

**CALSSA DATA REQUEST – SDG&E RESPONSE**  
**Data Request #01**  
**SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001**  
**DATE RECEIVED: February 18, 2022**  
**DATE RESPONDED: March 4, 2022**

**General Objections:**

SDG&E objects to the definitions and instructions included in this data request on the grounds that they are overbroad, unduly burdensome, and seek information that is irrelevant to the subject matter involved in the pending proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence, and therefore, beyond the requirements of CPUC Rule of Practice and Procedure 10.1. SDG&E also notes that special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

1. Please send responses to all data requests from all other parties in this proceeding, including responses sent to date and all future responses.

**SDG&E Response:**

SDG&E objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SDG&E will provide all responsive documents in existence at the time of its response. Should CalSSA seek to update its request, SDG&E will respond to such a request as a new data request in the future. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

All public data request responses that SDG&E has provided to parties to date can be found at the web address below. Confidential responses to past data requests can be provided upon receipt of the signed non-disclosure agreement, provided by SDG&E via email on February 18, 2022.

<https://www.sdge.com/rates-and-regulations/proceedings/Application-for-a-Residential-Untiered-Time-of-Use-Rate-with-a-Fixed-Charge>

2. Please provide illustrative rates for a rate structure in which all rate design elements are equivalent to the proposed TOU-ELEC rate except with the Fixed Monthly Customer Charge set at \$25 per month for all customers on the rate. For these illustrative rates, use a revenue requirement that is equivalent to that used in SDG&E’s direct testimony.

**SDG&E Response:**

SDG&E objects to the request on the grounds that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached “CALSSA\_DR\_001\_Q2.xlsx”

3. Referring to SDG&E’s proposal for a tiered Fixed Monthly Customer Charge that is based on individual customers’ peak demand (Prepared Direct Testimony of Hannah Campi at pp. HC-9

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to HC-11), please explain why those tiers are based on non-coincident demand rather than demand that is coincident with the peak TOU period.

**SDG&E Response:**

See Rebuttal Testimony of Hannah Campi, pages 6-7, section titled “Non-Coincident Demand (“NCD”) is appropriate to set a demand differentiated fixed charge.

4. Referring to SDG&E’s proposal for a tiered Fixed Monthly Customer Charge that is based on individual customers’ peak demand and to the avoided distribution capacity cost values for SDG&E in the Commission-approved Avoided Cost Calculator, as shown in the table below, please provide any reasoning why aligning cost recovery with peak load hours should be done with tariffs using the Avoided Cost Calculator but should not be done for rate design.

**Avoided Distribution Capacity Costs for SDG&E in the Avoided Cost Calculator**

Hour of Day	Avoided Distribution Capacity Cost (\$/MWh)
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	118
17	367
18	859
19	1121
20	985
21	482
22	122
23	0
24	0

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**SDG&E Response:**

SDG&E objects to this request on the grounds that it is irrelevant and unintelligible in that it assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E emailed CALSSA on March 2<sup>nd</sup> requesting clarification on this question. CALSSA responded on March 3<sup>rd</sup>: “We are simply wondering if there is a reason those Avoided Cost Calculator values should not be considered in rate design.” This question is irrelevant to this proceeding.

SDG&E designs its rates based on its marginal cost studies. SDG&E’s current marginal cost study is from its 2019 GRC Phase 2. SDG&E is not aware of any current effective tariffs that use Avoided Cost Calculator (“ACC”) values.

The avoided cost calculator is fully litigated in a separate proceeding, where parties can provide testimony and evidence, and the CPUC makes a final determination about what values to use in the ACC and how it is structured. SDG&E does not design or control the outputs of the avoided cost calculator, and may not agree with choices made by the CPUC in the final versions of the ACC. Simply put, the ACC is an evaluation tool for behind-the-meter resources, not a rate design tool.