

**CforAT DATA REQUEST – 01**  
**CforAT Data Request in A.17-12-013**  
**(SDG&E’s 2018 RDW Application)**  
**Date Received: April 18, 2018**  
**Date Submitted: April 30, 2018**

**Question 1:**

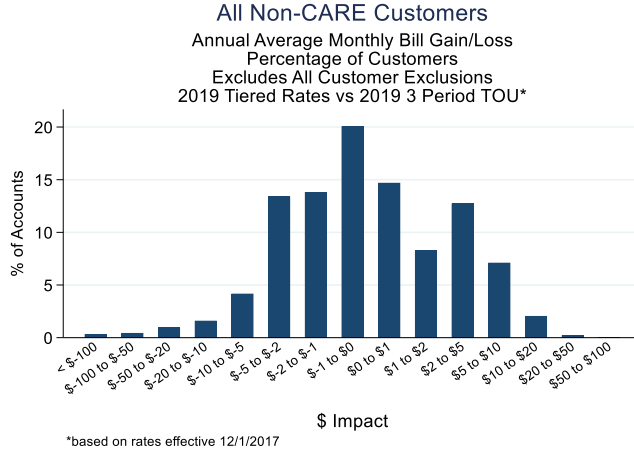
In SDG&E-1 at p. CF-17 and in SDG&E-2 in Attachment C and Attachment G, various data is provided on the bill impacts of proposed TOU scenarios on CARE and non-CARE customers. Please indicate whether SDG&E’s calculations of bill impacts in the various TOU scenarios exclude those customers who are not subject to default per Section 745, with separate confirmation as to whether they exclude CARE/FERA-eligible customers in hot climate zones.

- a. If the data provided in SDG&E’s testimony on estimated bill impacts includes customers who will be excluded from default TOU, please identify how the bill impacts would change if they are excluded.
- b. CforAT identifies the material below as requiring an update if they do not exclude customers who will not be subject to default. However, if SDG&E determines that there is additional material impacted by this question, please identify those additional materials as well. Relevant material includes:
  - i. SDG&E-1, at p. CF-16, Chart 2 (to the extent that it includes FERA customers in hot climate zones, customers in hot climate zones who are eligible for either CARE or FERA but not enrolled in either program, and/or non-CARE/FERA-eligible customers otherwise subject to exclusion under §745)
  - ii. SDG&E-1, at p. CF-17, Chart 3 (to the extent that it includes CARE customers in hot climate zones and/or CARE customers in other climate zones who are otherwise subject to exclusion under §745)
  - iii. SDG&E-2 at Attachment C (Illustrative residential bill impacts for proposed default TOU rate) at the following identified tables: p. 1 of 50, p. 2 of 50, p. 15 of 50, p. 16 of 50, p. 21 of 50, p. 39 of 50, and p. 45 of 50.
  - iv. SDG&E-2 at Attachment G (Public Utilities Code Section 745 Analysis) at the following identified tables: pp. 1-8 of 93, pp. 58-61 of 93, and pp. 70-73 of 93.

**SDG&E Response to Question 1:**

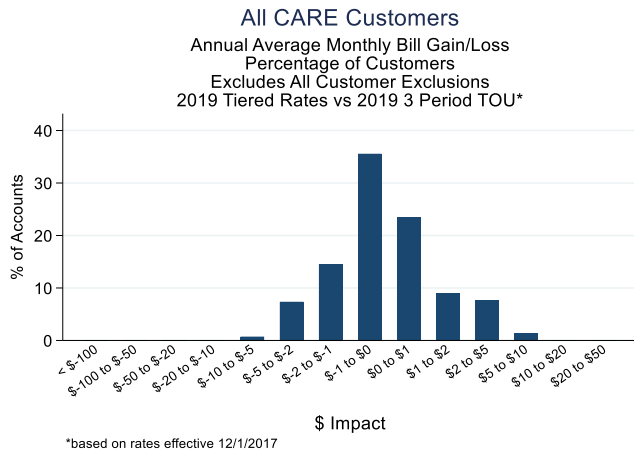
- a. Please see the responses to question 1.b.i-iv.
- b. Please see the responses below.
  - i. The following chart updates SDG&E-1, at p. CF-16, Chart 2. It shows the estimated bill impacts for Non-CARE customers who are not subject to exclusion under §745.

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Non-CARE Customers	
Bill Impacts	# of Customers
<\$-100	2,140
\$-100 to \$-50	2,792
\$-50 to \$-20	6,261
\$-20 to \$-10	10,106
\$-10 to \$-5	26,266
\$-5 to \$-2	84,247
\$-2 to \$-1	86,958
\$-1 to \$0	126,195
\$0 to \$1	92,468
\$1 to \$2	52,242
\$2 to \$5	80,069
\$5 to \$10	44,747
\$10 to \$20	12,955
\$20 to \$50	1,381
\$50 to \$100	35
\$100+	-
<b>Total</b>	<b>628,862</b>

ii. The following chart updates SDG&E-1, at p. CF-17, Chart 3. It shows the estimated bill impacts for CARE/FERA customers who are not subject to exclusion under §745.



CARE Customers	
Bill Impacts	# of Customers
<\$-100	12
\$-100 to \$-50	22
\$-50 to \$-20	66
\$-20 to \$-10	162
\$-10 to \$-5	990
\$-5 to \$-2	10,049
\$-2 to \$-1	19,772
\$-1 to \$0	48,506
\$0 to \$1	32,013
\$1 to \$2	12,259
\$2 to \$5	10,448
\$5 to \$10	1,904
\$10 to \$20	134
\$20 to \$50	6
\$50 to \$100	-
\$100+	-
<b>Total</b>	<b>136,343</b>

iii. Please see the attached document titled “CforAT DR-001 Q1biii”.



CforAT DR-001  
Q1biii.pdf

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- iv. Please see the attached documents titled “CforAT DR-001 Q1biv – Gain-Loss” and “CforAT DR-001 Q1biv – 2019 Electricity Burden”.



CforAT DR-001  
Q1biv - Gain-Loss.pdf



CforAT DR-001  
Q1biv - 2019 Electric

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**Question 2:**

In SDG&E-6 at p. CB-6, SDG&E provides a table of customer groups excluded from default TOU. Please provide the following information regarding this table:

- a. For the category of CARE/FERA-eligible customers in Mountain and Desert climate zones, please describe how you intend to identify customers who are eligible, but not enrolled in these programs in order to exclude them from default.
- b. For the category of customers requiring an in-person visit prior to disconnection, please describe how you identify these customers in order to exclude them from default.

**SDG&E Response to Question 2:**

- a. SDG&E will continue to use CARE/FERA eligibility estimates from Athens Research<sup>1</sup> to identify opportunities on a geographic or zip code level, and will also use PRIZM Premier codes to target potential participants on a more granular (household) level.
- b. Customers requiring an in-person visit prior to disconnect are flagged in SDG&E's Customer Information System. SDG&E uses this flag to identify this set of customer exclusions. Once the Mass TOU Default population is pulled, SDG&E will perform a quality control check to ensure this customer group (and other exclusions) have been removed from the default population.

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<sup>1</sup> As detailed in SDG&E's Residential Low-Income Marketing & Outreach Plan for 2017-2020, filed on July 21, 2017, per Decision 16-11-22.

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**Question 3:**

In SDG&E-6 at p. CB-4, SDG&E identifies 4% of its customer base as “non-benefitters,” defined as customers who are expected to experience an average bill increase of at least \$10/month. Has SDG&E considered excluding these customers from default TOU?

**SDG&E Response to Question 3:**

No. However, in order to assist these customers in transitioning to TOU pricing, SDG&E’s proposed Mass TOU Default implementation plan provides several opportunities for customers to analyze how TOU pricing plans impact them, and make informed decisions regarding their pricing plan. SDG&E also proposes to provide certain customer protections during the transition process. Customers have the option of opting-out and selecting a different pricing plan as well.

The following are some of the key elements of SDG&E’s plan around customer communication and protection during the TOU default transition process:

- SDG&E will provide both general awareness and customer-specific communications prior to and throughout the TOU default process.
- SDG&E will personally contact those customers who will be most adversely impacted by TOU pricing.
- SDG&E will NOT default a customer to a TOU pricing plan if that customer proactively notifies SDG&E that they would like to “opt-out” of TOU before default.
- SDG&E is offering up to 12-months of bill protection to all customers who are defaulted onto the turn-on rate (TOU-DR-1), enabling these customers to try TOU pricing for a “risk-free” period.

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**Question 4:**

In SDG&E-6 at p. CB-7-CB-10, SDG&E describes its plan to conduct customer research regarding the TOU transition through “surveys, focus groups, data analytics, or other combinations of qualitative and/or quantitative research. Please identify how SDG&E plans to ensure that this customer research includes feedback from hard-to-reach customers, including specifically customers with disabilities.

**SDG&E Response to Question 4:**

SDG&E plans to conduct customer research in a variety of ways to ensure that hard-to-reach customers, including those with various disabilities, have the opportunity to respond to surveys and provide their opinions. Survey invitation letters will be sent both through the mail and via e-mail. All surveys will be offered in English and Spanish, and respondents will be able to complete them either over the phone or online. Additionally, SDG&E makes efforts to ensure that representative numbers of responses are received for various categories of customers across the service territory, including income (CARE/FERA), geographic region/climate zone, language preference, age, education, and our own behavioral Smart Pricing (SPP) segments. One important caveat to note is that the research pertaining to the TOU transition will primarily focus on our default eligible population, of which some customer groups such as medical baseline will be excluded.

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**Question 5:**

In SDG&E-7 at pp. HT-4-HT-6, SDG&E discusses various directional ME&O questions and strategies. While this material includes a goal of “help[ing] customers understand their choices by providing tools and analysis to make informed decisions about choosing the pricing plan that works best for them,” it otherwise appears to prioritize “TOU customer retention,” “reduce[d] attrition,” and “acceptance” of TOU rates. Describe how SDG&E intends to ensure that customers understand their option to opt out of TOU rates and select to remain on a tiered rate structure, including how SDG&E intends to ensure that it does not prioritize TOU retention over customer selection of an alternative preferred rate.

**SDG&E Response to Question 5:**

SDG&E is testing ME&O options in the default TOU pilot that vary with respect to communication channel, content, frequency, and other factors. ME&O options, including email (EM) and direct mail (DM), are being tested at five predetermined stages (e.g. at 30/60/90 days, at the time of default and post-default), and each option is being measured for effectiveness amongst different test groups. In each of the three communications prior to default, customers are notified that they have options and choices when it comes to their preferred pricing plan, including selecting another eligible rate, or staying on their current plan. Language included on the 60-day direct mail letter, for example, indicates these options no less than five times as indicated below:

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NAME  
 CO  
 ST2  
 ST  
 CITY STA ZIP10

PKGBAG\_MARKS



Choices are coming to your energy pricing. Throughout California, new pricing based on when you use energy is now available. These new plans are called Time of Use (TOU).

On **MTRateEffectiveDate - English** your pricing plan will change to the TOU-DR1 plan, which rewards you for shifting energy use to lower cost times. You have the option to be moved automatically to this new plan, choose another TOU plan, or stay on your current plan.

**WHAT DOES THIS CHANGE MEAN FOR ME?**

With these Time of Use pricing plans, the cost of electricity is lower during off-peak periods and higher during on-peak hours from 4 p.m. to 9 p.m. This new approach to pricing allows you to save in two ways - by shifting your energy use to off-peak times and by reducing your overall use.

**WHAT ARE MY CHOICES?**

You can choose to automatically move to TOU-DR1, choose to enroll in either TOU plan now, or stay on your current plan. **Time of Use plans include one year no-risk pricing.** Make your choice online at [sdge.com/whenmatters](http://sdge.com/whenmatters) or simply return the enclosed reply card by February 20, 2018.

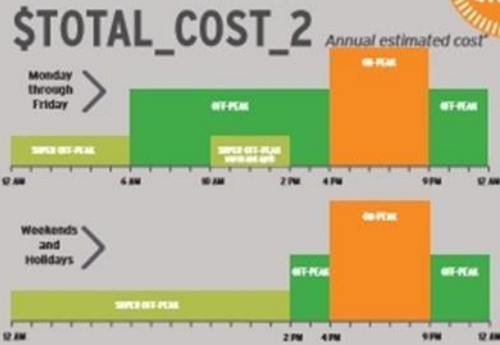
**YOU HAVE 3 OPTIONS**

Details as of: MTRateEffectiveDate - English Account number: BPAccountNumber Meter number: MTRateEffectiveDate - English



**IF NO ACTION IS TAKEN  
 YOU WILL AUTOMATICALLY  
 MOVE TO THIS PLAN  
 TOU-DR1**

*This plan has three peak periods that differ between weekdays and includes weekends. TOU pricing has two tiers based on overall energy use. Includes one year no-risk pricing.*



**OR YOU CAN  
 CHOOSE TO MOVE  
 TO THIS PLAN  
 TOU-DR2**

*This plan has two peak periods throughout the day. TOU pricing has two tiers based on overall energy use. Includes one year no-risk pricing.*



**OR YOU CAN STAY ON YOUR  
 CURRENT  
 PLAN**



See the enclosed brochure for more options/information, visit [sdge.com/whenmatters](http://sdge.com/whenmatters) or call us at 1-800-411-SDGE (7343).



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Signature required (please do account holder)

Verify that your name and service address are correct

SELECT ONE OPTION (please check box):

- I want to remain on my current plan
- Switch me now to the TOU-DR2 Pricing Plan
- Switch me now to the TOU-DR1 Pricing Plan

REMINDER: You can try your new TOU pricing plan risk-free for up to 1 year.

YES, I'M READY TO SIGN UP FOR MY NEW TOU PRICING PLAN.

To switch to a new plan right away, complete and return this card before February 20, 2018. You will switch to MTRatefriendlyName on MTRateEffectiveDate - English if you do nothing.

Name: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
SERV\_ST \_\_\_\_\_  
SERV\_CITY, SERV\_STA, SERV\_ZIP \_\_\_\_\_

Name of Company \_\_\_\_\_  
Account number: \_\_\_\_\_  
EPBillAccountNumber \_\_\_\_\_

Meter number: \_\_\_\_\_  
MTMeterID \_\_\_\_\_

Date required \_\_\_\_\_  
Continued SEQ\_SUIS\_TONC \_\_\_\_\_

**WHAT DO I DO NOW?**

Excellent question. Right now, you have three options to choose from:

**PRICING PLAN OPTIONS**

- A** Do nothing - you'll be switched to the **TOU-DR1** plan
- B** Enroll now in either the **TOU-DR1** or **TOU-DR2** plan
- C** Select to stay on your **current plan**

**1 YEAR NO RISK PRICING**

*You can try a new TOU pricing plan risk-free for up to one year. If you end up spending more than you did on your current plan, you'll receive a bill credit for the difference.*

*You have up to 12 months of bill protection.*

You can enroll in a new pricing plan now by going to [sdge.com/whenmatters](http://sdge.com/whenmatters). Or complete and return the enclosed reply card before February 20, 2018. The sooner you enroll, the sooner your opportunity to save.

**WHAT IS THE BENEFIT OF SWITCHING TO TIME OF USE?**

During the on-peak hours from 4 p.m. to 9 p.m., the cost of producing and delivering electricity can increase. By shifting some of your usage to off-peak hours, you'll help us decrease demand on the electric grid, which benefits the environment, as well as your monthly bill.



**SO, DO I HAVE TO STOP USING ENERGY DURING ON-PEAK HOURS?**

No, you do not. While shifting your energy use to off-peak hours will help lower your energy costs, even small adjustments during on-peak hours can help as well. For example, running your dishwasher before 4 p.m. or after 9 p.m. can make a difference in your bill. For other simple tips look at the enclosed brochure.

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**Question 6:**

In SDG&E-7 at p. HT-14, SDG&E describes plans for SDG&E’s ME&O communications, including default notifications. SDG&E states that the materials included in this phase will “direct customers to utilize online, self-service options to either enroll or opt-out of their respective TOU pricing plan to another eligible rate.” Please describe how the materials being developed to assist customers in selecting a rate are being designed to ensure that they are accessible to people who have difficulty using standard forms of communication due to disability. This includes incorporation of large print, availability and use of alternative formats, training for customer service representatives, and any other strategies being used to provide accessible communications.

**SDG&E Response to Question 6:**

TOU materials are being developed in English and Spanish. Key messages, including available pricing plan options and calls-to-action, are printed in large font. Choosing a pricing plan online is not the only way for customers to opt out of TOU. Customers will also be given the option to call SDG&E and speak to an Energy Service Specialist (ESS) directly. As part of the default TOU pilot, SDG&E is also testing the effectiveness of a business reply card that can be used to make a selection by mail. Currently, customers who call SDG&E’s general phone line will have the opportunity to select from a menu of automated voice prompts (IVR) directing them to “billing and payment” matters and “other payment options.” From there, they can connect to an ESS who can answer their questions and assist with selecting a pricing plan. SDG&E is also in the process of gathering requirements to implement an automated, self-serve opt-in/opt-out option using IVR to launch later in 2018.

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**Question 7:**

In SDG&E-7 at p. HT-17, SDG&E describes the use of a “Pricing Plan Microsite” as a tactic for customer marketing. Please describe how SDG&E will make the information provided on the microsite available for customers who have limited or no access to the internet.

**SDG&E Response to Question 7:**

As explained in Mr. Tantum’s testimony, pp. HT-22-26, SDG&E believes that a key part of the ME&O strategy is to work closely with Community Based Organizations and local government partners to help us reach hard to reach customers like those who have limited or no internet access. SDG&E will engage these partners and leverage their relationships with the communities/constituents they serve through outreach strategies such as educational events, presentations, workshops and training sessions.

Examples of this type of outreach strategy include:

- **Special Needs Roundtable:** During this SDG&E-hosted event, key stakeholders that serve the Special Needs community in the San Diego and South Orange County regions are able to learn about new Time of Use pricing plan options and other programs and tools to help their constituents save on energy bills. This event provides a unique forum for SDG&E to collaborate and brainstorm innovative outreach tactics to support the Default Time of Use transition and garner feedback on existing efforts.
- **Women, Infant & Children (WIC) Food & Nutrition Program Outreach:** In association with San Diego State University, SDG&E is able to provide rate education briefings to all nine Women, Infant & Children (WIC) Food & Nutrition Program offices, which includes information on solutions to help customers save energy.
- **Presentation Series at San Diego Center for the Blind:** In partnership with San Diego Center for the Blind, SDG&E has been able to conduct a series of presentations reaching customers from all over SDG&E’s service territory. Content of these presentations included changes coming to rates, awareness around the new High Usage Charge, as well as solutions and assistance.

Additionally, SDG&E leverages its own customer-facing groups to provide support to help educate and engage customers on TOU pricing plan opportunities. Customer-facing groups include the Customer Contact Center, payment locations and branch offices, field service teams and credit and collections.

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**Question 8:**

Throughout SDG&E-7 (e.g. pp. HT-18-HT-20), there are descriptions of multiple forms of printed material to be developed for customer outreach. Please describe how these materials are being designed to ensure that they are accessible to people who have difficulty using standard printed materials due to disability. This includes incorporation of large print as well as availability and use of alternative formats and any other strategies being used to provide accessible communications.

**SDG&E Response to Question 8:**

SDG&E’s Pricing Plan materials are being designed with larger print type and with fewer words per page. Materials are printed in both English and Spanish. Additional accessible formats are available through SDG&E’s Customer Contact Center upon customer request.

SDG&E also believes that one of our more effective strategies in working with and educating customers with special needs or disabilities is a robust community engagement strategy. SDG&E is continually expanding our reach through Partner Education and Outreach efforts with more than 250 grassroots community-based organizations. These Partners take an active role in helping SDG&E educate and engage customers and represent a diverse array of customers both by zip code and by demographic segments including: multicultural/multilingual, tribal, seniors, veterans, special needs and Limited English Proficient (LEP).

Additionally, sdge.com continues to be enhanced so that our customers with visual, hearing, motor and cognitive disabilities can better understand, navigate, and interact with our site. All information is presented in a textual format, so that navigation elements throughout the site can be increased in size for easy visualization, and displayed according to the user’s preference.