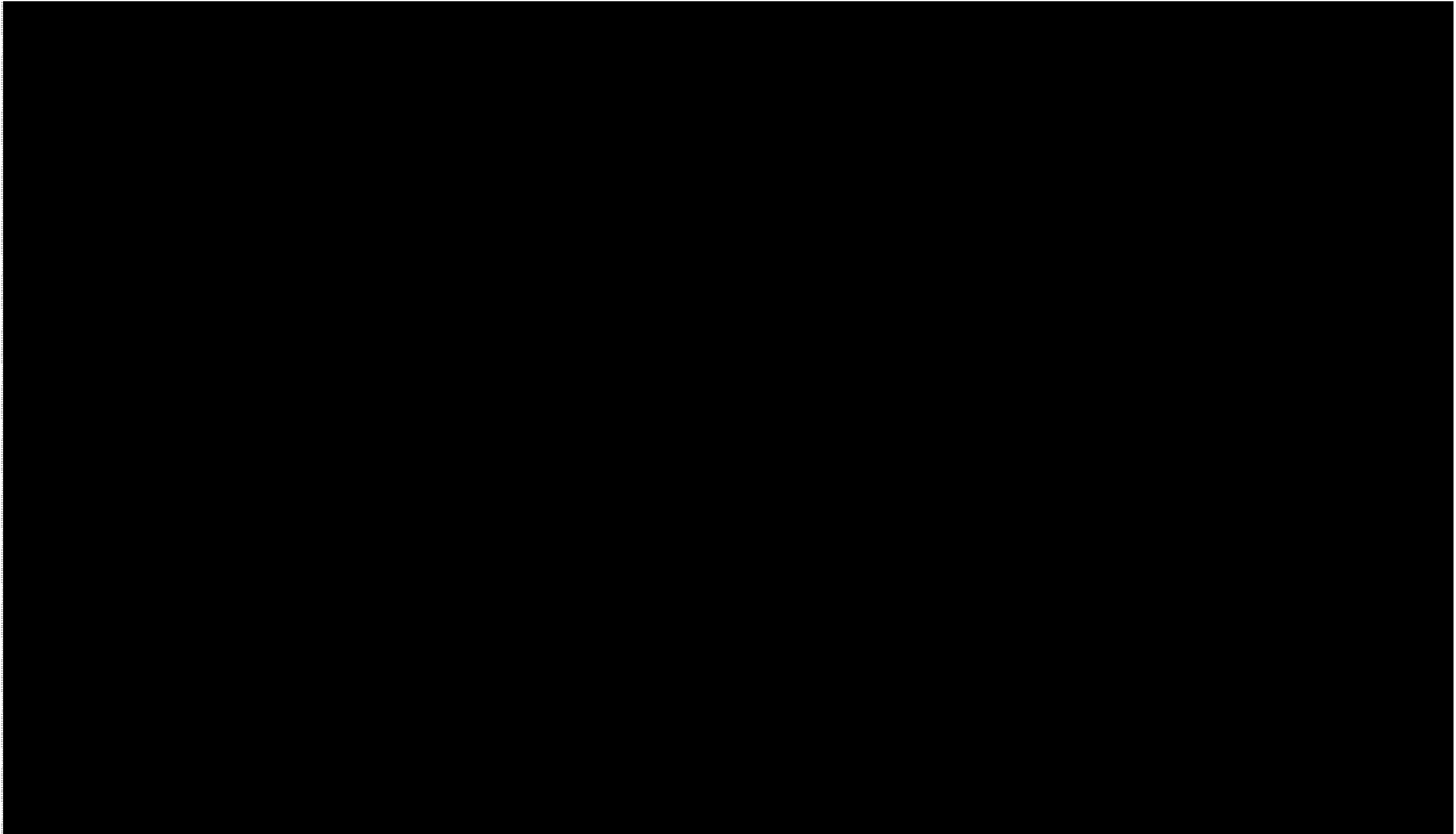
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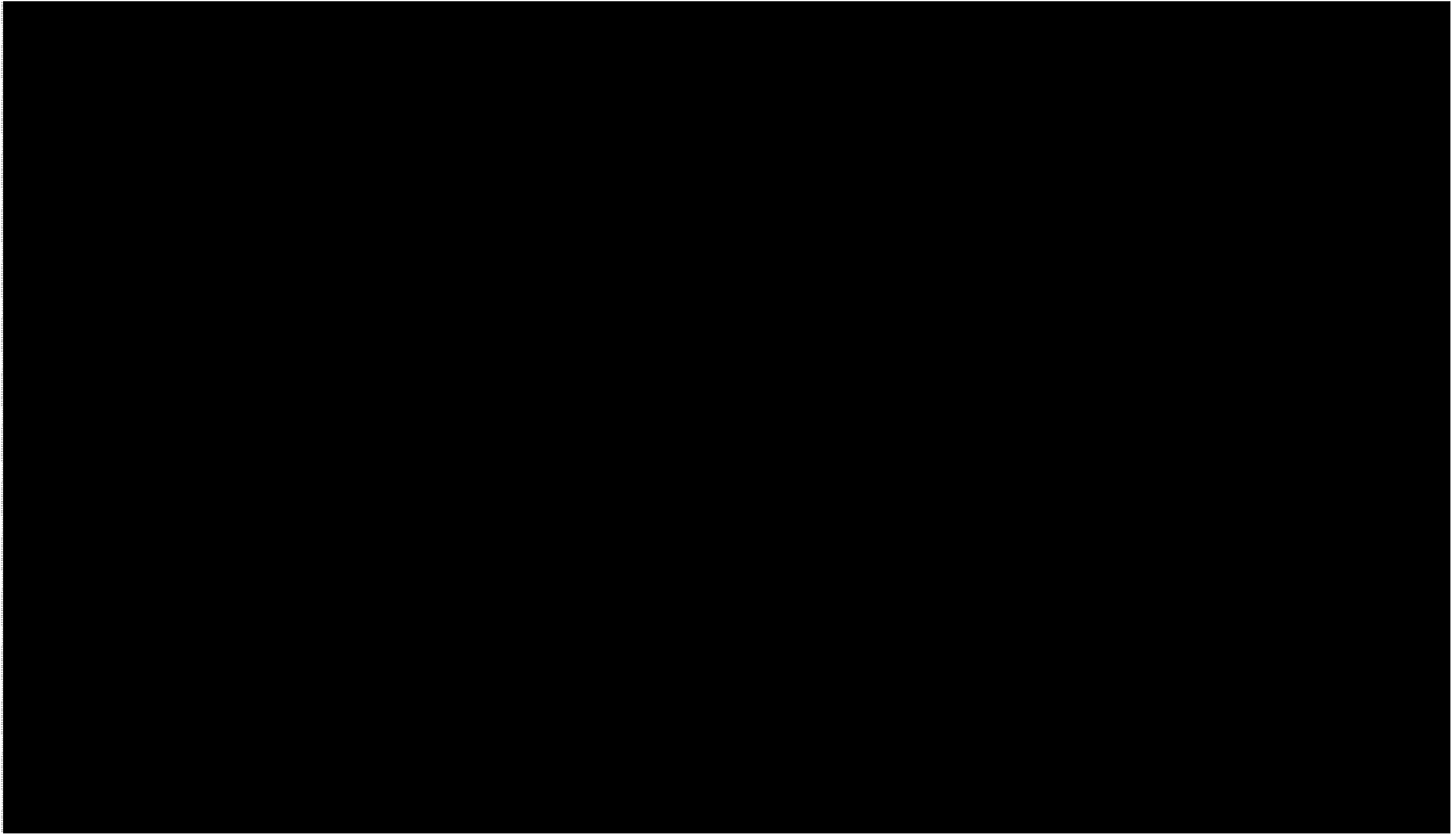
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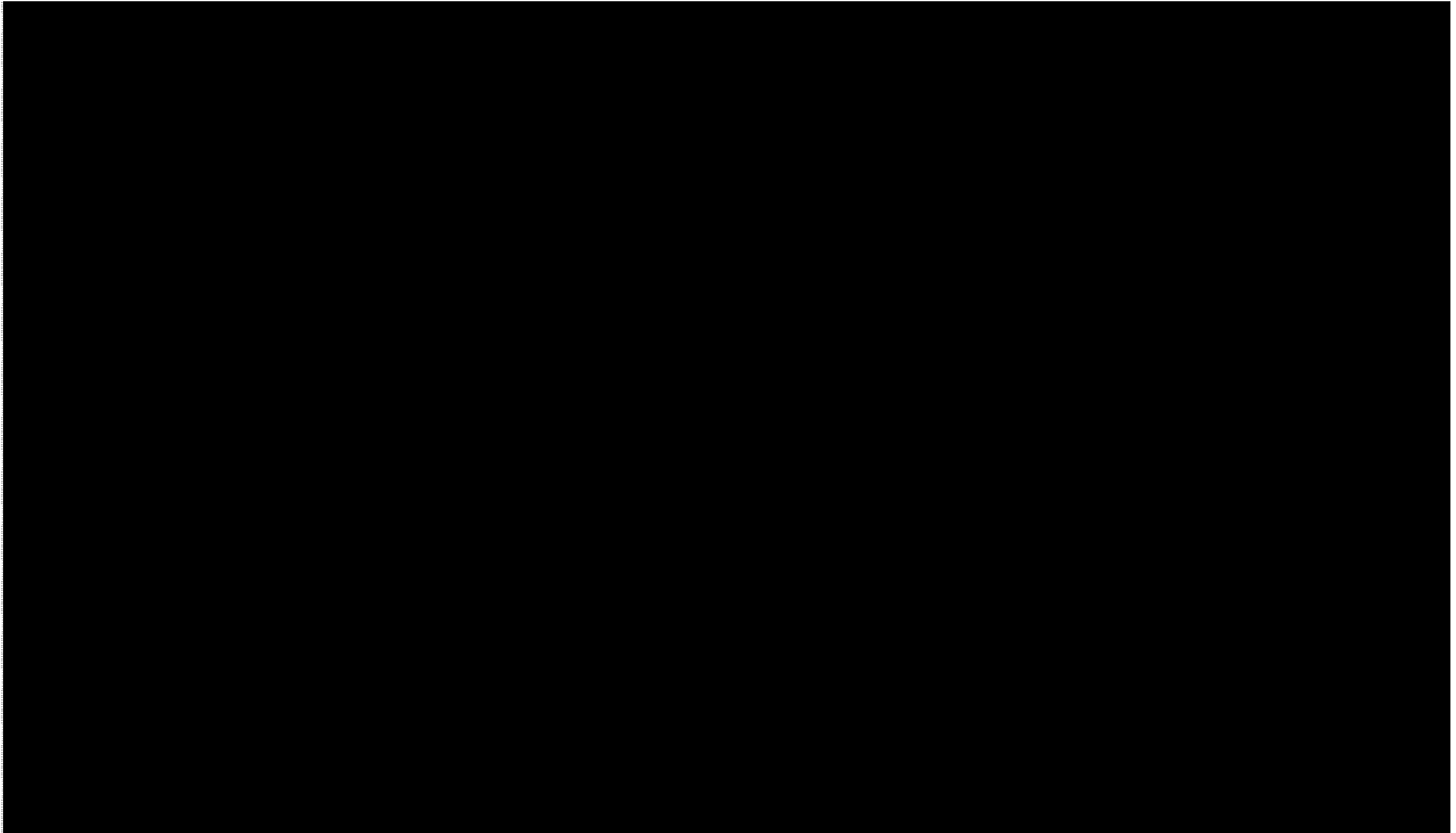


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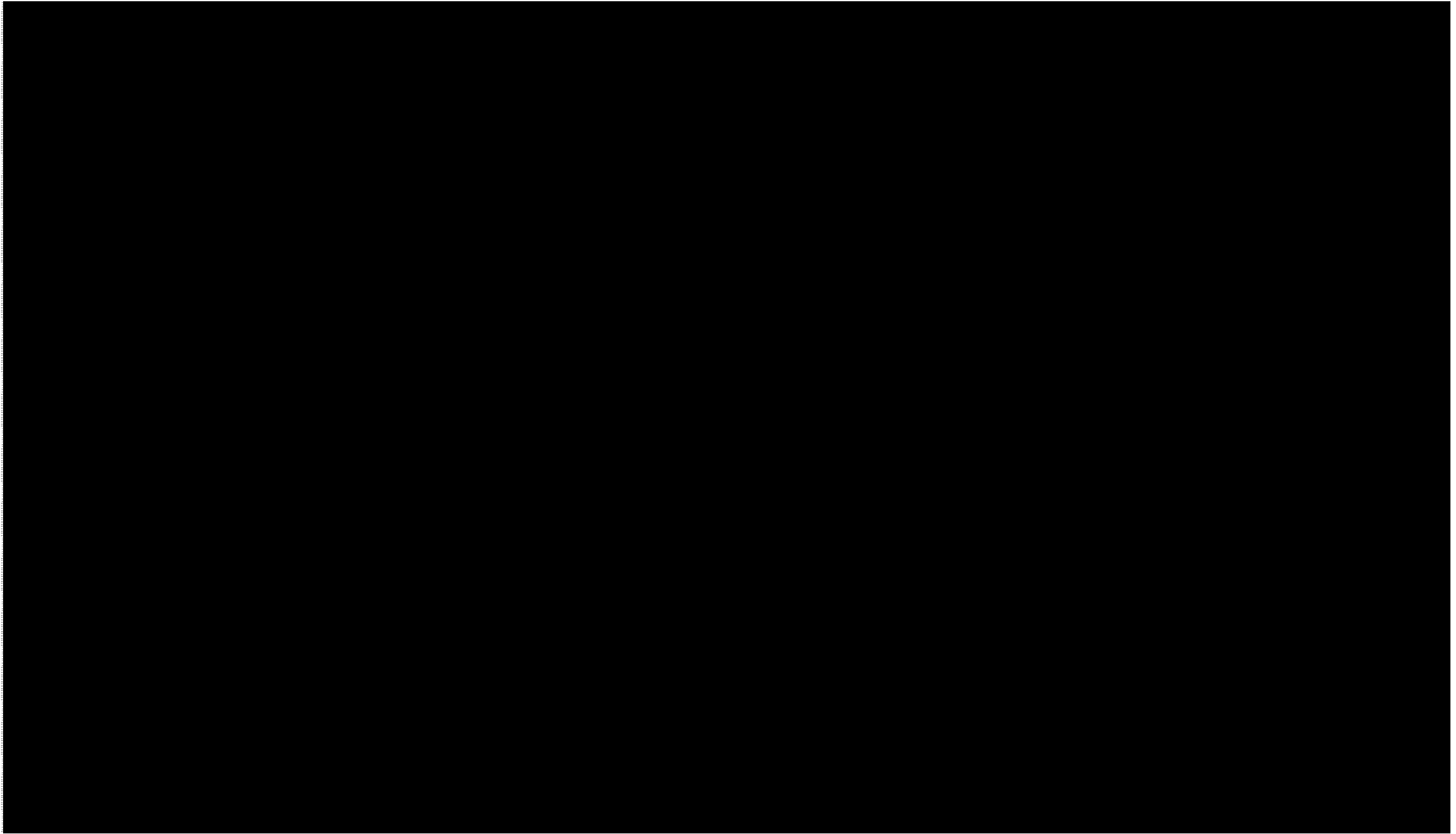




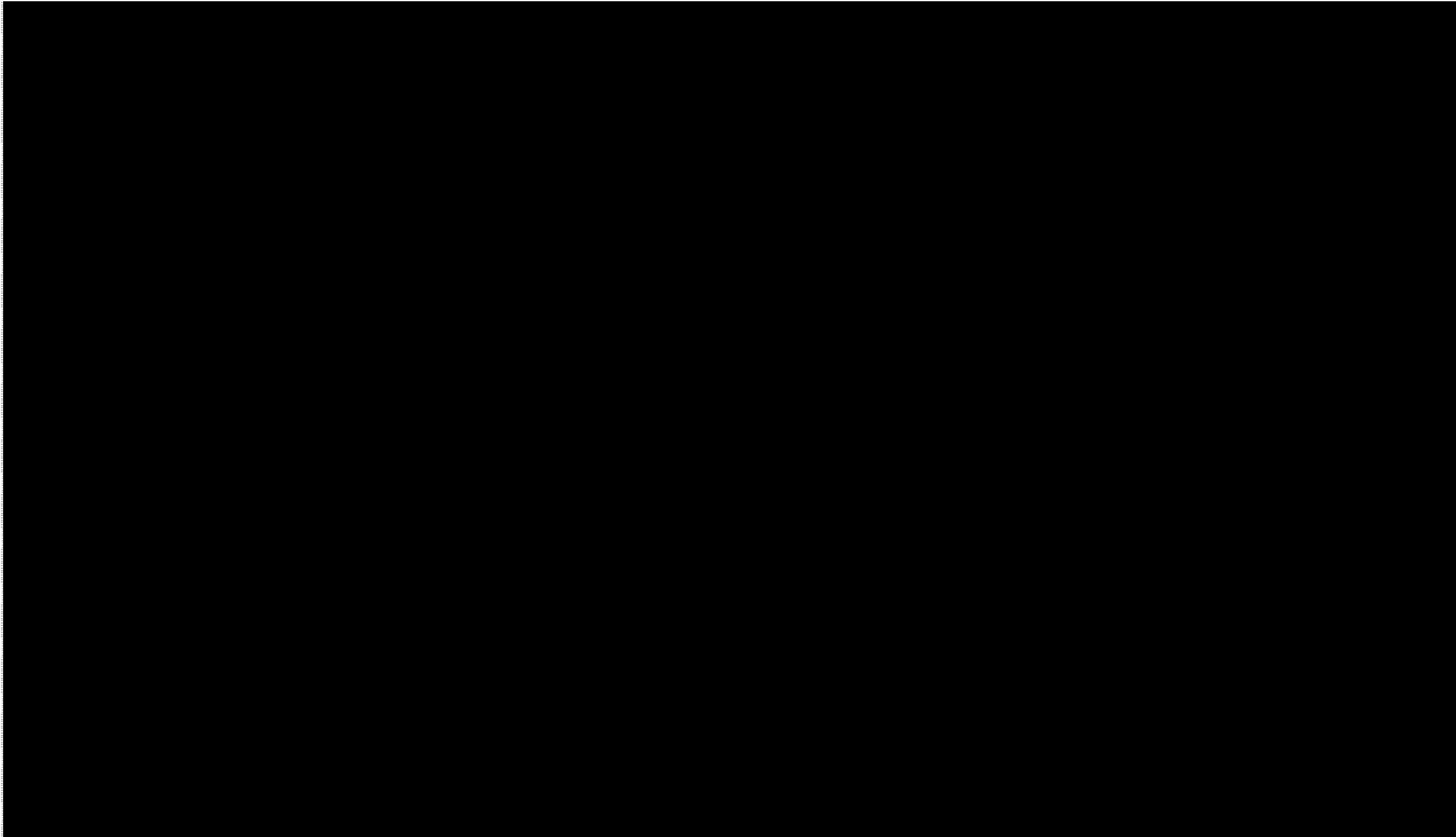
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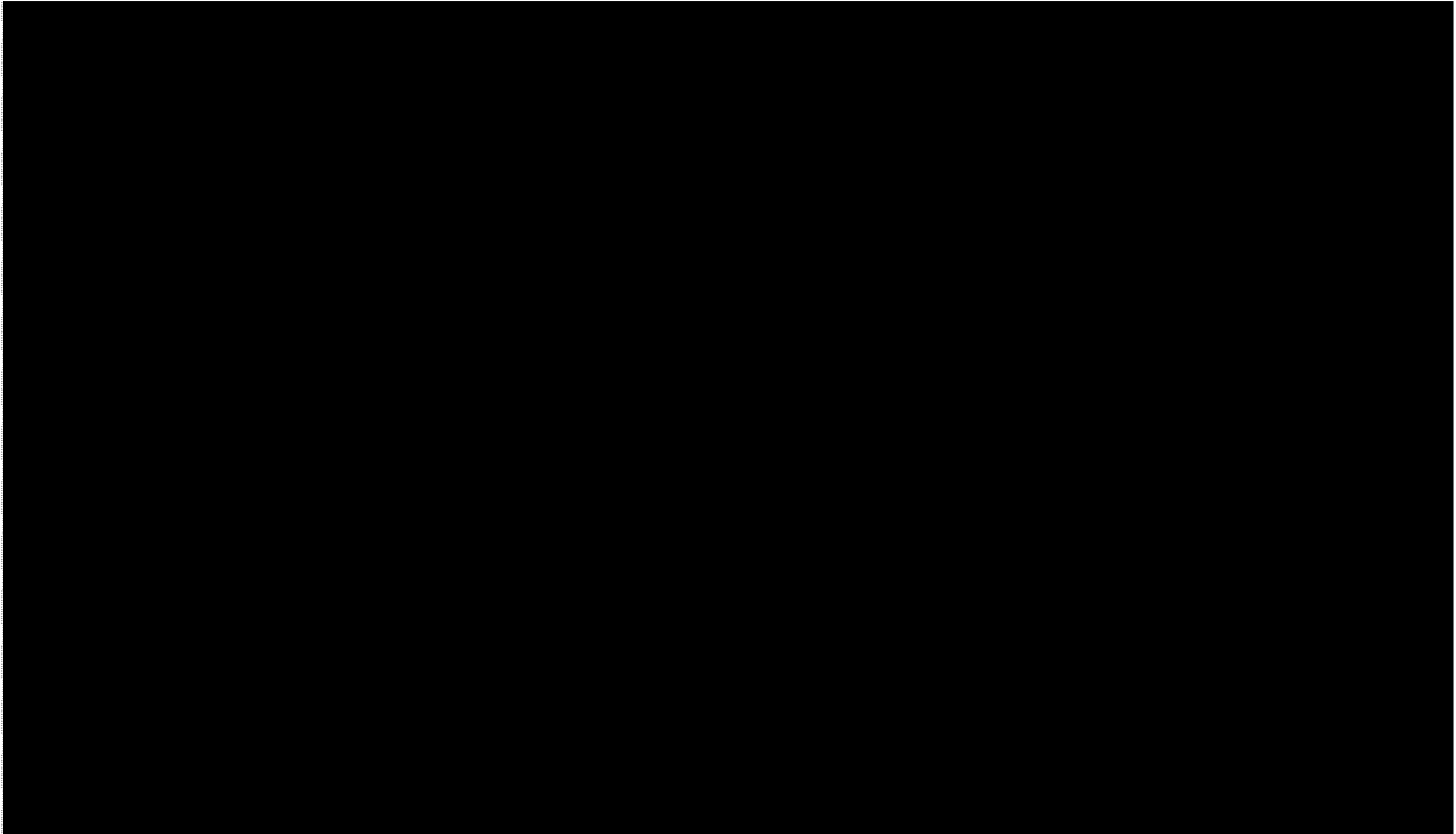
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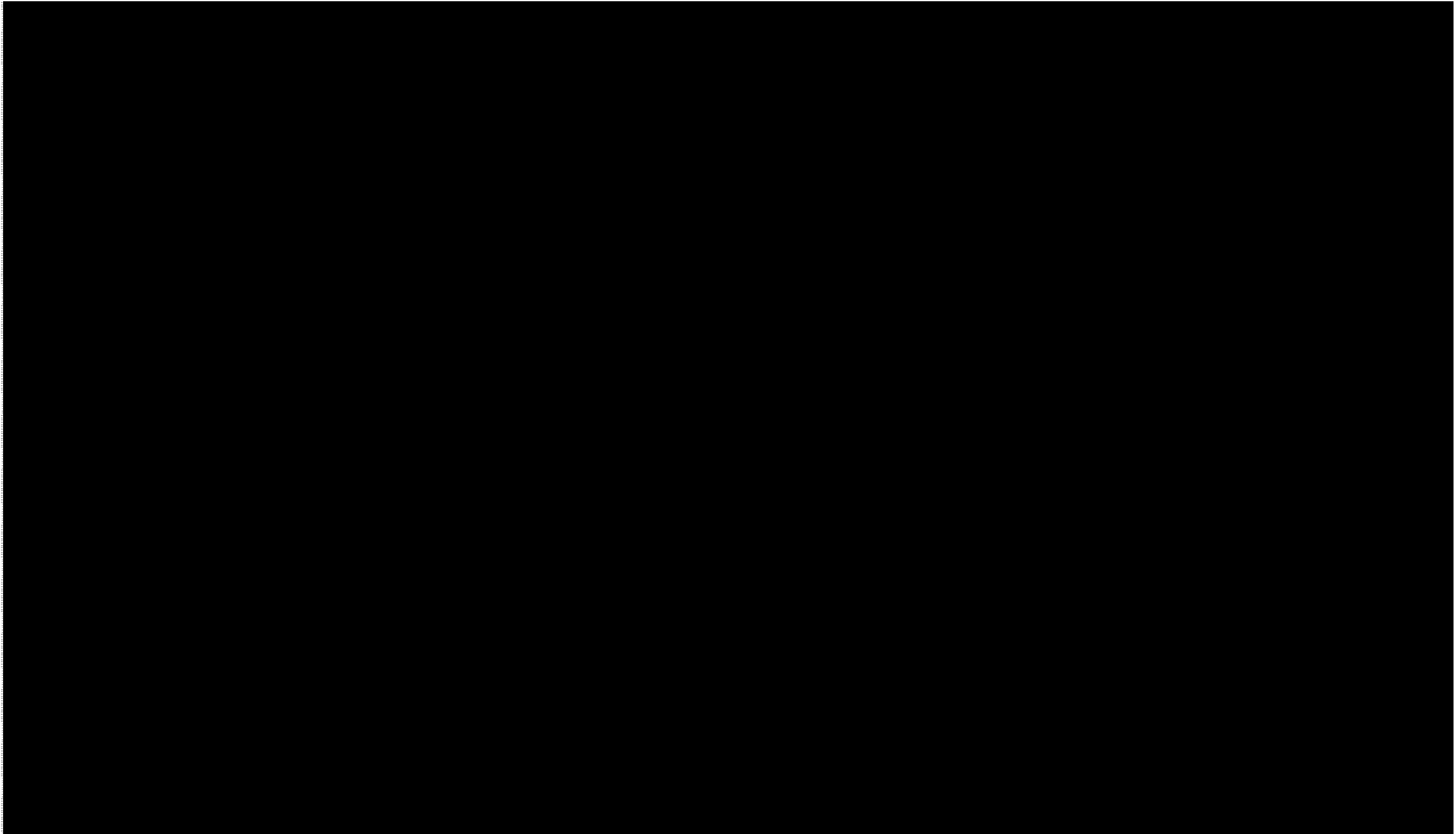
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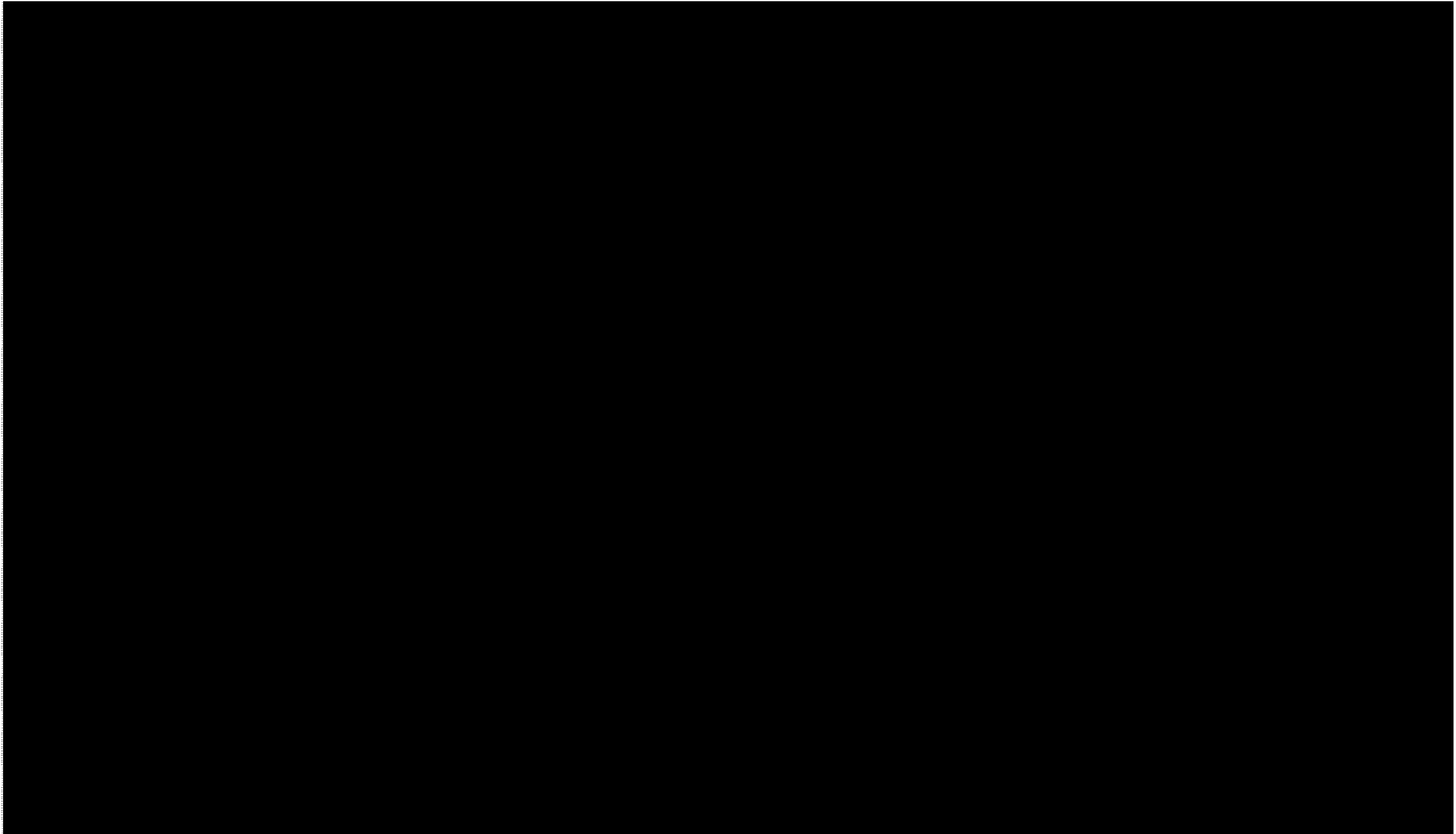
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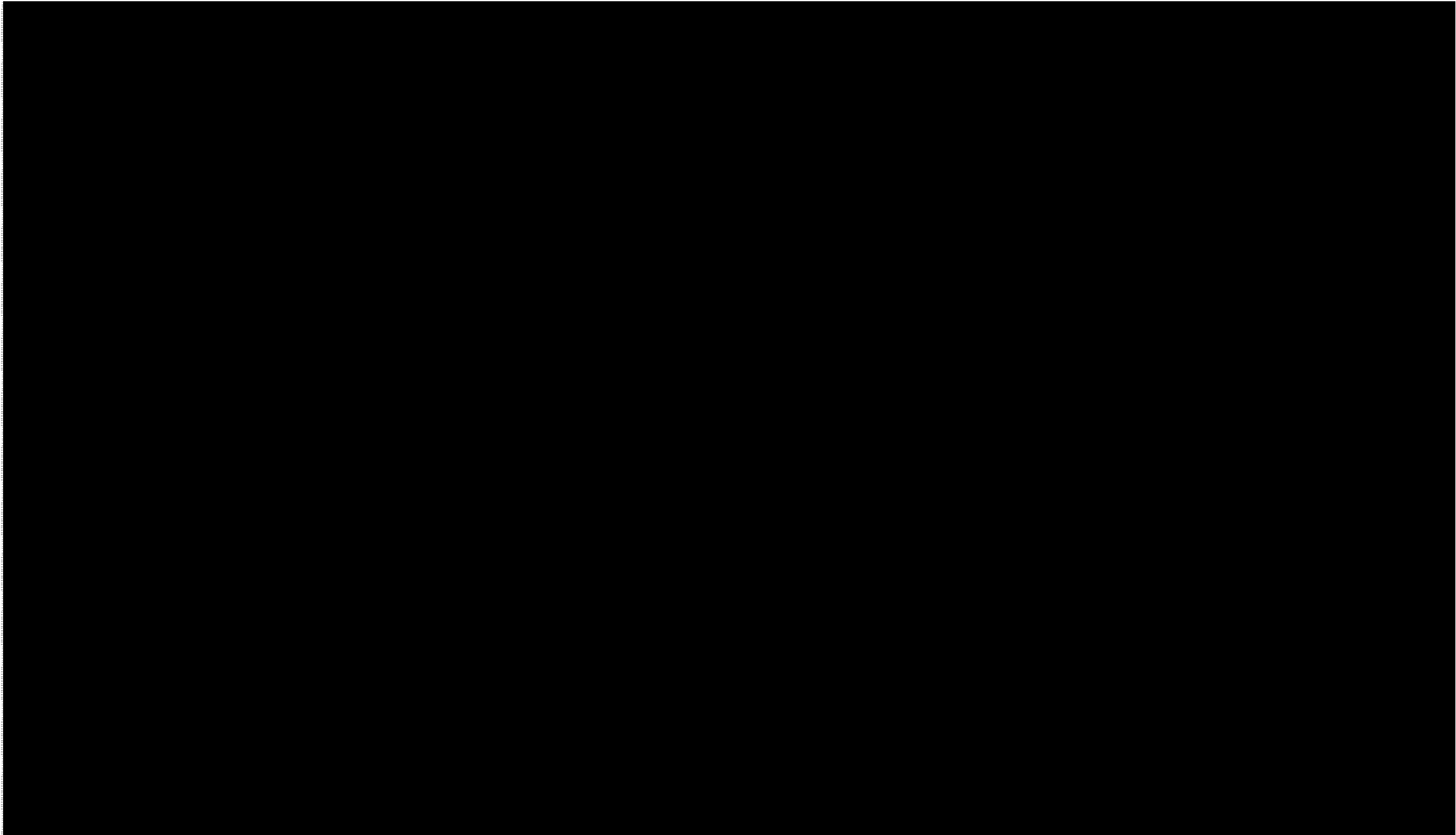
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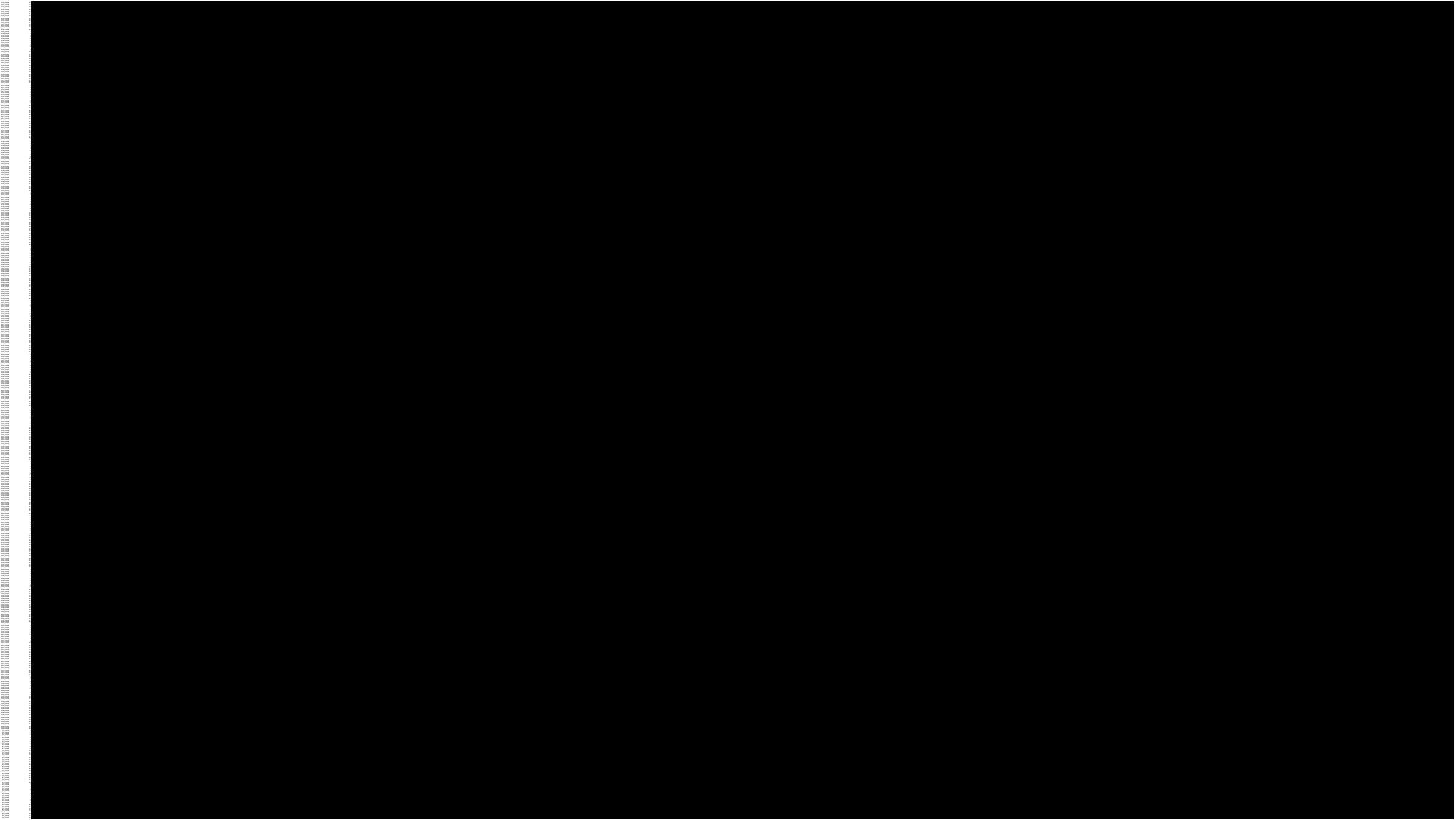


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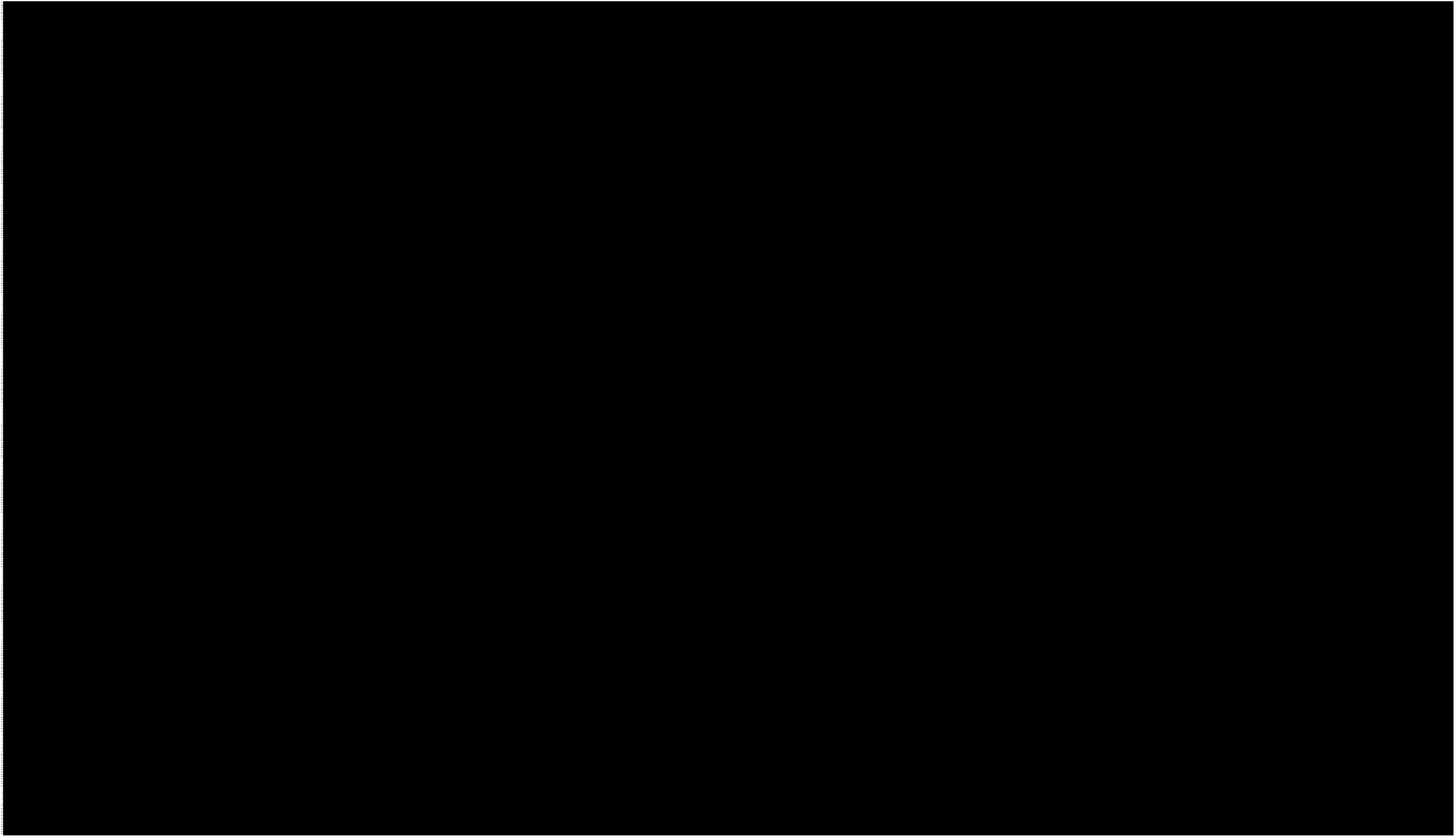


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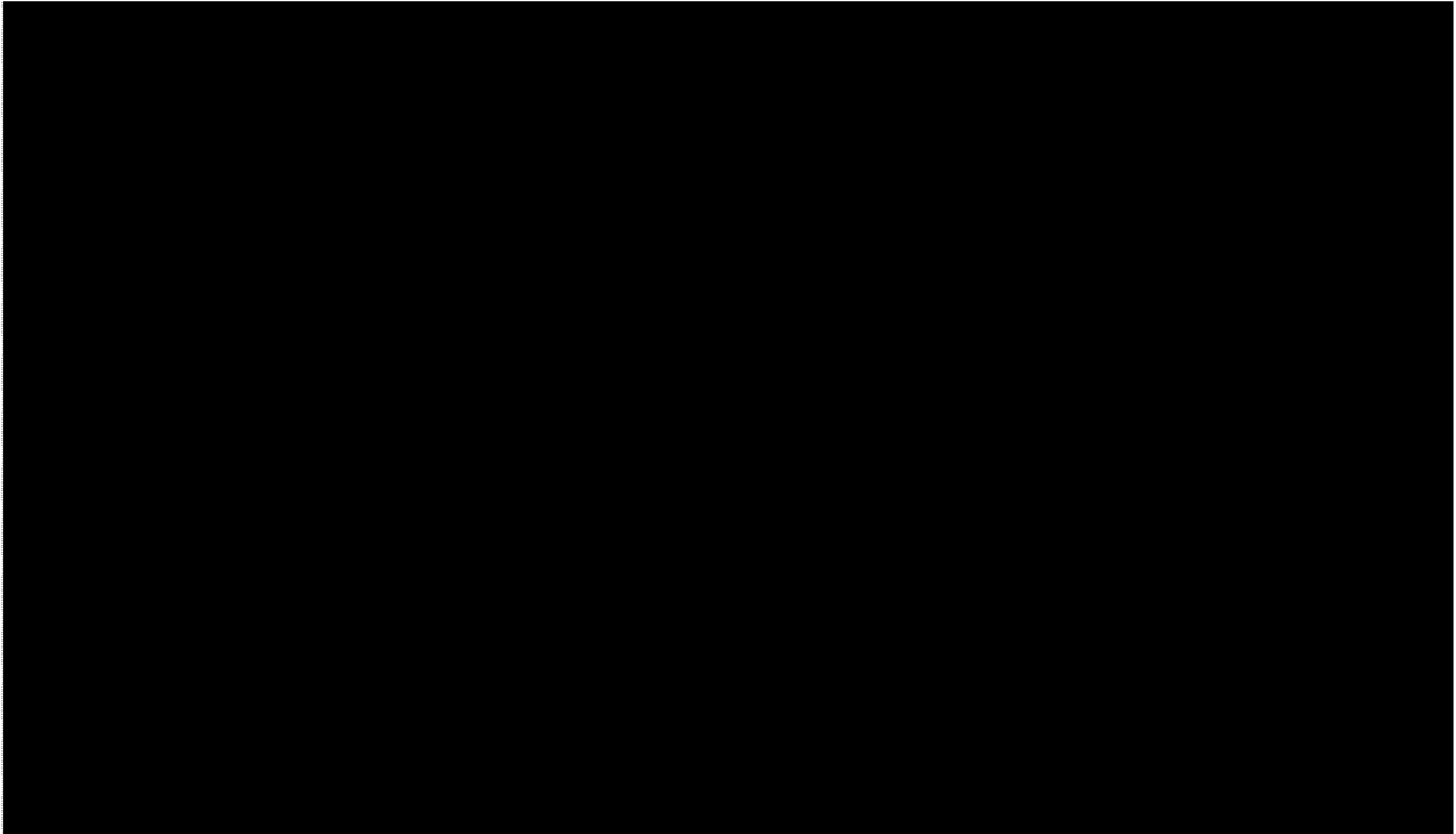




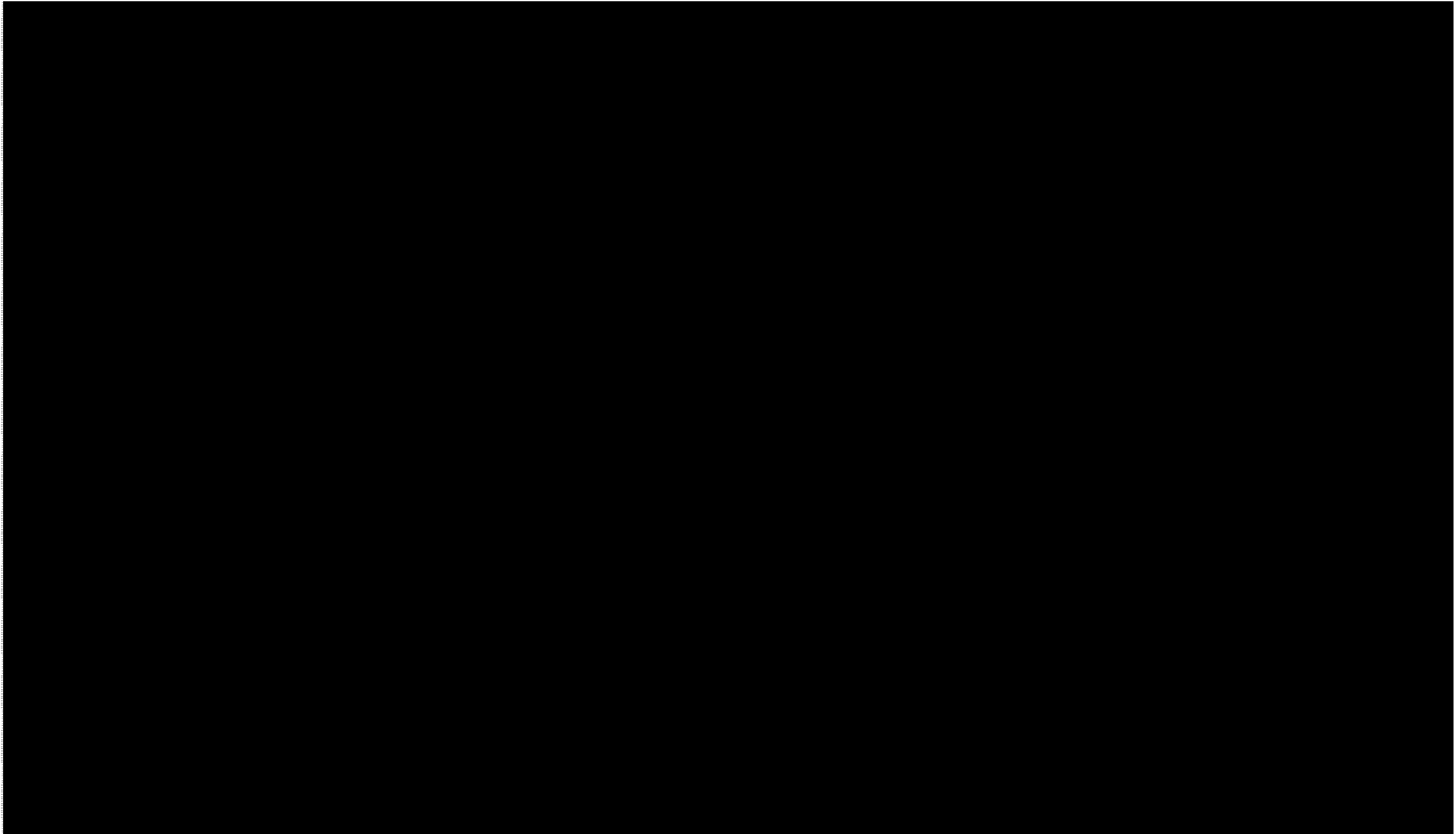
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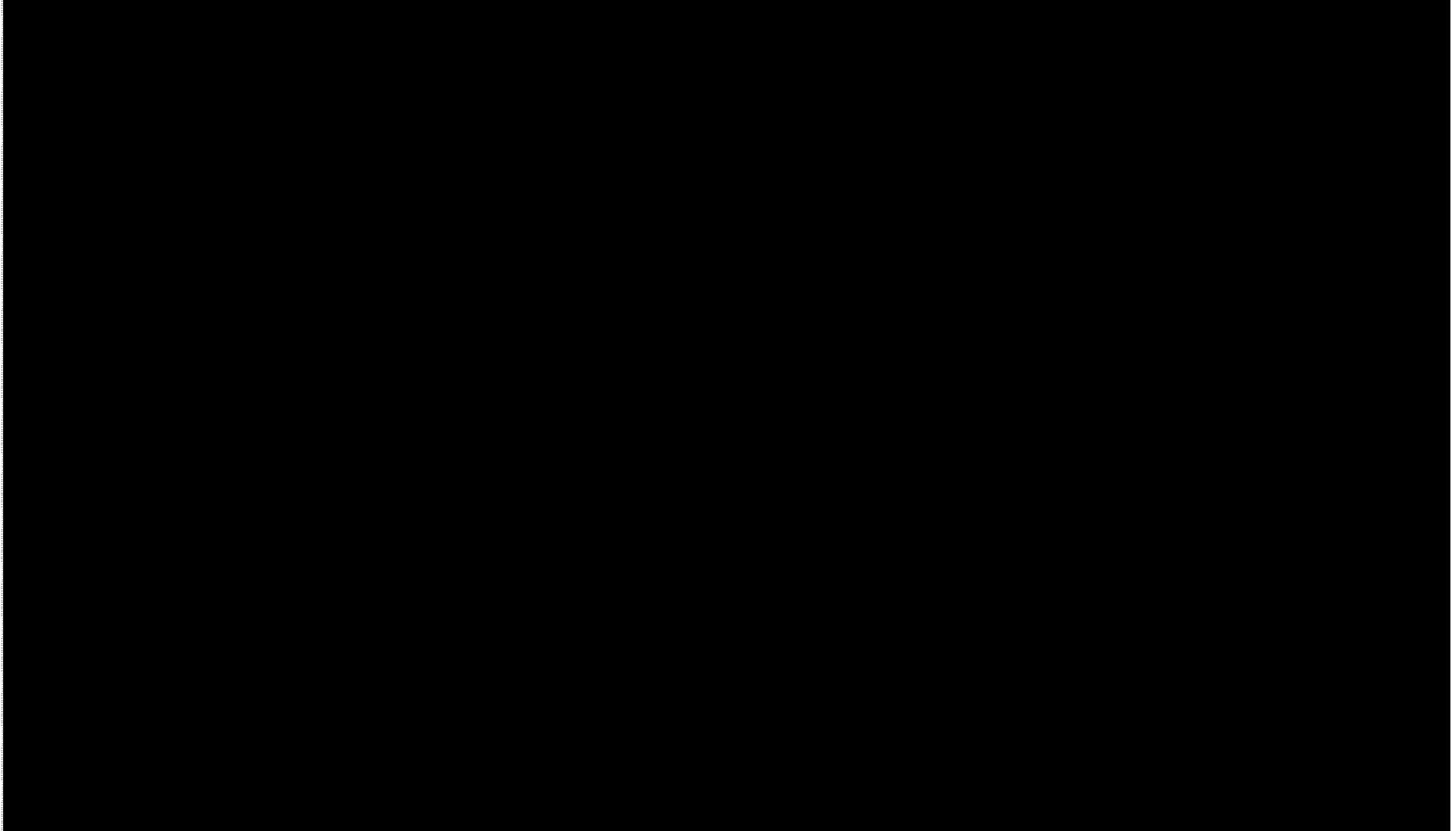
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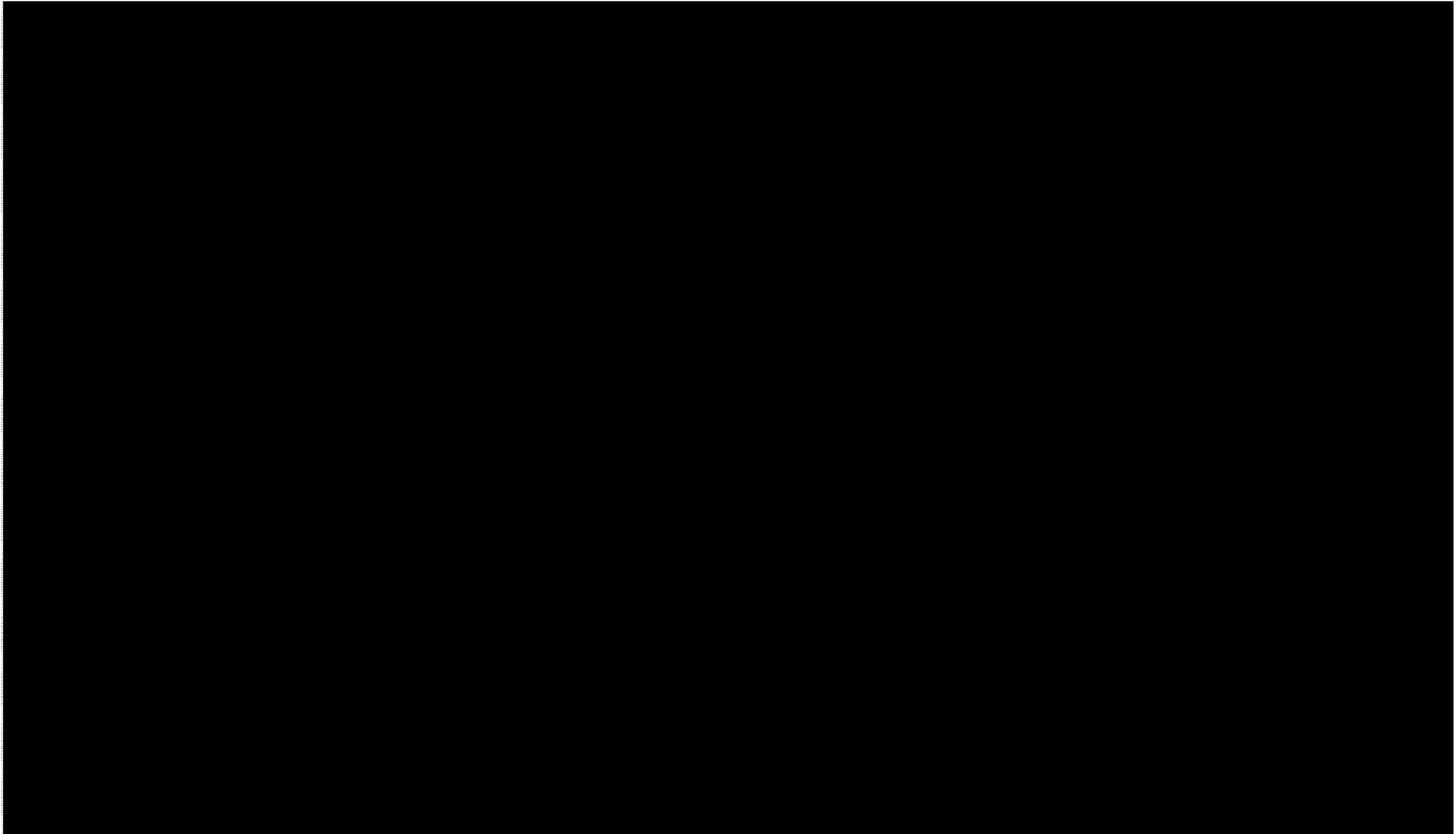
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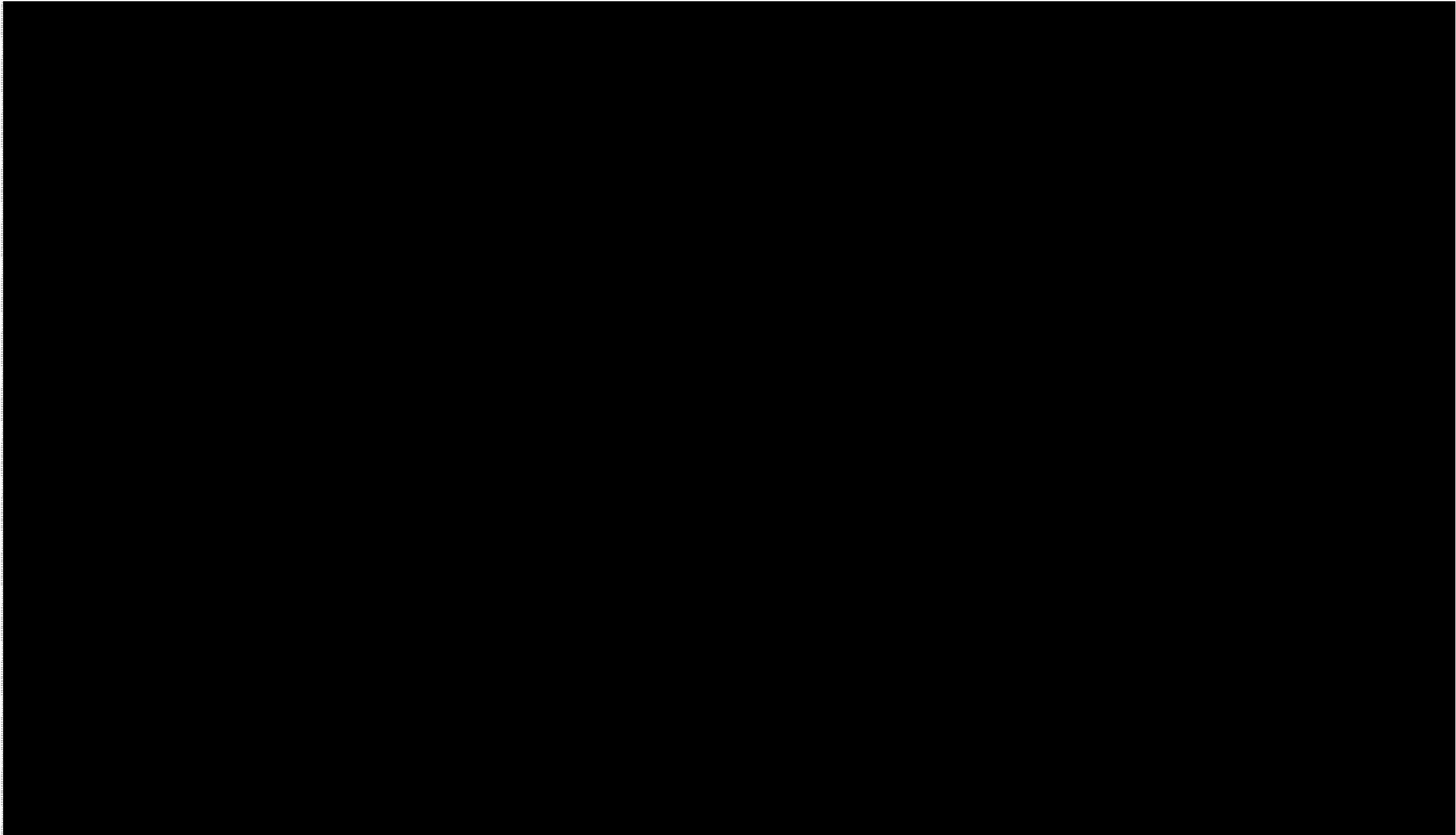


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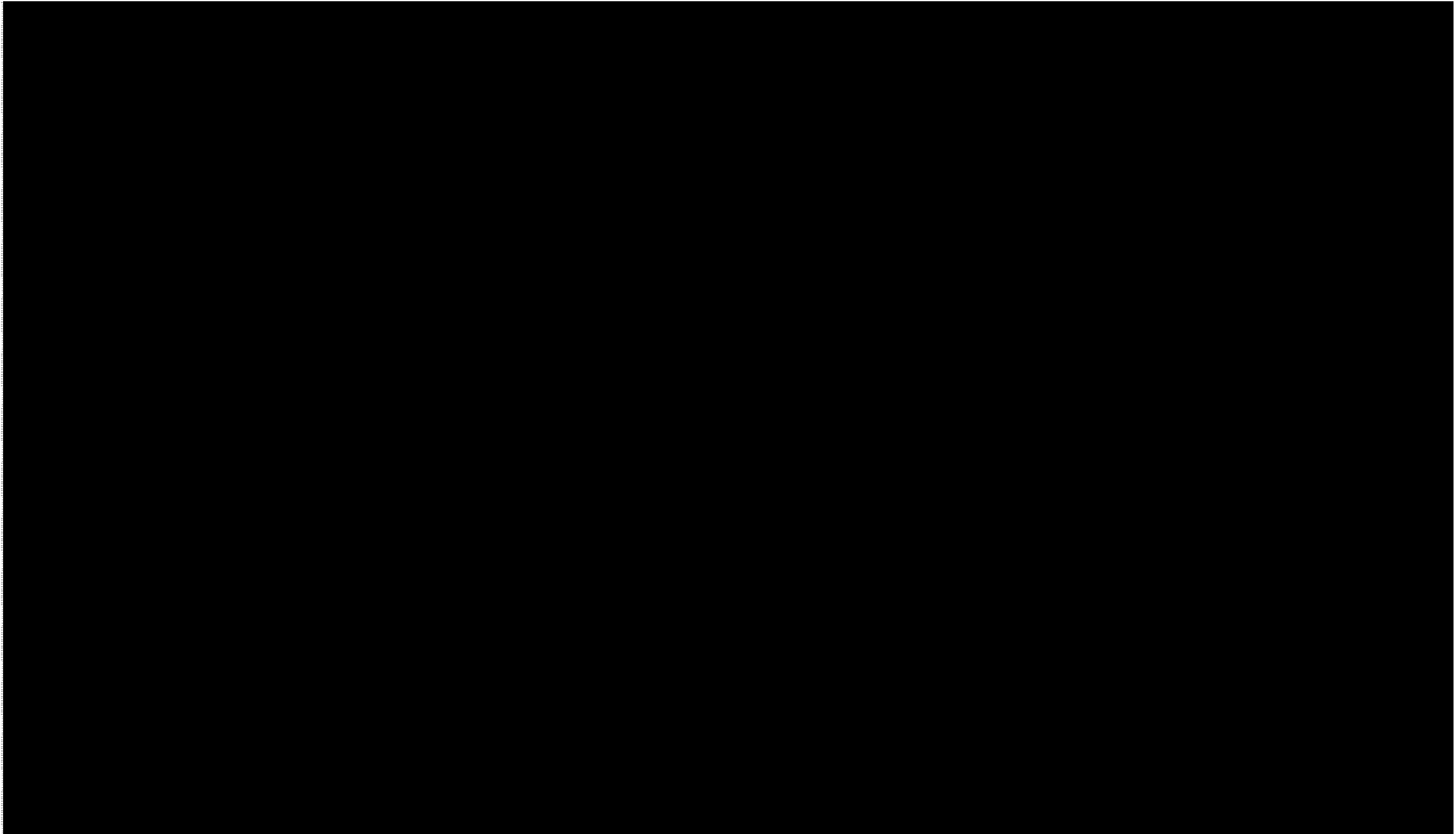
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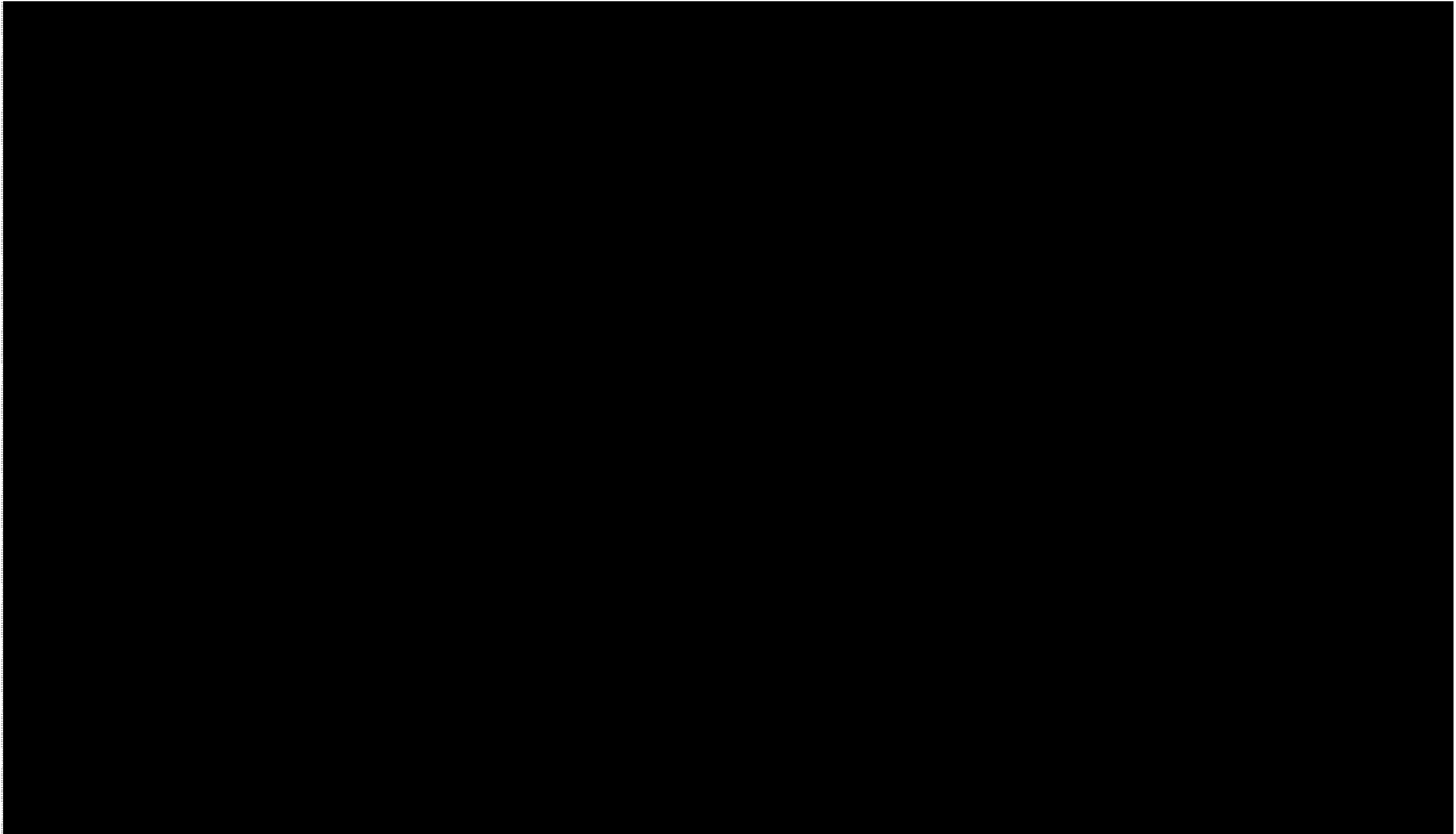
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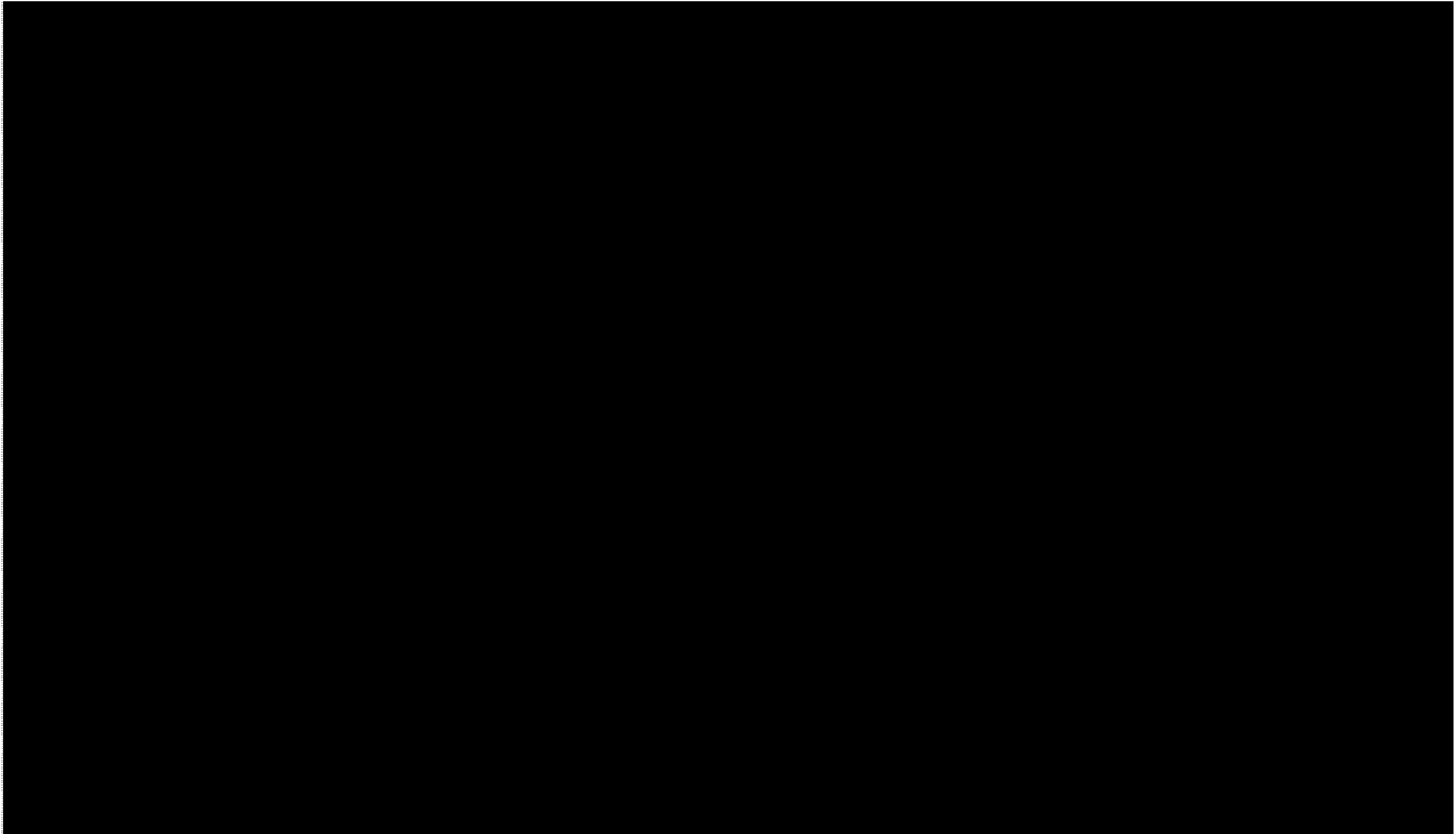
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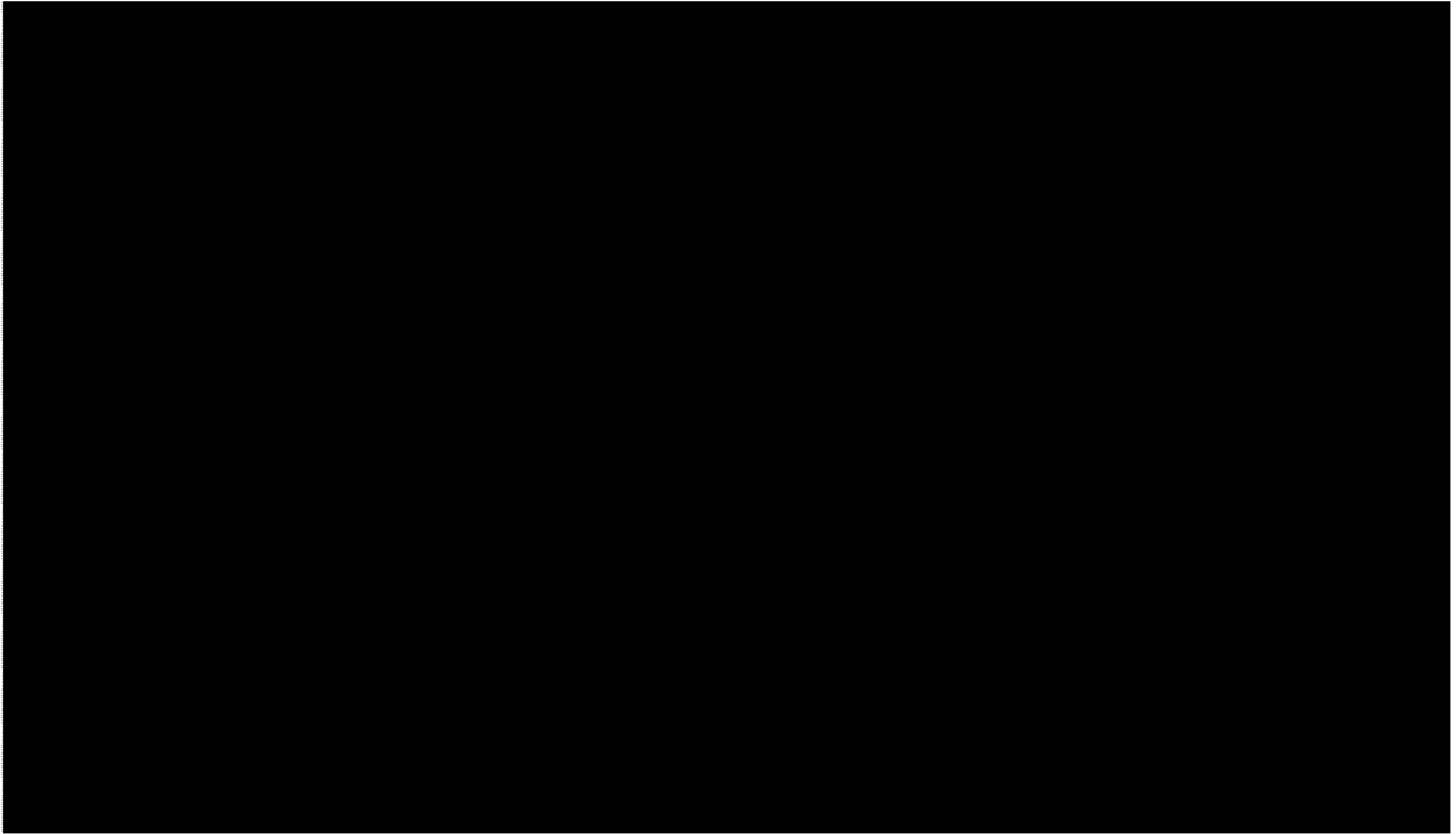
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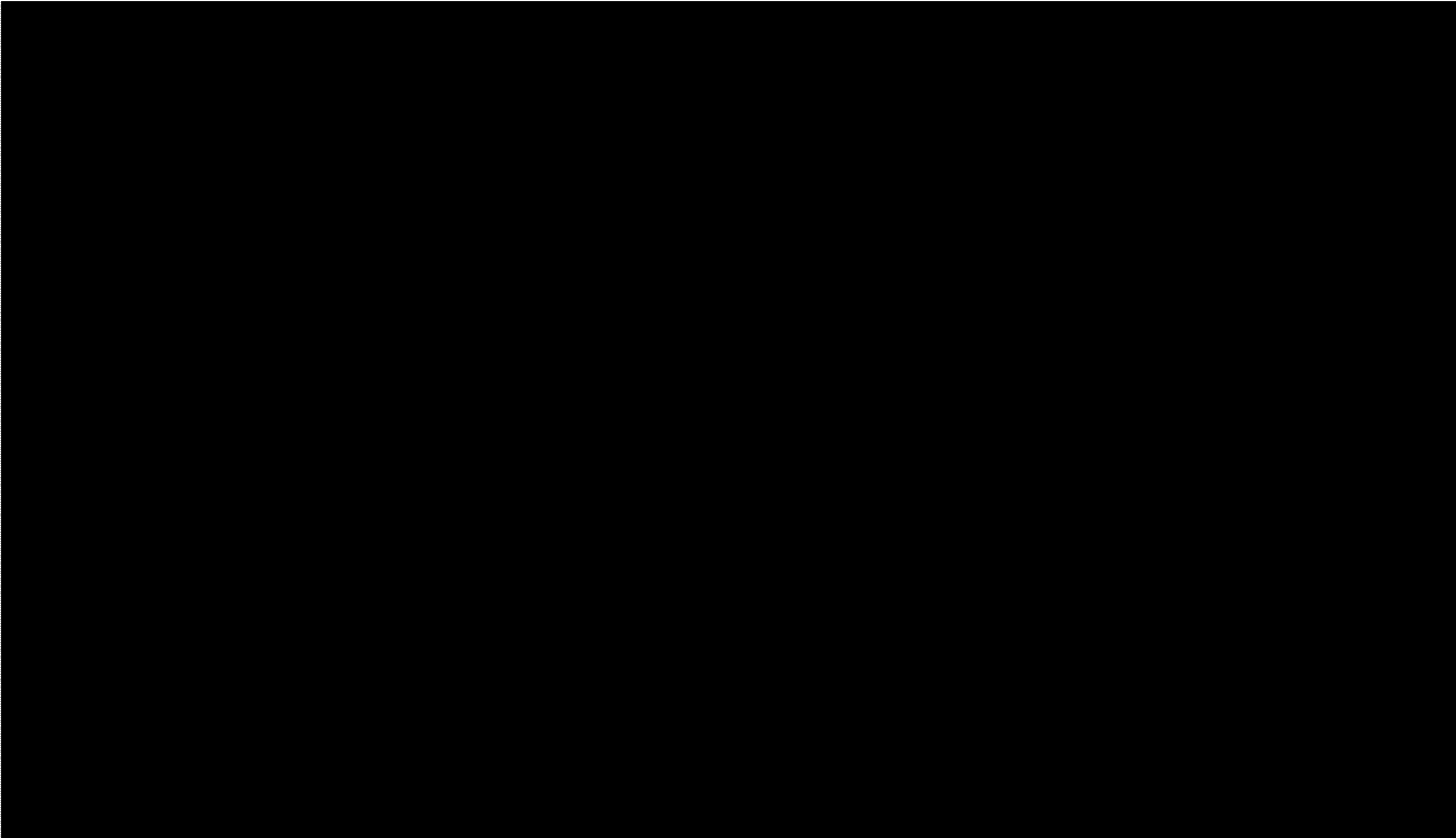
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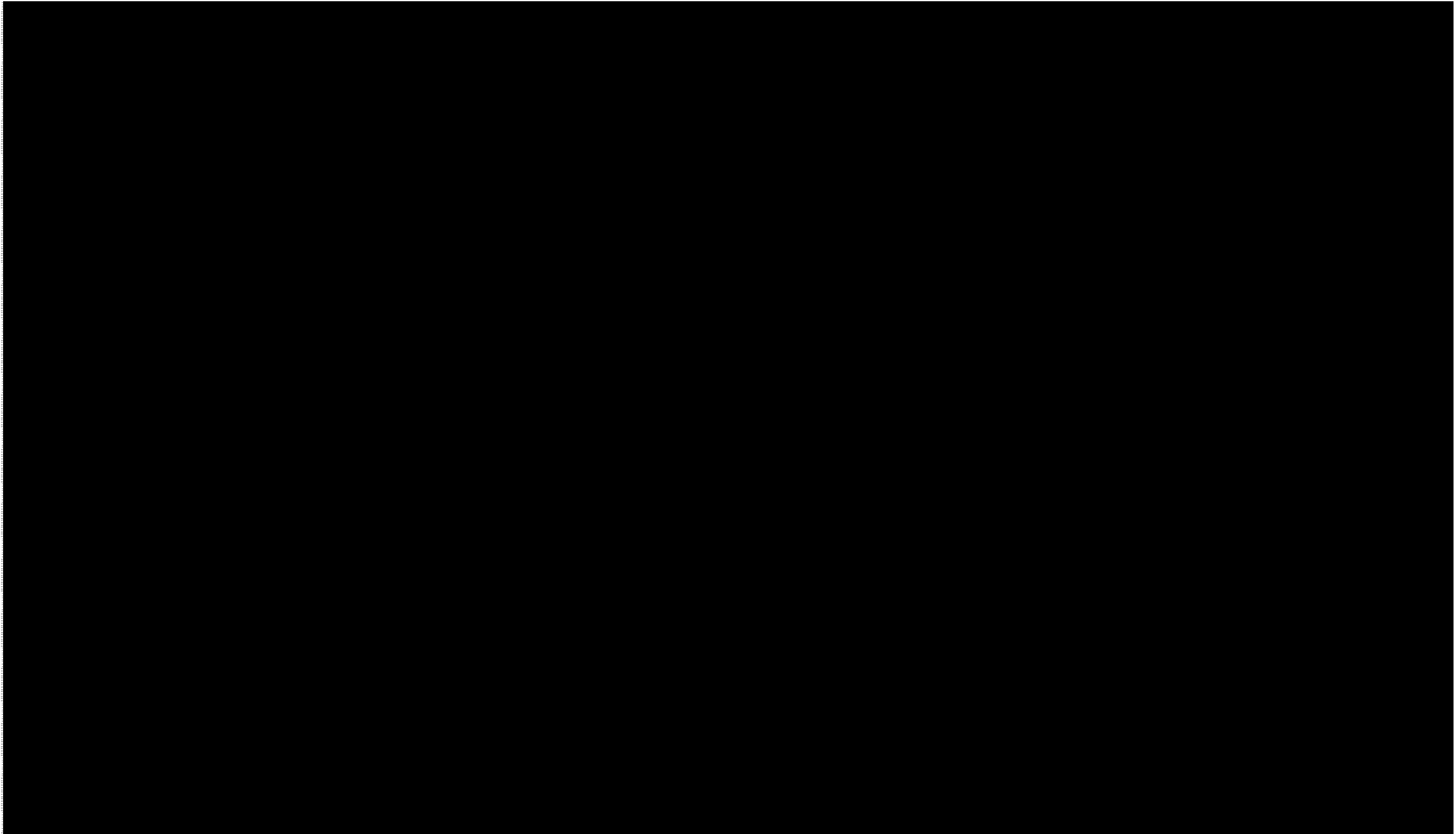
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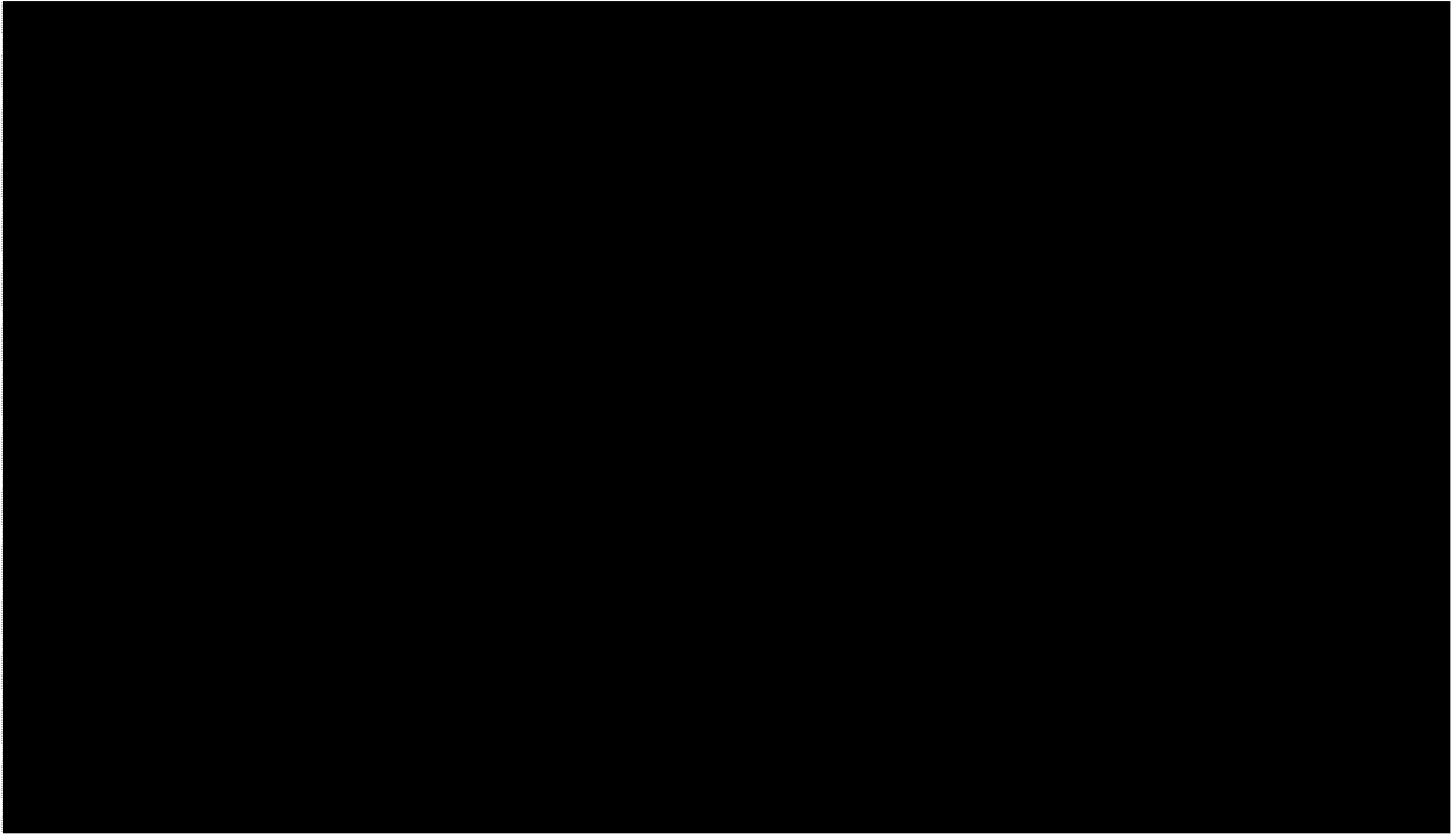
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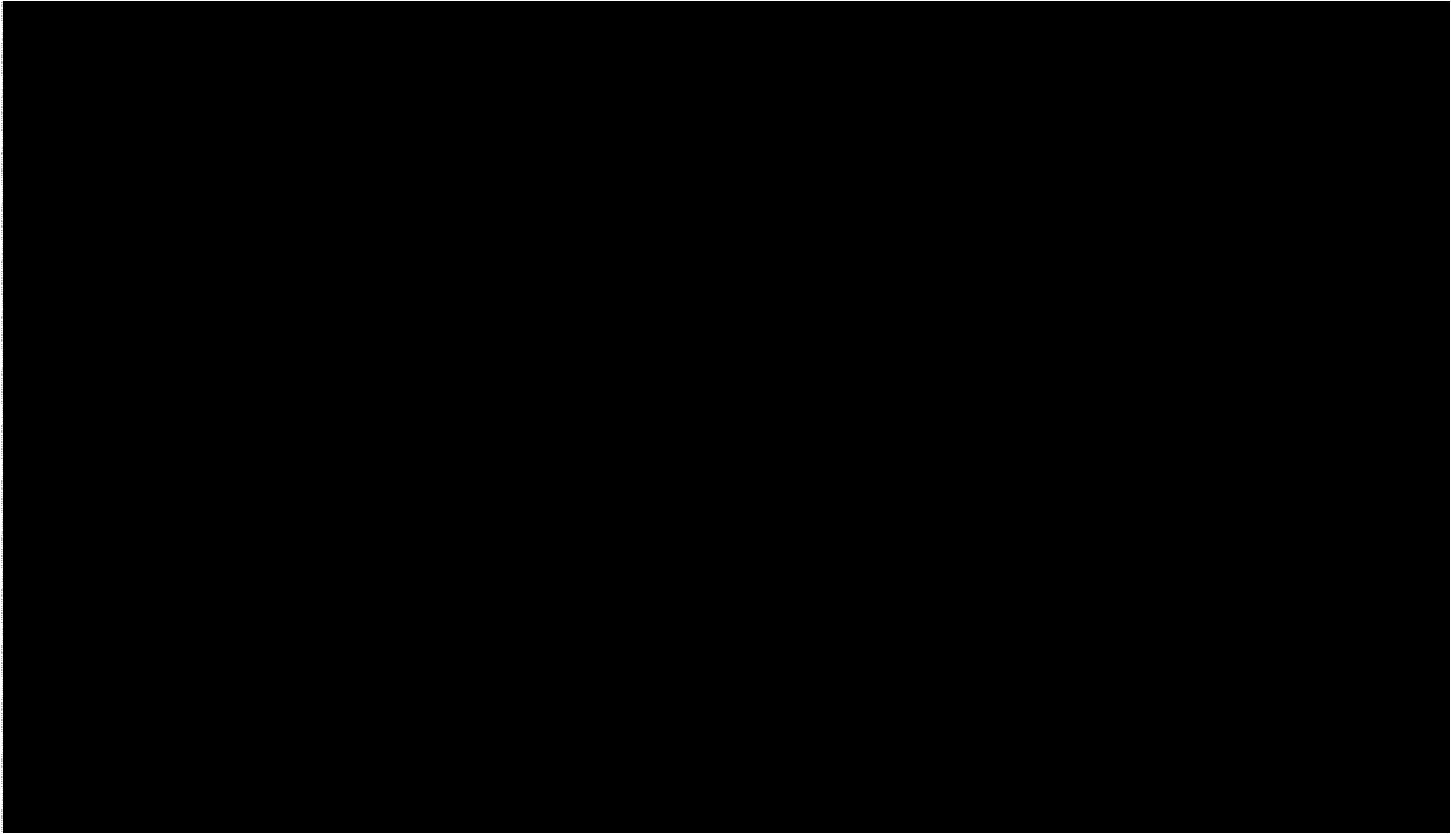
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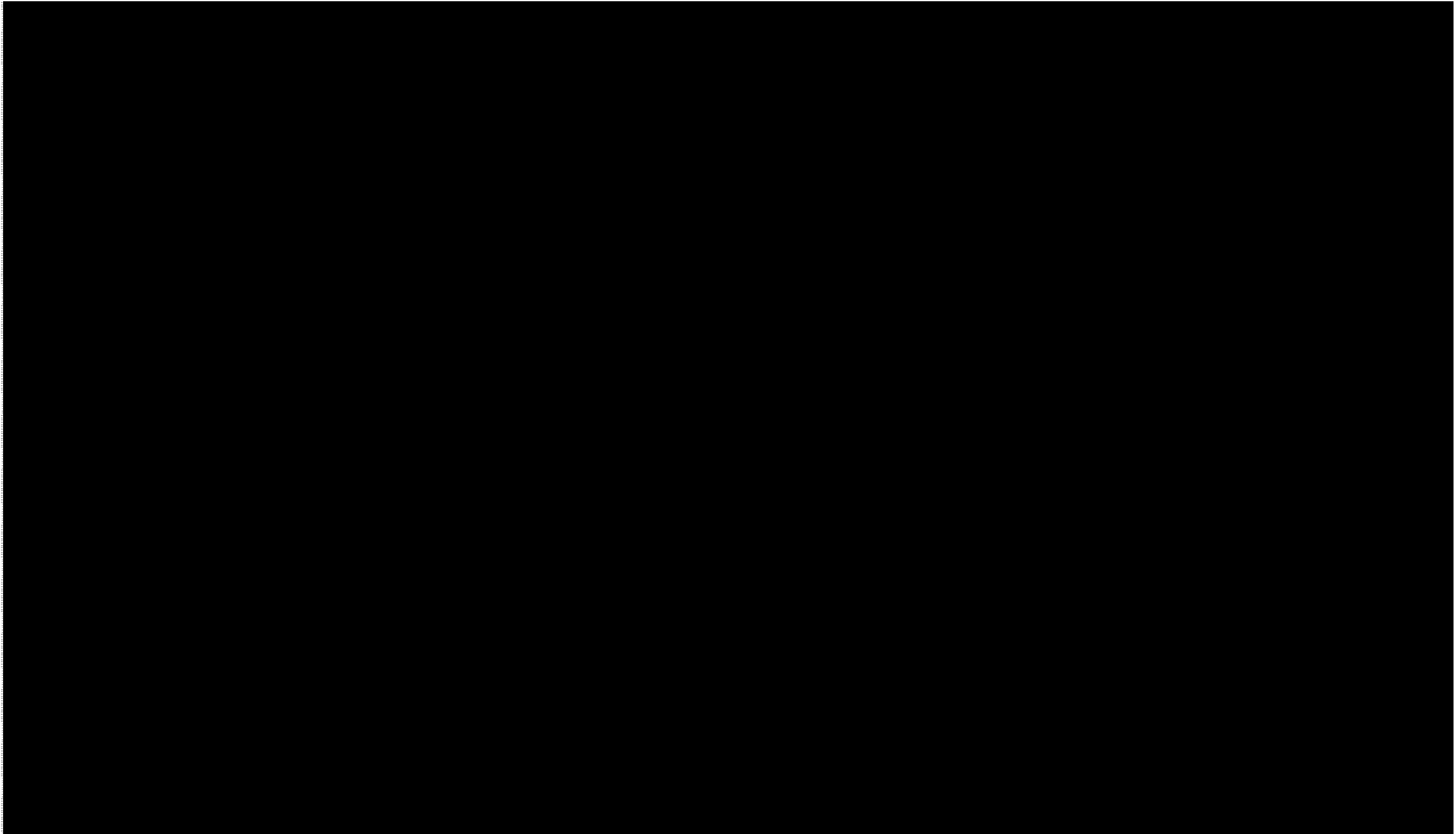
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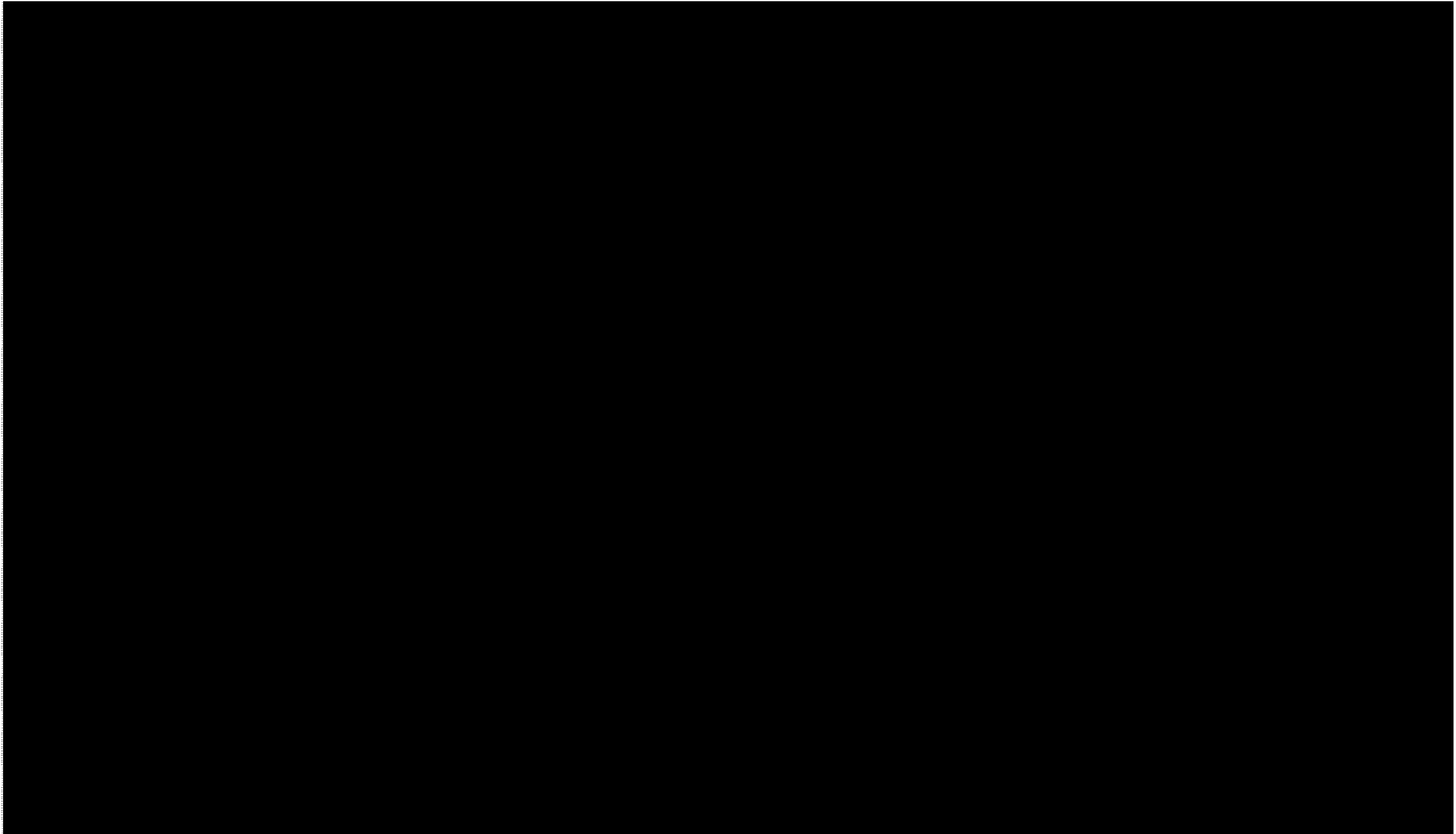
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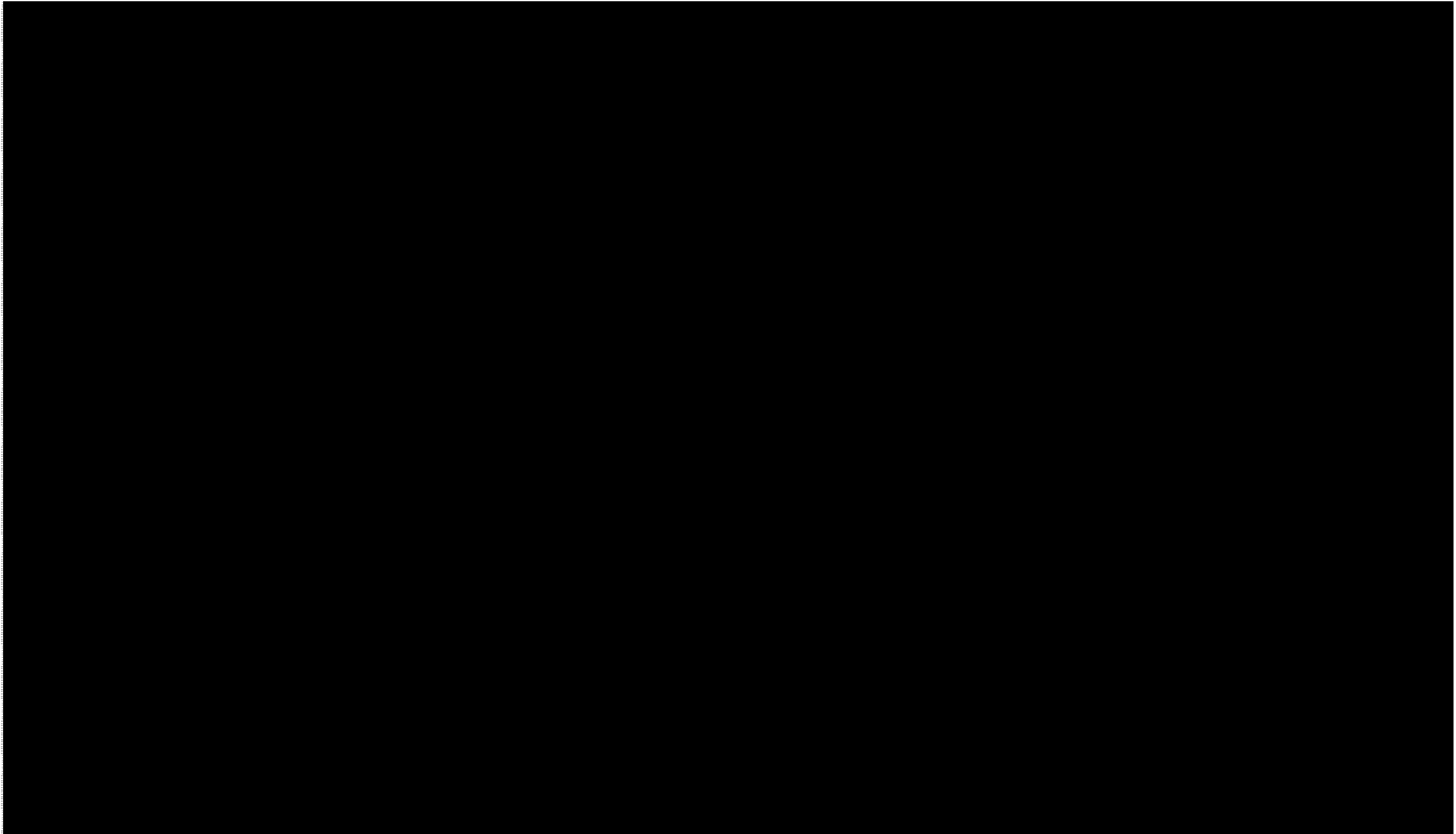
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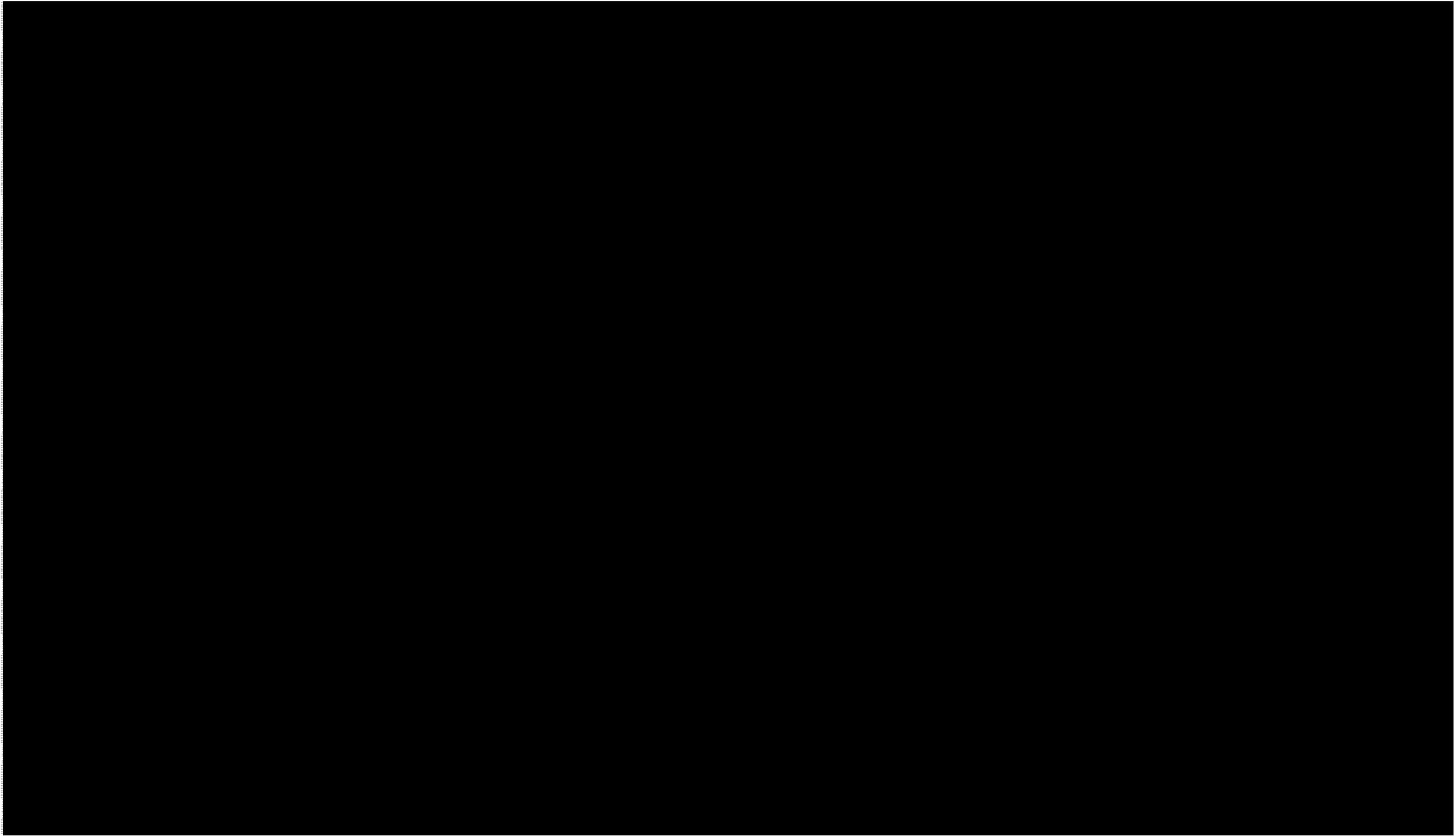
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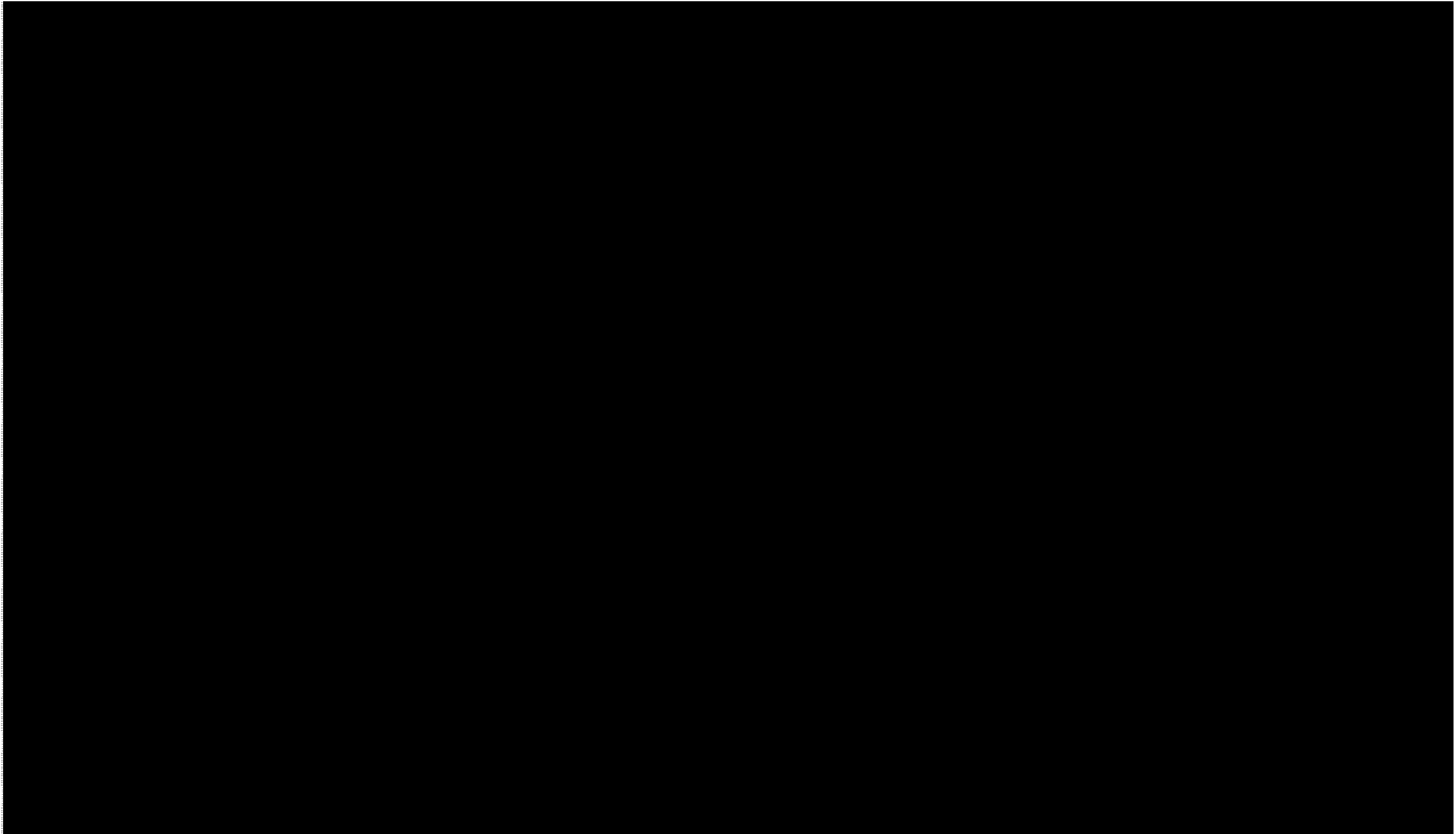
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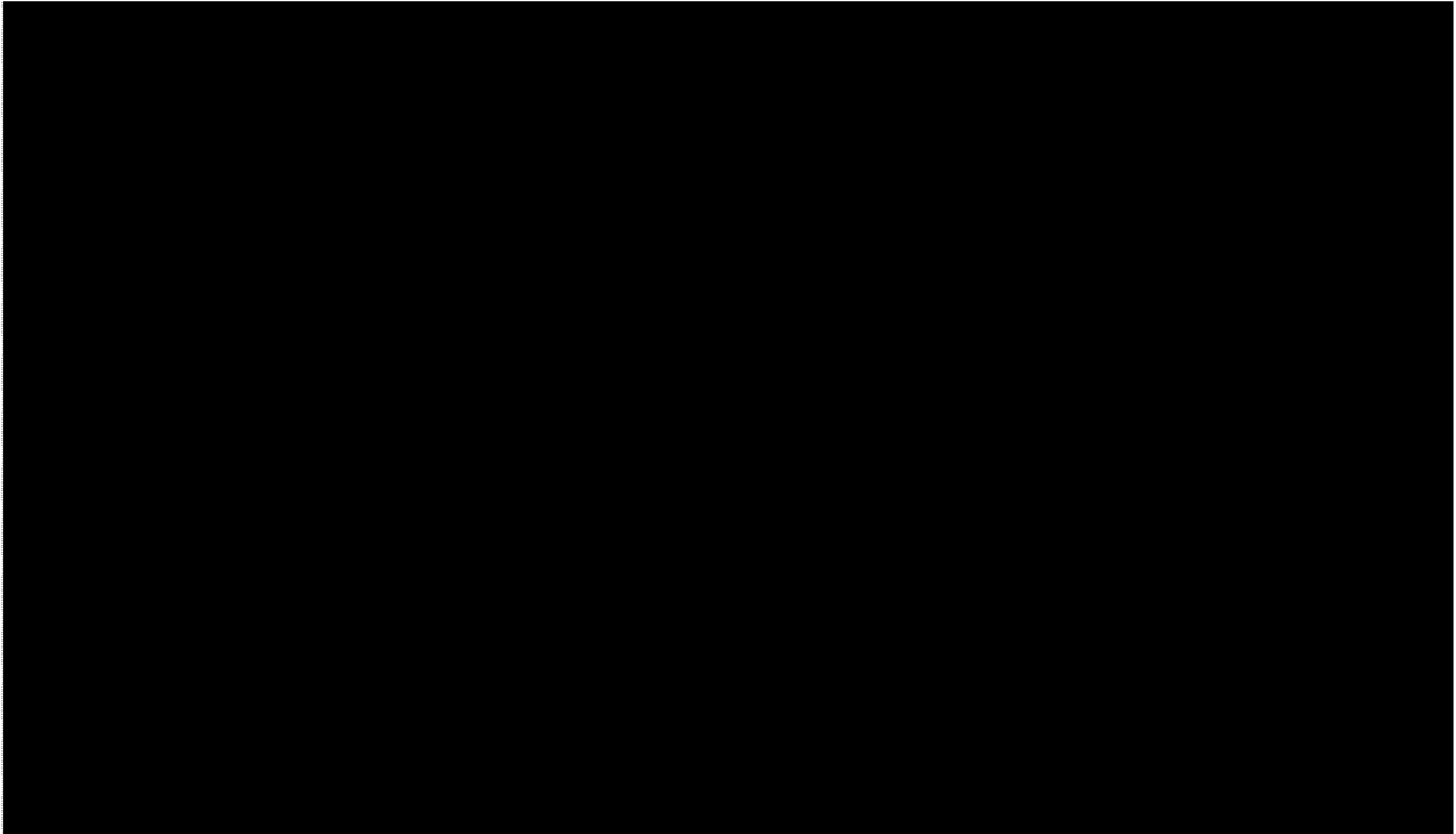
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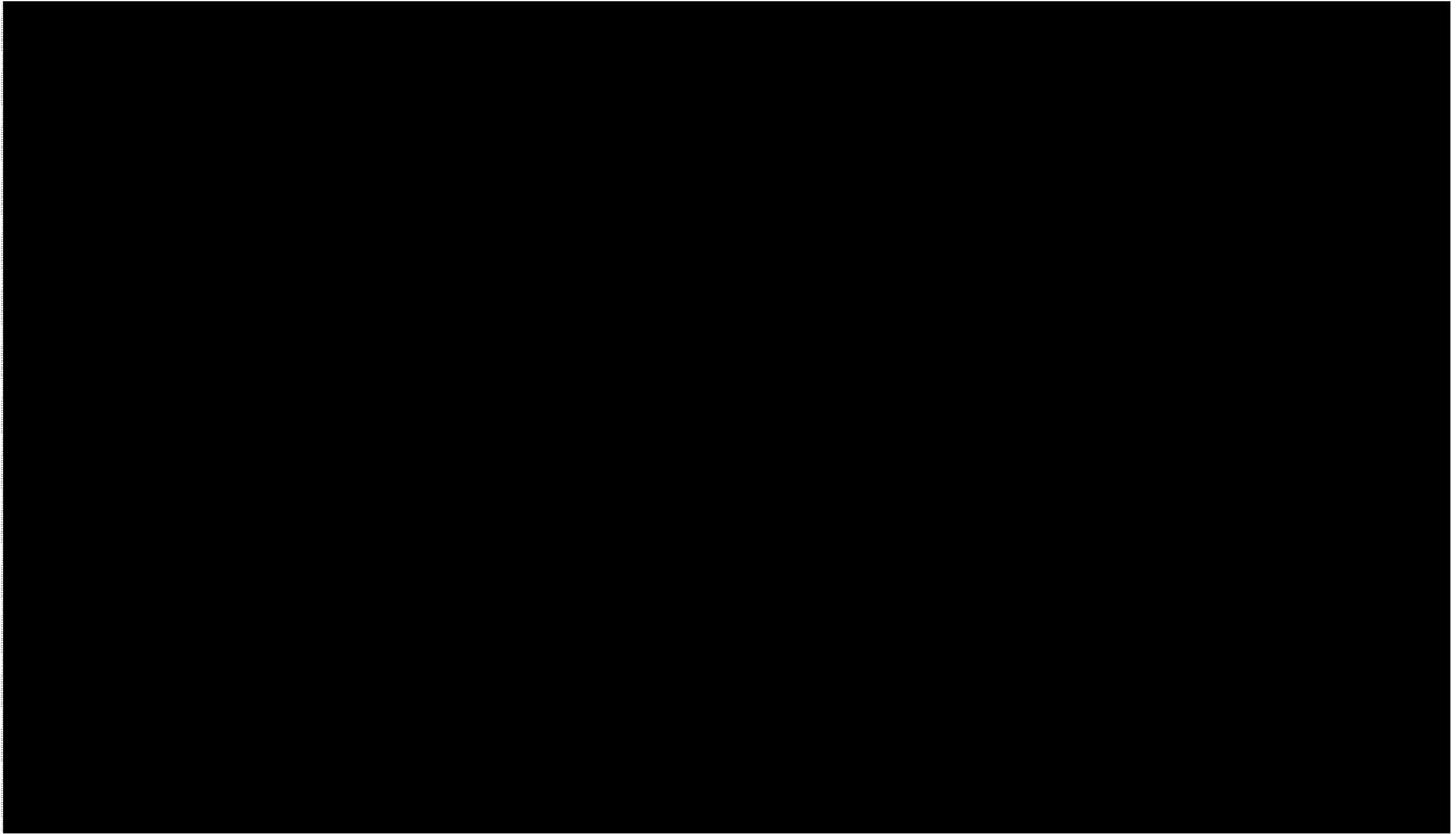
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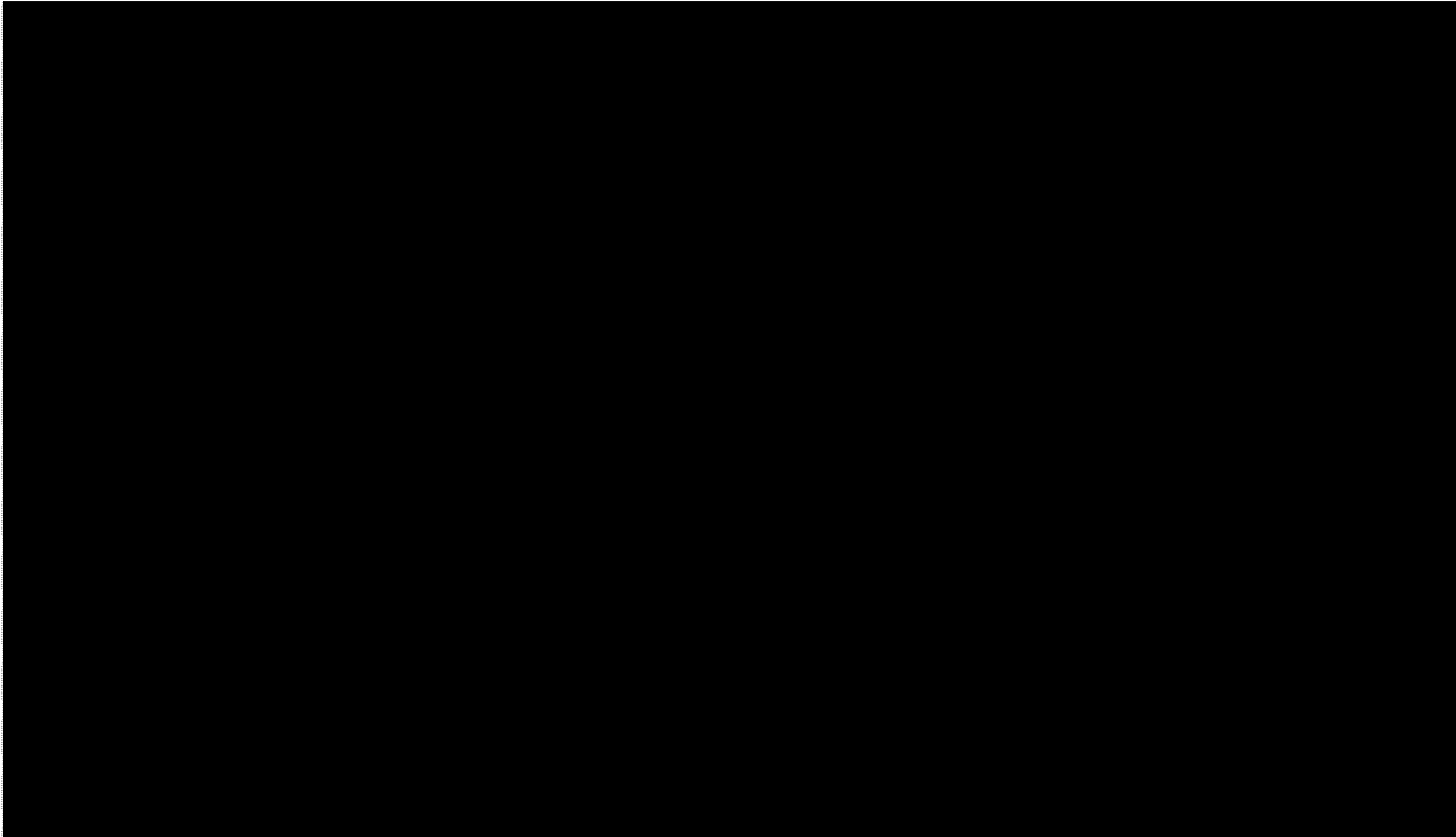


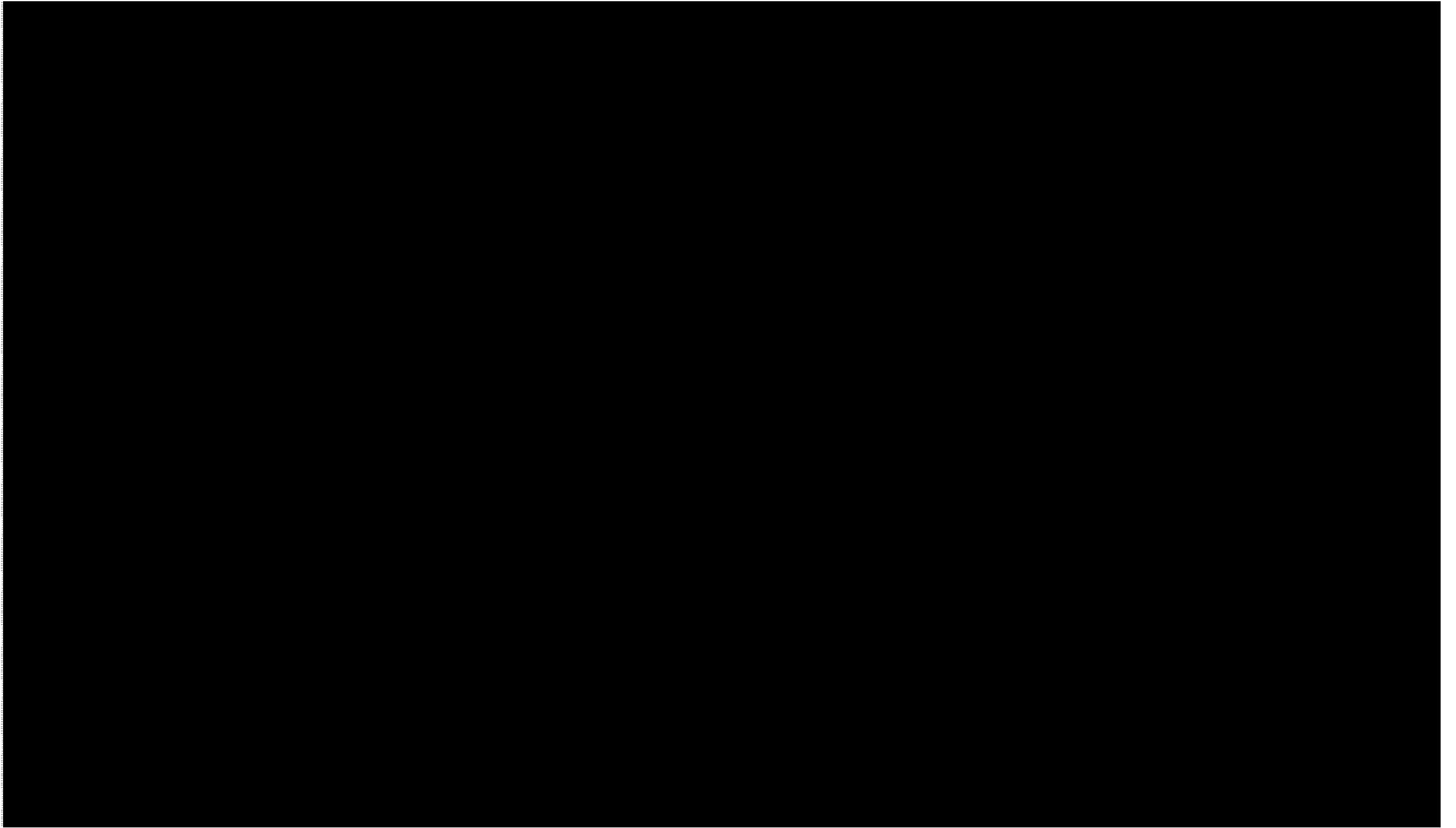
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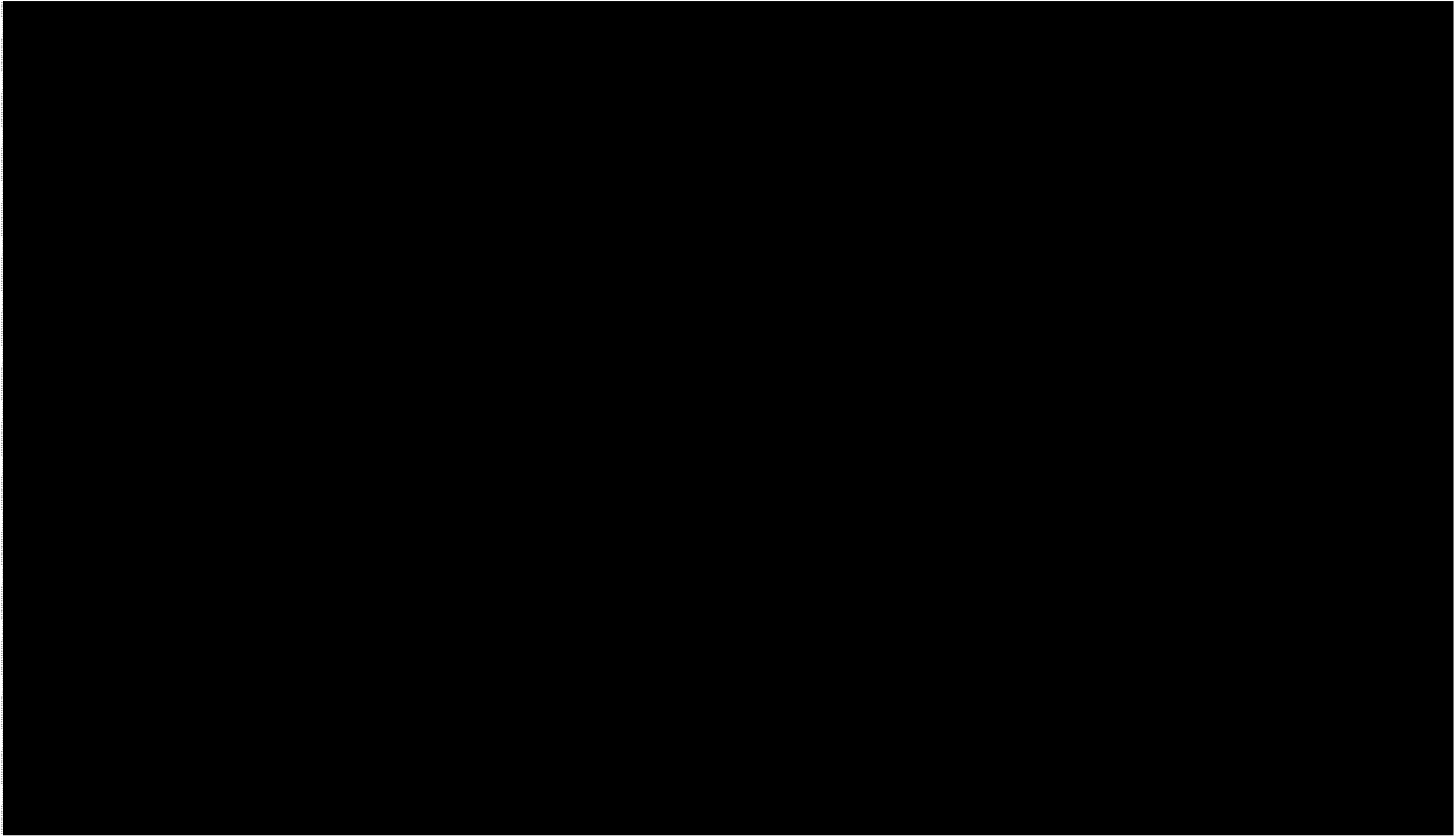
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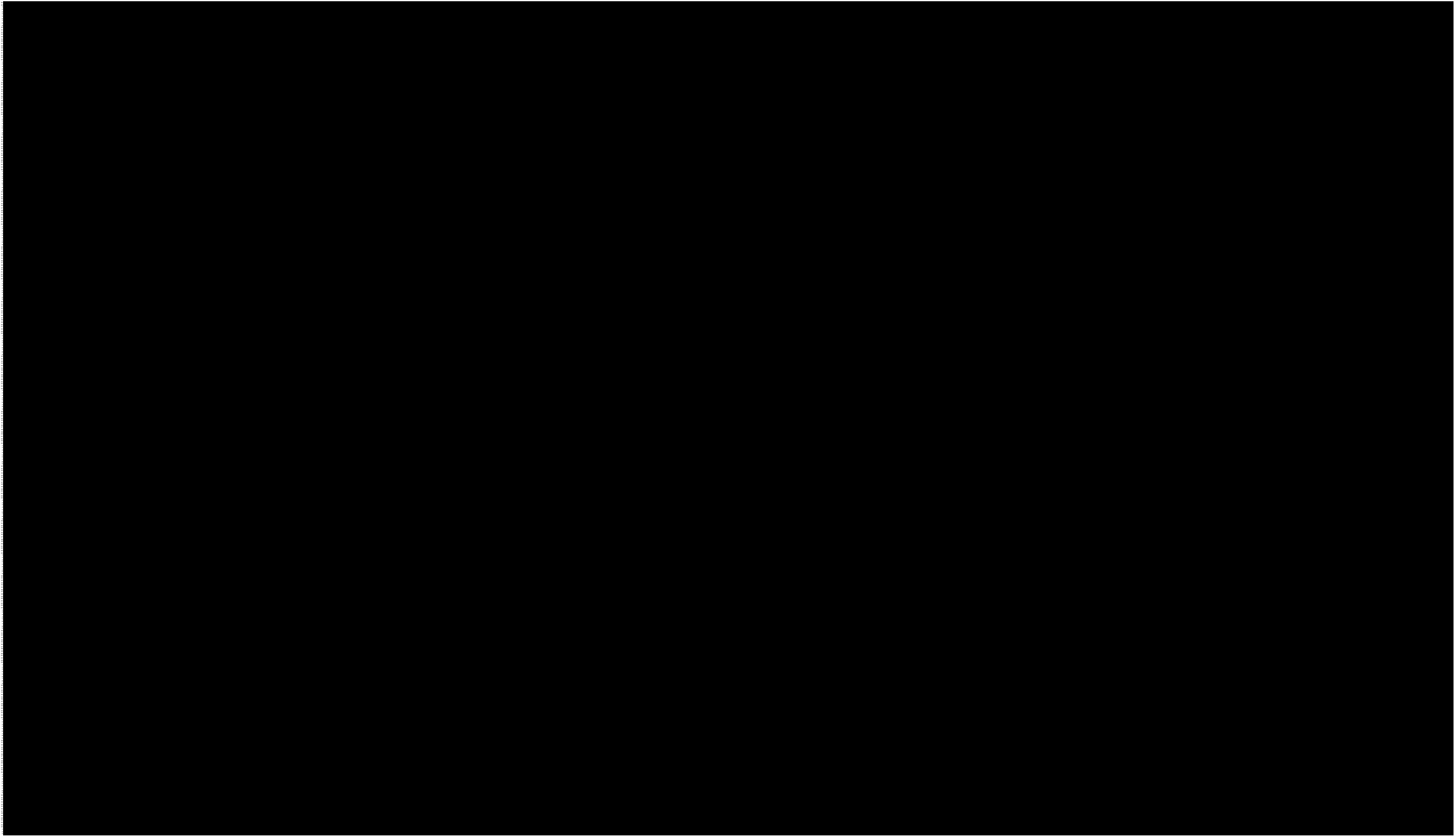




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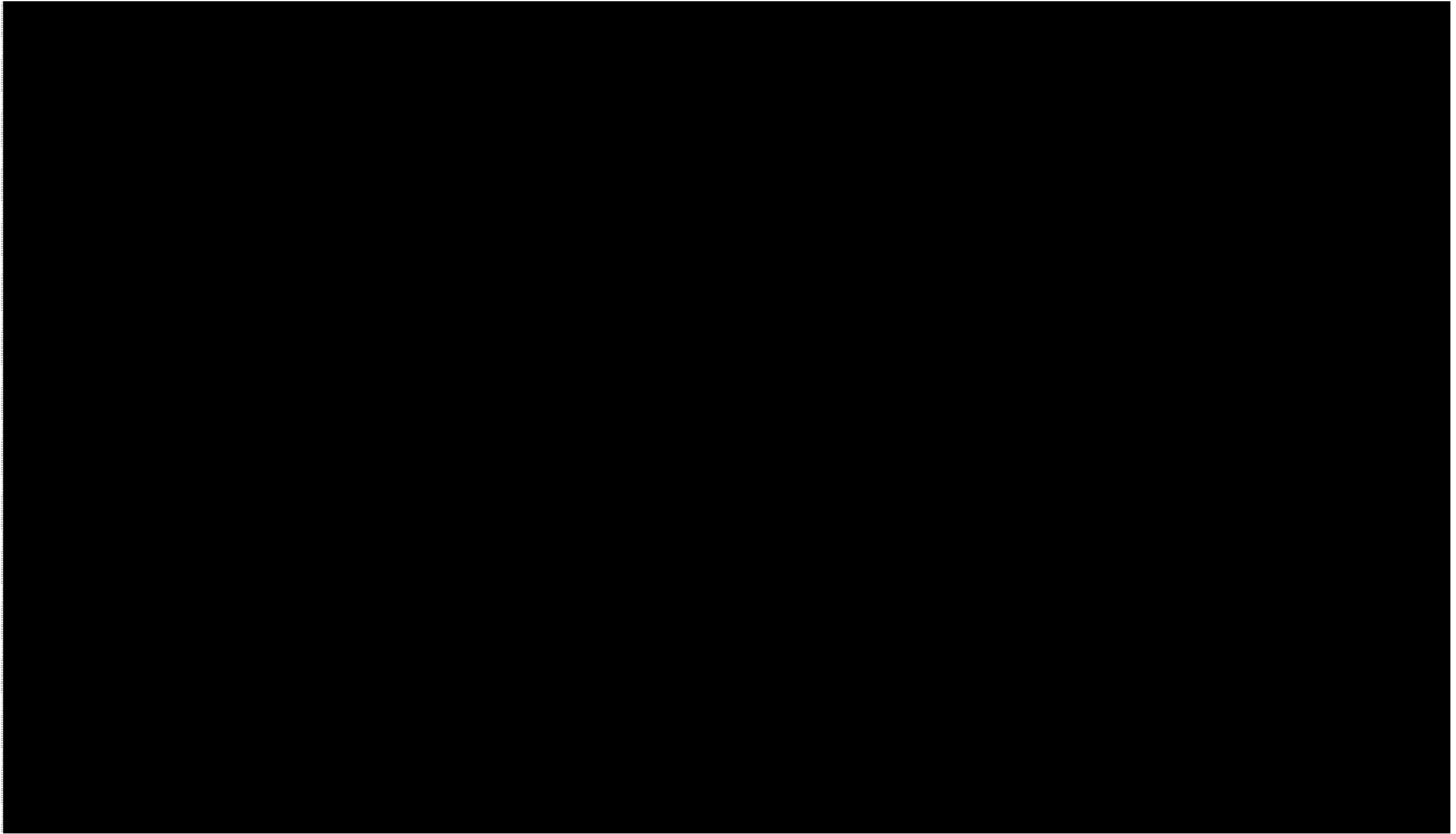


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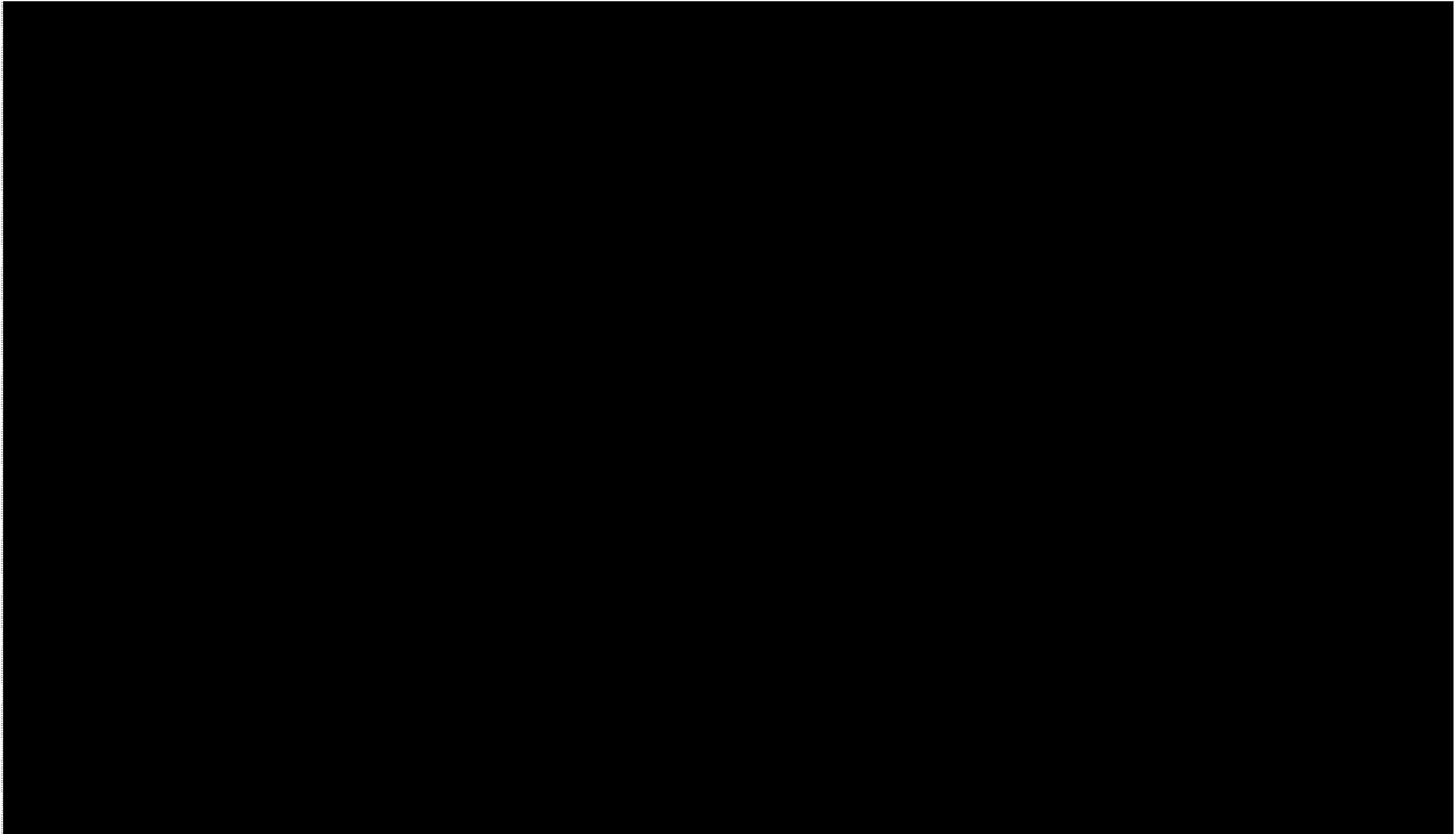


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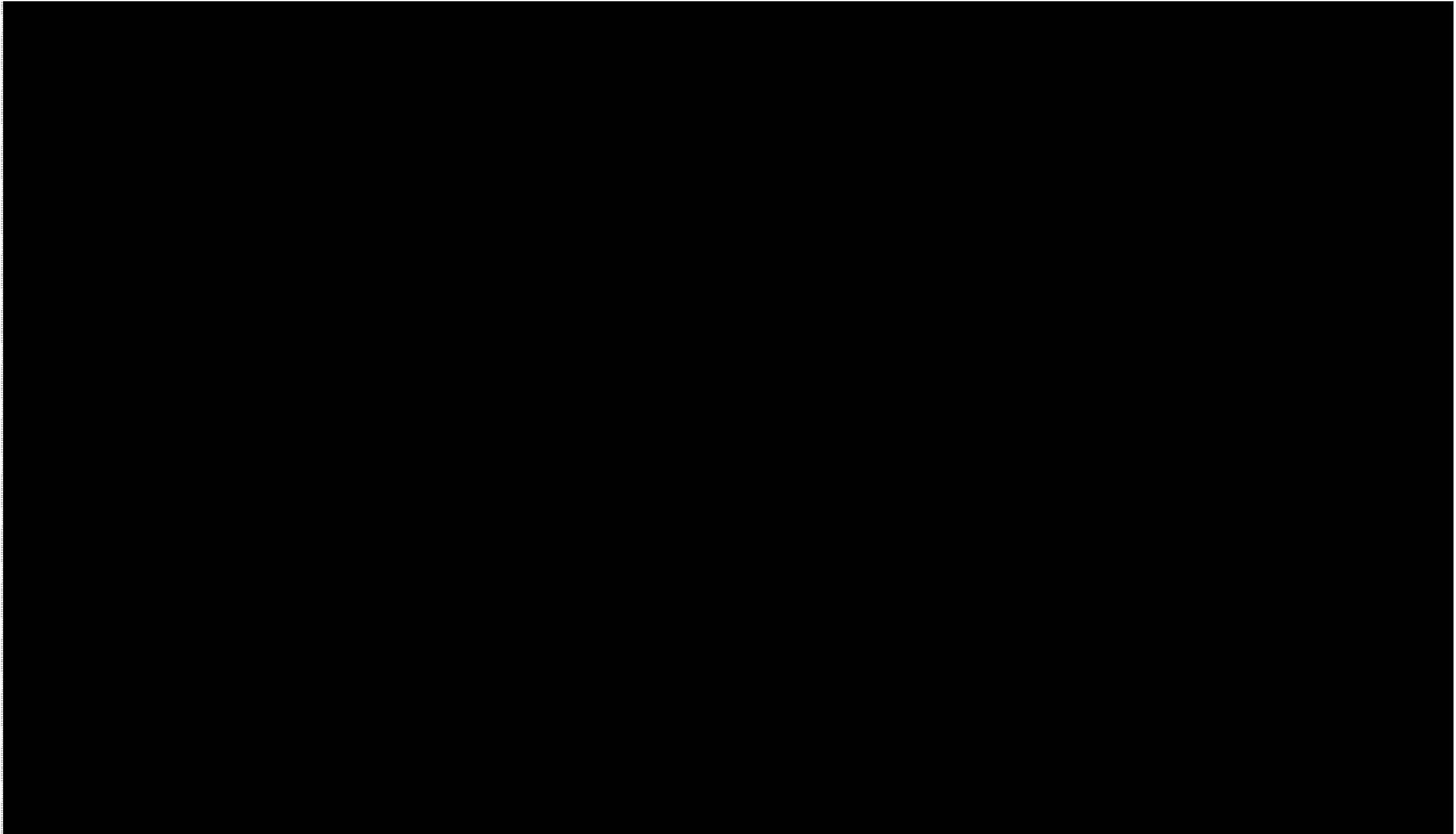
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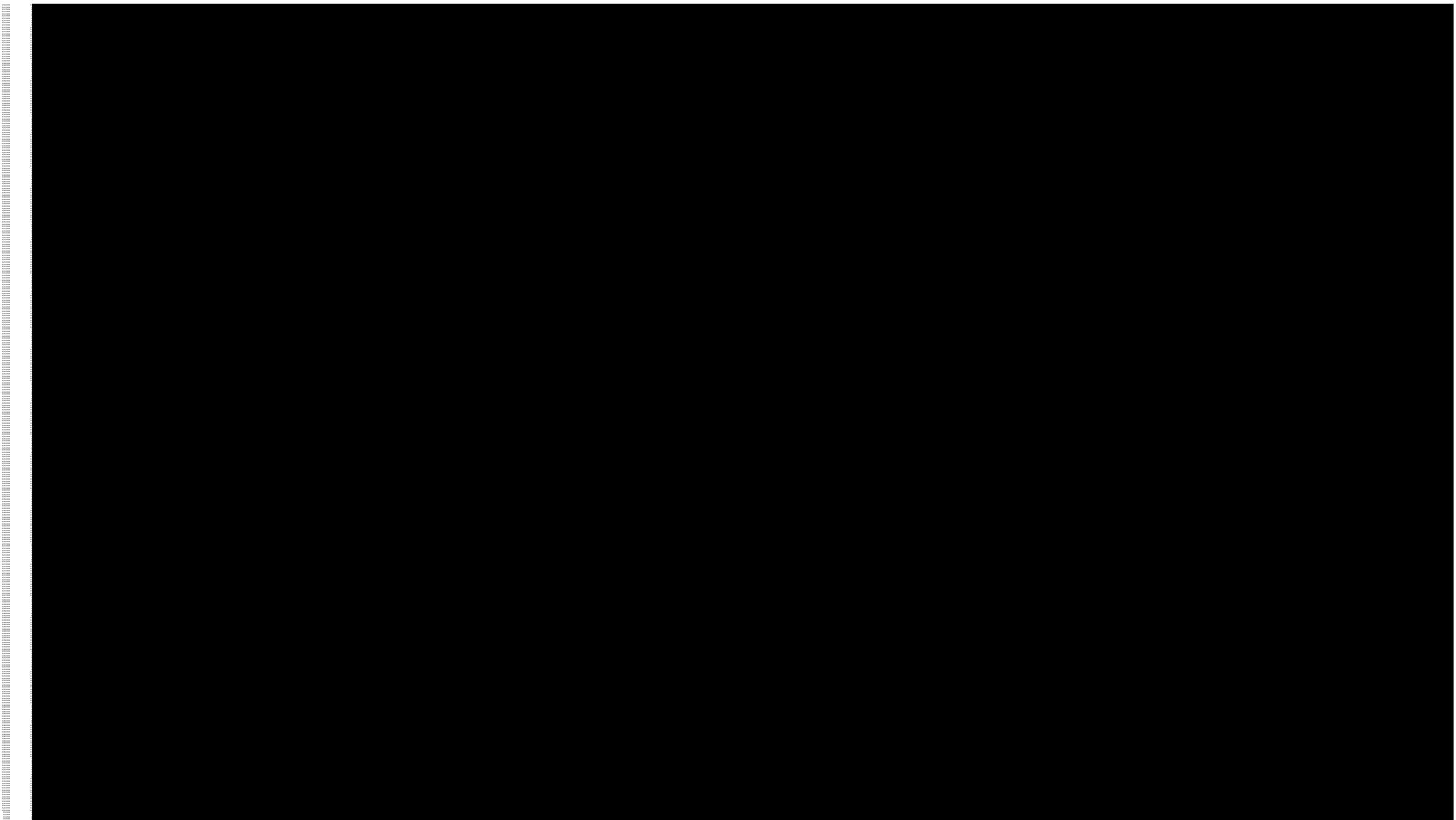


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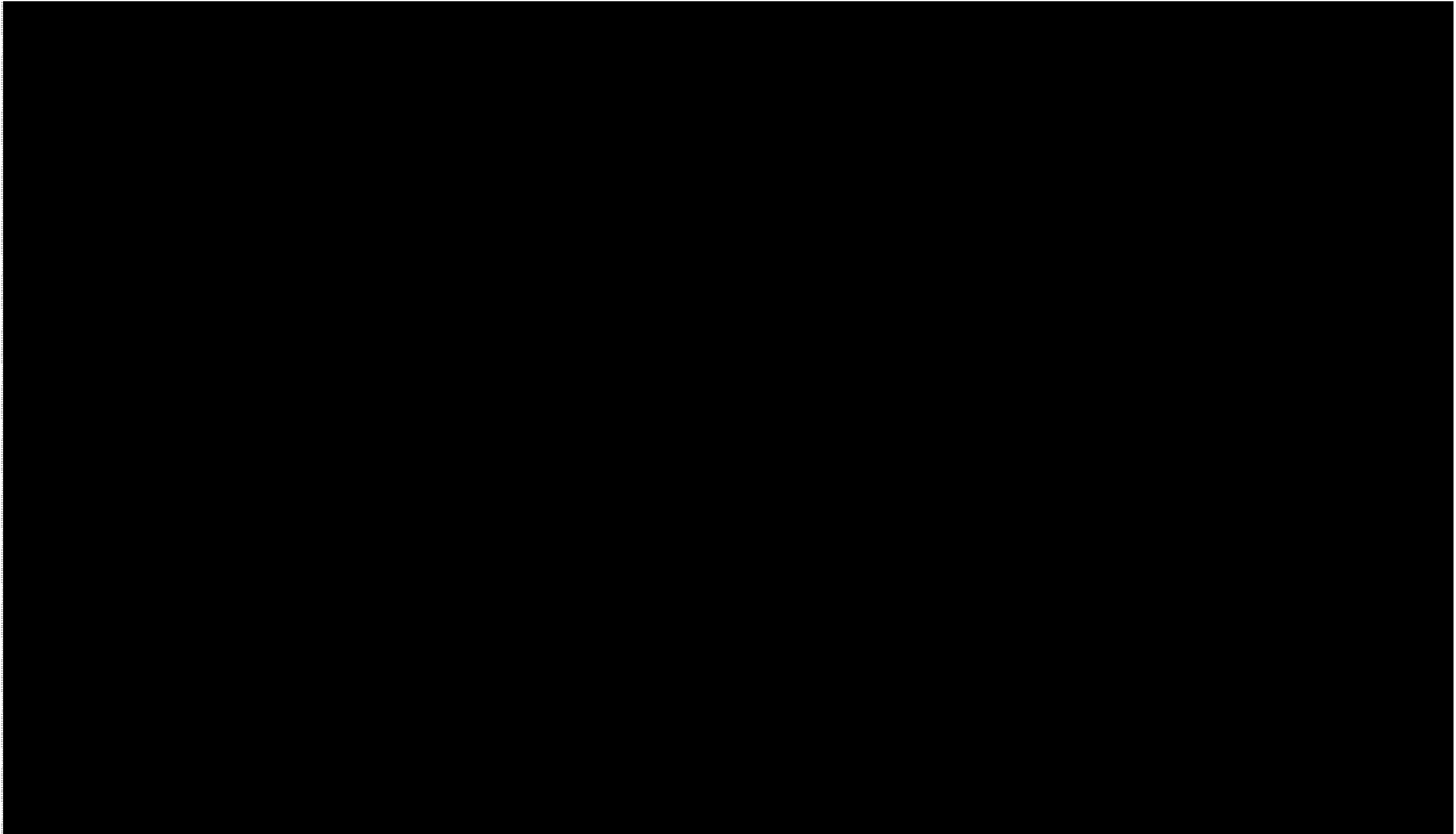
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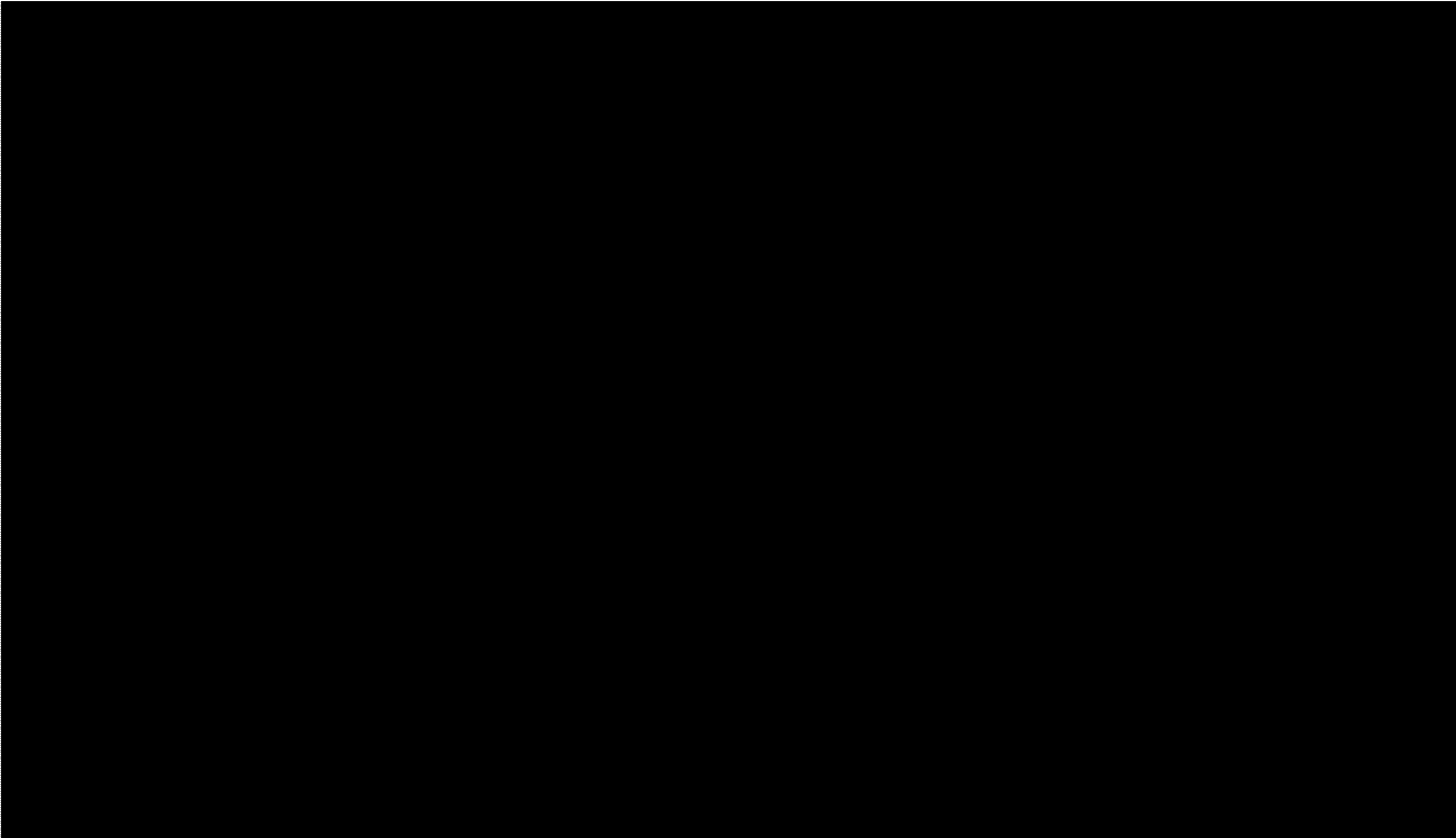




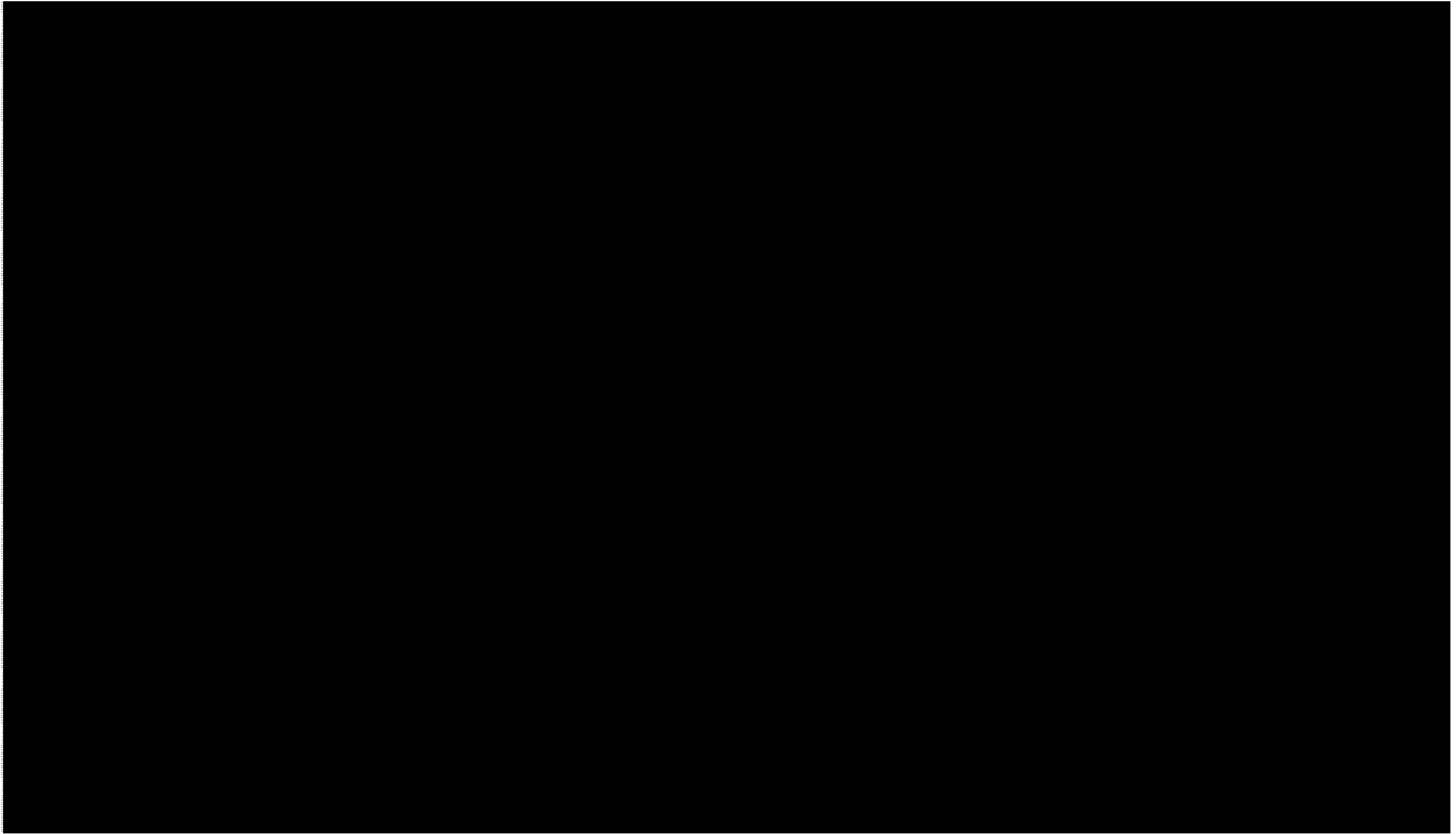
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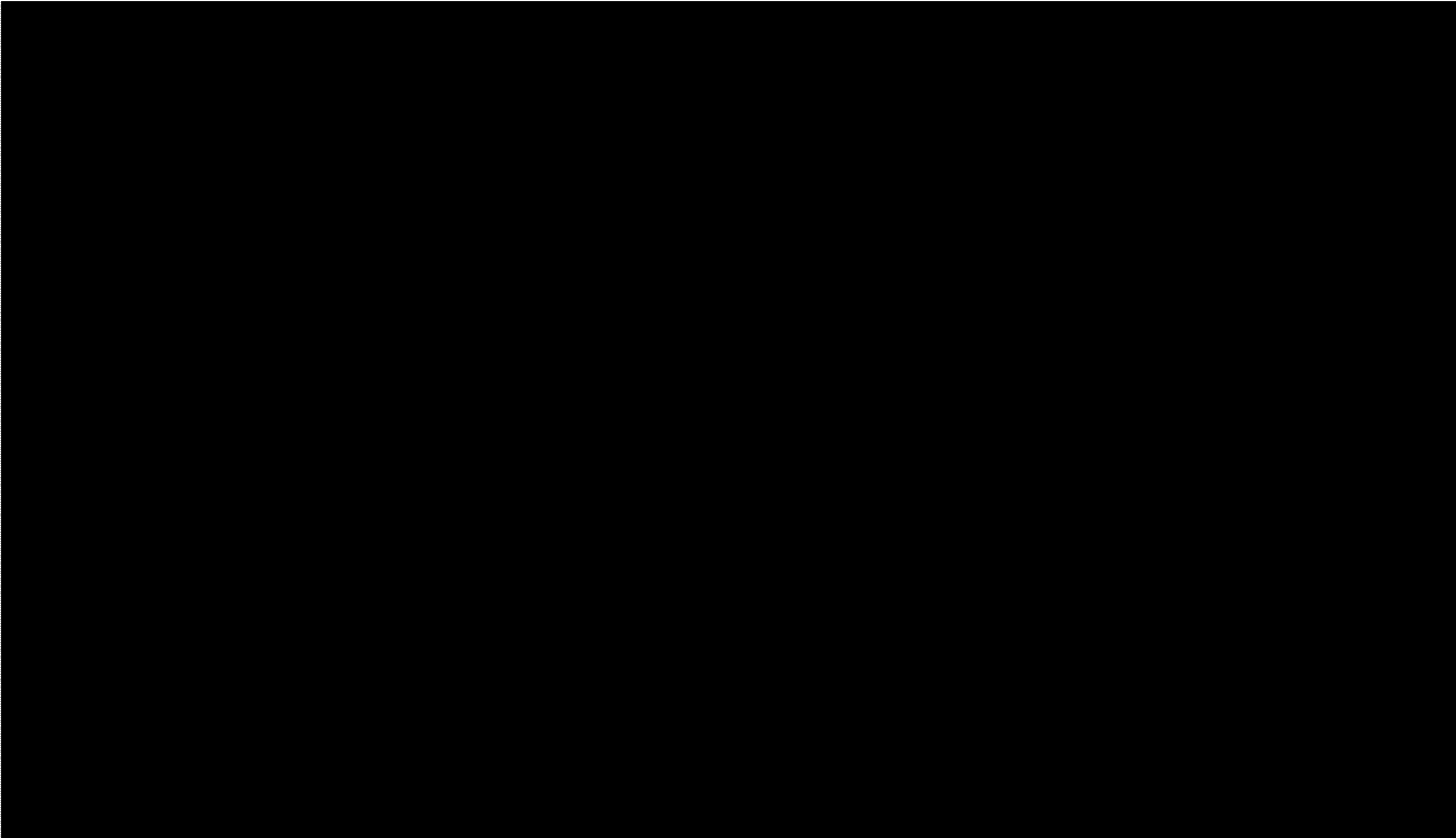
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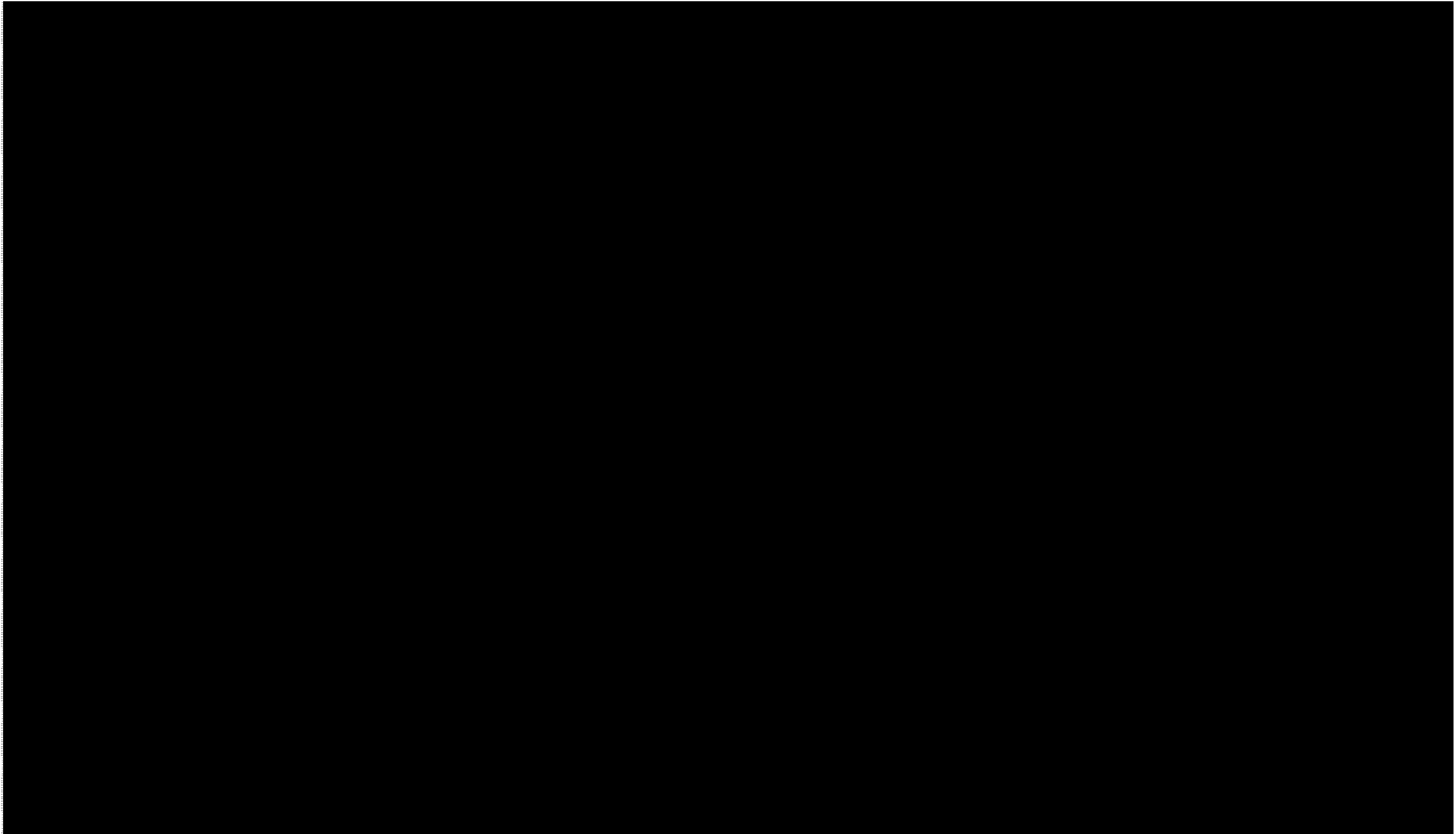
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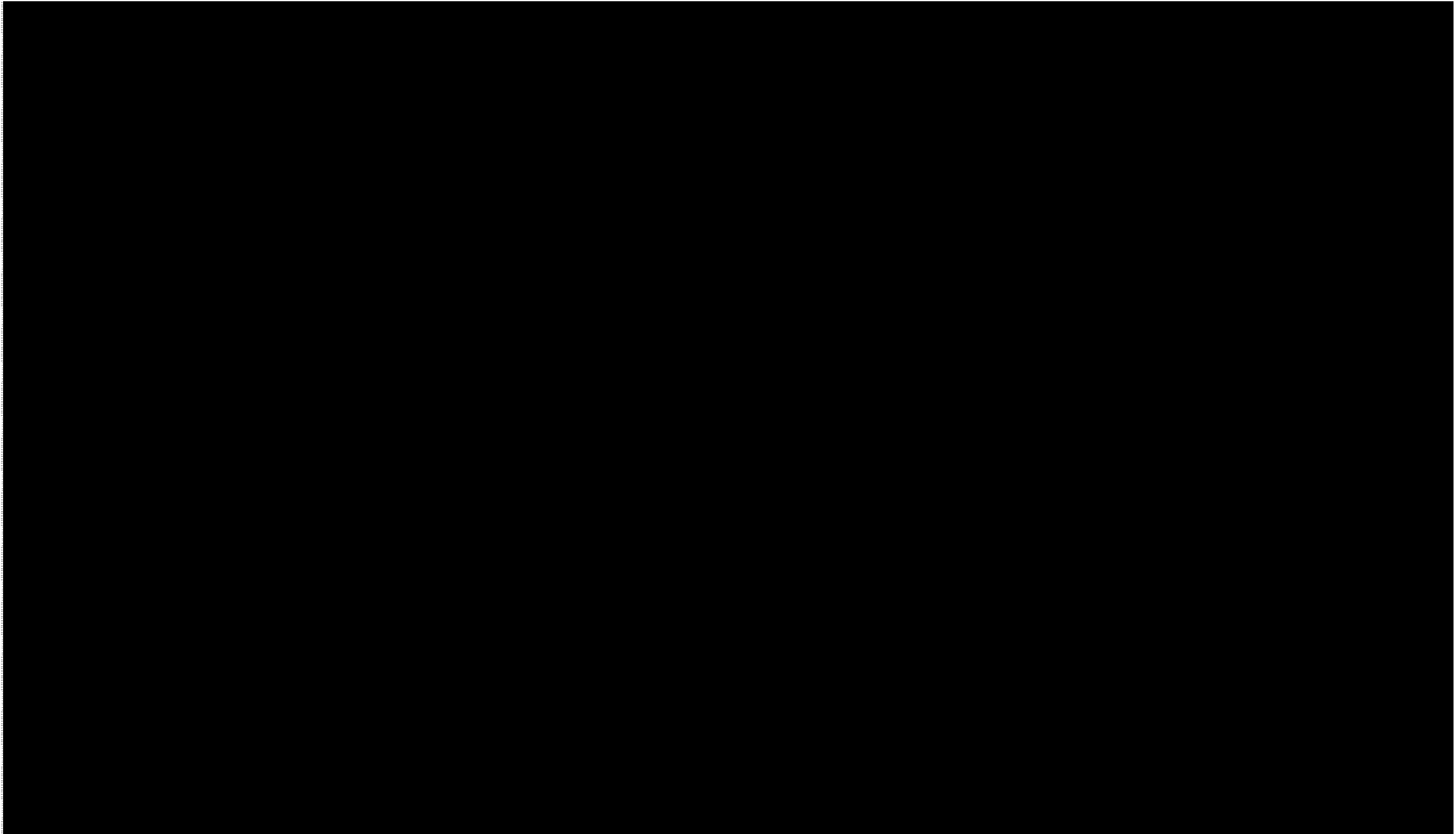
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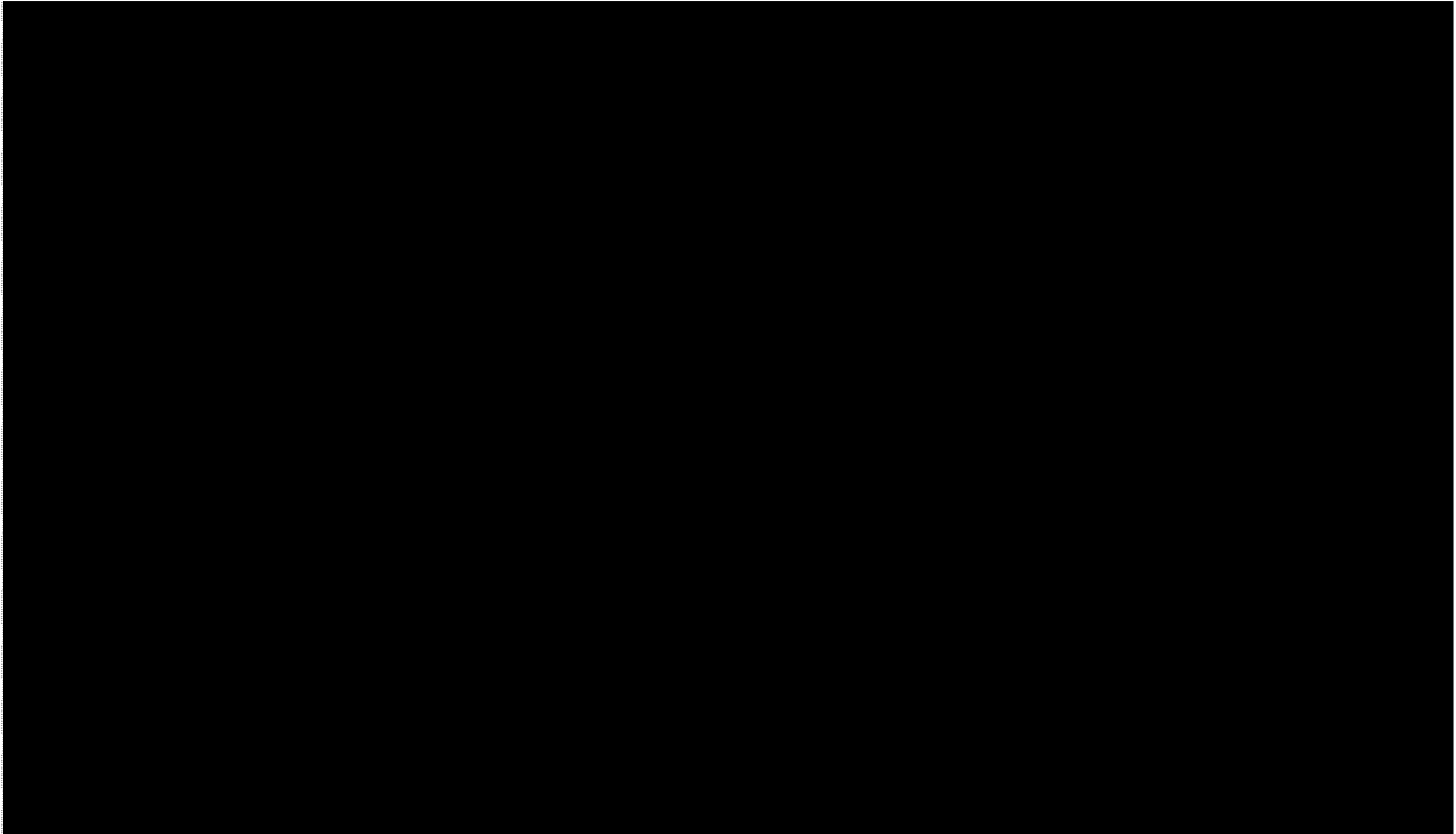
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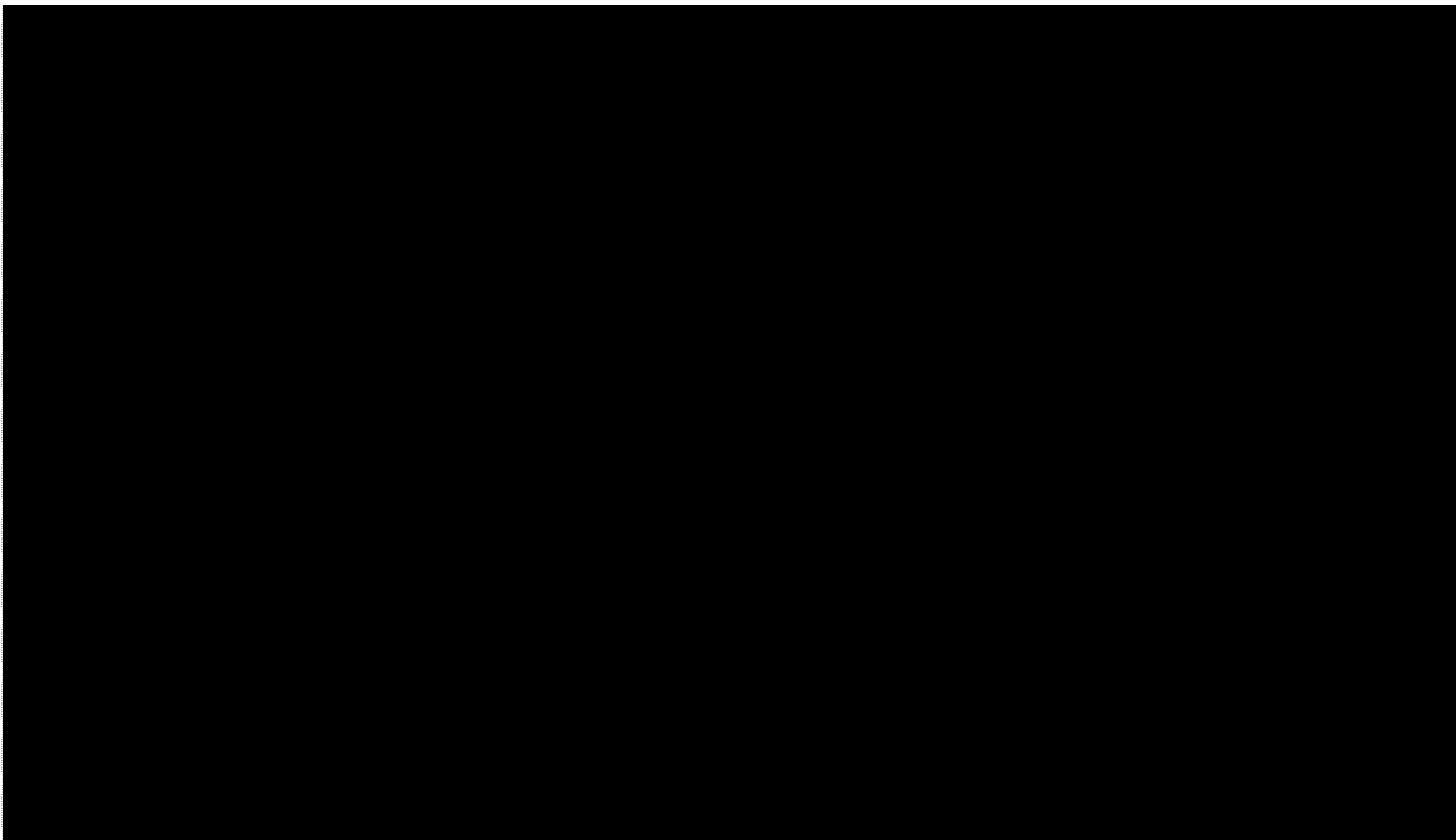
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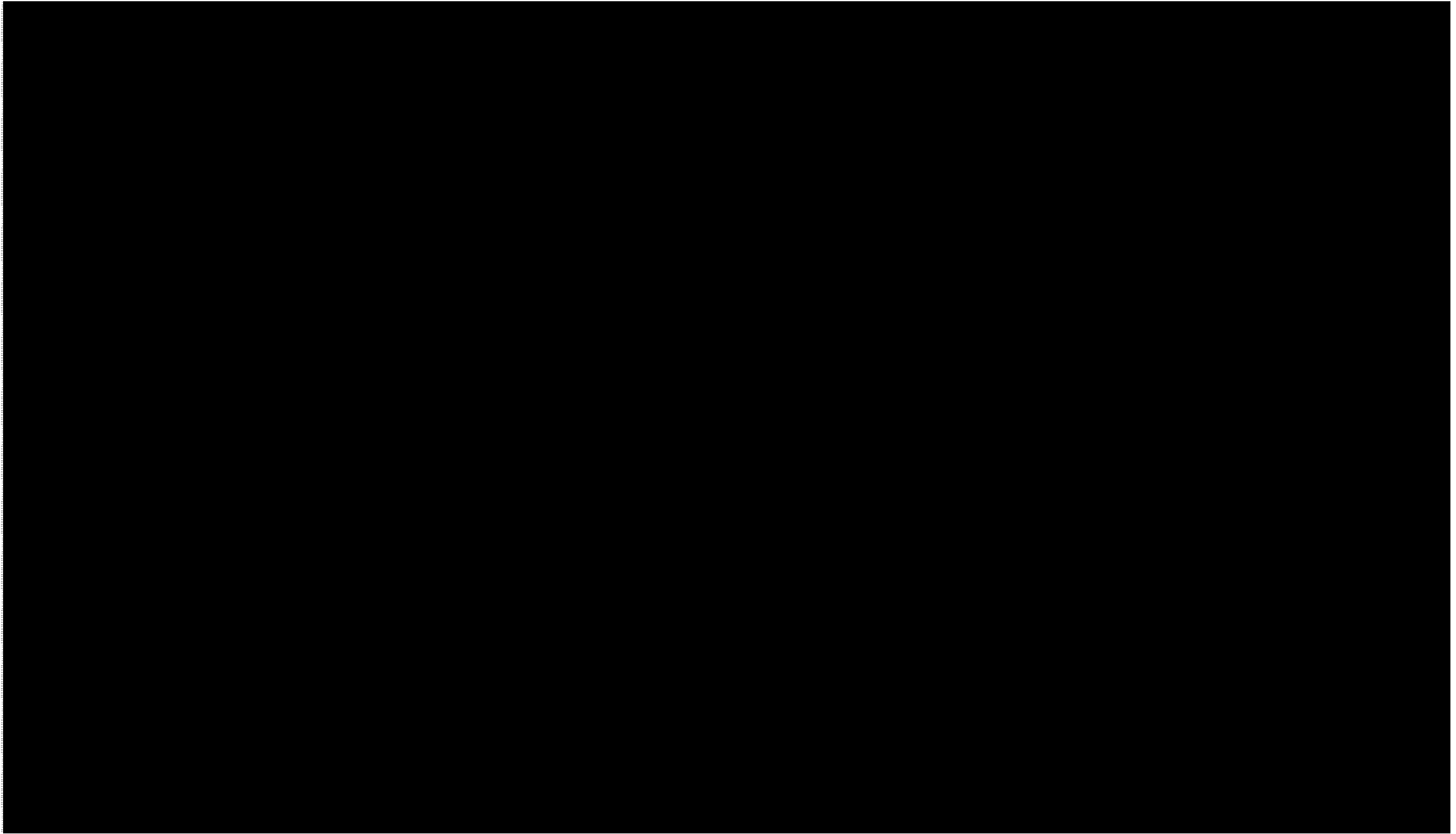
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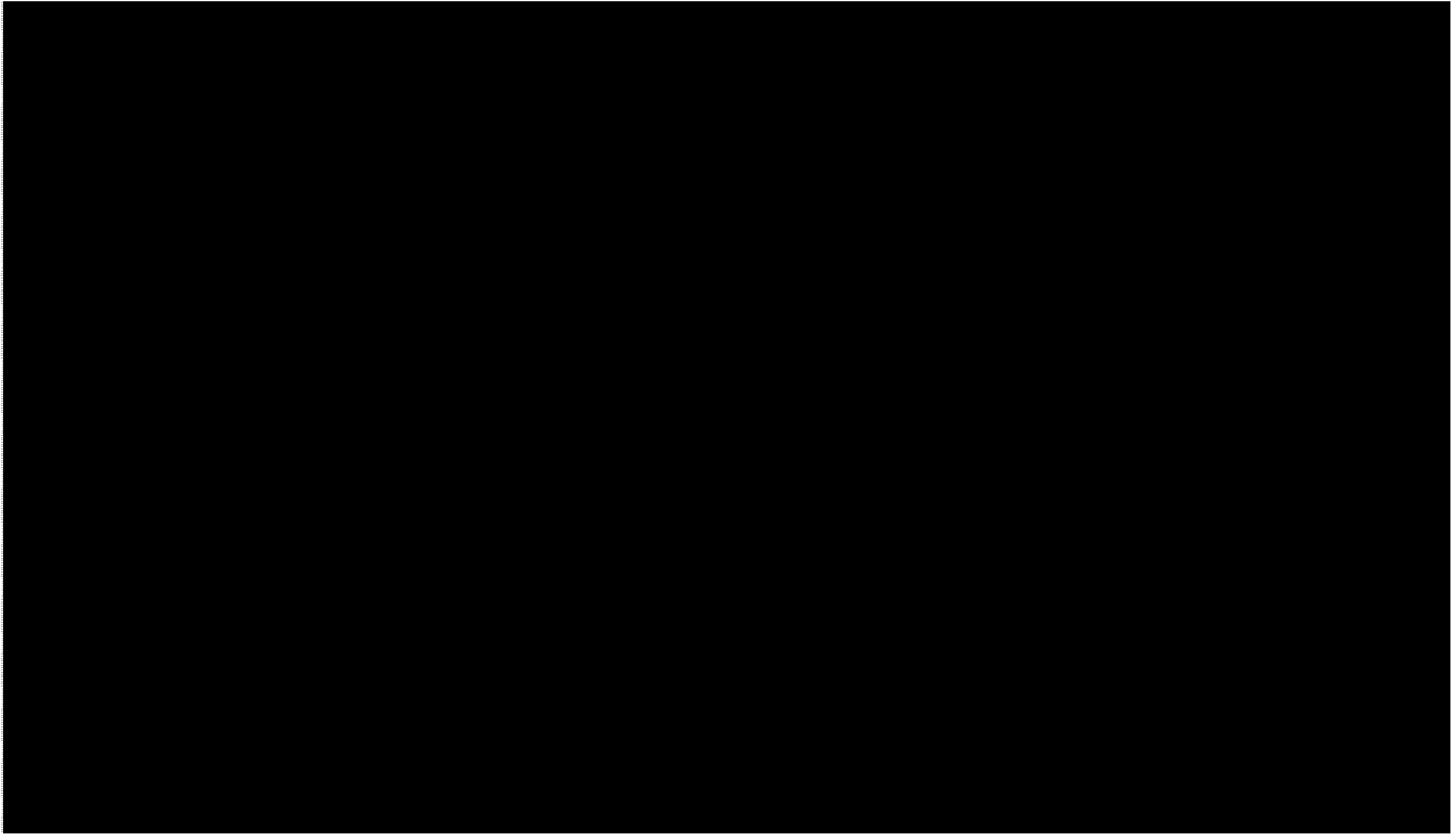
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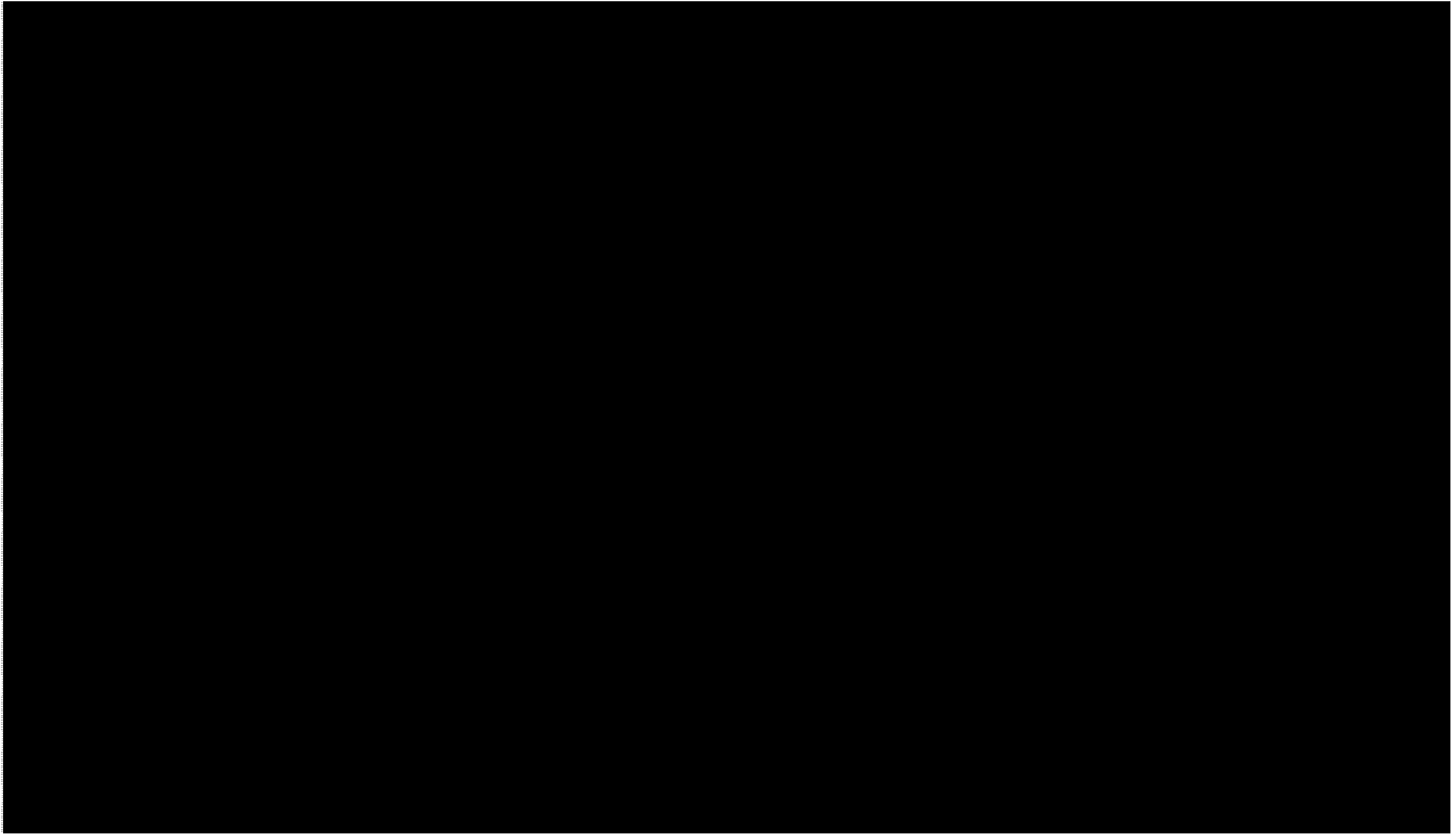
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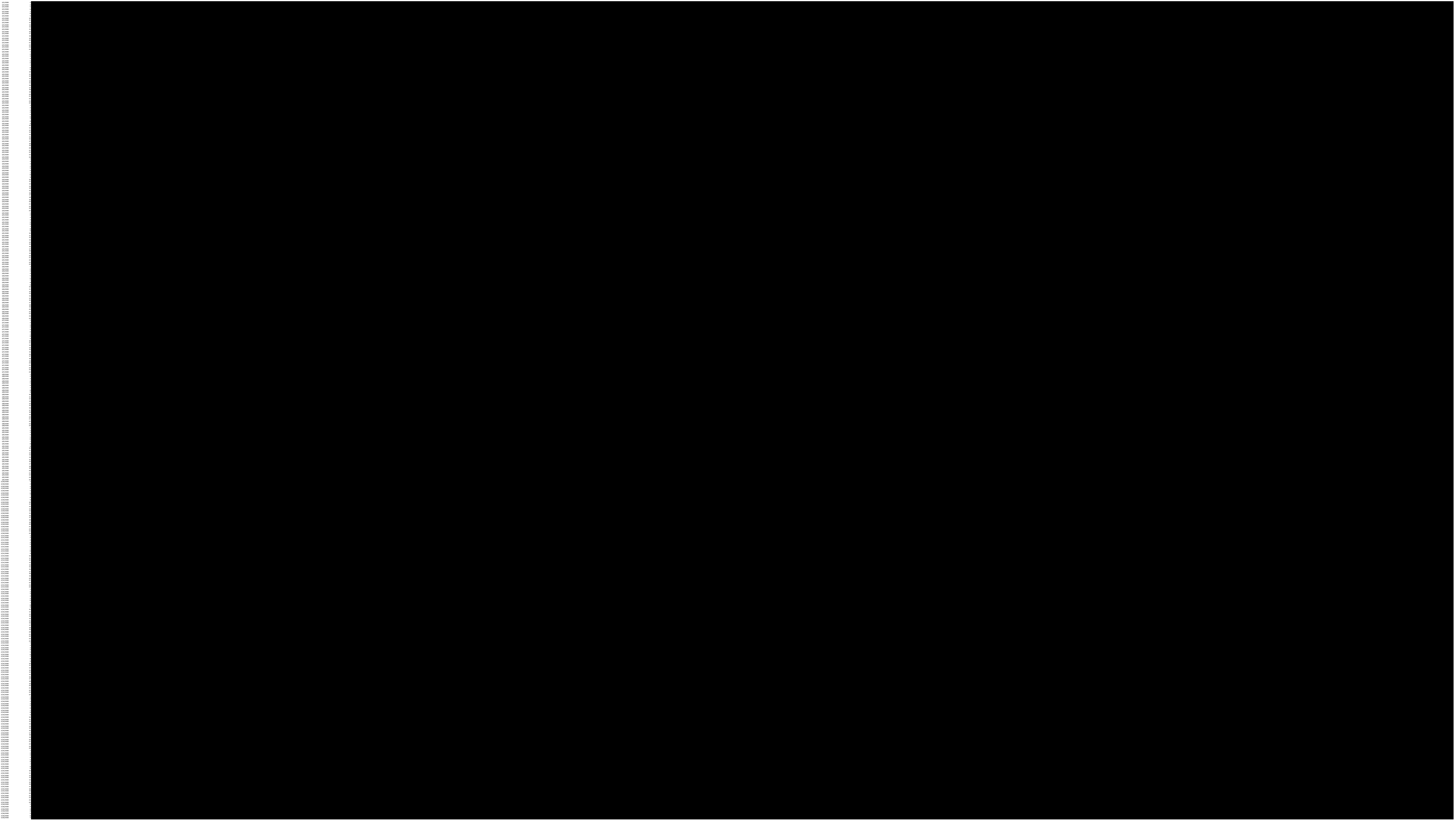


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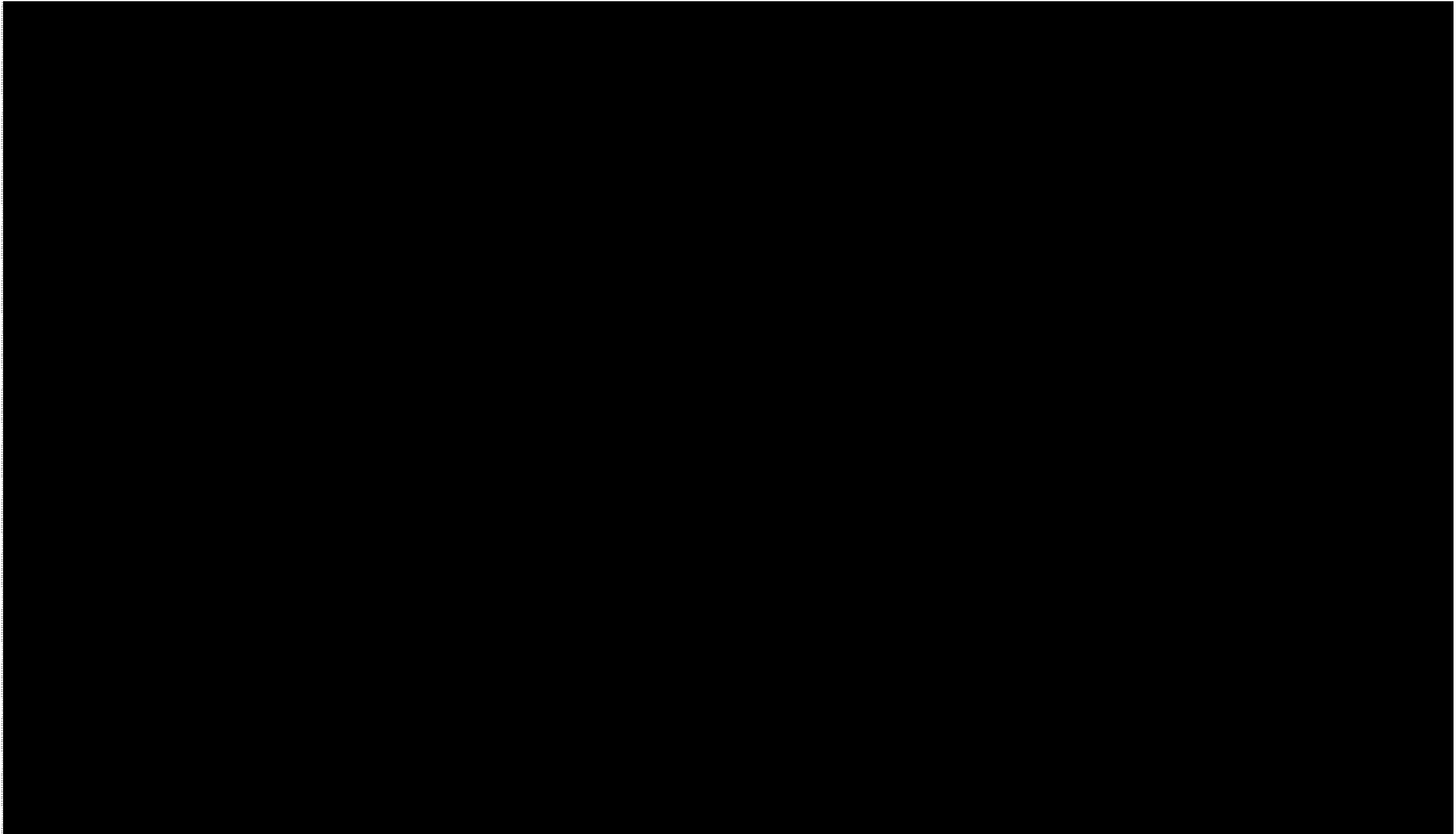


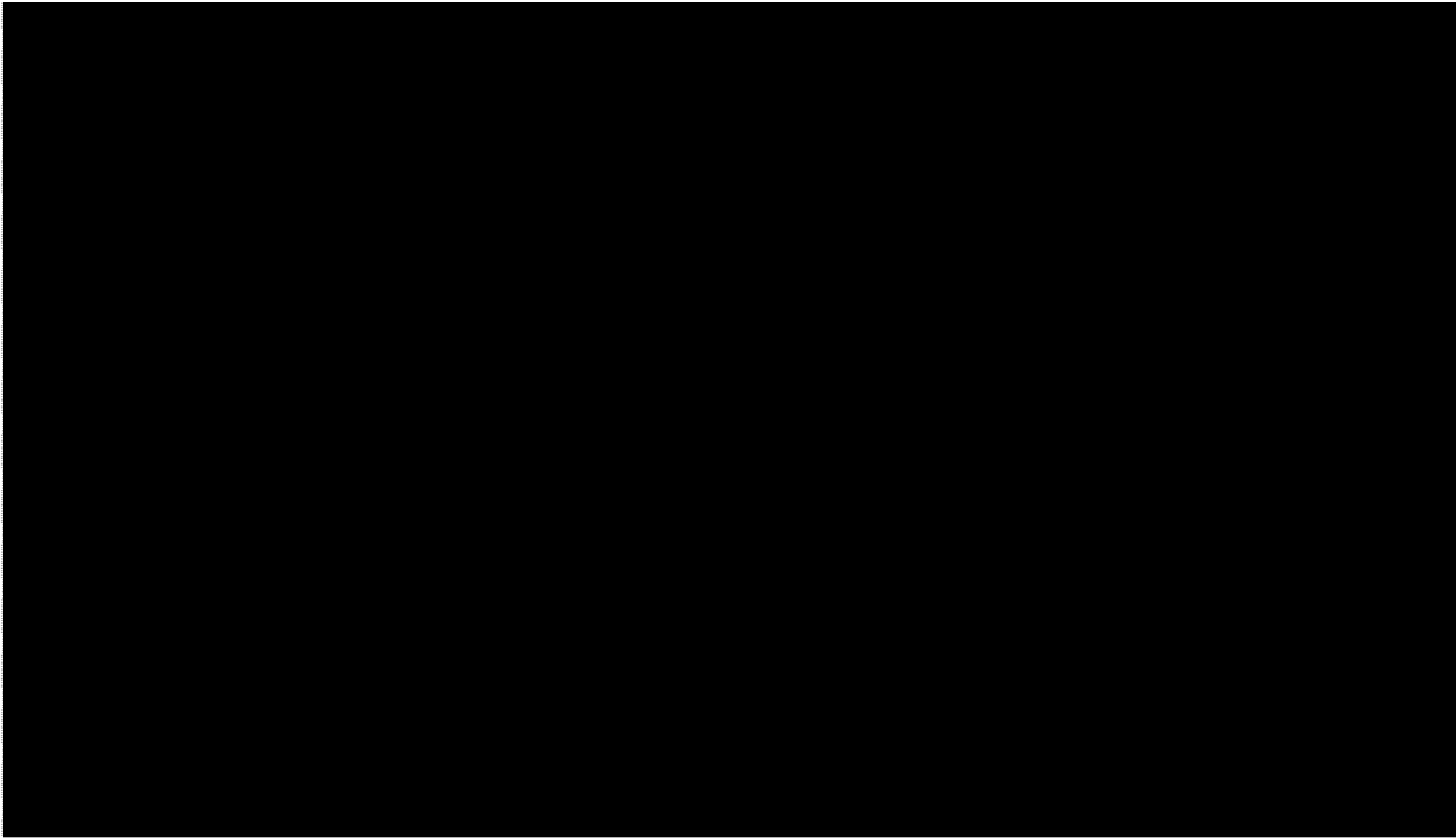
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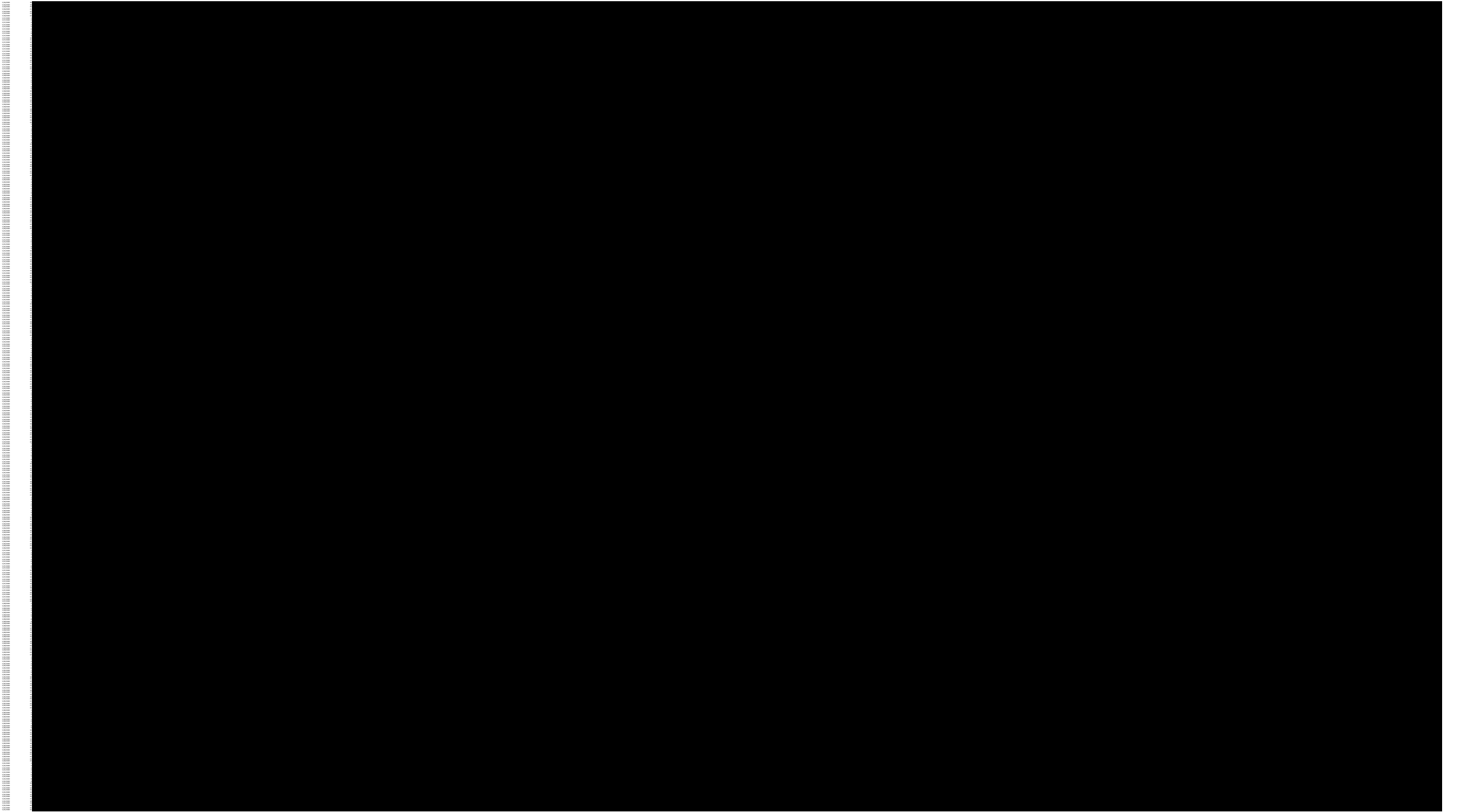




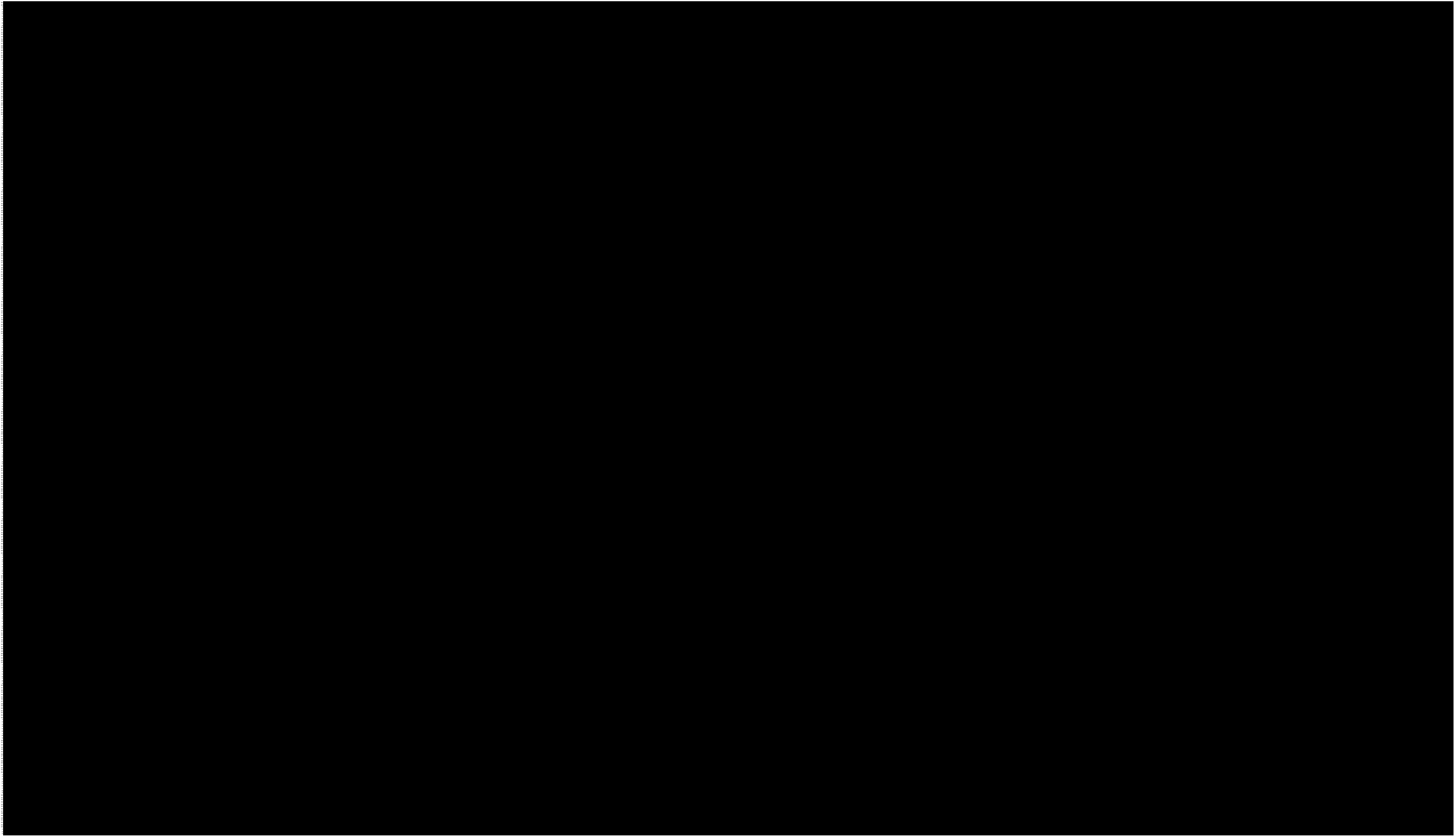
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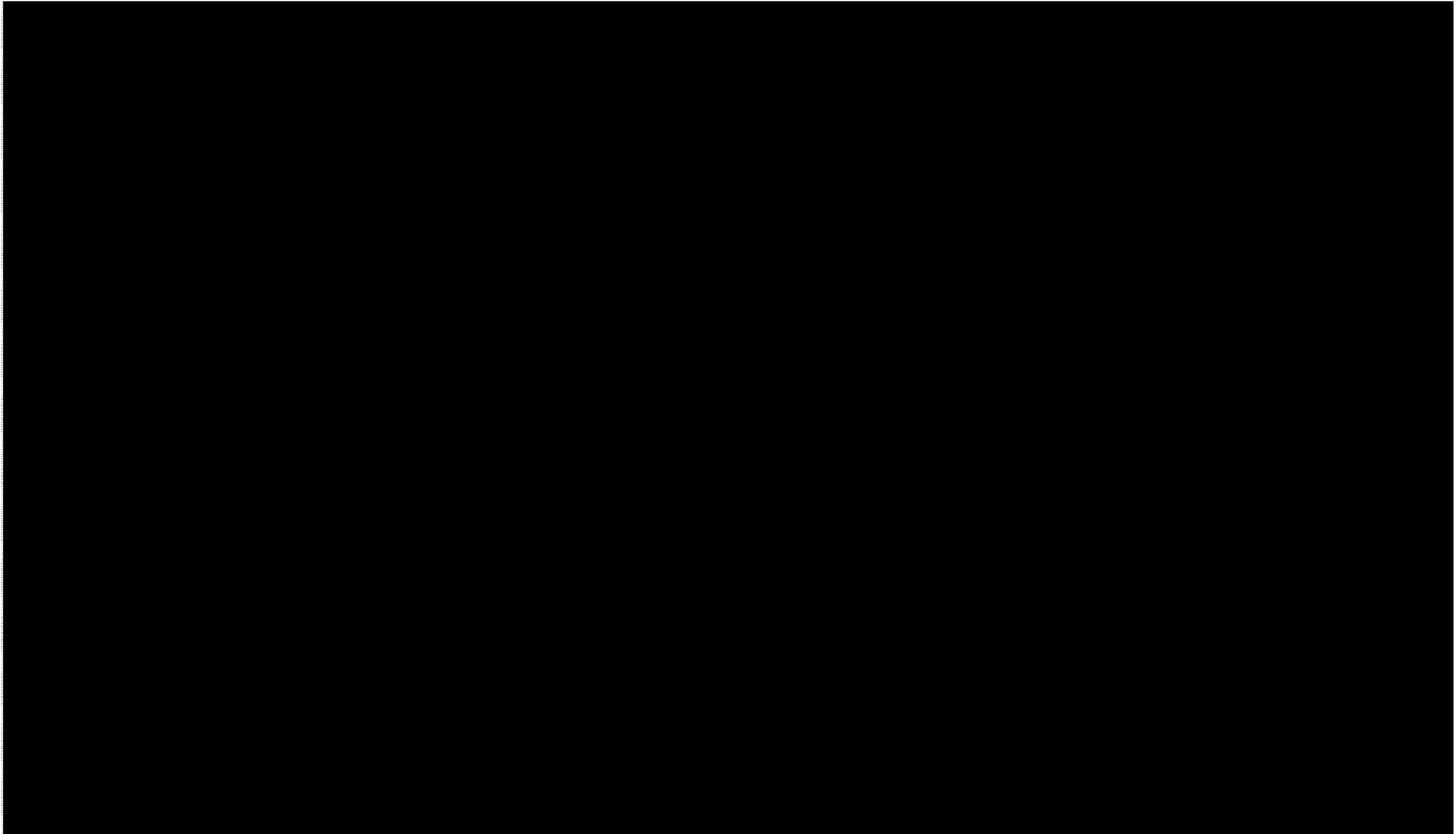




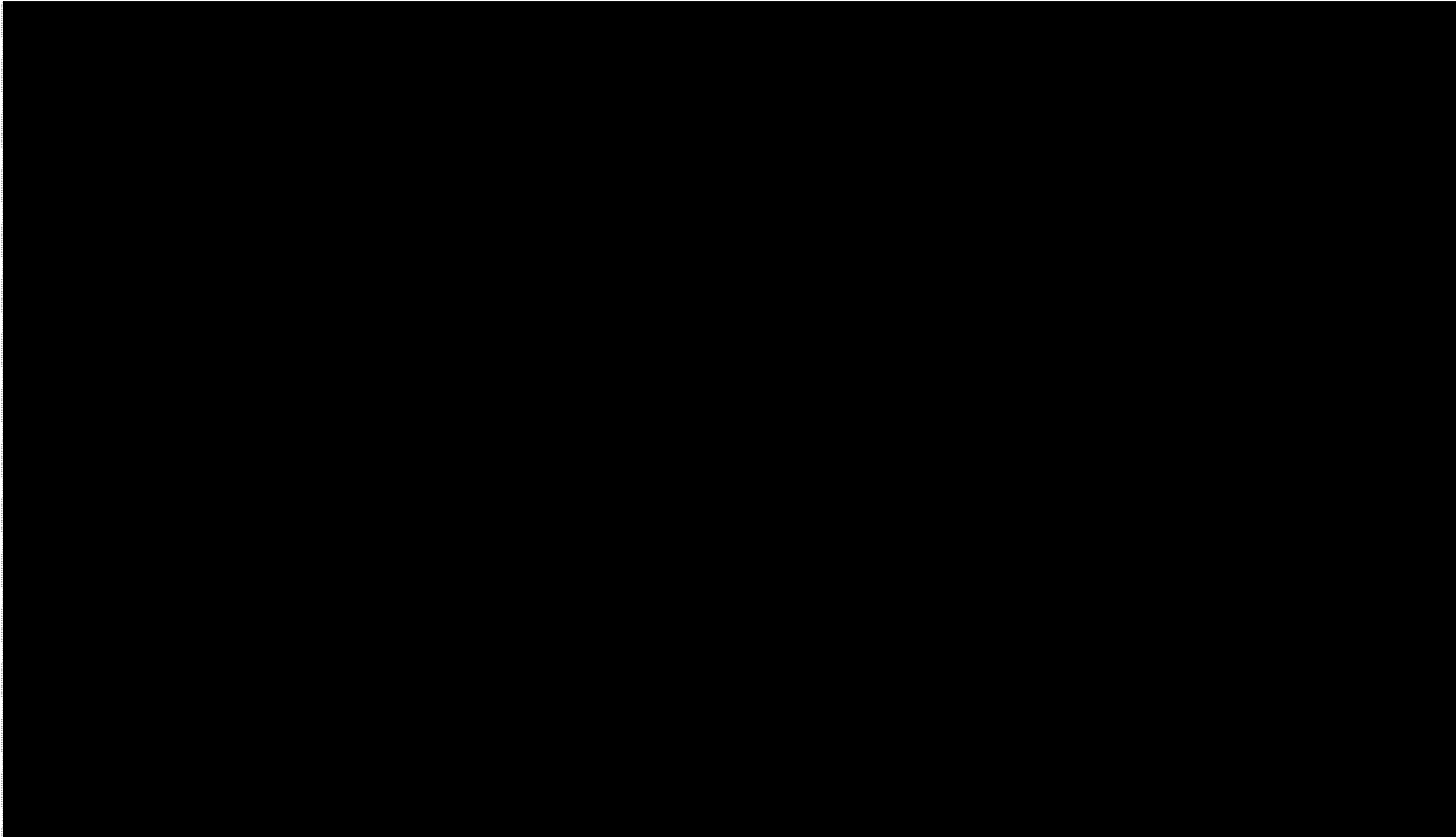
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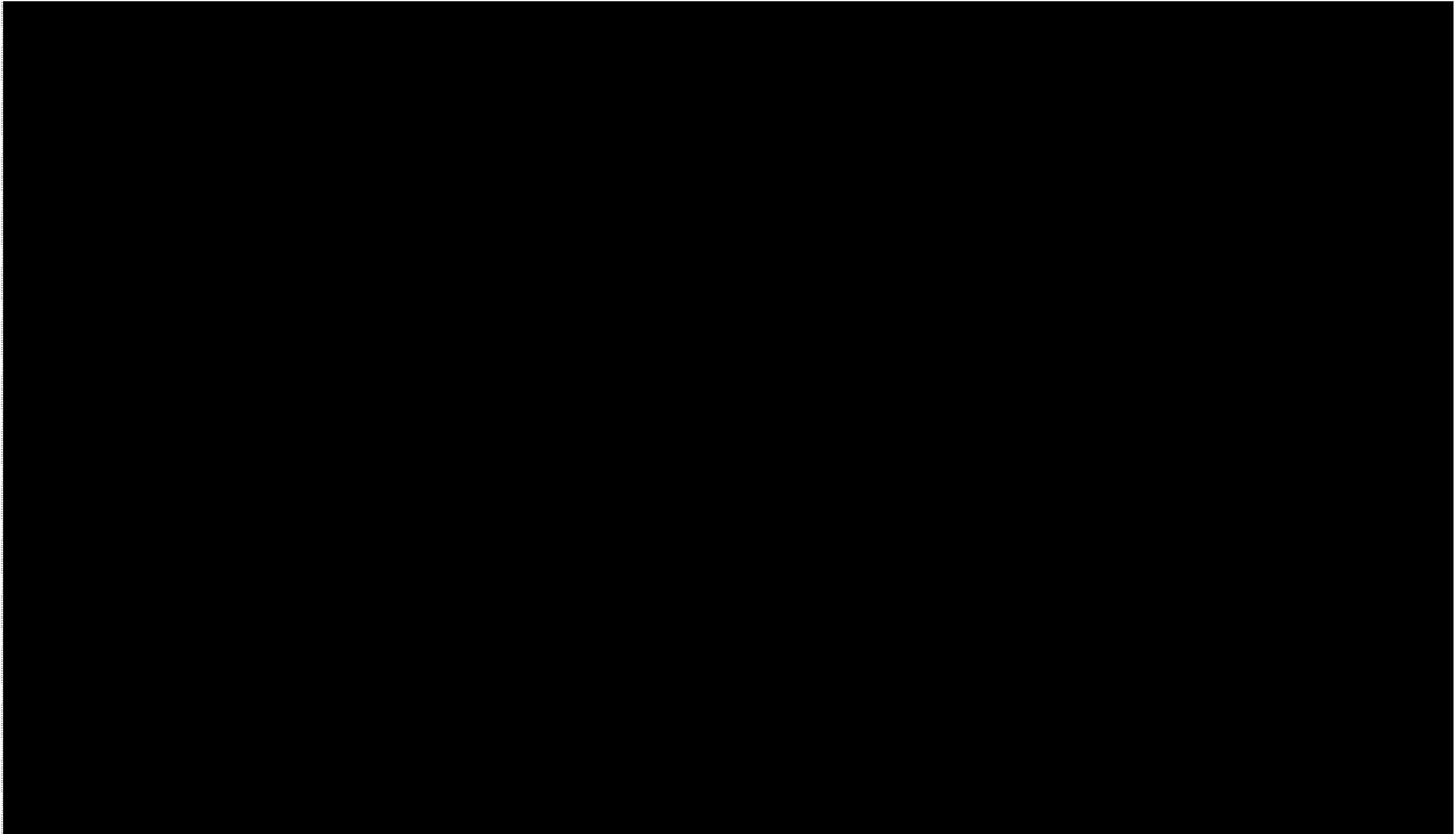
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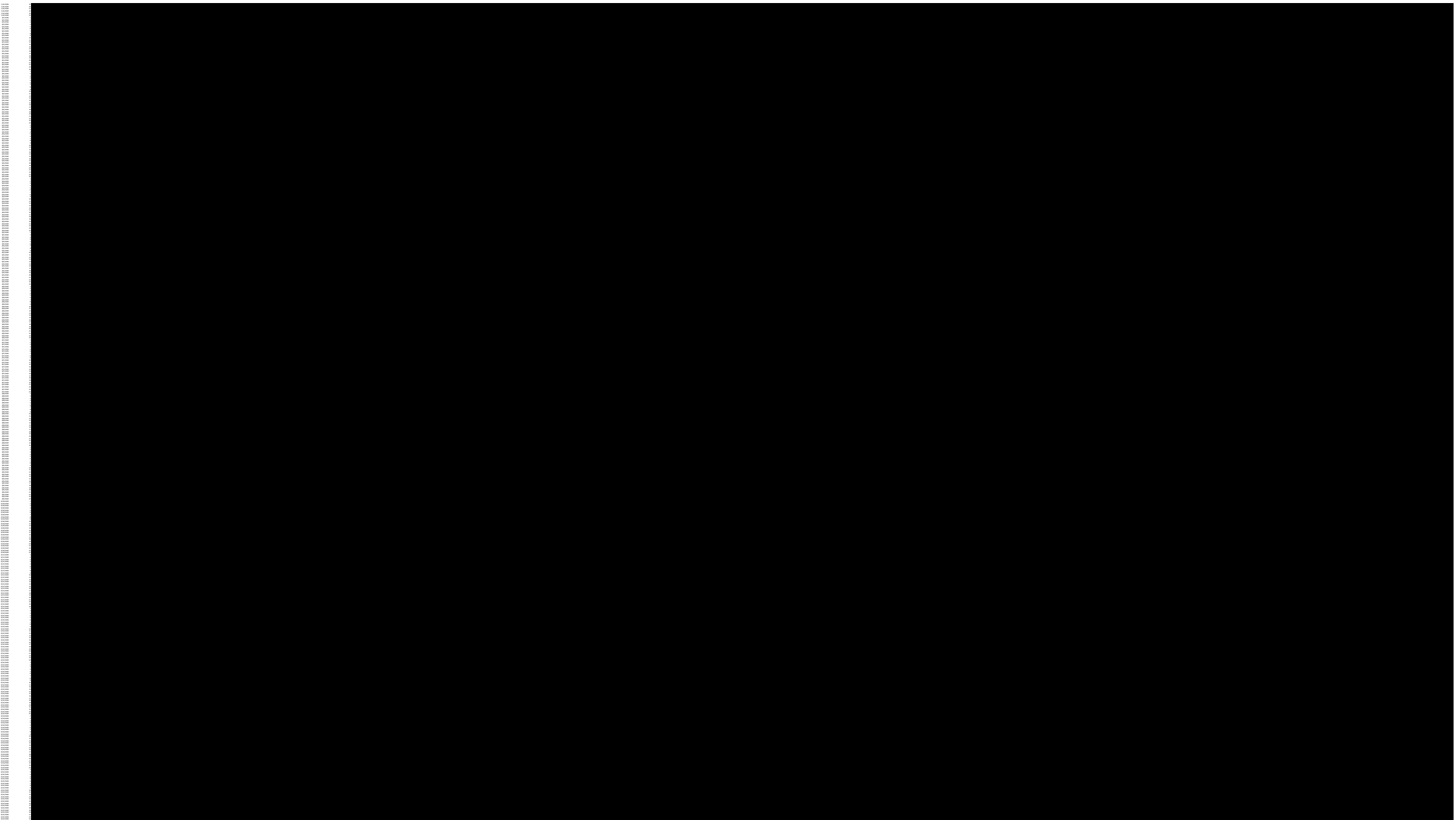


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