Company: San Diego Gas & Electric Company (U 902 E)

Proceeding: Real Time Pricing Pilot Rate Application: A.21-12-006/A.21-12-008

Exhibit: SDG&E-XX

PREPARED REBUTTAL TESTIMONY OF ERIC DALTON (CHAPTER 7) ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

January 30, 2023



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PREPARED REBUTTAL TESTIMONY OF

ERIC DALTON (CHAPTER 7)

I. INTRODUCTION

The purpose of my rebuttal testimony is to address intervenors' prepared direct testimony served on December 30, 2022 in San Diego Gas & Electric Company's (SDG&E) Applications (A.) 21-12-006 and 21-12-008 (consolidated). Specifically, my rebuttal testimony will address the recommendation of the Public Advocates Office of the California Public Utilities

Commission (Cal Advocates) and The Utility Consumers' Action Network (UCAN) that implementation costs for related to the real-time-pricing pilot rate (RTP Pilot) and export compensation pilot (Commodity Export Compensation Pilot) rate, as addressed in this proceeding, be recorded in a memorandum account as opposed to a two-way balancing account.

SDG&E's failure to address any individual issue in this rebuttal testimony does not imply agreement by SDG&E with any argument, position, or proposal asserted by parties.

II. SDG&E REQUESTS A MEMORANDUM ACCOUNT FOR THE PILOT PROGRAMS

Although SDG&E originally proposed a two-way balancing account to record the authorized revenue requirement and actual incremental costs associated with both RTP Pilot and the Commodity Export Compensation Pilot, after considering intervenor testimony of Cal Advocates and UCAN, which propose use of a memorandum account without a cap on costs, SDG&E agrees that such accounting treatment is appropriate and revises its request herein.^{1,2} As

¹ Cal Advocates proposes separate subaccounts for Stage 1 and Stage 2 of the RTP Pilot. *See* Cal Advocates Prepared Testimony of Thomas Brawley (Chapter 2) at 2-12. SDG&E did not propose separate subaccounts but does not object to them.

² For purposes of clarity, SDG&E notes that Cal Advocates refers to both the import rate, what SDG&E refers to as the RTP Pilot, and the export rate, aka the Commodity Export Compensation Rate, as the "RTP Pilot." Thus, Cal Advocates' proposed Real-Time Pricing Memorandum Account would permit

UCAN notes, a memorandum account without a cap would allow for adequate customer enrollment and would avoid potential delays in implementation.³ Further, a "memorandum account would allow the Commission to review whether the dollars spent were prudent prior to rate recovery."⁴

III. SUMMARY AND CONCLUSION

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For the reasons stated above, a memorandum account, without a cap, is reasonable and appropriate for purposes of SDG&E's proposed RTP Pilot programs and Commodity Export Compensation Pilot program. Accordingly, SDG&E respectfully requests approval to establish an uncapped memorandum account to record the authorized revenue requirement and actual incremental costs associated with the RTP Pilot and the Commodity Export Compensation Pilot.

This concludes my prepared rebuttal testimony.

recording of costs for both the import and export rate. *See* Cal Advocates Prepared Testimony of Thomas Brawley (Chapter 2) at 2-1, FN 100.

³ Direct Testimony of Mary Neal on Behalf of UCAN at 23.

⁴ *Id*.