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To: Somerville, Michelle
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SDGE_ED_02

In Chris Bender's testimony, Chapter 6, page CB-15, lines 6-7, he states that "Based on the CIS replacement schedule, it is critical that the Mass TOU Default transition is completed by December 2019, to ensure there is no overlap into the design phase." However, the figure outlining the CIS replacement schedule (provided on page CB-15, line 5), shows the design phase occurring from Q1 2019 to Q3 2019, which overlaps entirely with SDG&E's proposed default transition timeline of March to December 2019. The construct/build phase similarly has substantial overlap with SDG&E's proposed timeline. Only the test and implementation phases are scheduled to occur after December 2019.

Did Mr. Bender intend to say that SDG&E needs to ensure there is no overlap into the test phase? If so, it appears from the figure that the test phase does not begin until the latter part of Q1 2019 – what then prevents SDG&E from extending the default transition into the beginning of Q1 2020?

If Mr. Bender did indeed mean that SDG&E needs to ensure there is no overlap into the design phase, can he please explain the apparent overlap with SDG&E's proposed transition timeline of March to December 2019?

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?

Thanks,
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