

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**

**TABLE OF CONTENTS**

I. OVERVIEW AND PURPOSE..... 1

II. THE PROGRAM IS PART OF THE COST TO SERVE CUSTOMERS AND SHOULD BE COLLECTED THROUGH DISTRIBUTION RATES..... 1

III. CONCLUSION..... 2



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

5         SDG&E disagrees with Cal Advocates’ argument to collect program costs through the  
6 PPP charge. SDG&E submits that the Program costs should be collected through the distribution  
7 revenue requirement as part of the cost to serve customers, and not on an equal cents-per-kWh  
8 basis. Electric vehicles (“EV”) provide opportunities for grid management, grid integration, and  
9 enhanced distribution system management. Further, the Program is an infrastructure program  
10 that is part of distribution infrastructure. The Commission has previously determined that EV  
11 charging infrastructure costs are related to the distribution system and are appropriately  
12 recovered through distribution rates.<sup>4</sup> SDG&E recommends the Commission reject Cal  
13 Advocates’ proposal.

### 14 **III. CONCLUSION**

15         This concludes my prepared rebuttal testimony.

---

<sup>2</sup> Cal Advocates (Bach) at 2-5.

<sup>3</sup> 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.

<sup>4</sup> D.18-05-040 at 123-124.