

**ELECTRIFY AMERICA (EA) DATA REQUEST
EA-SDG&E DR-02
ELECTRIC VEHICLE HIGH POWER CHARGING RATE (A.19-07-006)
SDG&E RESPONSE
DATE RECEIVED: APRIL 24, 2020
DATE RESPONDED: MAY 1, 2020**

EA DATA REQUEST 2.0

Please refer to the Rebuttal Testimony of William Saxe, WS-1, 1. 14 – WS-2, 1. 3 and Attachment A to the Rebuttal Testimony of William Saxe.

Question 1

Please detail SDG&E’s investment plan for “Year 1”, as that term is used in Attachment A, regarding distribution infrastructure used to support customers eligible under the proposed EV-HP rate.

SDG&E Response

SDG&E objects that the question calls for speculation and/or requires SDG&E to perform analyses that do not currently exist. Without waiving those objections, SDG&E distribution infrastructure supports all customers, and planned distribution investments are typically not attributed to individual customers taking service on specific rate schedules.

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Question 2

Please detail SDG&E's investment plan for "Year 2", as that term is used in Attachment A, regarding distribution infrastructure used to support customers eligible under the proposed EV-HP rate.

SDG&E Response

SDG&E objects that the question calls for speculation and/or requires SDG&E to perform analyses that do not currently exist. Without waiving those objections, see response to Question 1.

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Question 3

Please detail SDG&E's investment plan for "Year 3", as that term is used in Attachment A, regarding distribution infrastructure used to support customers eligible under the proposed EV-HP rate.

SDG&E Response

SDG&E objects that the question calls for speculation and/or requires SDG&E to perform analyses that do not currently exist. Without waiving those objections, see response to Question 1.

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Question 4

Please detail SDG&E’s investment plan for “Year 4”, as that term is used in Attachment A, regarding distribution infrastructure used to support customers eligible under the proposed EV-HP rate.

SDG&E Response

SDG&E objects that the question calls for speculation and/or requires SDG&E to perform analyses that do not currently exist. Without waiving those objections, see response to Question 1.

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Question 5

Please detail SDG&E’s investment plan for “Year 5”, as that term is used in Attachment A, regarding distribution infrastructure used to support customers eligible under the proposed EV-HP rate.

SDG&E Response

SDG&E objects that the question calls for speculation and/or requires SDG&E to perform analyses that do not currently exist. Without waiving those objections, see response to Question 1.

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Question 6

Please provide all studies conducted by the Company used to identify any investment identified in the Responses to the above Requests.

SDG&E Response

SDG&E objects that the question calls for speculation and/or require SDG&E to perform analyses that do not currently exist. Without waiving those objections, see response to Question 1.

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Question 7

Please provide all Data Request Responses and associated workpapers or other documents associated with Responses to Data Requests received from all parties in this Proceeding that have not been made directly available through the link <https://www.sdge.com/rates-and-regulations/proceedings/ev-high-power-charging-rate>.

SDG&E Response

The following Data Request Responses in the EV-HP proceeding have not been uploaded to the link provided above, and are attached to this response:

- Natural Resources Defense Council DR-1:
 - Q1 workpaper
 - Q3 workpaper
- San Diego Airport Parking DR-1 response text

END OF RESPONSES