Application:	A.19-10-012
Exhibit No.:	
Witness:	Jennifer Montanez

PREPARED REBUTTAL TESTIMONY OF

JENNIFER MONTANEZ

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



JUNE 19, 2020

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PREPARED REBUTTAL TESTIMONY OF JENNIFER MONTANEZ

I. OVERVIEW AND PURPOSE

My prepared rebuttal testimony responds to certain direct testimony submitted by intervening parties in San Diego Gas & Electric Company's ("SDG&E") Power Your Drive ("PYD") Extension Program Application ("A.") 19-10-012 addressing my direct testimony on bill impacts and rate issues related to SDG&E's proposal. My rebuttal testimony reaffirms SDG&E's justifications for recovering costs for the PYD Extension Program ("Program") through distribution rates. Specifically, I address rate issues raised by the Public Advocates Office ("Cal Advocates") of the California Public Utilities Commission ("CPUC" or "Commission") Chapter 2, submitted as testimony by Alan Bach dated May 18, 2020.
Failure to address any individual issue in this rebuttal testimony does not imply any

II. THE PROGRAM IS PART OF THE COST TO SERVE CUSTOMERS AND SHOULD BE COLLECTED THROUGH DISTRIBUTION RATES

agreement by SDG&E with any proposal made by this or other parties.

Cal Advocates proposes to move cost recovery of SDG&E's PYD Extension Program revenue requirement from distribution, where it is allocated based on equal percent marginal cost ("EPMC"), to the Public Purpose Programs ("PPP") rate component, where it would be allocated on a volumetric \$/kilowatt-hour ("kWh") basis.

Cal Advocates argues that the Program would provide the societal benefits of greenhouse gas ("GHG") reductions and transportation electrification ("TE"); therefore, it is reasonable for

Public Advocates Office at the California Public Utilities Commission's Direct Testimony on San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot (May 18, 2020) ("Cal Advocates (Bach)").

all customers to contribute to the program costs.² Furthermore, Cal Advocates claims that the benefits of the Program are consistent with programs funded by the Electric Program Investment Charge ("EPIC"), which provides "cost-effective energy efficiency and conservation activities" and is collected through the PPP charge.³

SDG&E disagrees with Cal Advocates' argument to collect program costs through the PPP charge. SDG&E submits that the Program costs should be collected through the distribution revenue requirement as part of the cost to serve customers, and not on an equal cents-per-kWh basis. Electric vehicles ("EV") provide opportunities for grid management, grid integration, and enhanced distribution system management. Further, the Program is an infrastructure program that is part of distribution infrastructure. The Commission has previously determined that EV charging infrastructure costs are related to the distribution system and are appropriately recovered through distribution rates. SDG&E recommends the Commission reject Cal Advocates' proposal.

III. CONCLUSION

This concludes my prepared rebuttal testimony.

² Cal Advocates (Bach) at 2-5.

Public Utilities ("P.U.") Code § 381(b)(1), see P.U. Code § 399.8. P.U. Code § 399.8(c)(1), D.11-12-035 at 4, 13 and Ordering Paragraph 3 at 40-41. See also Cal Advocates (Bach) at 2-6.

⁴ D.18-05-040 at 123-124.