

CENTER FOR ACCESSIBLE TECHNOLOGY DATA REQUEST – SDG&E RESPONSE

Data Request #02

SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001

DATE RECEIVED: December 6, 2021

DATE RESPONDED: January 3, 2022

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). SDG&E further objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SDG&E will provide all responsive documents and information in existence at the time of its response.

1. Please identify the dates of the data used in preparation of SDG&E's response to CforAT's DR-01.

SDG&E Response:

SDG&E's initial response to CforAT's DR-01 was based on 2019 authorized system net determinants and not historical customer data. There are no specific dates assigned to this data.

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2. Please redo the calculations provided in response to CforAT DR-01 (reproduced below) using the 12 most recent months of data available. Please specify the 12 month period used.

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:

From December 2020 – November 2021	
Number of Customers	37,652
Revenue if no Medical Program (\$/yr)	\$84,041,482.11
Revenue with Medical Program (\$/yr)	\$56,103,153.40
Value of Medical Discount (\$/yr)	\$27,938,328.71
Value of Medical Discount (%)	33%
Average bill if no medical program (\$cust-mo)	\$223.12
Average bill with medical program (\$cust-mo)	\$148.95
Average bill discount (\$cust-mo)	\$74.17
Average bill discount (%)	33%

SDG&E notes that the methodology used in PG&E’s table may not be directly comparable to SDG&E’s methodology. As such, conclusions drawn by PG&E around the value of the existing program, and the corresponding discount PG&E proposes in their testimony, cannot be directly applied to SDG&E’s testimony.