

Cal Advocates DATA REQUEST – SDG&E RESPONSE

Data Request #002 – Q1

SDG&E A.21-09-001

DATE RECEIVED: September 9, 2021

DATE RESPONDED: October 22, 2021

**RESPONSE CONTAINS CONFIDENTIAL MATERIALS**

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. Despite the fact that Cal Advocates filed a protest during the time that SDG&E was preparing this Data Request Response, under CPUC Rule of Practice and Procedure 1.4, Cal Advocates was not a party in this matter at the time the Data Request was made.

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 charges<sup>1</sup>, 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.<sup>2</sup> That is, the resulting rate differentials should reflect the EPMC marginal cost differences between the new TOU periods.

<sup>1</sup> As proposed in Table 1 of Exhibit SDG&E-01

<sup>2</sup> i.e. SDG&E’s 20% of commodity capacity costs are moved from the summer On-Peak period to the winter On-Peak

**Cal Advocates DATA REQUEST – SDG&E RESPONSE**

**Data Request #002 – Q1**

**SDG&E A.21-09-001**

**DATE RECEIVED: September 9, 2021**

**DATE RESPONDED: October 22, 2021**

- 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.<sup>3</sup>
  - 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:

See attached workpapers “CONFIDENTIAL - A2109001 – CalPA DR02\_Q1.xlsx”, “CONFIDENTIAL - A2109001 – CalPA DR02\_Q1b.xlsx”, and “A2109001CalPA DR02 TOU-ELEC Bill Calc Model\_New TOU.xlsx” where relevant profiles can be selected in cell B5 of the “Bill Impact Summary” and “Bill Impact Summary (CARE)” tabs.

**CONFIDENTIAL – “CONFIDENTIAL – A2109001 – CalPA DR02\_Q1.xlsx” and “CONFIDENTIAL - A2109001 – CalPA DR02\_Q1b.xlsx” contain nonpublic “protected materials” (i.e., trade secret, market sensitive, or other confidential and/or proprietary information) as determined by SDG&E in accordance with the provisions of Decision 06-06-066 and subsequent decisions. The Protected Materials have been highlighted in yellow. The confidentiality declaration of Hannah Campi is also provided.**

Note that this will not include the full comparison feature showing bill impacts relative to current rates as in the original model, since SDG&E’s other rates do not have a mid-peak rate to compare against. It will generate illustrative bill impacts under TOU-ELEC using rates developed from Cal Advocates proposed TOU periods. For bill impacts using SDG&E’s current standard TOU periods, Cal Advocates should refer to the original bill impact calculator provided.

To develop load profiles, SDG&E used the entire population of residential customers and segmented

---

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.

<sup>3</sup> Exhibit SDG&E-02.

**Cal Advocates DATA REQUEST – SDG&E RESPONSE**

**Data Request #002 – Q1**

**SDG&E A.21-09-001**

**DATE RECEIVED: September 9, 2021**

**DATE RESPONDED: October 22, 2021**

by climate zone, CARE status, size, and EV rate to bucket customers into segments of customers with the same characteristics. These individual profiles were then aggregated by averaging across all profiles. SDG&E's EV profiles represent customers who were taking service on an EV rate. SDG&E did not develop end-use electric profiles for energy storage or electric heat pumps.

SDG&E's illustrative bill impacts and bill impact model isolate structural impacts and do not account for how various customers might shift load to optimize charging/consumption behavior.