

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

**Data Request #006**

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

**DATE RECEIVED: November 19, 2021**

**DATE RESPONDED: December 1, 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).

**SUBJECT: UPDATED WORKPAPERS**

1. Please provide to Cal Advocates, all confidential and public workpapers supporting SDG&E's updated testimony for SDG&E's 2021 Residential Electrification Application (A.21-09-001)1 in Excel Format with all formulas and citations intact, on the same business day that SDG&E's updated testimony is served.

**SDG&E Response:**

There are no updates to the Rate Design workpapers associated with SDG&E's December 1, 2021, updated testimony, with the exception of the correction which was already made to "Updated\_CONFIDENTIAL – Illustrative Rate Design\_A2109001.xlsx" when SDG&E was preparing its response to Cal Advocates DR004. This corrected document was provided in that response on October 8, 2021.

Attached you will find an updated version of the Bill Calculator "TOU-ELEC Bill Calc Model A2109001 (Amended Proposal).xlsx" which includes a correction identified in the preparation of SDG&E's response to UCAN's DR02. This correction is unrelated to SDG&E's updates to its testimony.

2. In the response to Data Request Number 1 above, please identify and mark within the workpapers any changes that relate to changes in the updated testimony, including but not limited to any changed inputs and/or outputs.

**SDG&E Response:**

Changes are in "TOU-ELEC Bill Calc Model A2109001 (Amended Proposal).xlsx".

The changes are:

1. Cell L4 on the "Bill Impact Summary" and "Bill Impact Summary (CARE)" tabs now reference Cells G9218:AL9218 on the "Load Profiles" tab. This reflects the change in

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SDG&E’s proposal to base the monthly fixed customer charge on monthly maximum demand peaks rather than daily maximum demand peaks.

2. The “Maxifs” formula in cells G8812:AL9176 on the “Load profiles” tab was adjusted to remove the reference to TOU period. Previously, the formula was incorrectly looking at the maximum only within the On-peak period.