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).

1. Will successor tariff NEM customers without the qualifying technologies[1] qualify for TOU-ELEC?
    a. What about legacy NEM customers (i.e. NEM 1.0 and NEM 2.0) who have moved to the NEM successor tariff?

SDG&E Response:

As stated in the Direct Testimony of SDG&E witness Morien, "In addition to qualifying technologies, SDG&E is proposing that customers who take service under the new net energy metering (NEM) Reform Tariff (Reform Tariff), currently under consideration in Rulemaking (R.) 20-08-020, be eligible to take service on TOU-ELEC on an opt-in basis." (p. GM-13:1-4)

If NEM 1.0 and 2.0 customers have moved to the Reform Tariff, and Reform Tariff customers are eligible to take service on TOU-ELEC as SDG&E has proposed, they would be able to take service on TOU-ELEC.

2. In the testimony of both Gwendolyn Morien and Hannah Campi, SDG&E proposes to give CARE/FERA customers a 50% discount on all fixed charges, along with the exemptions and line-item discounts that apply to CARE/FERA customers.2

    a. Does SDG&E plan to offer both a 50% discount fixed charge and the standard CARE/FERA discount for volumetric rates?

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[1] Direct Testimony of Gwendolyn Morien, p. GM-12, lines 12 – 13. Decision 20-03-003, Ordering Paragraph 51 states that these technologies are electric vehicles, energy storage, and electric heat pump water heaters.
[2] Direct testimony of Gwendolyn Morien, p. GM-12, lines 7 – 9.

i. What would be the level (i.e. percentage) of this discount on the volumetric rates for TOU-ELEC?
    1. How is this percentage calculated?
    2. How does this percentage compare to non-TOU-ELEC customers' volumetric rates? If there is a difference, please explain why this difference exists.

b. What would the discount percentage be for a CARE/FERA customer with a typical load profile on TOU-ELEC if both the 50% discounted fix charge and the typical CARE/FERA exemptions and line-item discounts were applied?
    i. Please provide an illustrative example of how this 50% discount along with the standard CARE discounts would apply to a CARE customer's TOU-ELEC bill.
    ii. Please provide an illustrative example of how this 50% discount along with the standard FERA discounts would apply to a FERA customer's TOU-ELEC bill.

SDG&E Response:

a. SDG&E proposes a 50% discount on only the fixed charge. CARE/FERA customers will pay the same volumetric rates as non-CARE/FERA customers, less any required exemptions, and the CARE/FERA discount will be applied to the bill as a line item. SDG&E does not propose to provide a CARE discount greater than the statutory maximum 35% per PU Code 739.1(c)(1). This calculation is described in SDG&E's Schedule E-CARE tariff: https://tariff.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_E-CARE.pdf

    The CARE discount for TOU-ELEC is calculated consistent with current practice in SDG&E's consolidated rates model for all other CARE rates. The current CARE line-item discount is 32.26%, with an effective discount of 35%, based on rates effective June 1, 2021. Because SDG&E's minimum bill for CARE customers is 50% of the standard minimum bill, the line-item discount must be adjusted so that the total effective discount for CARE customers is 35% consistent with statutory requirements.

    The FERA discount is calculated the same way. Current FERA customers receive a 50% discount on the minimum bill. Based on rates effective June 1, 2021, the FERA line-item discount is 17.95%, with an effective discount of 18%. The FERA discount is described in SDG&E's Schedule FERA tariff: https://tariff.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_FERA.pdf

b. SDG&E objects to this question as this 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. The requested data is equally available to Cal Advocates. Notwithstanding the foregoing objections, SDG&E responds as follows:

    See response to 2(a).

3. SDG&E proposes to cap the enrollment of TOU-ELEC to the first 40000 customers.

a. What was SDG&E's reasoning behind 40000 customers? Did SDG&E conduct revenue shortfall calculations to inform this number?
    i. Please provide the workpapers and analysis used to determine any revenue shortfall calculations that would occur under various enrollment caps under TOU-ELEC.

SDG&E Response:

Capping enrolment at 40,000 limits the potential cost shifting that can occur to non-participating customers.

Additionally, SDG&E is proposing an ex-post review of TOU-ELEC three years from its date of implementation to assess customer adoption trends, whether cost shifting has occurred, if changes should be made to the tariff to address said cost shift, and whether to change the customer participation cap. If at that time it is determined that little cost shifting has occurred, it may be appropriate to raise the enrolment cap.

SDG&E believes it is important to establish an enrollment cap as there could be significant cost shifting from this rate, resulting in non-participating customers paying higher bills.

SDG&E's current cost shifting estimates accounts for structural savings associated with the TRAC component and volumetric distribution rates. It does not account for other potential savings under the rate that participating customers might see from changes in behavior, *i.e.*, load shifting.

See attached titled "A.21-09-001_Cal Advocates DR03Q3.xlsx".

4. SDG&E previously reported that its new billing system was scheduled to come online in January 2021, and that the schedule for billing system changes included a "stabilization period" that would go on through the 3rd quarter of 2021.
    a. What is the current status of SDG&E's new billing system transition? Has the "stabilization period" been completed?
    b. If the new system is still going through the implementation phase, what is the current timeline for when this system would be fully operational?
    c. Please provide a detailed timeline of SDG&E's billing system transition including periods when changes to rates cannot be made and when changes to rates can be made, including introduction of new rates.

SDG&E Response

SoCalGas/SDG&E objects to this request on the grounds that it calls for speculation. Subject to and without waiving the foregoing objection, SDG&E responds as follows: **a**

a. SDG&E implemented its new billing system on April 5th, 2021. SDG&E is currently in the last month of its stabilization period and will be exiting stabilization in October 2021.

b. Please see response to 4a.

c. As SDG&E is exiting its CIS stabilization in October, it will begin making changes to its rates and implementing new rates related to previously approved CPUC Decisions. SDG&E is forecasting that it will take until the end of the second quarter in 2022 to complete this work, at which time it could then shift to implementing additional rates and changes..