**DATA REQUEST**

1. With reference to Table JS-1 on page JS-3 of the second revised testimony of witness Stein, please provide detailed supporting workpapers (executable versions in native format with all formulas and links intact) of the entries in each of the “proposed allocation” columns in this table. Please show the derivation of dollar amounts as well as the percentage allocations.

**SDG&E Response:** Becausewitness Stein did not provide second revised testimony, as referenced in this question, SDG&E’s response assumes the question is meant to refer to his revised direct testimony provided on May 8, 2019. With that clarification, SDG&E answers as follows: As indicated in footnote #1 on page JS-3, the supporting detail for table JS-1 can be found in the testimony and Excel workpapers of witnesses Emge (Chapter 2) and Saxe (Chapter 5). The Excel files with links and formulas intact can be found in the workpapers of these witnesses, located here: <https://www.sdge.com/rates-and-regulations/proceedings/2019-grc-phase2>

1. Please provide executable versions in native format with all formulas and links intact of the confidential versions of all of the models and other workpapers supporting Chapter 2 of the second revised filing.

**SDG&E Response:** This was previously provided to FEA.

1. Please provide executable versions in native format with all formulas and links intact of the confidential versions of all of the models and other workpapers supporting Chapter 3 of the second revised filing.

**SDG&E Response:** This was previously provided to FEA.

1. Please provide executable versions in native format with all formulas and links intact of the confidential versions of all of the models and other workpapers supporting Chapter 5 of the second revised filing.

**SDG&E Response:** This was previously provided to FEA.

1. Please provide executable versions in native format with all formulas and links intact of the confidential versions of all of the models and other workpapers supporting Chapter 6 of the second revised filing.

**SDG&E Response:** This was previously provided to FEA.

1. Please provide executable versions in native format with all formulas and links intact of the confidential versions of all of the models and other workpapers supporting demand charge research studies filed as supplemental testimony, updated if necessary.

**SDG&E Response:**

Workpapers can be found at the link included in answer 3-1. There are no confidential workpapers associated with the demand charge studies. SDG&E did not update the demand charge studies as part of the January 15, 2020 revised testimony because the change in SDG&E’s authorized revenue requirements does not impact the demand charge studies that SDG&E performed in this proceeding.

1. Please provide executable versions in native format with all links and formulas intact of the studies supporting the “cost based MSF” appearing in Table GM-3 on page GRM-8 of the second revised testimony of witness Morien, updated if necessary.

**SDG&E Response:**

Workpapers can be found at the link included in answer 3-1. The “cost-based MSF” reflect the Equal Percent Marginal Cost (EPMC) Distribution Customer Rates found in Row D of the “Distrib Class EPMC Rates & Rev” tab of the “Ch\_5\_WP#1\_Marg Dist Rev Alloc Revised” file. The marginal distribution customer costs presented in Row C of this same tab, that are the basis for these EPMC Distribution Customer Rates, can be found in the “Ch\_5\_WP#2\_Marg Dist Cust Costs for Non School Classes Revised” and “Ch\_5\_WP#3\_Marg Dist Cust Costs for School Class Revised” files.

1. Please provide executable versions in native format with all links and formulas intact showing dollar amounts for the “current” and “proposed” charges by class in Tables JE-5, JE-6, JE-7, JE-8, JE-9, JE-10, JE-11, JE-12, JE-13, JE-14, JE-15, and JE-16 in the second revised testimony of witness Emge.

**SDG&E Response:** Please see the embedded Excel file.



1. For the second revised filing, for Rate AL-TOU, for both year one and year two, please provide the billing determinants at present rates and the multiplication of these billing determinants times present rates, and the revenues produced by those rates; the same information for each proposed rate value and the billing determinants along with revenues. Please provide executable versions of all spreadsheets and models in native format with all links and formulas intact.

**SDG&E Response:** Please see the embedded excel file titled “FEA\_DR03\_Q9\_10\_nonGF.xslx” and “FEA\_DR03\_Q9\_10\_GF.xlsx”



1. For the second revised filing, for Rate A6-TOU, for both year one and year two, please provide the billing determinants at present rates and the multiplication of these billing determinants times present rates, and the revenues produced by those rates; the same information for each proposed rate value and the billing determinants along with revenues. Please provide executable versions of all spreadsheets and models in native format with all links and formulas intact.

**SDG&E Response:** Please see the embedded excel files provided in response to question 3-9.

1. For all of the workpapers and supporting documents for the second revised Chapter 5 direct testimony of William Saxe, please provide schedules that separately show information for AL-TOU, A6-TOU and other customers in the M/L C&I classes. Others may be shown as a group or on a more granular basis. Please subdivide AL-TOU and A6-TOU to show each voltage level separately. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

**SDG&E Response:**

The Chapter 5 Revised Workpapers (“Ch-5\_WP#2\_Marg Cust Costs for Non School Classes Revised” and “Ch-5\_WP#3\_Marg Cust Costs for School Class Revised”) show the development of the marginal distribution customer costs by rate schedule and by voltage level for the M/L C&I class. The “Sch AL-TOU Cust Cost Summary” tab of this file provides the marginal distribution customer costs for Schedule AL-TOU broken down by voltage level and kW size. The “Sch A6-TOU Cust Cost Summary” tab of this file provides the marginal distribution customer costs for Schedule A6-TOU broken down by voltage level and kW size.

1. In Attachments A, B.1, B.2 and B.3 to the second revised Chapter 5, for AL-TOU customers by voltage level and A6-TOU customers by voltage level, please show the data for direct access customers and the data for bundled service customers separately. Please provide executable versions of all spreadsheets and models in native format with all formulas intact.

**SDG&E Response:**

The attached (“FEA DR-03, Question 12”) file provides Attachments A, B.1, B.2, and B.3 from the 2019 GRC Phase 2 Revised Prepared Direct Testimony of William G. Saxe (Chapter 5) modified to reflect the associated data for Schedules A-TOU and A6-TOU Bundled and Direct Access (“DA)/Community Choice Aggregation (“CCA”) customers by voltage level, as requested. The Schedules AL-TOU and A6-TOU data included in these attachments are highlighted in gray.



Also, attached is the 2019 GRC Phase 2 Chapter 5 workpaper (“FEA DR-03 - 2019 GRC Phase 2

Dist Rev Alloc [Chapter 5 Workpaper]-Revised”) linked to the “FEA DR-03, Question 12” file that presents the associated data for Schedule AL-TOU and A6-TOU Bundled and DA/CCA customers. The Schedules AL-TOU and A6-TOU data included in this modified workpaper are highlighted in gray.



1. With regard to the second revised filing, please provide an executable version in native format with all formulas and links intact, and other supporting documents, constituting the workpapers showing the derivation of the proposed Basic Service Fee (“BSF”) for Rate Schedule AL-TOU and Rate Schedule A6-TOU.

**SDG&E Response:** This information can be found in the Chapter 3 Workpaper (“2019 GRC Phase 2-Chapter 3\_WP1-PUBLIC.xlsx” on the ‘Dist BSF Transition Path’ tab.

1. With regard to the second revised filing, please provide an executable version in native format with all formulas and links intact, and other supporting documents, constituting the workpapers showing the derivation of the “distance adjustment” for all such adjustments at proposed rates for AL-TOU and A6-TOU.

**SDG&E Response:**  SDG&E is in the process of answering this question and will provide an answer as soon as it is available.

1. Please provide the confidential version of SDG&E’s response to Question Nos. 3 and 6 (pertaining to generation resources) to Public Advocates Office DR 1; master data request, provided October 1, 2019.

**SDG&E Response:** This information was previously provided.

1. This question refers to the generation capacity CT proxy shown in Chapter 6 of the second revised filing. With regard to that proxy cost:
   1. How much is included for each direct cost (defined as equipment, buildings, installation/overnight construction, commissioning, contractor fees/profits and contingency)?
   2. How much is included for each component of owners’ costs (defined as land, water rights, permitting, rights-of-way, design engineering, spare parts, owners’ engineers, project management, legal/financial support, grid interconnection costs, and owners’ contingency)?

**SDG&E Response:** Please refer to SDG&E’s workpaper “Ch-6\_WP#1\_Marg Gen Comm Cost.xlsx”. Tab “Capacity Marginal Cost” provides a detailed breakdown of the assumptions behind the generation capacity CT proxy. As shown in the list of assumptions, SDG&E’s source for CT installed costs and fixed O&M was the [California Energy Commission: Estimated Cost of New Renewable and Fossil Generation in California](http://www.energy.ca.gov/2014publications/CEC-200-2014-003/CEC-200-2014-003-SF.pdf) ,Tables 59 and 60 respectively. Pages 136-140 of this report describe in more detail the assumptions behind these costs.

1. If any of the enumerated items in preceding Question 3-16 are not included in the costs, please explain why not and provide your best estimate of what each of those costs would be.

**SDG&E Response:** See the response to question 3-16.