

Cal Advocates DATA REQUEST – SDG&E RESPONSE

Data Request #004

SDG&E GRC PHASE 2 - A.21-09-001

DATE RECEIVED: September 24, 2021

DATE RESPONDED: October 8, 2021

DATA REQUEST

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).

Notice Regarding Prepared Direct Testimony:

On September 1, 2021, SDG&E filed an Application and Served associated testimony seeking approval to update its rate design to include a residential untiered TOU Rate with a fixed charge. While preparing its responses to this Data Request, SDG&E discovered an immaterial error contained in the Prepared Direct Testimony of Hannah Campi on Behalf of San Diego Gas & Electric Company. The originally served testimony included erroneous figures in Tables HC-2 and HC-6. SDG&E will serve amended testimony to correct any errors at a later date. The changes in the upcoming amended testimony do not substantially alter SDG&E's calculations, arguments, or conclusions in this proceeding.

1. In Exhibit SDGE-02, Direct Testimony of Hannah Campi, SDG&E proposes creating a tiered fixed charge based on the following tiers, and the associated prices:

Table 1: Illustrative TOU-ELEC Fixed Monthly Customer Charge¹

¹ Exhibit SDGE-02: Direct Testimony of Hannah Campi, p. HC-10, Table HC-4.

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Fixed Customer Charge kW Range	\$/Month
Tier 1: 0-4 kW	28.53
Tier 2: 4-8 kW	51.28
Tier 3: 8-10 kW	68.35
Tier 4: >10 kW	85.41

- a. What is the basis SDG&E used to develop the kW ranges for the fixed customer charges? Include all associated workpapers/documents, with Excel formulas intact for Excel-based workpapers.

SDG&E Response:

Fixed charge kW ranges were developed using a distribution of SDG&E’s customers by rate schedule and peak demand. This distribution can be found on the “Determinants” tab of the workpaper titled “CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx” and is presented by rate schedule in Figure HC-1: Annual Peak NCD by Rate. Tier ranges aim to balance the goals of scaling the fixed charge to demand, limiting complexity from overly granular kW ranges, and covering a relevant portion of customers across rate schedules.

“CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx” contains 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 has already been provided.

2. In SDG&E workpaper “CONFIDENTIAL - Illustrative Rate Design_A2109001.xlsx,” the “Total by Rate Component” tab, cells O22:O27 (commodity rates) do not match the commodity rates calculated in cells N15:N21 in the “Commodity Rate Design” sheet; and the cells E22:E27 (distribution rates) in “Total by Rate Component” tab do not match the distribution energy rate calculated in the “Marginal Distribution Rate” tab, cell H17. Please list and provide the \$/kWh value of the rate components by TOU period that make up these discrepancies. Please reconcile these differences.

SDG&E Response:

See updated attached workpaper titled “Updated CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx” which contains additional explanatory footnotes on the “Total by Rate Component” Tab.

“Updated CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx” contains 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.

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3. In SDG&E workpaper “TOU-ELEC Bill Model_A2109001.xlsx,” tab “Load Profiles,” cells G9201:AL9212 is a table of the maximum monthly noncoincident demand of each load profile for each month of the year. In these cells, the formula contains a “MAXIFS” function and then is multiplied by 4. Cell L4 in tabs “Bill Impact Summary” and “Bill Impact Summary (CARE)” are also multiplied by 4. Please explain why these values are multiplied by 4.

SDG&E Response:

The hourly values presented in the “Load Profiles” tab were originally understood to be the average of four 15-minute intervals occurring in each hour. Multiplying by four approximates hourly maximum demand from this average value. This was a misunderstanding of the load profiles, which represented hourly-metered data. However, the profiles aggregate multiple accounts, including many multifamily residences, which generally have lower peak demands. As a result, many profiles show lower demands than many of SDG&E’s single-family home residential customers have in reality. As the bill impact model does not calculate individual customer bills and produces illustrative bills, multiplying by 4 acts as a scalar to show the illustrative bill impacts of customers who fall into the kW ranges in Tiers 3 and 4.