

San Diego Gas & Electric Company
Residential Default TOU RDW
Application 17-12-013
Energy Division Data Request 03 dated March 20, 2018
SDG&E Response Dated: April 4, 2018

SDGE ED 03

SDG&E proposes to make TOU the standard turn-on rate in January 2019 (Chapter 6, page CB-3, lines 1-2). However, under D.17-09-036, TOU could only become the standard turn-on rate concurrent with the start of the default transition, which would be March 2019. In that case, when would SDG&E transition new customers who start service in January and February 2019, who would not have accumulated 12 months of usage data until January and February 2020, respectively?

SDG&E Response to SDGE ED 03:

SDG&E’s original Mass TOU Default approach, as discussed in (A.17-12-013), was to make January 1, 2019 the date when TOU would become the turn-on rate. This “kickoff” date marks the time when the TOU rates are updated, customers can begin to early opt-in/out, PD60 letters will start to be generated (with rate comparisons), etc.

However, SDG&E will begin making TOU the turn-on rate beginning March 1, 2019, to coincide with the default transition plan.¹ The standard rate will be the turn-on for new residential customer accounts starting service prior to March 1, 2019.

Because the pre-transition communications (PD-60) will require 12-months of billing history and because TOU is not the turn-on rate until March 1, 2019, customer accounts starting new service between November 2018 and February 2019 will be transitioned to TOU between Jan 2020 and May 2020 (see table below).

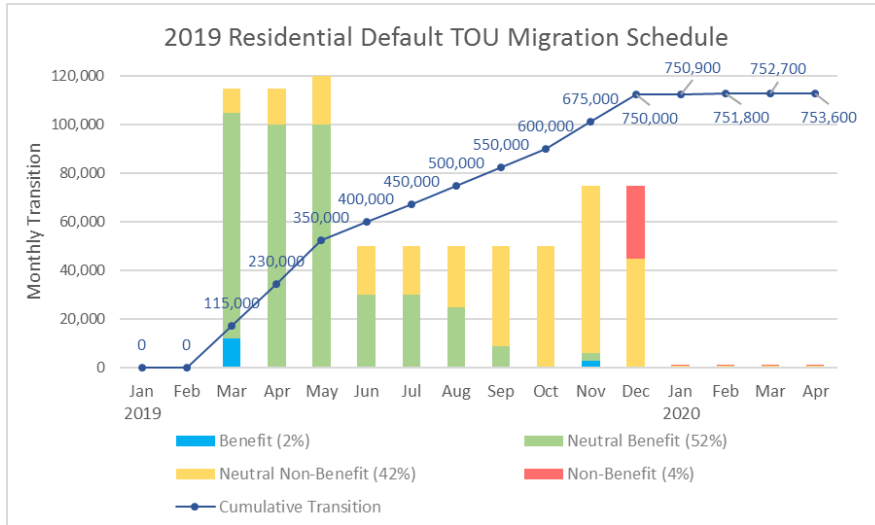
New Customer Account Starting Service	TOU Default Notification (General Info)	PD60 Notification (w/ Rate Comparison)	PD30 TOU Default Reminder	Default Transition
Nov 2018	Oct 2019	Nov 2019	Dec 2019	Jan 2020
Dec 2018	Nov 2019	Dec 2019	Jan 2020	Feb 2020
Jan 2019	Dec 2019	Jan 2020	Feb 2020	Mar 2020
Feb 2019	Jan 2020	Feb 2020	Mar 2020	Apr 2020

Throughout 2017, there were about 11,000 customer accounts that started new service and remained turned on for a full 12-months. The CIS risks identified in Data Request SDGE_ED_02 can be effectively managed, due to the relatively low quantity (about 900/month) of forecasted customer accounts that will need to be transitioned during the first four months of 2020.

¹ To ensure other parties are aware of the need to change Mr. Bender’s testimony, this data request response is being served on the service list for this proceeding. In addition, at an appropriate time before or during hearings, a corrected version of Mr. Bender’s prepared Direct Testimony, reflecting this and any other necessary corrections, will be served on the service list.

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An update to the Mass TOU Default schedule provided in Chapter 6, page CB-5, line 8 is provided below.



Black = Standard Transitions ♦ Pink = DTP Control Blue = New Accounts (Start Oct 2018 - Feb 2019)						
Mon-Yr	Monthly Transition	Cumulative Transition	Benefit (2%)	Neutral Benefit (52%)	Neutral Non-Benefit (42%)	Non-Benefit (4%)
Jan '19						
Feb '19						
Mar '19	115,000	115,000	12,000	93,000	10,000	
Apr '19	115,000	230,000		100,000	15,000	
May '19	120,000	350,000		100,000	20,000	
Jun '19	50,000	400,000		19,000	20,000	
Jul '19	50,000	450,000		11,000	20,000	
Aug '19	50,000	500,000		30,000	20,000	
Sep '19	50,000	550,000		25,000	41,000	
Oct '19	50,000	600,000		9,000	50,000	
Nov '19	75,000	675,000	3,000	3,000	46,000	23,000
Dec '19	75,000	750,000			45,000	6,000
Jan '20	900	750,900	18	468	378	36
Feb '20	900	751,800	18	468	378	36
Mar '20	900	752,700	18	468	378	36
Apr '20	900	753,600	18	468	378	36
Total	753,600		15,000	390,000	315,000	30,000