

Cal Advocates DATA REQUEST – SDG&E RESPONSE

Data Request #008

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

DATE RECEIVED: February 17, 2022

DATE RESPONDED: March 11, 2022

RESPONSE CONTAINS CONFIDENTIAL MATERIALS

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).

SUBJECT: TOU PERIODS 2

1. Please re-do the analysis^[1] in SDG&E’s Application and Testimony,^[2] using the parameters described in Sierra Club’s proposal,^[3] i.e., including the 10am – 2pm timeframe in the super off-peak TOU period for all months, by doing the following.

- a. Assuming no change to SDG&E’s proposed customer charges, please recalculate TOU-ELEC using the TOU period configuration described in Sierra Club’s proposal.

In doing so, let the rate differentials float without SDG&E’s proposed commodity rate adjustments. That is, the resulting rate differentials should reflect the EPMC marginal cost differences between the new TOU periods.

SDG&E Response:

SDG&E objects to the request on the grounds that it 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. Notwithstanding the foregoing objections, SDG&E responds as follows:

A summary comparison of SDG&E’s proposed TOU-ELEC and TOU-ELEC with Sierra Club’s TOU periods is presented in the table below.

	Units	TOU-ELEC Original Proposed TOU Periods A	TOU-ELEC Sierra Club Proposed TOU Periods B	Change (\$) C= B-A
Fixed Customer Charge:				
Tier 1: 0-4 kW	\$/Month	28.53	28.53	0
Tier 2: 4-8 kW	\$/Month	51.28	51.28	0
Tier 3: 8-10 kW	\$/Month	68.35	68.35	0
Tier 4: >10kW	\$/Month	85.41	85.41	0

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<i>Summer Energy:</i>				
On-Peak	\$/kWh	0.45211	0.47613	0.02402
Off-Peak	\$/kWh	0.2201	0.31691	0.09681
Super Off-Peak	\$/kWh	0.18959	0.17534	-0.01425
<i>Winter Energy:</i>				
On-Peak	\$/kWh	0.2997	0.24039	-0.05931
Off-Peak	\$/kWh	0.2118	0.20009	-0.01171
Super Off-Peak	\$/kWh	0.18406	0.17294	-0.01112

The TOU periods used for this analysis are in the following table:

Sierra Club Proposed TOU		
	Weekdays	Weekends/Holidays
Summer		
On Peak	4PM-9PM	4PM-9PM
Off Peak	All other hours	All other hours
Super Off Peak	12AM-6AM and 10AM-2PM	12AM-2PM
Winter		
On Peak	4PM-9PM	4PM-9PM
Off Peak	All other hours	All other hours
Super Off Peak	12AM-6AM and 10AM-2PM	12AM-2PM

- Please provide all workpapers used for the analysis in the response to Question 1 above in Excel format with formulas intact linking the billing determinants and revenue requirement inputs by component to the rate outputs.

SDG&E Response:

SDG&E objects to the request on the grounds that it 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. Notwithstanding the foregoing objections, SDG&E responds as follows:

See attached files titled “CONFIDENTIAL – A2109001 – CalPA DR008_Q2.xlsx” and “CONFIDENTIAL – A2109001 – CalPA DR008_MC SC TOU.xlsx.”

CONFIDENTIAL – “CONFIDENTIAL – A2109001 – CalPA DR008_Q2.xlsx” and “CONFIDENTIAL - A2109001 – CalPA DR008_MC SC TOU.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.

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3. Provide all bill impacts of the TOU-ELEC rate with the TOU periods described in Sierra Club’s proposal, in the format of Attachment A in the testimony of Hannah Campi.^[4]

SDG&E Response:

SDG&E objects to the request on the grounds that it 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. Notwithstanding the foregoing objections, SDG&E responds as follows:

See attached file titled “TOU-ELEC Bill Model_A2109001 CALPA_DR008.xlsx” “Bill Impact Summary” and “Bill Impact Summary (CARE)” tabs.

4. Please provide the bill impacts of the TOU-ELEC rate with the TOU periods described in Sierra Club’s proposal, in Excel format with all the rate and consumption inputs linked.

SDG&E Response:

SDG&E objects to the request on the grounds that it 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. Notwithstanding the foregoing objections, SDG&E responds as follows:

See attached file titled “TOU-ELEC Bill Model_A2109001 CALPA_DR008.xlsx”

^[1] Specifically the bill impact analysis and rate design used to create the TOU-ELEC bill impact analysis and illustrative rate design models.

^[2] Specifically the analysis that supports the proposal made in Exhibit SDG&E-02: Revised Direct Testimony of Hannah Campi on behalf of San Diego Gas & Electric Company.

^[3] Direct Testimony of Melissa Whited on Behalf of Sierra Club, January 14, 2022, p. 24, lines 6 - 7.

^[4] Exhibit SDG&E-02.