

Cal Advocates DATA REQUEST – SDG&E RESPONSE

Data Request #002

SDG&E A.21-09-001

DATE RECEIVED: September 9, 2021

DATE RESPONDED: September 23, 2021

DATA REQUEST

General Objections:

SDG&E objects to the propounding of this data request as improper based on Cal Advocates lack of party status in this matter. Under CPUC Rule of Practice and Procedure 10.1, party status is required to obtain discovery. At the time this data request was made, Cal Advocates had not yet filed a protest or response to this application, filed a motion to become a party, nor has a prehearing conference or hearing occurred wherein Cal Advocates can make an oral motion for party status. Therefore, under CPUC Rule of Practice and Procedure 1.4, Cal Advocates is not a party in this matter.

SDG&E further 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).

Question 1:

1. Please recreate the analysis done in SDG&E’s Application and Testimony, as described in the following sections, with the following TOU periods:

TOU Period	Weekdays		Weekends and Holidays	
	Summer	Winter	Summer	Winter
On-Peak	4 p.m. - 9 p.m.	N/A	N/A	N/A
Mid-Peak	N/A	4 p.m. - 9 p.m.	4 p.m. - 9 p.m.	4 p.m. - 9 p.m.
Off-Peak	All other hours	9 p.m. - 8 a.m.	All other hours	9 p.m. - 8 a.m.
Super-Off-Peak	N/A	8 a.m. - 4 p.m.	N/A	8 a.m. - 4 p.m.
CPP Event Period	4 p.m. - 9 p.m.	4 p.m. - 9 p.m.	N/A	N/A

- a. Assuming no change to SDG&E’s proposed customer charges¹, please recalculate TOU-ELEC using the TOU period configuration above.
 - i. In doing so, let the rate differentials float without SDG&E’s proposed commodity rate adjustments.² That is, the resulting rate differentials should reflect the EPMC marginal cost differences between the new TOU periods.

¹ As proposed in Table 1 of Exhibit SDG&E-01

² i.e. SDG&E’s 20% of commodity capacity costs are moved from the summer On-Peak period to the winter On-Peak period. Exhibit SDG&E-02 p. HC-5. SDG&E’s proposal to set the TOU differential between the Off-Peak and Super Off-Peak Period (OSOPP) at 1.5, creating a flattened TOU structure outside of the peak period. Exhibit SDG&E-02 p. HC-6.

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- b. Please provide all workpapers used for this analysis in Excel format with formulas intact linking the billing determinants and revenue requirement inputs by component to the rate outputs.
- c. Provide all bill impacts of the TOU-ELEC rate with these TOU periods, in the format of Attachment A in the testimony of Hannah Campi.³
 - i. Please provide the bill impacts in Excel format with all the rate and consumption inputs linked.
 - ii. In addition, please explain how SDG&E developed the end-use electric profiles for electric vehicles, energy storage, electric heat pump for water heating and climate control used to develop the bill impact estimates.
 - a) Did SDG&E assume any load control (i.e. load shifting) to optimize charging/consumption behavior? Please explain in detail.

SDG&E Response

SDG&E objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

SDG&E further objects to this request on the grounds that it calls for speculation.

Subject to and without waiving the foregoing objections, SDG&E responds as follows:

As discussed in an email between SDG&E and Cal Advocates on September 13th/September 14th. SDG&E will provide the response to Question 1 by October 21st.

Question 2:

2. Provide all bill impact tables provided in pages A-3 to A-10 of Attachment A in the testimony of Hannah Campi in Excel format with all formulas intact linking the rate and consumption inputs.
 - a. In addition, please explain how SDG&E developed the end-use electric profiles for electric vehicles, energy storage, electric heat pump for water heating and climate control used to develop the bill impact estimates.
 - i. Did SDG&E assume any load control (i.e. load shifting) to optimize charging/consumption behavior? Please explain in detail.

SDG&E Response

SDG&E objects to this request on the grounds that it is unintelligible in that it assumes facts that do not exist.

³ Exhibit SDG&E-02.

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Subject to and without waiving the foregoing objections, SDG&E responds as follows:

2. Please see the response to Cal Advocates DR 001, workpaper titled “TOU ELEC Bill Model_A2109001.xlsx”, which will generate bill impact tables by selecting a given profile from the list in cell B5 on the “Bill Impacts” tab.
 - a. SDG&E did not develop energy storage or electric heat pump profiles at a granular level, but instead used a range of historical load profiles, including profiles of customers on EV rates.
 - i. SDG&E used aggregated 2019 historical load profiles from different customer types (by customer size (annual consumption), CARE status and EV rate) to analyze bill impacts using current rates and rates proposed in this application. Profiles were not developed to reflect the adoption of new behind-the-meter (BTM) technologies other than EVs (by assuming all customers on an EV rate have an EV). SDG&E does not have information on which customers have a heat pump for water or climate control. SDG&E does not have access to customer dispatch patterns for BTM storage. Therefore, SDG&E did not assume any load shifting.

Question 3:

3. Please explain how SDG&E developed the fixed customer charges for SDG&E’s TOU-ELEC rate as illustrated in table 1 of Exhibit SDG&E-01.⁴
 - a. What components are included in SDG&E’s proposed customer charges and why?
 - b. Please populate the following table to provide a breakdown of the various cost components included in SDG&E’s customer charge. For each component, please explain SDG&E’s rationale for including it. The sum of all the numerical values in each row should reflect proposed values on Table 1 of Exhibit SDG&E-01.

⁴ Prepared Direct Testimony of Gwendolyn R. Morien dated September 1, 2021

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SDG&E TOU-ELEC Proposed Fixed Customer Charge Components									
	<u>Marginal customer cost</u>					<u>Marginal Distribution Demand Cost</u>			<u>Other Costs</u>
	TSM*			Customer service costs	EPMC if applicable	Circuit	Substation	EPMC if applicable	
fixed customer charge	<i>Transformer \$/Mo</i>	<i>Service \$/mo</i>	<i>Meter \$/mo</i>	<i>\$/mo</i>	<i>\$/mo</i>	<i>\$/mo</i>	<i>\$/mo</i>	<i>\$/mo</i>	<i>\$/mo</i>
0-4									
4-8 kW									
8-10kW									
>10									
*Please indicate whether recc or nco method was used									

- c. What was the basis for SDG&E’s choice of using a customer’s top three daily noncoincident demand peaks over 12 months as the basis for the fixed charge? Why did SDG&E decide to not use more daily peaks? Include all documents and/or any workpapers that support this decision.

SDG&E Response

Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. Please refer to SDG&E’s response to Cal Advocates Data Request 001, Workpaper titled “Confidential Illustrative Rate Design_ TOU ELEC.xlsx” “Tiered Customer Charge” Tab.
- b. See attached file “A.21-09-001 – CalPA DR002_Q3.xlsx”
- c. SDG&E initially considered basing the tiered customer charge on a customer’s single maximum NCD peak, as well as on the average of the NCD peak in each month. SDG&E had concerns that a single point of peak demand could be overly punitive and result in a negative customer experience, but that averaging across all months could result in cost-shifting.