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 SUPPLEMENTAL DIRECT TESTIMONY OF WILLIAM G. SAXE (CHAPTER 3) ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

August 15, 2022



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PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF

WILLIAM G. SAXE (CHAPTER 3)

I. OVERVIEW AND PURPOSE

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The purpose of this prepared supplemental direct testimony is to provide modifications to the San Diego Gas & Electric Company (SDG&E) proposed rate design for the Stage 1 real-time pricing (RTP) pilot program (Pilot) that was originally filed in Application (A.) 21-12-006, pursuant to Ordering Paragraph (OP) 6 of Decision (D.) 21-07-010. Assigned Commissioner Genevieve Shiroma issued a scoping memo and ruling on April 18, 2022, that consolidated A.21-12-006 (RTP Application) and A.21-12-008 (Commercial Electric Vehicle Dynamic Rate Application) and directed the Energy Division (ED) to file recommendations to SDG&E for consideration in modifying the RTP Application. The ED filed its RTP Application revised recommendations (ED Staff Recommendations) on July 12, 2022. SDG&E is submitting this prepared supplemental direct testimony to address revisions to SDG&E's consolidated RTP Application and Commercial Electric Vehicle Dynamic Rate Application, as recommended by the ED. Because the revisions are extensive and include both adding new testimony and removing previously served testimony, SDG&E is withdrawing previously served direct testimony and will rely solely on this prepared supplemental direct testimony as its direct testimony in this proceeding.¹ Additionally, the commodity export compensation pilot (Commodity Export Compensation Pilot) rate design proposed for Schedule EV-HP customers in this prepared supplemental direct testimony replaces the rate design direct testimony submitted by SDG&E witness Ray Utama in the Commercial Electric Vehicle Dynamic Rate Application.

¹ Note that this supplemental direct testimony is replacing the direct testimony submitted by Sam Shannon, a former consultant on this Application, as the rate design witness.

- Stage 1 RTP Pilot Commodity Import Rate Design: as stated in the prepared supplemental direct testimony of SDG&E witness Jeff DeTuri (Chapter 1), SDG&E agrees to expand the eligibility for the Stage 1 RTP Pilot to all customer classes except street lighting instead of just being available to the Medium/Large Commercial & Industrial (M/L C&I) class, as SDG&E originally proposed in its RTP Application direct testimony.² Attachment A presents the Illustrative Stage 1 RTP Pilot commodity import rates for all SDG&E customer classes except street lighting.
- Commodity Export Compensation Pilot Rate Design: as stated in the prepared supplemental direct testimony of SDG&E witness Mr. DeTuri, SDG&E agrees with proposing a commodity export compensation rate available to all customer classes except street lighting.³ Attachment B presents the proposed illustrative commodity export compensation credits for all SDG&E customer classes except street lighting.
- Illustrative Time-Differentiated Transmission Energy Rates: as described above, SDG&E is proposing that the Stage 1 RTP Pilot be made available to all customer classes except street lighting. Although most SDG&E electric customers do not currently pay time-differentiated transmission rates, at the recommendation of the ED⁴ and as directed by the California Public Utilities Commission (CPUC or Commission), 5 SDG&E presents illustrative timedifferentiated transmission energy rates in Attachment C.

My testimony is organized as follows:

- Section I Overview and Purpose
- Section II Stage 1 RTP Pilot Commodity Import Rate Design
- Section III Commodity Export Compensation Pilot Rate Design

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³ *Id*.

² Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section II: Regulatory Background.

⁴ ED Staff Recommendations, in Section III: Energy Division Recommendation, F. Time Differentiated Transmission.

⁵ D.21-07-010, in Section 5.5: Matters Required to be Addressed in the RTP Pilot Application, at 57-58.

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- Section IV Illustrative Time-Differentiated Transmission Energy Rates
- Section V Summary and Conclusion
- Section VI Statement of Qualifications
- Attachment A Illustrative Stage 1 RTP Pilot Commodity Input Rates
- Attachment B Illustrative Commodity Export Compensation Pilot Credits
- Attachment C Illustrative Time-Differentiated Transmission Energy Rates
- Attachment D Current and Proposed Illustrative Total Rates for Eligible Customers

II. STAGE 1 RTP PILOT COMMODITY IMPORT RATE DESIGN

Pursuant to D.21-07-010, SDG&E is proposing a two-stage optional RTP Pilot.⁶ As described in the prepared supplemental direct testimony of SDG&E witness Mr. DeTuri, SDG&E is proposing that the Stage 1 RTP Pilot be available to all customer classes except street lighting.⁷ The Stage 1 RTP Pilot commodity import rate design is similar to SDG&E's existing Schedule Public Grid Integrated Rate (GIR) commodity rate design since, as explained in the prepared supplemental direct testimony of SDG&E witness Ray Utama (Chapter 4), SDG&E's billing system currently has the functionality to bill a market-based commodity rate similar to GIR.⁸ As shown in Attachment A, the proposed illustrative Stage 1 RTP Pilot commodity import rates consist of three rate design components: (a) the California Independent System Operator (CAISO) day-ahead market (DAM) commodity energy prices; (b) Critical Peak Pricing

⁶ As explained in the Regulatory Background section (Section II) of the supplemental direct testimony of Mr. DeTuri, the Stage 2 RTP Pilot will be proposed two years after the Stage 1 RTP Pilot is implemented. The Stage 2 RTP Pilot, including the Stage 2 RTP Pilot rate design, will be determined based on the evaluation of the Stage 1 RTP Pilot data and results.

⁷ Prepared Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section II: Regulatory Background.

⁸ Prepared Supplemental Direct Testimony of Ray Utama (August 15, 2022), in Section III: Implementation Costs.

(CPP) commodity capacity adder; and (c) total base commodity rate. Each of these rate design components is discussed in more detail below. Also, Attachment D presents the current and proposed illustrative total rates for the seven rate schedules eligible for the Stage 1 RTP Pilot (Residential Class: Schedules TOU-DR1 and EV-TOU-5; Small Commercial Class: Schedule TOU-A; M/L C&I Class: Schedules AL-TOU and A6-TOU; and Agricultural Class: Schedules PA-T-1 and TOU-PA), as addressed in the prepared supplemental direct testimony of SDG&E witness Mr. Utama.⁹

A. CAISO Day-Ahead Energy Price

The first component in the Stage 1 RTP Pilot commodity import rate design is the CAISO day-ahead hourly commodity energy price. SDG&E proposes to incorporate the CAISO day-ahead hourly market price that is based on the hourly Locational Marginal Prices (LMP) at SDG&E's Default Load Aggregation Point (DLAP), derived from the CAISO Open Access Same-time Information System (OASIS) website. As addressed in the prepared supplemental direct testimony of SDG&E witness Mr. DeTuri, the RTP program will pass these hourly commodity signals on to customers. The total hourly prices for the next day, which include the CAISO hourly price component, will be posted on SDG&E's website, allowing customers to make decisions about their next day's energy use based on those prices. In the event that the day-ahead price is delayed, the Stage 1 RTP Pilot will use the prior day's hourly rates. SDG&E will display the total hourly price on its website, as described in the prepared supplemental direct

⁹ Prepared Supplemental Direct Testimony of Ray Utama (August 15, 2022), in Section II: Implementation Design.

¹⁰ California ISO, Oasis, available at http://oasis.caiso.com/mrioasis/logon.do.

¹¹ Prepared Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section VI: CAISO Day-Ahead Energy Price.

testimony of Mr. Utama.¹² Attachment A identifies that all customer classes will pay the same Stage 1 RTP CAISO day-ahead hourly commodity energy prices.

B. CPP Commodity Capacity Adder

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The second component in the Stage 1 RTP Pilot commodity rate design is the CPP commodity capacity adder. The CPP commodity capacity adder will be applied during high-cost pricing periods when SDG&E calls CPP Events to recover assigned commodity capacity-related costs during those events. The CPP Events under the Stage 1 RTP Pilot will be the same CPP Events that SDG&E calls under its existing CPP rates for all customer classes. 13 In the RTP Application, SDG&E originally proposed a commodity capacity adder based on the top 150 SDG&E system peak hours consistent with the commodity capacity adder in GIR. Because SDG&E is now proposing that the Stage 1 RTP Pilot be available to all customer classes except street lighting, and eligible customer classes currently have the option to take service on CPP commodity rates with the CPP Event Day commodity capacity adder applied, SDG&E is proposing the CPP Event Day commodity capacity adder approach applied when SDG&E calls CPP Events. 14 SDG&E believes this already-existing CPP Event Day commodity capacity adder will be more understandable for more customers. In addition, the commodity export compensation credit that SDG&E proposed in the Commercial Electric Vehicle Dynamic Rate Application reflected the marginal cost based CPP Event Day commodity capacity adder.

¹² Prepared Supplemental Direct Testimony of Ray Utama (August 15, 2022), in Section II: Implementation Design.

¹³ The SDG&E CPP type rates for customer classes are TOU-DR-P for residential, TOU-A-P for small commercial, CPP-D for M/L C&I, and CPP-D-AG and TOU-PA-P for agricultural.

¹⁴ Consistent with SDG&E's current CPP commodity rates, CPP Events are effective from 4:00 pm to 9:00 pm and CPP Events can be triggered on any day of the week, year-round, with a maximum of 18 event days per calendar year.

Because the RTP Application and Commercial Electric Vehicle Dynamic Rate Application have been consolidated, SDG&E believes that for consistency purposes the same CPP Event Day commodity capacity adder approach should be used in both the proposed Stage 1 RTP Pilot commodity import rate design and the commodity export compensation pilot rate design.

Attachment A presents the proposed Illustrative Stage 1 RTP CPP commodity capacity adder by customer class based on SDG&E's current electric rates.¹⁵

C. Total Base Commodity Rate

The third component in the Stage 1 RTP Pilot commodity rate design is the base commodity rate. The proposed base commodity rate is the average commodity rate by customer class adjusted downward to remove the variable CAISO production costs and RTP CPP commodity capacity adder revenues. This base commodity rate ensures that participating Stage 1 RTP Pilot customers still contribute to the recovery of the allocated class commodity costs and that RTP customers are not being subsidized by non-participating customers. In addition, like existing class commodity rates, the total base commodity rate for the RTP Pilot includes the recovery of applicable CPP and Schedule DG-R (DG-R) commodity revenue under-/over-collections assigned to each customer class. SDG&E proposes that the applicable CPP and DG-R under-/over-collection rates applied to the Stage 1 RTP Pilot be the class average under-/over-collection rates. Attachment A presents the proposed illustrative Stage 1 RTP total base commodity rate by customer class based on SDG&E's current electric rates. ¹⁶

¹⁵ SDG&E's current electric rates were filed on May 16, 2022 in SDG&E Advice Letter 4004-E, effective June 1, 2022 (Advice Letter 4004-E).

¹⁶ *Id*.

III. COMMODITY EXPORT COMPENSATION PILOT RATE DESIGN

As suggested in the ED Staff Recommendations, SDG&E is proposing an optional commodity export compensation pilot credit for all customer classes except street lighting, consistent with the commodity export credit proposed for commercial electric vehicle (EV) customers in the Commercial Electric Vehicle Dynamic Rate Application, as addressed in the prepared supplemental direct testimony of SDG&E witness Mr. DeTuri. SDG&E proposes that the commodity export credit include: (a) CAISO day ahead commodity energy price; and (b) CPP Event Day commodity capacity adder based on marginal costs only. As SDG&E witness Mr. DeTuri states in his prepared supplemental direct testimony, the commodity export compensation credit will initially be available to M/L C&I customers on Schedule EV-HP in Stage 1 of the pilot but will be available to all customer classes except street lighting in Stage 2 of the pilot. Attachment B presents the proposed illustrative commodity export credit by customer class based on SDG&E's current electric rates.

IV. ILLUSTRATIVE TIME-DIFFERNTIATED TRANSMISSION ENERGY RATES

In D.21-07-010, the Commission directed SDG&E to present the impact of time-differentiated transmission rates in its RTP Application.²⁰ Currently, the only SDG&E customers that pay time-differentiated transmission rates are M/L C&I customers who pay transmission \$/kilowatt (kW) on-peak demand charges. Comparatively, SDG&E's customers with non-time-differentiated transmission \$/kilowatt-hour (kWh) energy rates pay the same

¹⁷ Prepared Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section II: Regulatory Background.

¹⁸ *Id*.

¹⁹ Advice Letter 4004-E.

²⁰ D.21-07-010, in Section 5.5: Matters Required to be Addressed in the RTP Pilot Application, at 57-58.

transmission \$/kWh energy rate regardless of the time of the day the energy is consumed. Because SDG&E is now proposing, pursuant to the ED Staff Recommendations, that the Stage 1 RTP Pilot be available to all customer classes except street lighting, SDG&E presents illustrative time-differentiated transmission \$/kWh energy rates for these other customer classes based on the percentage of on-peak costs currently directly assigned to the transmission \$/kW on-peak demand charges of M/L C&I customers. Attachment C presents a comparison of the current 2022 non-time-differentiated transmission \$/kWh energy rates to the calculated illustrative 2022 time-differentiated transmission \$/kWh energy rates by customer class. SDG&E is not proposing changes to transmission rates in this application. Transmission rate changes fall under the jurisdiction of the Federal Energy Regulatory Commission (FERC) and thus, the time-differentiated transmission \$/kWh energy rates presented in this testimony are not being proposed and purely reflect illustrative time-differentiated transmission \$/kWh energy rates.

V. SUMMARY AND CONCLUSION

SDG&E recommends that the Commission approve the proposed optional Stage 1 RTP commodity import and export compensation pilot rate design described above, rate design used to develop the illustrative rates and credits presented in Attachments A and B, respectively. If this rate design is adopted, the Stage 1 RTP pilot commodity import rates and commodity export compensation pilot credits implemented will be updated to reflect SDG&E's electric rates at the time of implementation.

Once a Commission decision is issued in this proceeding, SDG&E will file a tier 2 advice letter to implement the rates and credits adopted. Because the preference is to have fewer rate changes in a given year, if the decision in this proceeding is issued within a few months of SDG&E's January 1st consolidated advice letter filing, SDG&E recommends that the rates and

- 1 credits adopted in this proceeding be implemented on January 1st through SDG&E's consolidated
 2 advice letter filing.
 - This concludes my prepared supplemental direct testimony.

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VI. STATEMENT OF QUALIFICATIONS

My name is William G. Saxe. My business address is 8330 Century Park Court, San Diego, California 92123. I am employed as Rates & Cost Studies Project Manager in the Customer Pricing Department of SDG&E. I have worked for SDG&E since February 2001. Prior to joining SDG&E, I was employed by Sempra Energy, the parent company of SDG&E, from April 1999 through January 2001. In addition, I was employed by the Illinois Commerce Commission (ICC) from September 1990 through April 1999.

I received a Bachelor of Science degree in Economics from the University of Wisconsin-Madison in 1985. I received a Master of Business Administration degree, with a concentration in Finance, from the University of Wisconsin-Madison in 1990.

I have previously testified before the CPUC on rate design, marginal cost and other issues. In addition, I have previously submitted testimony before the FERC and the ICC.

ATTACHMENT A ILLUSTRATIVE STAGE 1 RTP PILOT COMMODITY IMPORT RATES

Customer Classes	Residential	Small Commercial	<u>M/L C&I</u>	Agricultural
CAISO Day-Ahead Hourly Price (\$/kWh)	same price	for all customer classes	that is updated daily	, day-ahead
Illustrative CPP Commodity Capacity Adder (\$/kWh) ¹	\$0.85113	\$1.53747	\$2.12583	\$1.44993
Illustrative Total Base Commodity Rate (\$/kWh) ²				
Commodity Base Rate (\$/kWh)	\$0.06491	\$0.05688	\$0.06574	\$0.04983
Under-/Over-Collections Class Average Critical Peak Pricing (CPP) Under-/Over-Collection Rate Class Average Schedule DG-R (DG-R) Under-/Over-Collection Rate	\$0.00011 NA	\$0.00102 A NA	(\$0.00354) (\$0.00011)	\$0.00364 NA
Illustrative Total Commodity Base Rate (\$/kWh)	\$0.06502	\$0.05791	\$0.06209	\$0.05347

Notes:

- (1) The illustrative CPP Commodity Capacity Adders are based on SDG&E's current electric rates filed in SDG&E AL 4004-E, effective June 1, 2022.
- (2) The illustrative Total Base Commodity Rates are based on SDG&E's current electric rates filed in SDG&E AL 4004-E, effective June 1, 2022.

ATTACHMENT B ILLUSTRATIVE COMMODITY EXPORT COMPENSATION RATES

Customer Classes ¹	Residential	Small Commercial	<u>M/L C&I</u>	<u>Agricultural</u>
CAISO Day-Ahead Hourly Price Credit (\$/kWh)	same pr	ice for all customer classes	that is updated daily, da	ny-ahead
Illustrative Export CPP Commodity Capacity Credit (\$/kWh) ²	(\$0.44368	(\$0.84695)	(\$0.98163)	(\$0.89743)

Notes:

- (1) SDG&E presents the illustrative commodity export compensation credits by customer class for both Stage 1 and Stage 2 of the export pilot. Stage 1 of the pilot is for customers on Schedule EV-HP, customers that will receive the commodity export compensation credits for the M/L C&I customer class.
- (2) The Illustrative Export CPP Commodity Capacity Credits are based on SDG&E's current electric rates filed in SDG&E AL 4004-E, effective June 1, 2022.

ATTACHMENT C ILLUSTRATIVE TIME-DIFFERENTIATED \$/KWH TRANSMISSION ENERGY RATES

	Current 2022 Transmission Rates ¹	Time-Differentiated 2022Transmission Rates	Difference
Residential			
Flat \$/kWh Rate	\$0.08993		
TOU \$/kWh Rates			
On-Peak	\$0.08993	\$0.10805	\$0.01812
Off-Peak	\$0.08993	\$0.08094	(\$0.00899)
Super Off-Peak	\$0.08993	\$0.08094	(\$0.00899)
Small Commercial			
Flat \$/kWh Rate	\$0.05712		
TOU \$/kWh Rates			
On-Peak	\$0.05712	\$0.07629	\$0.01917
Off-Peak	\$0.05712	\$0.05141	(\$0.00571)
Super Off-Peak	\$0.05712	\$0.05141	(\$0.00571)
Medium/Large Commercial & Industrial (M/L C&I) ²			
Flat \$/kWh Rate	\$0.05088		
TOU \$/kWh Rates			
On-Peak	\$0.05088	\$0.06868	\$0.01780
Off-Peak	\$0.05088	\$0.04579	(\$0.00509)
Super Off-Peak	\$0.05088	\$0.04579	(\$0.00509)
Agricultural			
Flat \$/kWh Rate	\$0.03530		
TOU \$/kWh Rates			
On-Peak	\$0.03530	\$0.05121	\$0.01591
Off-Peak	\$0.03530	\$0.03177	(\$0.00353)
Super Off-Peak	\$0.03530	\$0.03177	(\$0.00353)

Note:

- (1) Current 2022 Transmission Rates are based on SDG&E's current electric 2022 transmission rates filed in SDG&E AL 3928-E-A/3928-E-B, effective January 1, 2022.
- (2) Most SDG&E M/L C&I customers pay non-coincident demand and on-peak demand transmission charges. Schedules VGI, Public GIR, and EV-HP customers that are M/L C&I customers currently pay flat transmission energy charges. The illustrative time-differentiated \$/kWh energy charges shown for M/L C&I reflect illustrative transmission rates for VGI, Public GIR, and EV-HP customers.

			CURRENT RATES					ILLUSTRATIVE PROPOSED RATES				
		-	TOTAL					ILLUSTRATIVETR	OI OSED KATES			
			UDC	WF-NBC & DWR-BC	COMMODITY		TOTAL UDC	WF-NBC & DWR-BC	COMMODITY			
			RATE ¹	RATE	RATE ²	TOTAL RATE	RATE	RATE	RATE ³	TOTAL RATE		
RESIDENTIAL CLASS												
Schedule TOU-DR1												
	Energy Charges											
	Summer: On-Peak	S/kWh	\$0.26467	\$0.00309	\$0.42232	\$0.69008	\$0.26467	\$0.00309	NA	\$0.26776		
	Summer: Off-Peak	\$/kWh	\$0.26467	\$0.00309	\$0.19003	\$0.45779	\$0.26467	\$0.00309	NA	\$0.26776		
	Summer: Super Off-Peak	\$/kWh	\$0.26467	\$0.00309	\$0.06802	\$0.33578	\$0.26467	\$0.00309	NA	\$0.26776		
	Winter: On-Peak	\$/kWh	\$0.39848	\$0.00309	\$0.14268	\$0.54425	\$0.39848	\$0.00309	NA	\$0.40157		
	Winter: Off-Peak	S/kWh	\$0.39848	\$0.00309	\$0.08004	\$0.48161	\$0.39848	\$0.00309	NA	\$0.40157		
	Winter: Super Off-Peak	\$/kWh	\$0.39848	\$0.00309	\$0.06187	\$0.46344	\$0.39848	\$0.00309	NA	\$0.40157		
	Summer: Baseline Adjustment	S/kWh	-\$0.10182	NA	NA	-\$0.10182	-\$0.10182	NA	NA	-\$0.10182		
	Summer: 101% to 130% Baseline Adjustment	S/kWh	-\$0.10182	NA	NA	-\$0.10182	-\$0.10182	NA	NA	-\$0.10182		
	Winter: Baseline Adjustment	S/kWh	-\$0.10182	NA	NA	-\$0.10182	-\$0.10182	NA	NA	-\$0.10182		
	Winter: 101% to 130% Baseline Adjustment	S/kWh	-\$0.10182	NA	NA	-\$0.10182	-\$0.10182	NA.	NA	-\$0.10182		
	Minimum Bill	Min \$/Day	\$0.35000	NA	NA	\$0.35000	\$0.35000	NA.	NA	\$0.35000		
Stage 1 Pilot Commodity Import Rates												
	CAISO Day-Ahead Hourly Price	S/kWh	NA	NA	NA	NA	NA	NA	Day-Ahead Hourly Price	Day-Ahead Hourly Price		
	RTP Import Commodity Capacity Adder	\$/kWh	NA	NA	NA	NA	NA	NA.	\$0.85113	\$0.85113		
	Total Commodity Base Rate	S/kWh	NA	NA	NA	NA	NA	NA	\$0.06502	\$0.06502		
Schedule EV-TOU-5												
	Basic Service Fee	S/Month	\$16.00	NA.	NA	\$16.00	\$16.00	NA.	NA	\$16.00		
	Energy Charges											
	Summer: On-Peak	S/kWh	\$0.24286	\$0.00309	\$0.39286	\$0.63881	\$0.24286	\$0.00309	NA	\$0.24595		
	Summer: Off-Peak	S/kWh	\$0.24286	\$0.00309	\$0.14461	\$0.39056	\$0.24286	\$0.00309	NA	\$0.24595		
	Summer: Super Off-Peak	S/kWh	\$0.03124		\$0.06802		\$0.03124	\$0.00309	NA NA	\$0.03433		
	Winter: On-Peak	S/kWh	\$0.24286	\$0.00309	\$0.16699	80.41294	\$0.24286	\$0.00309	NA	\$0.24595		
	Winter: Off-Peak	S/kWh	\$0.24286	\$0.00309	\$0.11975		\$0.24286	\$0.00309	NA NA	80.24595		
	Winter: Super Off-Peak	S/kWh	\$0.03124		\$0.06187		\$0.03124	\$0.00309	NA NA	\$0.03433		
Stage 1 Pilot Commodity Import Rates												
* * *	CAISO Day-Ahead Hourly Price	S/kWh	NA	NA	NA	NA	NA	NA	Day-Ahead Hourly Price	Day-Ahead Hourly Price		
	RTP Commodity Capacity Adder	S/kWh	NA		NA		NA	NA.	\$0.85113	\$0.85113		
	Total Commodity Base Rate	S/kWh	NA	NA	NA	NA	NA	NA	\$0.06502	\$0.06502		

		CURRENT RATES					ILLUSTRATIVE PROPOSED RATES				
	-	TOTAL UDC RATE ¹	WF-NBC & DWR-BC RATE	COMMODITY RATE ²	TOTAL RATE	TOTAL UDC RATE	WF-NBC & DWR-BC RATE	COMMODITY RATE ³	TOTAL RATE		
SMALL COMMERCIAL CLASS											
Schedule TOU-A											
Basic Service Fee											
Secondary											
0.5 kW	S/Month	\$10.70	NA	NA	\$10.70	\$10.70	NA	NA	\$10.70		
5-20 kW	S/Month	\$17.12	NA	NA	\$17.12	\$17.12	NA	NA	\$17.12		
20-50 kW	S/Month	\$32.10	NA	NA	\$32.10	\$32.10	NA	NA	\$32.10		
>50 kW	S/Month	\$80.25	NA	NA	\$80.25	\$80.25	NA	NA	\$80.25		
Primary											
0-5 kW	S/Month	\$10.70	NA	NA	\$10.70	\$10.70	NA	NA	\$10.70		
5-20 kW	S/Month	\$17.12	NA	NA	\$17.12	\$17.12	NA	NA	\$17.12		
20-50 kW	S/Month	\$32.10	NA	NA	\$32.10	\$32.10	NA	NA	\$32.10		
>50 kW	S/Month	\$80.25	NA	NA	\$80.25	\$80.25	NA	NA	\$80.25		
Energy Charges											
Sumer: On-Peak											
Secondary	S/kWh	\$0.19522	\$0.00309	\$0.25075	\$0.44906	\$0.19522	\$0.00309	NA	\$0.19831		
Primary	S/kWh	\$0.19455	\$0.00309	\$0.24950	\$0.44714	\$0.19455	\$0.00309	NA	\$0.19764		
Sumer: Off-Peak											
Secondary	S/kWh	\$0.19522	\$0.00309	\$0.13781	\$0.33612	\$0.19522	\$0.00309	NA	\$0.19831		
Primary	S/kWh	\$0.19455	\$0.00309	\$0.13712	\$0.33476	\$0.19455	\$0.00309	NA	\$0.19764		
Winter: On-Peak											
Secondary	S/kWh	\$0.19522	\$0.00309	\$0.14718	\$0.34549	\$0.19522	\$0.00309	NA			
Primary	S/kWh	\$0.19455	\$0.00309	\$0.14648	\$0.34412	\$0.19455	\$0.00309	NA	\$0.19764		
Winter: Off-Peak											
Secondary	S/kWh	\$0.19522	\$0.00309	\$0.07221		\$0.19522	\$0.00309	NA			
Primary	\$/kWh	\$0.19455	\$0.00309	\$0.07193	\$0.26957	\$0.19455	\$0.00309	NA	\$0.19764		
Stage 1 Pilot Commodity Import Rates											
CAISO Day-Ahead Hourly Price	S/kWh	NA	NA	NA	NA	NA	NA	Day-Ahead Hourly Price	Day-Ahead Hourly Price		
RTP Commodity Capacity Adder	S/kWh	NA	NA	NA	NA	NA	NA	\$1.53747	\$1.53747		
Total Commodity Base Rate	S/kWh	NΔ	NA	NA.	NA	NΔ	NA	\$0.05791	\$0.05791		

		_	CURRENT RATES					ILLUSTRATIVE PROPOSED RATES			
			TOTAL UDC RATE ¹	WF-NBC & DWR-BC RATE	$\frac{\text{COMMODITY}}{\text{RATE}^2}$	TOTAL RATE	TOTAL UDC W RATE	F-NBC & DWR-BC RATE	$\frac{\text{COMMODITY}}{\text{RATE}^3}$	TOTAL RAT	
MEDIUM/LARGE COMMERICAL &	& INDUSTRIAL (M/L C&I) CLASS	S									
Schedule AL-TOU											
	Basic Service Fee Less than or equal to 500 kW										
	Secondary	S/Month	\$199.35		NA	. \$199.35	\$199.35	NA	N		
	Primary Secondary Substation	S/Month S/Month	\$53.75 \$18,717.35	NA NA	NA NA		\$53.75 \$18,717.35	NA NA	N N		
	Primary Substation	S/Month	\$18,717.35		NA NA		\$18,717.35	NA NA	N N		
	Transmission	S/Month	\$289.91	NA	NA	\$289.91	\$289.91	NA	N	A \$289	
	Greater than 500 kW Secondary	S/Month	\$766.91	NA	NA	\$766.91	\$766.91	NA	N	A \$766	
	Primary	S/Month	\$63.95	NA	NA		\$63.95	NA	N		
	Secondary Substation Primary Substation	S/Month	\$18,717.35 \$18,717.35	NA NA	NA NA		\$18,717.35 \$18,717.35	NA NA	N		
	Primary Substation Transmission	S/Month S/Month	\$18,717.35	NA NA	NA NA		\$18,717.35	NA NA	N N		
	Greater than 12 MW										
	Secondary Substation Primary Substation	S/Month S/Month	\$31,585.50 \$31,644.17	NA NA	NA NA		\$31,585.50 \$31,644.17	NA NA	N N		
	Transmission Multiple Bus	S/Month	\$3,000.00	NA NA	NA NA		\$3,000.00	NA NA	N N		
	Distance Adjustment Fee OH - Sec. Sub. §/F Distance Adjustment Fee UG - Sec. Sub. §/F		\$1.23 \$3.17	NA NA	NA NA		\$1.23 \$3.17	NA NA	N N		
	Distance Adjustment Fee OH - Pri. Sub. §/F		\$1.22		NA NA		\$1.22	NA NA	N N		
	Distance Adjustment Fee UG - Pri. Sub. §/F	oot/Month	\$3.13	NA	NA	\$3.13	\$3.13	NA	N	Α 5	
	Non-Coincident Demand										
	Secondary	S/kW	\$31.32	NA	NA	\$31.32	\$31.32	NA	N	A S	
	Primary	S/kW	\$30.62	NA	NA NA		\$30.62	NA VI	N		
	Secondary Substation Primary Substation	S/kW S/kW	\$19.75 \$19.12	NA NA	NA NA		\$19.75 \$19.12	NA NA	N N		
	Transmission	S/kW	\$19.05	NA	NA		\$19.05	NA	N		
	Maximum On-Peak Demand: Summer Secondary	S/kW	\$27.80	NA	\$12.18	\$39.98	\$27.80	NA	N	A S	
	Primary	S/kW	\$27.54	NA	\$12.12	\$39.66	\$27.54	NA	N	A S	
	Secondary Substation	S/kW	\$3.90	NA	\$12.18		\$3.90	NA	N		
	Primary Substation Transmission	S/kW S/kW	\$3.77 \$3.75	NA NA	\$12.12 \$11.60		\$3.77 \$3.75	NA NA	N N		
	Maximum On-Peak Demand: Winter Secondary	S/kW	\$28.74	NA.	NA	. \$28.74	\$28.74	NA	N	A S	
	Secondary Primary	S/kW	\$28.74 \$28.56	NA NA	NA NA		\$28.74 \$28.56	NA NA	N N		
	Secondary Substation	S/kW	\$0.82	NA	NA		\$0.82	NA	N		
	Primary Substation Transmission	S/kW S/kW	\$0.79 \$0.79	NA NA	NA NA		\$0.79 \$0.79	NA NA	N N		
	111111111111111111111111111111111111111	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	30.77				30.77	144			
	Energy Charges										
	Sumer: On-Peak Energy Secondary	\$/kWh	\$0.00769	\$0.00309	\$0.17868	\$0.18946	\$0.00769	\$0.00309	N/	A \$0.0	
	Primary	S/kWh	\$0.00769	\$0.00309	\$0.17782	\$0.18860	\$0.00769	\$0.00309	N/	A \$0.0	
	Secondary Substation	\$/kWh	\$0.00457		\$0.17868		\$0.00457	\$0.00309	N/		
	Primary Substation Transmission	S/kWh S/kWh	\$0.00457 \$0.00457	\$0.00309 \$0.00309	\$0.17782 \$0.17021		\$0.00457 \$0.00457	\$0.00309 \$0.00309	N/ N/		
	Sumer: Off-Peak Energy										
	Secondary	S/kWh	\$0.00769		\$0.10423		\$0.00769	\$0.00309	N.		
	Primary Secondary Substation	S/kWh S/kWh	\$0.00769 \$0.00457	\$0.00309 \$0.00309	\$0.10375 \$0.10423		\$0.00769 \$0.00457	\$0.00309 \$0.00309	N/ N/		
	Primary Substation	\$/kWh	\$0.00457		\$0.10375		\$0.00457	\$0.00309	N/		
	Transmission	\$/kWh	\$0.00457	\$0.00309	\$0.09933	\$0.10699	\$0.00457	\$0.00309	N/	A \$0.	
	Sumer: Super Off-Peak Energy Secondary	\$/kWh	\$0.00769	\$0.00309	\$0.09960	\$0.11038	\$0.00769	\$0.00309	N/	A \$0.	
	Primary	S/kWh	\$0.00769	\$0.00309	\$0.09927		\$0.00769	\$0.00309	N/		
	Secondary Substation	\$/kWh	\$0.00457	\$0.00309	\$0.09960		\$0.00457	\$0.00309	N/		
	Primary Substation Transmission	S/kWh S/kWh	\$0.00457 \$0.00457	\$0.00309 \$0.00309	\$0.09927 \$0.09526		\$0.00457 \$0.00457	\$0.00309 \$0.00309	N/ N/		
	Winter: On-Peak Energy				280020			2.00.00			
	Secondary	\$/kWh	\$0.00769		\$0.20915		\$0.00769	\$0.00309	N/		
	Primary Secondary Substation	S/kWh S/kWh	\$0.00769 \$0.00457	\$0.00309 \$0.00309	\$0.20820 \$0.20915		\$0.00769 \$0.00457	\$0.00309 \$0.00309	N/ N/		
	Primary Substation	S/kWh	\$0.00457	\$0.00309	\$0.20820		\$0.00457	\$0.00309	N/		
	Transmission	\$/kWh	\$0.00457	\$0.00309	\$0.19942	\$0.20708	\$0.00457	\$0.00309	N/	A \$0.	
	Winter: Off-Peak Energy Secondary	\$/kWh	\$0.00769	\$0.00309	\$0.11723	\$0.12801	\$0.00769	\$0.00309	N/	A \$0.	
	Primary	S/kWh	\$0.00769	\$0.00309	\$0.11674		\$0.00769	\$0.00309	N/		
	Secondary Substation	S/kWh	\$0.00457	\$0.00309	\$0.11723	\$0.12489	\$0.00457	\$0.00309	N/		
	Primary Substation Transmission	S/kWh S/kWh	\$0.00457 \$0.00457		\$0.11674 \$0.11195		\$0.00457 \$0.00457	\$0.00309 \$0.00309	NA NA		
	Winter: Super Off-Peak Energy	-AWII	30,00437	30.00309	au.11193	30.11501	30.00437	30.00309	N/	. 50.	
	Secondary	S/kWh	\$0.00769		\$0.09058		\$0.00769	\$0.00309	N/		
	Primary Secondary Substation	S/kWh S/kWh	\$0.00769 \$0.00457	\$0.00309 \$0.00309	\$0.09028 \$0.09058	\$0.10106 \$0.09824	\$0.00769 \$0.00457	\$0.00309 \$0.00309	NA NA		
	Primary Substation	S/kWh	\$0.00457		\$0.09028		\$0.00457 \$0.00457	\$0.00309	N/		
	Transmission	\$/kWh	\$0.00457		\$0.08664		\$0.00457	\$0.00309	N/		
ge 1 Pilot Commodity Import Rates											
ge 1 1 sor Commonny import Kates	CAISO Day-Ahead Hourly Price	\$/kWh	NA	NA	NA	. NA	NA	NA	Day-Ahead Hourly Price	Day-Ahead Hourl	
	RTP Commodity Capacity Adder	\$/kWh	NA	NA	NA		NA	NA	\$2.1258		
	Total Commodity Base Rate	S/kWh	NA	NA	NA	. NA	NA	NA.	\$0.0620	19 S0.0	

 $ATTACHMENT\ D$ CURRENT AND PROPOSED ILLUSTRATIVE TOTAL RATES FOR RATE SCHEDULES ELIGIBLE FOR STAGE 1 RTP PILOT COMMODITY IMPORT RATES

			CURRENT RATES				ILLUSTRATIVE PROPOSED RATES				
		TOTAL UDC	WF-NBC & DWR-BC	COMMODITY		TOTAL UDC	WF-NBC & DWR-BC	COMMODITY			
		RATE1	RATE	$RATE^2$	TOTAL RATE	RATE	RATE	RATE ³	TOTAL RATE		
Schedule A6-TOU											
I	Basic Service Fee										
	> 500 kW										
		ionth \$63.9		NA		\$63.95		N/			
Pri		lonth \$18,717.3		NA		\$18,717.35		N/			
		lonth \$1,670.5		NA		\$1,670.55		N/			
12 MW: Pri	imary Substation \$/N	lonth \$31,644.1	7 NA	NA	\$31,644.17	\$31,644.17	NA	N/	\$31,644.17		
Distance Adjustment Fe	ce OH - Pri. Sub. \$/Foot/N	ionth \$1.2	2 NA	NA	\$1.22	\$1.22	NA.	N/	\$1.22		
Distance Adjustment Fo	ee UG - Pri. Sub. \$/Foot/M	ionth \$3.1	3 NA	NA	\$3.13	\$3.13	NA	N/	\$3.13		
Non-Coi	incident Demand										
	Primary	5/kW \$31.7	5 NA	NA		\$31.75	NA	N/	\$31.75		
Pri	*	5/kW \$19.1		NA		\$19.12		N/			
	Transmission	5/kW \$19.0	5 NA	NA	\$19.05	\$19.05	NA	N/	\$19.05		
Maximum On-Peak D											
		5/kW \$28.2		\$12.12		\$28.20		N/			
Pri	*	5/kW \$4.3		\$12.12		\$4.38		N/			
	Transmission	5/kW \$4.3	5 NA	\$11.60	\$15.95	\$4.35	NA	NA	\$4.35		
Maximum On-Peak	Demand: Winter										
	Primary	5/kW \$28.6	5 NA	NA	. \$28.65	\$28.65	NA.	NA			
Pri		5/kW \$0.8		NA		\$0.83		NA			
	Transmission	5/kW \$0.8	3 NA	NA	S0.83	\$0.83	NA	N/	\$0.83		
	Energy Charges										
Sumer:	On-Peak Energy										
		kWh \$0.0045		\$0.17782		\$0.00457		N/			
Pri		kWh \$0.0045		\$0.17782		\$0.00457		N/			
		kWh \$0.0045	7 \$0.00309	\$0.17021	\$0.17787	\$0.00457	\$0.00309	N/	\$0.00766		
Sumer:	Off-Peak Energy										
n.		kWh \$0.0045 kWh \$0.0045		\$0.10375 \$0.10375		\$0.00457 \$0.00457		N/ N/			
rn		kWh \$0.0045		\$0.10375 \$0.09933		\$0.00457		N/			
Sumer: Super	Off-Peak Energy	EWII 30.0043	30.00309	30.09933	30.10099	30.00437	30000309	100	30.00766		
	Primary \$	kWh \$0.0045	7 \$0.00309	\$0.09927	\$0.10693	\$0.00457	\$0.00309	N/	\$0.00766		
Pri		kWh \$0.0045	7 \$0.00309	\$0.09927	\$0.10693	\$0.00457	\$0.00309	N/	\$0.00766		
	Transmission S	kWh \$0.0045	7 \$0.00309	\$0.09526	\$0.10292	\$0.00457	\$0.00309	NA	\$0.00766		
Winter:	On-Peak Energy										
		kWh \$0.0045		\$0.20820		\$0.00457		N/			
Pri		kWh \$0.0045		\$0.20820		\$0.00457		NA			
		kWh \$0.0045	7 \$0.00309	\$0.19942	\$0.20708	\$0.00457	\$0.00309	N/	\$0.00766		
Winter:	Off-Peak Energy										
· ·		kWh \$0.0045 kWh \$0.0045		\$0.11674 \$0.11674		\$0.00457 \$0.00457		N/ N/			
rn		kWh \$0.0045		\$0.116/4 \$0.11195		\$0.00457		N/			
Winter Course	Transmission S Off-Peak Energy	swii 50.0045	\$0.00309	50.11195	50.11961	50.00457	50.00309	N/	50.00766		
water: Super		kWh \$0.0045	7 \$0.00309	\$0.09028	\$0.09794	\$0.00457	\$0.00309	N/	\$0.00766		
Pri		kWh \$0.0045		\$0.09028 \$0.09028		\$0.00457 \$0.00457		N/			
***		kWh \$0.0045		\$0.08664		\$0.00457		N/			
		50.0043	. 30.000	_2330004		2.30457	200000				
Stage 1 Pilot Commodity Import Rates											
CAISO Day-Ah		kWh N.		NA		NA		Day-Ahead Hourly Price			
RTP Commodity		kWh N.		NA		NA	NA	\$2.1258			
	nodity Dage Pate S	LWI N	A NA	N/A	N/A	N.A.		\$0.0620	\$0.06209		

	_		CURRENT	RATES		ILLUSTRATIVE PROPOSED RATES			
		TOTAL UDC RATE ¹	WF-NBC & DWR-BC RATE	$\frac{\text{COMMODITY}}{\text{RATE}^2}$	TOTAL RATE	TOTAL UDC WE	NBC & DWR-BC RATE	$\frac{\text{COMMODITY}}{\text{RATE}^3}$	TOTAL RATE
AGRICULTURAL CLASS									
Schedule PA-T-1									
Basic Service Fee Secondary	\$/Month	\$112.87	NA	NA	\$112.87	\$112.87	NA	NA	\$112.87
Primary	S/Month	\$112.87	NA	NA	\$112.87	\$112.87	NA	NA	\$112.87
Transmission	S/Month	\$112.87	NA	NA	\$112.87	\$112.87	NA	NA	\$112.87
Non-Coincident Demand									
Secondary Primary	S/kW S/kW	\$8.49 \$8.19		NA NA	\$8.49 \$8.19	\$8.49 \$8.19	NA NA	NA NA	
Transmission	S/kW	\$8.15		NA NA		\$8.15	NA.	NA NA	
Time-of-Use (TOU) Demand									
Secondary	S/kW	\$22.48		NA	\$22.48	\$22.48	NA	NA	
Primary Transmission	S/kW S/kW	\$22.37 \$0.00		NA NA	\$22.37 \$0.00	\$22.37 \$0.00	NA NA	NA NA	
					-	-			
Maximum On-Peak Demand: Summer Secondary	S/kW	\$0.00	NA	\$6.17	\$6.17	\$0.00	NA	NA NA	\$0.00
Primary	\$/kW	\$0.00	NA	\$6.14	\$6.14	\$0.00	NA	NA	\$0.00
Transmission	\$/kW	\$0.00	NA	\$5.88	\$5.88	\$0.00	NA	NA	\$0.00
Maximum On-Peak Demand: Winter									
Secondary Primary	S/kW S/kW	\$0.00 \$0.00		NA NA	\$0.00 \$0.00	\$0.00 \$0.00	NA NA	NA NA	
Transmission	S/kW	\$0.00		NA NA	\$0.00	\$0.00	NA NA	NA NA	
Energy Charges									
Sumer: On-Peak Energy									
Secondary Primary	S/kWh S/kWh	\$0.00541 \$0.00541	\$0.00309 \$0.00309	\$0.14961 \$0.14889	\$0.15811 \$0.15739	\$0.00541 \$0.00541	\$0.00309 \$0.00309	NA NA	
Transmission	S/kWh	\$0.00541		\$0.14249	\$0.15099	\$0.00541	\$0.00309	NA	
Sumer: Off-Peak Energy Secondary	S/kWh	\$0.00541	\$0,00309	\$0.09291	\$0.10141	\$0.00541	\$0.00309	NA NA	\$0.00850
Primary	S/kWh	\$0.00541		\$0.09248		\$0.00541	\$0.00309	NA	
Transmission Sumer: Super Off-Peak Energy	S/kWh	\$0.00541	\$0.00309	\$0.08854	\$0.09704	\$0.00541	\$0.00309	NA	\$0.00850
Secondary	S/kWh	\$0.00541	\$0.00309	\$0.07453	\$0.08303	\$0.00541	\$0.00309	NA	
Primary Transmission	S/kWh S/kWh	\$0.00541 \$0.00541		\$0.07427 \$0.07128	\$0.08277 \$0.07978	\$0.00541 \$0.00541	\$0.00309 \$0.00309	NA NA	
Winter: On-Peak Energy									
Secondary Primary	S/kWh S/kWh	\$0.00541 \$0.00541		\$0.15644 \$0.15572	\$0.16494 \$0.16422	\$0.00541 \$0.00541	\$0.00309 \$0.00309	NA NA	
Transmission	S/kWh	\$0.00541	\$0.00309	\$0.14916	\$0.15766	\$0.00541	\$0.00309	NA	\$0.00850
Winter: Off-Peak Energy Secondary	S/kWh	\$0.00541	\$0.00309	\$0.08771	\$0.09621	\$0.00541	\$0.00309	NA NA	\$0.00850
Primary	S/kWh	\$0.00541	\$0.00309	\$0.08735		\$0.00541	\$0.00309	NA	
Transmission Winter: Super Off-Peak Energy	S/kWh	\$0.00541	\$0.00309	\$0.08376	\$0.09226	\$0.00541	\$0.00309	NA	\$0.00850
Secondary	S/kWh	\$0.00541		\$0.06777	\$0.07627	\$0.00541	\$0.00309	NA	
Primary Transmission	S/kWh S/kWh	\$0.00541 \$0.00541	\$0.00309 \$0.00309	\$0.06755 \$0.06483	\$0.07605 \$0.07333	\$0.00541 \$0.00541	\$0.00309 \$0.00309	NA NA	
Stage 1 Pilot Commodity Import Rates CAISO Day-Ahead Hourly Price	S/kWh	NA	NA	NA	NA	NA	NA	Day-Ahead Hourly Price	Day-Ahead Hourly Price
RTP Commodity Capacity Adder	S/kWh S/kWh	NA	NA	NA	NA	NA	NA NA	\$1.44993 \$0.05347	\$1.44993
Total Commodity Base Rate	SkWh	NA	NA.	NA	NA	NA	NA.	\$0.05347	\$0.05347
SCHEDULE TOU-PA <u>Basic Service Fee</u>									
SEIVE FEE									
Secondary Primary	S/Month S/Month	\$23.41 \$23.41		NA NA	\$23.41 \$23.41	\$23.41 \$23.41	NA NA	NA NA	
Filling	3 Month	323.41	na.	NA	323.41	323.41	NA.	100	323,41
Energy Charges Sumer: On-Peak Energy									
Secondary Secondary	S/kWh	\$0.09959		0.24924	\$0.35192	\$0.09959	\$0.00309	N.A	
Primary Sumer: Off-Peak Energy	S/kWh	\$0.09929	\$0.00309	0.24799	\$0.35037	\$0.09929	\$0.00309	N.A	\$0.10238
Secondary	S/kWh	\$0.09959		0.13769	\$0.24037	\$0.09959	\$0.00309	NA	
Primary Winter: On-Peak Energy	S/kWh	\$0.09929	\$0.00309	0.13701	\$0.23939	\$0.09929	\$0.00309	N.A	\$0.10238
Secondary	S/kWh	\$0.09959		0.12932	\$0.23200	\$0.09959	\$0.00309	N.A	
Primary Winter: Off-Peak Energy	S/kWh	\$0.09929	\$0.00309	0.12871	\$0.23109	\$0.09929	\$0.00309	NA.	\$0.10238
Secondary	S/kWh	\$0.09959		0.06301	\$0.16569	\$0.09959	\$0.00309	NA	
Primary	S/kWh	\$0.09929	\$0.00309	0.06278	\$0.16516	\$0.09929	\$0.00309	NA.	\$0.10238
Stage 1 Pilot Commodity Import Rates									
CAISO Day-Ahead Hourly Price RTP Commodity Capacity Adder	S/kWh S/kWh	NA NA		NA NA	NA NA	NA NA	NA NA	Day-Ahead Hourly Price \$1.44993	
Total Commodity Base Rate	S/kWh	NA NA		NA NA	NA NA	NA NA	NA NA	\$0.05347	
Note:									

Note:

(1) The Current UDC Total rate above reflects the sum of transmission, distribution, public purpose program (PPP), nuclear decommissioning, ongoing competition transition (CTC), local
(1) The Current Commodity Rates shown are the Schedule EECC, Beeric Energy Commodity Cost, rates, effective June 1, 2022 per SDG&E AL 4004-E.

(2) The Illustrative Proposed Commodity Rates shown are the illustrative Stage 1 RTP Plist rates, based on SDG&Es current electric rates effective June 1, 2022 per SDG&E AL 4004-E. petition transition (CTC), local generation charge (LGC), reliability services (RS), and total rate adjustment component (TRAC) rates, effective June 1, 2022 per SDG&E Advice Letter (AL) 4004-E.