

**CALSSA DATA REQUEST #1**  
**A.17-12-013**  
**(SDG&E's 2018 RDW Application)**  
**Date Received: April 19, 2018**  
**Date Submitted: May 3, 2018**

The California Solar & Storage Association (CALSSA) requests the following information relevant to Application 17-12-013 at the California Public Utilities Commission.

1. Illustrative rates that are revenue neutral with the illustrative rates in JS-Table 3 of *Prepared Direct Testimony of Jeffrey Shaughnessy*, according to the following structure.

Seasons:

Summer: June – September

Winter: October – May

TOU Periods:

Peak: 4PM – 9PM, All Days

Part-Peak: 3PM – 4PM & 9PM – 12AM, All Days

Off-Peak: 12AM – 3PM, All Days

Rates:

Summer and Winter Off-Peak: 17.3 c/kWh

Ratio of Summer Peak to Summer Part-Peak: 1.35:1

Ratio of Winter Peak to Winter Part-Peak: 1.06:1

**SDG&E Response:**

SDG&E objects to this data request as overbroad and seeking information that is out of scope, irrelevant and not likely to lead to the discovery of admissible evidence. Specifically, the request seeks rate information that does not align with SDG&E's current authorized TOU periods and seasons. Moreover, in the Scoping Memo and Ruling ("Scoping Memo"), issued on April 10, 2018, the Commission outlined the scope in this case to include "[w]hether SDG&E's proposed rate options are reasonable"<sup>1</sup> and goes on to specifically identify the 3-period and 2-period options proposed in SDG&E's application as the in-scope rate options. The Scoping Memo also specifically determines that issues regarding additional rate designs are not within scope, including "[w]hether the IOUs should propose dynamic optional rates that incentivize distributed energy resources."<sup>2</sup> As noted by the Commission, "[i]n order to give due consideration to the rate design proposals in the applications and issues regarding default TOU implementation, **other new rate design proposals will not be considered in this proceeding.**"<sup>3</sup>

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<sup>1</sup> A.17.12.011 Amended Scoping Memo and Ruling of Assigned Commissioner For Phases II and III of the Proceeding and Joint Ruling with Administrative Law Judges, issued on April 10, 2018, at 4.

<sup>2</sup> *Id.* at 10.

<sup>3</sup> *Id.* (emphasis added).