

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric
Company (U 902 E) for Approval of Real Time
Pricing Pilot Rate

Application No. 21-12-
(Filed December 13, 2021)

**PREPARED DIRECT TESTIMONY OF
SAM SHANNON (CHAPTER 2)
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

December 13, 2021



TABLE OF CONTENTS

I.	OVERVIEW AND PURPOSE	1
II.	RATE DESIGN	1
A.	Proposed Design for Stage 1.....	3
1.	CAISO Day Ahead Energy Price.....	3
2.	Capacity Adder	4
3.	Volumetric Commodity Base Rate	6
4.	Time-differentiated Transmission Rate	6
III.	SUMMARY AND CONCLUSION	7
IV.	STATEMENT OF QUALIFICATIONS	8

ATTACHMENT A

1

PREPARED DIRECT TESTIMONY OF

2

SAM SHANNON (CHAPTER 2)

3

I. OVERVIEW AND PURPOSE

4 The purpose of my prepared direct testimony is to describe the proposed rate design for
5 Stage 1 of the real-time pricing (RTP) pilot program (Pilot). This RTP Pilot application is being
6 filed pursuant to Decision (D.) 21-07-010, Ordering Paragraph (OP) 6, which directed San Diego
7 Gas and Electric (SDG&E) to file a separate application to develop and implement a RTP pilot
8 program.

9 My testimony is organized as follows:

- 10 • **Section I – Overview and Purpose**
- 11 • **Section II – Rate Design:** describes all components of the proposed RTP pilot
12 rate;
- 13 • **Section III – Summary and Conclusion:** provides a summary of
14 recommendations; and
- 15 • **Section IV – Statement of Qualifications:** presents my qualifications.

16 My testimony also contains the following attachments:

- 17 • **Attachment A:** Illustrative Proposed RTP rates

18

II. RATE DESIGN

19 SDG&E proposes an RTP Pilot rate that will provide day-ahead hourly price signals to
20 customers to better reflect the short-term costs of energy consumption. As addressed in the
21 Policy testimony of SDG&E witness Jeff DeTuri (Chapter 1), a real-time pricing program is
22 designed to take the commodity signals that a utility sees on an hourly basis and pass them on to
23 the customer, so that customers can make more efficient choices regarding their energy use.
24 Hourly prices reflect the variations in load and generation resources available at a given time,
25 particularly the operating cost of the marginal generator. During times with high load and low

1 renewable generation the marginal generator needed to serve that load will be more expensive
2 than in other times. Each day, SDG&E must communicate its forecasted load for the next day in
3 each hour.¹ This load is matched up with the generation bids from generators to create the
4 dispatch stack for each hour, thus setting the hourly price.

5 The proposed rate design for the Stage 1 RTP Pilot, as shown in Attachment A,
6 incorporates the wholesale energy prices from CAISO into the retail commodity rates, while
7 collecting other costs through the existing utility distribution company (Utility Distribution
8 Company (UDC), i.e., non-commodity) rates. Pursuant to the direction in D.21-07-010, SDG&E
9 is proposing a two-stage RTP Pilot.

10 SDG&E proposes for Stage 1 of the Pilot to be available to Medium and Large
11 Commercial and Industrial customers (M/L C&I) and for Stage 2 of the Pilot to be available to
12 all customer classes except street lighting (Residential, Small Commercial, Agricultural, and
13 M/L C&I), but that both Stage 1 and Stage 2 will have the same general rate design. This pilot
14 rate will consist of a new commodity tariff in which the hourly commodity rate is composed of:
15 1) the CAISO day-ahead market price for that hour; 2) a base commodity charge; and 3) a
16 critical peak pricing adder (C-CPP)² applied to the top 150 peak hours in a year. These
17 components will be discussed in more detail below. Stage 2 of the pilot may see changes to this
18 rate design to incorporate other customer classes, such as residential customers. The proposed
19 rate design for Stage 1 and Stage 2 of the Pilot are discussed below.

¹ For a more detailed discussion of how the day-ahead market in California Independent System Operator (CAISO) operates, see the CAISO Business Practice Manual for Market Operations, Version 78 (Revised November 17, 2021).

² SDG&E has two critical peak pricing (CPP) adders, one for distribution tariffs and one for commodity tariffs. The C-CPP adder is the commodity tariff adder.

1 **A. Proposed Design for Stage 1**

2 SDG&E proposes to adapt an existing market-based commodity rate, the Schedule Public
3 Grid Integrated Rate (GIR) commodity rate,³ into the Pilot commodity rate for Stage 1. As
4 discussed in the testimony of SDG&E witness Ray Utama (Chapter 3), SDG&E will be able to
5 utilize existing functionality, originally developed for its GIR and Vehicle Grid Integration
6 (VGI) rates, when implementing this RTP pilot rate. SDG&E will therefore be able to
7 implement Stage 1 of the RTP Pilot by the end of 2022.

8 Eligible customers as described in detail in Mr. Utama's testimony, include M/L C&I
9 customers and potentially some small commercial customers that opt-into a M/L C&I rate. They
10 will continue to take UDC electric service on their current UDC rate and would continue to pay
11 these UDC charges paired with the RTP commodity rates.⁴ Stage 1 of the RTP Pilot will not
12 apply to Community Choice Aggregations (CCAs) or other customers who are not subject to
13 SDG&E commodity tariffs. The RTP commodity rates will consist of three components: (1) the
14 CAISO day ahead energy price; (2) the capacity adder equal to the current GIR commodity
15 critical peak pricing (C-CPP) hourly adder; and (3) a base component equal to the current GIR
16 commodity base rate. Each of these components is discussed in more detail below.

17 **1. CAISO Day Ahead Energy Price**

18 The first component in the commodity rate stack is the CAISO day-ahead hourly energy
19 price. The hourly price reflects the cost that SDG&E is exposed to when it bids in its load. Each
20 hour will have a price based on the day ahead clearing price in CAISO at the SDG&E Default

³ SDG&E, Schedule Public GIR, available at https://tariff.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_PUBLIC_GIR.pdf.

⁴ SDG&E bundled customers rates are equal to their UDC rate + commodity rate.

1 Load Aggregation Point (DLAP) node. The hourly prices for the next day are posted by CAISO
2 at the same time every day, allowing customers' energy managers to make decisions about the
3 next day's operations. In the event that the day-ahead price is delayed, the RTP Pilot will use the
4 prior day's hourly rates. SDG&E will display the total hourly price on its website, as described
5 in Mr. Utama's testimony.

6 **2. Capacity Adder**

7 SDG&E proposes to collect production capacity related costs via a C-CPP hourly adder
8 that would be applied to the top 150 hours of peak load on the CAISO system. SDG&E will
9 review the hourly system load from the previous year and identify the 150 hours in which the
10 system load was highest. The 150th hour will set the adder threshold for the current year; thus, for
11 any hour of day-ahead load that is greater than the 150th peak hour in the previous year, the C-
12 CPP adder will be triggered. When the adder is triggered, it is known as "a C-CPP event." For
13 those hours that constitute a C-CCP event, the C-CPP adder will be added to the day-ahead
14 hourly price and customers will pay the combined rate.

15 Again, it is important to make the hourly energy price signal as loud as can be to assist
16 with evaluation of the RTP as an effective price signal. For days with C-CPP events, it will be
17 difficult to separate customers' response to the hourly price from their response to the C-CPP
18 event. The C-CPP adder is designed to be sufficiently high such that it will drown out the hourly
19 day-ahead price during the C-CPP event. In other words, the prices will continue to change in
20 each hour, but the changes will reflect a smaller percentage change than in times without a C-
21 CPP event, rendering the hourly price signals less effective. To the extent that the program can
22 split the two complementary signals over a C-CPP event day, the greater the effects can be
23 determined for each signal.

1 For purposes of determining the 150 peak load hours to which the C-CCP adder will
2 apply, SDG&E proposes to use the CAISO system gross load, as opposed to net load, to
3 determine the peak load hours for calling C-CCP events. Gross load is the total system load
4 (renewable + non-renewable generation), while net load is the gross system load, less renewable
5 generation. Net load reflects the amount of non-renewable generation needed to serve the
6 instantaneous load.

7 There are two reasons for using gross load to determine the C-CPP adder threshold.
8 First, using the gross load peak will provide some separation between the C-CPP price signal and
9 the day ahead energy price signal. The gross load peak is likely to occur at different times of the
10 day than the net load peak. The day ahead price is more heavily influenced by the net load peak
11 because the non-zero priced generators in the dispatch stack reflects the net load. The second
12 reason for using the gross peak load as the basis for calling C-CPP event days, is that the other
13 tariffs that have this kind of adder use the gross peak load. Consistency in tariff design is
14 important so that like cost recovery mechanisms charge for the same thing. The C-CCP adder
15 encourages peak load reduction across multiple tariffs and a coordinated price signal will
16 maximize the effect across the various tariffs.

17 SDG&E notes that the RTP C-CPP adder is slightly different from how the C-CPP adder
18 in SDG&E's VGI rate previously operated in that it does not include the same averaging feature
19 used in that rate. In a block of hours when the C-CPP adder applies in the VGI rate, the hourly
20 day-ahead rates were averaged across that block so that the final rate paid by customers is
21 constant. This averaging added complexity to the rate calculations in the billing system, without

1 any measurable customer benefit.⁵ Further, it muted the day-ahead price signal for those peak
2 hours, when SDG&E believes the price signals need to be as clear and as strong as possible to
3 better evaluate its effect on customer behavior. Accordingly, the proposed RTP Pilot does not
4 include the C-CPP rate averaging mechanism to be consistent with the other RTP rates offered
5 by SDG&E.

6 **3. Volumetric Commodity Base Rate**

7 The final piece in the RTP commodity rate stack is the base energy charge. SDG&E
8 proposes to set this equal to the GIR Commodity Base Rate, which is the average commodity
9 price paid by M/L C&I customers under the standard commodity tariffed rates adjusted
10 downward to remove certain variable production costs. In theory, these variable costs are
11 covered by the CAISO day ahead energy price. This base energy charge ensures that
12 participating RTP customers still contribute to the long-term fixed costs of production. In
13 addition, consistent with M/L C&I rates, the Total Commodity Base Rate includes the recovery
14 of the CPP, and Schedule DG-R commodity revenue under-collections based on the average
15 rates for the M/L C&I class.

16 **4. Time-differentiated Transmission Rate**

17 The Commission directed SDG&E to show the impacts of having time-differentiated
18 transmission rates included in the RTP Pilot.⁶ Since SDG&E proposes to limit the Stage 1 pilot
19 to M/L C&I customers, this requirement is already satisfied by the current M/L C&I
20 transmission rates that have an on-peak component. In the M/L C&I tariffs, transmission costs
21 are currently recovered through a maximum measured demand charge (Non-Coincident Demand

⁵ For a more detailed discussion, see Application (A.) 19-10-012, Prepared Direct Testimony of Randy Schimka on Behalf of SDG&E (October 28, 2019).

⁶ See D.21-07-010 at 57-58.

1 Charge) and a peak demand charge (On-Peak or System Peak Demand Charges). The peak
2 demand charge represents a time-differentiated approach to collecting peak demand-related
3 transmission costs and therefore, these customers already have an incentive to curtail demand
4 during those peak hours. Attachment A presents illustrative RTP total rates which include the
5 current time-differentiated transmission rates.

6 **III. SUMMARY AND CONCLUSION**

7 To summarize, the purposes and goals of a RTP rate are many, but one is to send a more
8 accurate price signal to customers than flat or time-of-use (TOU) energy rates by more closely
9 linking the cost of energy to consumption. A more accurate price signal provides pricing
10 incentives to shift consumption to times when low-cost renewable generation is higher and is
11 therefore expected to result in shared benefits to the system by reducing costs associated with
12 providing energy to customers and reducing greenhouse gas (GHG) emissions and other
13 pollutants. The RTP rate design proposed by SDG&E is a reasonable framework for
14 communicating these price signals to customers.

15 This concludes my prepared direct testimony.

1 **IV. STATEMENT OF QUALIFICATIONS**

2 My name is Sam Shannon. I am employed by Guidehouse Consulting Services (formerly
3 Navigant Consulting) (Guidehouse) as a managing consultant in the energy, sustainability, and
4 infrastructure practice. My business address is 517 Wingra Street, Madison, WI, 53715.

5 I graduated from Southwestern University in 2007 with a degree in Philosophy and
6 Spanish Literature. I received a Master of Public Affairs from the University of Wisconsin-
7 Madison in 2013 with a graduate certificate in Energy Analysis and Policy.

8 I have been at Guidehouse since 2019 working with utility clients on a variety of issues,
9 including residential TOU rate design, large C&I rate design, renewable energy programs,
10 economic development rates, and electric cost-of-service studies. Prior to Guidehouse, I worked
11 at the Public Service Commission of Wisconsin as the senior energy policy analyst. I developed
12 community solar programs, market-pricing rates, pole attachment rates, and performed cost-of-
13 service and rate design studies for electric, natural gas, and water utilities. I was also a member
14 of the National Association of Regulatory Utility Commissions, serving on the staff
15 subcommittees for Rate Design and Electric Policy.

16 I have not previously testified before the California Public Utility Commission. I have
17 appeared as a witness before the Florida Public Service Commission, the Minnesota Public
18 Utility Commission, and the Public Service Commission of Wisconsin.

ATTACHMENT A

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

LINE NO.	DESCRIPTION (A)	UNITS (B)	TRANSMISSION RATE (C)	DISTRIBUTION RATE (D)	PPP RATE (E)	NUCLEAR DECOMMISSION RATE (F)	CTC RATE (G)	LGC RATE (H)	RS RATE (I)	TRAC RATE (J)	GHG RATE (K)	TOTAL UDC RATE (L)	WF-NBC RATE (M)	EECC RATE (N)	DWR Credit (O)	TOTAL RATE (P)
77 SCHEDULE AL-TOU (Continued)																
78	On-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.17923	0.00000	0.19102
79	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.17836	0.00000	0.18015
80	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.17923	0.00000	0.18848
81	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.17836	0.00000	0.18761
82	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.17836	0.00000	0.18761
83	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.17070	0.00000	0.17995
84	Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.11010	0.00000	0.12189
85	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10959	0.00000	0.12138
86	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.11010	0.00000	0.11935
87	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10959	0.00000	0.11884
88	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10493	0.00000	0.11418
89	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10493	0.00000	0.11418
90	Super Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.00081	0.00000	0.10280
91	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.0950	0.00000	0.10229
92	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10959	0.00000	0.12138
93	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.09081	0.00000	0.10006
94	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.09050	0.00000	0.09975
95	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.08685	0.00000	0.09610
96	On-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.00081	0.00000	0.10280
97	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.18969	0.00000	0.20148
98	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.19056	0.00000	0.19981
99	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.18969	0.00000	0.19894
100	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.18169	0.00000	0.19094
102	Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10206	0.00000	0.11131
103	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10687	0.00000	0.11866
104	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10643	0.00000	0.11822
105	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10687	0.00000	0.11612
106	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10643	0.00000	0.11568
107	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10206	0.00000	0.11131
108	Super Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.08257	0.00000	0.09436
109	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.08230	0.00000	0.09409
110	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.08257	0.00000	0.09182
111	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.08230	0.00000	0.09155
112	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07898	0.00000	0.08823
113	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07898	0.00000	0.08823

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1	SCHEDULE AL-TOU (ELI)															
2	Basic Service Fee															199.35
3	Less than or equal to 500 kW															
4	Secondary	\$/Month	0.00	199.35	0.00	0.00	0.00	0.00	0.00	0.00	199.35	0.00	0.00	0.00	0.00	199.35
5	Primary	\$/Month	0.00	53.75	0.00	0.00	0.00	0.00	0.00	0.00	53.75	0.00	0.00	0.00	0.00	53.75
6	Secondary Substation	\$/Month	0.00	18,717.35	0.00	0.00	0.00	0.00	0.00	0.00	18,717.35	0.00	0.00	0.00	0.00	18,717.35
7	Primary Substation	\$/Month	0.00	18,717.35	0.00	0.00	0.00	0.00	0.00	0.00	18,717.35	0.00	0.00	0.00	0.00	18,717.35
8	Transmission	\$/Month	0.00	289.91	0.00	0.00	0.00	0.00	0.00	0.00	289.91	0.00	0.00	0.00	0.00	289.91
9	Greater than 500 kW															
10	Secondary	\$/Month	0.00	766.91	0.00	0.00	0.00	0.00	0.00	0.00	766.91	0.00	0.00	0.00	0.00	766.91
11	Primary	\$/Month	0.00	63.95	0.00	0.00	0.00	0.00	0.00	0.00	63.95	0.00	0.00	0.00	0.00	63.95
12	Secondary Substation	\$/Month	0.00	18,717.35	0.00	0.00	0.00	0.00	0.00	0.00	18,717.35	0.00	0.00	0.00	0.00	18,717.35
13	Primary Substation	\$/Month	0.00	18,717.35	0.00	0.00	0.00	0.00	0.00	0.00	18,717.35	0.00	0.00	0.00	0.00	18,717.35
14	Transmission	\$/Month	0.00	1,159.95	0.00	0.00	0.00	0.00	0.00	0.00	1,159.95	0.00	0.00	0.00	0.00	1,159.95
15	Greater than 12 MW															
16	Secondary Substation	\$/Month	0.00	31,585.50	0.00	0.00	0.00	0.00	0.00	0.00	31,585.50	0.00	0.00	0.00	0.00	31,585.50
17	Primary Substation	\$/Month	0.00	31,644.17	0.00	0.00	0.00	0.00	0.00	0.00	31,644.17	0.00	0.00	0.00	0.00	31,644.17
18	Transmission Multiple Bus	\$/Month	0.00	3,000.00	0.00	0.00	0.00	0.00	0.00	0.00	3,000.00	0.00	0.00	0.00	0.00	3,000.00
19	Distance Adjustment Fee OH - Sec. Sub	\$/foot/Month	0.00	1.23	0.00	0.00	0.00	0.00	0.00	0.00	1.23	0.00	0.00	0.00	0.00	1.23
20	Distance Adjustment Fee UG - Sec. Sub.	\$/foot/Month	0.00	3.17	0.00	0.00	0.00	0.00	0.00	0.00	3.17	0.00	0.00	0.00	0.00	3.17
21	Distance Adjustment Fee OH - Pri. Sub.	\$/foot/Month	0.00	1.22	0.00	0.00	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00	0.00	1.22
22	Distance Adjustment Fee UG - Pri. Sub.	\$/foot/Month	0.00	3.13	0.00	0.00	0.00	0.00	0.00	0.00	3.13	0.00	0.00	0.00	0.00	3.13
23	Non-Coincident Demand															
24	Secondary	\$/kW	16.91	10.18	0.00	0.00	0.00	0.00	0.00	0.00	27.09	0.00	0.00	0.00	0.00	27.09
25	Primary	\$/kW	16.34	10.12	0.00	0.00	0.00	0.00	0.00	0.00	26.46	0.00	0.00	0.00	0.00	26.46
26	Secondary Substation	\$/kW	16.91	0.26	0.40	0.00	0.25	0.00	0.00	0.00	17.82	0.00	0.00	0.00	0.00	17.82
27	Primary Substation	\$/kW	16.34	0.26	0.40	0.00	0.25	0.00	0.00	0.00	17.25	0.00	0.00	0.00	0.00	17.25
28	Transmission	\$/kW	16.27	0.26	0.40	0.00	0.25	0.00	0.00	0.00	17.18	0.00	0.00	0.00	0.00	17.18
29	Non-Coincident Demand with Super Off Peak Exemption															
30	Secondary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31	Primary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32	Secondary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
33	Primary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
34	Transmission	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
35	Maximum On-Peak Demand: Summer															
36	Secondary	\$/kW	3.52	19.14	0.00	0.00	0.00	0.00	0.00	0.00	22.66	0.00	12.62	0.00	0.00	35.28
37	Primary	\$/kW	3.40	19.04	0.00	0.00	0.00	0.00	0.00	0.00	22.44	0.00	12.55	0.00	0.00	34.99
38	Secondary Substation	\$/kW	3.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.52	0.00	12.62	0.00	0.00	16.14
39	Primary Substation	\$/kW	3.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.40	0.00	12.55	0.00	0.00	15.95
40	Transmission	\$/kW	3.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.39	0.00	12.02	0.00	0.00	15.41
41	Maximum On-Peak Demand: Winter															
42	Secondary	\$/kW	0.73	22.36	0.00	0.00	0.00	0.00	0.00	0.00	23.09	0.00	0.00	0.00	0.00	23.09
43	Primary	\$/kW	0.71	22.24	0.00	0.00	0.00	0.00	0.00	0.00	22.95	0.00	0.00	0.00	0.00	22.95
44	Secondary Substation	\$/kW	0.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.73	0.00	0.00	0.00	0.00	0.73
45	Primary Substation	\$/kW	0.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.71	0.00	0.00	0.00	0.00	0.71
46	Transmission	\$/kW	0.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.71	0.00	0.00	0.00	0.00	0.71
47	Off-Peak Demand: Summer															
48	Secondary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49	Primary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Secondary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
51	Primary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
52	Transmission	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
53	Off-Peak Demand: Winter															
54	Secondary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55	Primary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56	Secondary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57	Primary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
58	Transmission	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
59	Super Off-Peak Demand: Summer															
60	Secondary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
61	Primary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
62	Secondary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
63	Primary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
64	Transmission	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
65	Super Off-Peak Demand: Winter															
66	Secondary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
67	Primary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
68	Secondary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
69	Primary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
70	Transmission	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
71	Power Factor	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
72	Secondary	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
73	Primary	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
74	Secondary Substation	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
75	Primary Substation	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
76																

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

LINE NO.	DESCRIPTION (A)	UNITS (B)	TRANSMISSION RATE (C)	DISTRIBUTION RATE (D)	PPP RATE (E)	NUCLEAR DECOMMISSION RATE (F)	CTC RATE (G)	LGC RATE (H)	RS RATE (I)	TRAC RATE (J)	GHG RATE (K)	TOTAL UDC RATE (L)	WF-NBC RATE (M)	EECC RATE (N)	DWR Credit (O)	TOTAL RATE (P)
77 SCHEDULE AL-TOU (ELI) (Continued)																
78	On-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
79	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
80	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
81	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
82	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
83	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
84	Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
85	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
86	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
87	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
88	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
89	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
90	Super Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
91	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
92	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
93	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
94	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
95	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
96	On-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
97	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
98	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
99	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
100	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
101	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
102	Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
103	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
104	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
105	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
106	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
107	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
108	Super Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
109	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
110	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08316
111	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
112	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
113	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

LINE NO.	DESCRIPTION (A)	UNITS (B)	TRANSMISSION RATE (C)	DISTRIBUTION RATE (D)	PPP RATE (E)	NUCLEAR DECOMMISSION RATE (F)	CTC RATE (G)	LGC RATE (H)	RS RATE (I)	TRAC RATE (J)	GHG RATE (K)	TOTAL UDC RATE (L)	WF-NBC RATE (M)	EECC RATE (N)	DWR Credit (O)	TOTAL RATE (P)
77 SCHEDULE AL-TOU2 (Continued)																
78	On-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.16314	0.00000	0.17493
79	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.16235	0.00000	0.17414
80	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.16314	0.00000	0.17239
81	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.16235	0.00000	0.17160
82	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.16235	0.00000	0.17160
83	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.15537	0.00000	0.16462
84	Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10047	0.00000	0.11226
85	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10047	0.00000	0.11179
86	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.10000	0.00000	0.10972
87	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10047	0.00000	0.10925
88	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.10000	0.00000	0.10925
89	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.09575	0.00000	0.10500
90	Super Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.08224	0.00000	0.09403
91	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.08196	0.00000	0.09375
92	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.08224	0.00000	0.09149
93	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.08196	0.00000	0.09121
94	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.08224	0.00000	0.08790
95	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07865	0.00000	0.08790
96	On-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.17258	0.00000	0.18437
97	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.17179	0.00000	0.18358
98	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.17258	0.00000	0.18183
99	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.17179	0.00000	0.18104
100	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.16454	0.00000	0.17379
101	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.09243	0.00000	0.10168
102	Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.09679	0.00000	0.10858
103	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.09639	0.00000	0.10818
104	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.09639	0.00000	0.10604
105	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.09679	0.00000	0.10564
106	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.09243	0.00000	0.10168
107	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07153	0.00000	0.08078
108	Super Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.07478	0.00000	0.08657
109	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00580	0.07454	0.00000	0.08633
110	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07478	0.00000	0.08403
111	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07454	0.00000	0.08379
112	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07153	0.00000	0.08078
113	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00580	0.07153	0.00000	0.08078

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

LINE NO.	DESCRIPTION (A)	UNITS (B)	TRANSMISSION RATE (C)	DISTRIBUTION RATE (D)	PPP RATE (E)	NUCLEAR DECOMMISSION RATE (F)	CTC RATE (G)	LGC RATE (H)	RS RATE (I)	TRAC RATE (J)	GHG RATE (K)	TOTAL UDC RATE (L)	WF-NBC RATE (M)	EECC RATE (N)	DWR Credit (O)	TOTAL RATE (P)
77 SCHEDULE AL-TOU2 (ELI) (Continued)																
78	On-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
79	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
80	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
81	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
82	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
83	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
84	Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
85	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
86	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
87	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
88	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
89	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
90	Super Off-Peak Energy: Summer	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
91	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
92	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
93	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
94	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
95	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08445	0.00000	0.08790
96	On-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.08445	0.00000	0.08044
97	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
98	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
99	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
100	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
101	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
102	Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
103	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
104	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
105	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
106	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
107	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
108	Super Off-Peak Energy: Winter	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
109	Secondary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08570
110	Primary	\$/kWh	(0.01676)	0.00149	0.01416	0.00007	0.00072	0.00632	(0.00001)	0.00000	0.00000	0.00599	0.00000	0.07971	0.00000	0.08316
111	Secondary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
112	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316
113	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07971	0.00000	0.08316

ATTACHMENT A
TOTAL PROPOSED RATES FOR STAGE 1 RTP PILOT
SAN DIEGO GAS AND ELECTRIC COMPANY - ELECTRIC DEPARTMENT
REAL-TIME PRICING PILOT A.21-12-XXX

LINE NO.	DESCRIPTION (A)	UNITS (B)	TRANSMISSION RATE (C)	DISTRIBUTION RATE (D)	PPP RATE (E)	NUCLEAR DECOMMISSION RATE (F)	CTC RATE (G)	LGC RATE (H)	RS RATE (I)	TRAC RATE (J)	GHG RATE (K)	TOTAL UDC RATE (L)	WF-NBC RATE (M)	EECC RATE (N)	DWR Credit (O)	TOTAL RATE (P)
1	SCHEDULE A6-TOU															
2	Basic Service Fee															
3	Greater than 500 kW															
4	Primary	\$/Month	0.00	63.95	0.00	0.00	0.00	0.00	0.00	0.00	63.95	0.00	0.00	0.00	0.00	63.95
5	Primary Substation	\$/Month	0.00	18,717.35	0.00	0.00	0.00	0.00	0.00	0.00	18,717.35	0.00	0.00	0.00	0.00	18,717.35
6	Transmission	\$/Month	0.00	1,670.55	0.00	0.00	0.00	0.00	0.00	0.00	1,670.55	0.00	0.00	0.00	0.00	1,670.55
7	Greater than 12 MW -- Pri. Sub.	\$/Month	0.00	31,644.17	0.00	0.00	0.00	0.00	0.00	0.00	31,644.17	0.00	0.00	0.00	0.00	31,644.17
8	Distance Adjustment Fee OH	\$/foot/Month	0.00	1.22	0.00	0.00	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00	0.00	1.22
9	Distance Adjustment Fee UG	\$/foot/Month	0.00	3.13	0.00	0.00	0.00	0.00	0.00	0.00	3.13	0.00	0.00	0.00	0.00	3.13
10	Non-Coincident Demand															
11	Primary	\$/kW	16.34	10.47	0.40	0.00	0.25	0.00	0.00	0.00	27.46	0.00	0.00	0.00	0.00	27.46
12	Primary Substation	\$/kW	16.34	0.26	0.40	0.00	0.25	0.00	0.00	0.00	17.25	0.00	0.00	0.00	0.00	17.25
13	Transmission	\$/kW	16.27	0.26	0.40	0.00	0.25	0.00	0.00	0.00	17.18	0.00	0.00	0.00	0.00	17.18
14	Non-Coincident Demand with Super Off Peak Exemption															
15	Primary	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
16	Primary Substation	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17	Transmission	\$/kW	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18	Maximum Demand at Time of System Peak: Summer															
19	Primary	\$/kW	4.12	19.14	0.00	0.00	0.00	0.00	0.00	0.00	23.26	0.00	12.55	0.00	35.81	
20	Primary Substation	\$/kW	4.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.12	0.00	12.55	0.00	16.67	
21	Transmission	\$/kW	4.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.12	0.00	12.02	0.00	16.14	
22	Maximum Demand at Time of System Peak: Winter															
23	Primary	\$/kW	0.78	22.34	0.00	0.00	0.00	0.00	0.00	0.00	23.12	0.00	0.00	0.00	0.00	23.12
24	Primary Substation	\$/kW	0.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.78	0.00	0.00	0.00	0.00	0.78
25	Transmission	\$/kW	0.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.78	0.00	0.00	0.00	0.00	0.78
26	Power Factor															
27	Primary	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
28	Primary Substation	\$/kvar	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.25
29	Transmission	\$/kvar	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30	On-Peak Energy: Summer															
31	Primary	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.17836	0.00000	0.18181
32	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.17836	0.00000	0.18181
33	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.17070	0.00000	0.17415
34	Off-Peak Energy: Summer															
35	Primary	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.10559	0.00000	0.11304
36	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.10559	0.00000	0.11304
37	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.10493	0.00000	0.10538
38	Super Off-Peak Energy: Summer															
39	Primary	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.09050	0.00000	0.09395
40	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.09050	0.00000	0.09395
41	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08685	0.00000	0.09030
42	On-Peak Energy: Winter															
43	Primary	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.18969	0.00000	0.19314
44	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.18969	0.00000	0.19314
45	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.18169	0.00000	0.18514
46	Off-Peak Energy: Winter															
47	Primary	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.10643	0.00000	0.10988
48	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.10643	0.00000	0.10988
49	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.10206	0.00000	0.10551
50	Super Off-Peak Energy: Winter															
51	Primary	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08230	0.00000	0.08575
52	Primary Substation	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.08230	0.00000	0.08575
53	Transmission	\$/kWh	(0.01676)	0.00077	0.01306	0.00007	0.00000	0.00632	(0.00001)	0.00000	0.00000	0.00345	0.00000	0.07898	0.00000	0.08243
1	SCHEDULE RTP															
2	Base Energy Charge	\$/kWh	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.06211 varies per CAISO DA	0.00000	0.06211 varies per CAISO DA
3	Hourly Energy Charge	\$/kWh	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000