Cal Advocates DATA REQUEST – SDG&E RESPONSE
Data Request #005
SDG&E GRC PHASE 2 - A.21-09-001
DATE RECEIVED: October 27, 2021
DATE RESPONDED: November 10, 2021

DATA REQUEST

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).

Questions 1-4

Please answer Questions 1-4 pertaining to the following. During SDG&E's walkthrough with Cal Advocates of workpapers "CONFIDENTIAL - Illustrative Rate Design_A2109001" and "TOU-ELEC Bill Model_A2109001" on September 28, 2021, SDG&E stated that its reasoning for using the midpoint approach over a $/kW approach for calculating the demand charge for each customer charge "tier" was due to customer confusion concerns.

1. Please explain what kind of confusion SDG&E anticipates its customers would encounter with a demand-based customer fixed charge using the $/kW approach.

SDG&E Response:

Using individual demand would require setting the fixed charge for each customer individually, rather than at levels that apply to all customers. Customers would be required to understand and see significantly more prices that could be more difficult to explain.

2. Please explain how the midpoint method alleviates such concerns described in your response to Question 1 above.

SDG&E Response:

Using a midpoint methodology limits the number of charges presented to the customer, decreases the amount of calculations required to estimate their bill, and is likely to be more understandable. Electricity tariffs are confusing to customers, and limiting the number of possible fixed charges to four simplifies the tariff, when compared to a $/kW approach. Limiting the number of fixed charges to four possibilities allows a customer to more easily estimate what their bill would be under each fixed charge with their existing or estimated kWh consumption.

3. What kind of customer confusion may arise from the midpoint approach?

SDG&E Response:

OBJECTION: SDG&E objects to this request to the extent that it calls for speculation.

4. Please summarize SDG&E's experiences of similar issues described in responses to Questions 1 and 3 with customers on its small commercial rate schedules which also exhibit demand-based customer fixed charges, if any.

SDG&E Response:

OBJECTION: SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SDG&E further objects to this request to the extent that it calls for speculation. Subject to and without waiving the foregoing objection, SoCalGas/SDG&E responds as follows:

SDG&E has no formal data pertaining to confusion amongst customers on its small commercial rate schedules with demand-based customer fixed charges. Anecdotally, occasional customers have inquired as to the amount of their fixed charge, but no small commercial customers have inquired about the calculation of their demand-based fixed charge.

Question 5

5. SDG&E relies on its A.19-03-002 GRC2 proposed marginal customer access costs (MCAC)[1] to build its TOU-ELEC tiered customer charge.[2] With regards to the hookup costs that comprised the capital portion of SDG&E's underlying GRC 2 MCAC calculation, please explain why the residential unit transformer costs ($/unit) for the maximum annual demand range of 7-12kW is higher than the 3-6 kW maximum annual demand range as illustrated by the table below. Specifically, this table shows that the average transformer cost to serve customers with demands between 7 kW and 12 kW is $675/customer whereas it costs $771/customer to serve customers with maximum annual demands between 3 kW and 6 kW.

Max Annual Demand (kW)	120/240 1-Phase			
	Transformers	Services	Meters	Total
	($/Unit)	($/Unit)	($/Unit)	($/Unit)
0 - 2	245	139	246	630
3 - 6	771	139	246	1,156
7 - 12	675	196	246	1,117
13 - 20	1,350	214	246	1,810

Source: A. 19-03-002 "Copy of Ch_5_WP#2_Marg Dist Cust Costs for Non School Class Revised_Public" workpapers, Resid TSM UC tab.

[1] SDG&E-15, Prepared Rebuttal Testimony of William G Saxe, A. 19-03-002
[2] Updated_CONFIDENTIAL - Illustrative Rate Design_A2109001

SDG&E Response:

OBJECTION: SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence.

Questions 6-8

6. Do any of the 32 hourly load profiles that SDG&E provided in "TOU-ELEC Bill Model_A2109001," show EV-only load?

SDG&E Response:

SDG&E's EV load profiles aggregate whole-house EV rates with SDG&E's separately metered EV rate.

7. If the answer to Question 6 is no, please provide a "33rd" hourly load profile of customers taking service on SDG&E's separately metered EV rate, EV-TOU on the same workpaper.
    i. Please aggregate this data using the same methods SDG&E used for its other 32 hourly load profiles.

SDG&E Response:

Please see attached file titled "A2109001_CalPA DR05_Q6.xlsx"

8. Please describe how SDG&E pulled and aggregated the data in the answer to Question 7.

SDG&E Response:

SDG&E aggregated the 8,760 hours provided from the 2019 load profiles of Schedule EV-TOU and separately metered research EV sample customers.

Questions 9-10

9. Please estimate and provide via Excel spreadsheet the hourly marginal price floors (including relevant non-passable charges) associated with SDG&E's proposed E-ELEC rate. All formulae should remain intact and all relevant inputs and underlying assumptions to the final marginal cost price floor result.

SDG&E Response:

OBJECTION: SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither

relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence.

10. Please explain how the marginal cost price floor associated with SDG&E's proposed E-ELEC rate might change if SDG&E's E-ELEC had a smaller or larger tiered fixed charge.

SDG&E Response:

OBJECTION: SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence.