

Cal PA DATA REQUEST
Cal PA-SDG&E-DR-09
Application for Approval of Electric Vehicle High Power Charging Rate
SDG&E RESPONSE
DATE RECEIVED: March 3, 2020
DATE RESPONDED: March 6, 2020

Question 1

In its rebuttal testimony, San Diego Gas and Electric Company (SDG&E) proposes to set the EV-HP subscription charge at marginal costs in the first year and gradually phase-in the equal percent of marginal cost (EPMC) rate markup over 10 years.¹ SDG&E also no longer proposes to create a EV-HP Incentive Balancing Account to track the costs of its (no-longer supported) proposed subscription charge discount.² Under its rebuttal proposal, would SDG&E still track revenue shortfalls of EV-HP relative to the revenues that would otherwise have been collected under AL-TOU (per its response to Cal Advocates DR 5 Q8)?

SDG&E Response

SDG&E objects to the extent the question is vague or ambiguous. Notwithstanding that objection, under the proposal contained in its rebuttal testimony, SDG&E does not propose to track any revenue undercollection or overcollection of the revised EV-HP rate relative to revenues that would otherwise have been collected under AL-TOU.

¹ SDG&E rebuttal testimony of witness William Saxe, p. 2

² SDG&E rebuttal testimony of witness Brittany Applestein Syz, p. 4.

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Question 2

The Public Advocates Office and several other parties propose that EV-HP load should be regarded as retained and incremental load and that EV-HP revenue under- or overcollections should be quantified by comparing the effective rate to the marginal costs price floor of a contribution to margin (CTM) analysis.³ Does SDG&E support that EV-HP revenue under-/over-collections should be quantified against the marginal cost price floor of a CTM analysis, at least during the early years until SDG&E can fully phase in the EPMC rates above marginal costs?

- a. Please explain why or why not?

SDG&E Response

SDG&E objects to the extent that question is vague, ambiguous, overstates, or mischaracterizes the testimony of other parties. Notwithstanding those objections, should the Commission determine that revenue under-/over-collections need to be tracked for EV-HP customers, then SDG&E would support the use of a CTM analysis to compare revenues under EV-HP rates versus revenues under Schedule AL-TOU rates.

³ Public Advocates Office opening testimony pp. 20-22; SDAP Opening Testimony, pp. 3-4, 16-20; UCAN Opening Testimony, pp. 3-4, 16-20.

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Question 3

In its rebuttal testimony, SDG&E proposes that the EV-HP subscription charge should be based on increments of 10 kW for customers with demands of 150 kW or less, 25 kW increments for customers with demands of 150 to 500 kW, and 100 kW blocks for customers with demands greater than 500 kW.⁴ Please provide all underlying analysis, including Excel workpapers with references and formulae intact, that led SDG&E to propose the 150 kW threshold for the 10 kW subscription blocks.

- a. What customer usage or cost factors led SDG&E to propose a threshold of 150 kW?

SDG&E Response

SDG&E objects to the extent that the question is vague or ambiguous. Notwithstanding that objection, SDG&E did not conduct customer usage or cost factor studies to propose the 150 kW threshold for 10 kW subscription blocks. SDG&E instead revised its proposal to have smaller kW increments in the subscription charge based upon feedback from parties to this proceeding in an attempt to reach a reasonable accommodation.

END OF REQUEST

⁴ SDG&E rebuttal testimony of witness Brittany Applestein, p. 4.