

Application: A.18-10-

Exhibit: SDGE-

**DIRECT TESTIMONY OF**  
**JERRY STEWART**  
**ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**



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

OCTOBER 19, 2018

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**DIRECT TESTIMONY OF  
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**I. INTRODUCTION**

Resolution E-4906, Ordering Paragraph (OP) 37 directed the Utilities<sup>1</sup> “to file separate Applications with the Commission to allow appropriate consideration and allow for evidence development on the issue of loggers and meters.” OP 37 requests information on San Diego Gas & Electric’s (SDG&E’s) Demand Response (DR) programs and how to monitor third-party-aggregated customers’ use of Backup Generators (BUGs), the technology available, and the associated costs.

The responses provided below having to do with meters, loggers, and unit/installation costs are based on SDG&E’s experience performing measurement and verification of distributed generation (DG) within SDG&E’s service territory, as well as input from SDG&E’s metering vendor, Itron, Inc (Itron). SDG&E’s entire advanced metering infrastructure (AMI) system is provided by Itron, which consists of approximately 1.3 million electric smart meters and approximately 900,000 smart gas modules. In addition, Itron has extensive experience performing measurement and verification of DG and DR programs throughout the country. Also, in preparing this testimony, I necessarily consulted with my SDG&E colleagues that are subject matter experts in customer data and incentive levels.

SDG&E provides estimates of installation costs for the equipment and hardware identified in the applicable questions below. However, actual costs may vary depending on site conditions, metering objectives, and other internal and external factors. Such other factors that affect costs may include, but are not limited to, communication requirements, panel and circuit

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<sup>1</sup> Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) are the “Utilities.”

1 modifications, and permitting and inspections by the authority having jurisdiction. When  
2 evaluating final cost estimates, the California Public Utilities Commission (Commission) should  
3 take notice of the completeness of the estimates and whether they take into account site location,  
4 overall project management, ongoing maintenance, and meter installation and removal cost, as  
5 all of these can have a significant impact on the total cost.

## 6 **II. RESPONSES TO ORDERING PARAGRAPH 37**

7 Each section below retains the organizational structure of the requests in E-4906 OP 37.  
8 Section a responds to OP 37(a), and so on. The headings for each section are taken directly from  
9 OP 37.

### 10 **A. OP 37(a): Non revenue-grade and settlement-quality interval generator** 11 **meters**

#### 12 **1. OP 37(a)(1) The full range of models, along with their functionalities,** 13 **and associated unit and installation costs**

14 There are multiple non-revenue grade electric submeters available on the market. Some  
15 of the more common meter manufacturers include DENT Instruments, Veris Industries, Eaton,  
16 Spectrum, Sensus, Acuvim, Integrated Metering Systems, and Ohio Semtronics. For added  
17 depth, our consultant Itron chose two meters to provide more detailed explanations on: the  
18 DENT Instrument ELITEpro and Veris Industries meters.

19 First, the DENT Instruments ELITEpro XC Portable Power Data Logger<sup>[2][3]</sup> is capable of  
20 measuring, storing, and analyzing electric consumption data, which is derived from voltage and  
21 current inputs. The ELITEpro XC data logger uses direct connections to each phase of the

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<sup>2</sup> DENT Instruments, *Products, available at* <https://shop.dentstruments.com/collections/test-measurement/products/elitepro-xc-power-meter>.

<sup>3</sup> Even though this is called a “logger,” it is a non-revenue-grade meter that can capture energy quantities such as kWh/kW.

1 voltage and various interchangeable current sensor options such as split-core, clamp-on, or  
2 flexible Rogowski RoCoil current transformers (designed for large loads or large cables and  
3 busbars) to monitor current on each phase. The ELITEpro XC Portable Power Data Logger can  
4 capture kilowatt-hour/kilowatt (kWh/kW) energy and demand data as well as virtually all  
5 relevant energy parameters for diagnostics and monitoring on three-phase or single-phase circuit  
6 installations. Electrical load diagnostic parameters, such as power factor (both Apparent and  
7 Displacement), are captured in addition to energy and demand values. In addition to recording  
8 kWh/kW data, the ELITEpro XC data logger also features four analog input channels, which can  
9 be configured for voltage or current input used in any combination among channels.

10 The ELITEpro XC data logger comes standard with USB and an ethernet port that allows  
11 communication with a local network for convenient remote data download. Other optional  
12 communications are also available in Wi-Fi and Bluetooth, which will require customer's  
13 wireless network.

14 The ELITEpro XC data logger is currently quoted for \$1,500 per unit, excluding install.  
15 Additional costs with an external cellular modem, personal computer (PC) and other external  
16 devices necessary to communicate wirelessly start at \$2,000 per unit.

17 Installation costs vary depending on access to the service panel, access to power and the  
18 required metering service. In general, an electrical submeter can be installed and commissioned  
19 by a licensed electrician in several hours if there are no complications. Installation and  
20 commissioning costs without complications should not exceed \$1,200. Difficult installations can  
21 take much longer depending on the situation. There are sites that would require coordination  
22 with the customer for access and scheduling power shutdown to do the work. Some sites may  
23 lack access to the service panel, or lack available power. Additional work may include running

1 an electrical conduit to provide power, installing a new service panel, site surveys, and obtaining  
2 permits. Installations and commissioning cost with complications typically start at \$5,000.

3 Veris Industries X51C3A<sup>4</sup> is a bi-directional Modbus<sup>5</sup> remote terminal unit (RTU) Meter  
4 with data logger. This device uses direct connection to each phase of the voltage and current  
5 sensors using flexible Rogowski RoCoil current transformers. The bi-directional monitoring  
6 feature is designed to measure power imported from the utility grid as well as power exported  
7 from any energy source. The Veris Industries X51C3A can be easily installed on standard DIN  
8 rail, surface mounted, or contained in a panel. The front-panel display makes device installation  
9 and setup easy and provides local access to the full set of detailed measurements. The unit  
10 provides real energy (Watt-Hours) pulse and alarm outputs.

11 The Veris X51C3A uses serial communication via Modbus RTU, which provides  
12 complete accessibility of all measurements to an Energy Management system. The data logging  
13 capability protects data in the event of a power failure.

14 The Veris X51C3A, including three flexible Rogowski ropes, currently starts at \$2,100  
15 per unit, and installation costs are comparable to the DENT Elite device described above.

16 **2. OP 37(a)(2) Description of customers whose resource usage patterns**  
17 **and scenarios are best evaluated with this meter installation**

18 The metering technology choice is a function of the type of information required for  
19 verification rather than the customer class. In general, a non-revenue grade meter can be used  
20 when the intent is to record when the metered BUG is operating and the magnitude of the  
21 generation during the recording time. Sub meters such as DENT's ELITEpro XC Portable

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<sup>4</sup> Veris Industries, *Power Energy/Monitoring*, available at <https://www.veris.com/Item/E51C3A.aspx>.

<sup>5</sup> A Modbus is a serial communication protocol that enables multiple electronic devices to be connected to the same network and communicates to a computer.

1 Power Data Logger is appropriate for use for most residential and small to medium sized non-  
2 residential customers. Current transformers (CTs) sold directly from DENT Instruments and the  
3 ampacity range varies depending on the size of the generator. In particular, a non-revenue-grade  
4 data logger should not be used if there is a requirement to accurately determine the magnitude of  
5 the BUG generation as these meters are not tested to the standard of accuracy set by the  
6 American National Standards Institute (ANSI).

7 **B. OP 37(b) Revenue-grade and settlement-quality interval generator meters**

8 **1. OP 37(b)(1) The full range of models, along with their functionalities,**  
9 **and associated unit and installation costs**

10 The revenue-grade meters measure the amount of electric energy and these meters meet  
11 the accuracy requirement standards set by the ANSI. Itron is one of the companies that  
12 manufactures revenue grade smart meters. Other companies manufacturing revenue grade  
13 electric meters include GE, Landis+Gyr, Elster, and Scheider Electric. The Itron SENTINEL  
14 Meter is an example of a revenue-grade meter as described below:

15 The Itron SENTINEL Meter<sup>6</sup> is a solid-state, electronic, multi-measurement, polyphase  
16 meter and this meter is available on self-contained or transformer-rated type. The self-contained  
17 meter can generally handle currents up to 200 amps and voltages up to 480 volts (V), which is  
18 designed for use in residential and small commercial applications. The transformer-rated meter  
19 is typically rated at 20 amps, and the meter is applied for sites with load currents above 200 amps  
20 and/or voltages above 480V used with current transformer and/or voltage transformer. This is  
21 designed for large commercial and industrial customers, and substations. The Itron SENTINEL  
22 meter is capable of measuring electric energy quantities such as kilowatts, kilowatt-hours, volt-

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<sup>6</sup> Itron, *SENTINEL Commercial and Industrial Meter*, available at <https://www.itron.com/na/-/media/itron/integration/brochure/100242br07sentinelsolidstatemeter.pdf>.



1 amperes, volts, and currents, which can be configured easily to meet customer's needs. This  
2 meter can also measure net energy (delivered power minus received power in kilo-hours), and be  
3 able to show the single value on meter display. This meter is capable of storing load profile data  
4 and events log such as power outages, and time changes. Data can be pulled from the meter  
5 locally using a laptop with the meter's software application and an optical probe. In addition, the  
6 meter is equipped with a communication board that can be configured for point-to-point  
7 communication for a variety of communication equipment, including various external wireless  
8 modem technologies.

9         The SENTINEL meter, including an optical probe, is quoted at around \$1500 per unit.  
10 Additional costs with an external cellular modem, PC and other external devices necessary to  
11 communicate wirelessly start at \$2,000 per unit.

12         Itron's most recent quote from a subcontractor for installation of an Itron SENTINEL  
13 meter is \$1,300 for the meter. Other installation costs to consider include travel and  
14 miscellaneous truck stock (*e.g.*, nuts, bolts, washers), and additional overhead time for project  
15 management and procurement.

16         Another revenue grade meter that is available in the market is the Landis + Gyr MAXsys  
17 Elite Power and Energy Revenue Meter.<sup>7</sup> This meter contains advanced power quality features,  
18 can have real time peer-to-peer communications and can be reconfigured to suit the customer's  
19 needs. The MAXsys elite can provide up to 7 channels of load profile recording and the typical  
20 measurements include kilowatt-hours (kWh) delivered, kWh received, kilo-Volt-Ampere-  
21 Reactive-hours (kVARh) delivered, kVARh received, phase voltage, kilo-Volt-Ampere (kVa)

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<sup>7</sup> Landis + Gyr, *E850 MAXsys Elite*, available at [https://www.landisgyr.com/webfoo/wp-content/uploads/product-files/Maxsys\\_ProductSheet\\_W.pdf](https://www.landisgyr.com/webfoo/wp-content/uploads/product-files/Maxsys_ProductSheet_W.pdf).

1 delivered and kVA received. This meter also captures site diagnostics, multiple levels of sags and  
2 swells, and waveforms. This meter has graphical display that can show power quality data,  
3 vector diagrams, communication port, and various display information that are available on the  
4 meter. A data file from the meter can be obtained locally using a laptop with the meter's  
5 software application and an optical probe. The MAXsys Elite is equipped with serial  
6 communication ports that can be configured for point-to-point communication for a variety of  
7 communication equipment, including various external wireless modem technology.

8           The MAXsys Elite, including an optical probe, is quoted for \$3500 per unit. Additional  
9 costs for external cellular modem, PC and other external devices necessary to communicate  
10 wirelessly can be considered for at least \$2,000. Installation cost of this meter is similar to the  
11 SENTINEL meter, as mentioned above.

12                   **2.       OP 37(b)(2) Description of customers whose resource usage patterns**  
13                   **and scenarios are best evaluated with this meter installation**

14           Revenue-grade meters offer a greater level of accuracy, typically required for settling  
15 financial transactions. The Itron self-contained SENTINEL meter is mostly used for residential  
16 and small to medium sized non-residential customers. The transformer rated SENTINEL meter  
17 is typically used for large Commercial and Industrial customers. The cellular communication  
18 capabilities of revenue grade meters make the technology suitable to resources where it is not  
19 possible to leverage the local communication network. Revenue grade meters can also be  
20 integrated into a utility's mesh network, which would reduce overall communication costs.  
21 Larger BUGs operating at high voltages might also be better suited for revenue grade meters.

1           **C.     OP 37(c) Cumulative data loggers**

2                   **1.     OP 37(c)(1) Range of models, along with their functionalities, and**  
3                   **associated unit and installation costs**

4           Cumulative data loggers are devices that gather information over a period of time either  
5 with a built-in or external instrument or sensor. Some of the cumulative data loggers available in  
6 the market are manufactured by Continental Control Systems, Campbell Scientifics, and Omega.  
7 For added depth, our consultant Itron arbitrarily chose two data loggers to provide more detailed  
8 explanations on, the Continental Control Systems WattNode Pulse meter and Campbell  
9 Scientific CR310.

10           The Continental Control Systems WattNode Pulse meter<sup>8</sup> is a bi-directional watt-hour  
11 transducer with pulse output (solid state relay closure) proportional to kWh consumed or  
12 produced. The WattNode pulse measures per-phase voltage and per-phase current. Pricing for  
13 the WattNode Pulse meter starts at approximately \$200 depending on the features specified (*e.g.*,  
14 voltage level).

15           The WattNode Pulse meter must be paired with a data logger in order to collect and  
16 transmit the information. In the past, Itron has paired the WattNode Pulse meter with the Obvius  
17 AcquiSuite data acquisition server.<sup>9</sup> Obvius' AcquiSuite is a flexible data acquisition server  
18 allowing users to collect energy data from meters and environmental sensors. The AcquiSuite is  
19 designed to connect to internet protocol (IP) based applications such as software dashboards and  
20 kiosks, enterprise energy management applications, as well as demand response and smart grid  
21 programs. The AcquiSuite collects and logs data from connected (wired or wireless) devices  
22 based on user selected intervals. Data from downstream devices are time stamped and stored

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<sup>8</sup> Continental Control Systems, LLC, *WattNode Pulse*, available at <https://ctlsys.com/product/wattnode-pulse/>.

<sup>9</sup> Obvius, *AcquiSuite*, available at <http://www.obvius.com/Products/A8812>.

1 locally in non-volatile memory until the next scheduled upload or manual download. Using an  
2 integrated modem or Ethernet connection, it is possible to push or pull data via HTTP, XML,  
3 FTP or any custom protocol utilizing the AcquiSuite Module to build a customized application,  
4 including integrated cellular communication options. Itron's most recent price for an Obvius  
5 AcquiSuite is quoted at approximately \$1,500 per unit. The Obvius AcquiSuite requires a  
6 subscription to manage and transmit the data. An additional setup fee might also be incurred per  
7 logger.

8 The overall unit cost for the Watthour node and the Obvius AcquiSuite is at least \$1,700.  
9 Additional costs for data subscription and setup fees are not included. The installation cost for  
10 this device is comparable to the DENT Industries device, as described above.

11 Another data logging option is the CR310 data logger manufactured by Campbell  
12 Scientific.<sup>10</sup> This data logger is a compact, multi-purpose measurement that includes Ethernet  
13 port and removable terminal connectors. This data logger contains analog inputs that can be  
14 configured for voltage and current measurement. It also consists of up to seven terminals for  
15 digital input or output. This data logger is ideal for small applications and can communicate  
16 with a laptop via its USB port.

17 The CR310 data logger unit cost is quoted for approximately \$300, and the installation  
18 cost is comparable to the DENT Industries device described above.

19 **2. OP 37(c)(2) Description of customers whose resource usage patterns**  
20 **and scenarios are best evaluated with a meter installation**

21 Cumulative data meters are a low-cost solution, but the lack of logging and  
22 communication capabilities gives them limited use. They must be paired with a data logger and

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<sup>10</sup> Campbell Scientific, *CR310 Datalogger with Ethernet*, available at <https://www.campbellsci.com/cr310>.

1 cellular communications, otherwise the data is not usable without frequent on-site visits. After  
2 adding logging and communications capabilities, the cost of a cumulative data logger is  
3 comparable to a revenue grade meter. There are limited situations where a cumulative meter is  
4 advantageous relative to a revenue grade or non-revenue grade meter. These cumulative data  
5 meters can be used for residential and small to medium sized non-residential customers.

6 **D. OP 37(d) Customer load reduction and incentive profiles for each affected**  
7 **DR program; and range of meter or logger unit plus installation costs, under**  
8 **the prescribed scenarios in the below section.**

9 The response to OP 37(d) was put together with the input from my SDG&E colleagues  
10 that are subject matter experts in customer data and incentive levels. For the Base Interruptible  
11 Program (BIP), *see* Attachment A. For the Capacity Bidding Program (CBP), *see* Attachment B.

12 **E. OP 37(e) Percentage of customers providing the below-listed levels of**  
13 **demand response capacity (peak demand minus firm service level, expressed**  
14 **by “x”) and the corresponding range (lowest to highest), mean, and median**  
15 **incentive levels. We provide the below table as a request for information on**  
16 **values below 1 MW, and require the same information in 1 MW increments**  
17 **for output and load reductions from 1 MW to 20 MW.**

18 The response to OP 37(e) was put together with the input from my SDG&E colleagues  
19 that are subject matter experts in customer data and incentive levels. For the Base Interruptible  
20 Program (BIP), *see* Attachment A. For the Capacity Bidding Program (CBP), *see* Attachment B.

21 **F. OP 37(f) Provide and describe functionalities and associated costs of data**  
22 **loggers that could, in addition to recording the date, time and cumulative**  
23 **hours of operation, provide kW output of the resource, as mentioned by the**  
24 **consultant in its Plan**

25 All of the data loggers described in this document are able to record the date, time, and  
26 kW output of the resource, except for a data logger paired with an exhaust temperature probe, as  
27 described in section g, below.

1           **G.     OP 37(g) Provide and describe functionalities and associated costs of other**  
2           **types of measurement devices that could act as a proxy to the use of an**  
3           **underlying prohibited resource. Explain whether such a unit could provide**  
4           **sufficiently granular information to determine compliance or violation. (For**  
5           **example, could a building’s retail meter capture a resource’s output on event**  
6           **and nonevent days?)**

7           In addition to directly measuring the output of the generator, other solutions might be  
8           able to serve as a proxy for the actual output of the system. For example, a data logger paired  
9           with an exhaust temperature probe would be able to detect the operation of the generator within a  
10          few minutes (once the exhaust temperature has increased above ambient temperature). This  
11          solution might be prudent if for some reason direct measurement of the generator output is not  
12          feasible. In total, this solution would cost approximately \$400 in hardware.

13          The customer’s retail meter would also be able to detect the operation of the prohibited  
14          resource, but it would not be straightforward to detect when the resource was energized.  
15          Customers have many ways of responding to DR events including behavioral changes and  
16          energy storage. Discharge from an energy storage device that charges from renewable sources  
17          would be indistinguishable from an equally sized diesel generator. However, the customer’s  
18          retail meter would provide useful information for overall verification when paired with  
19          additional metering.

20           **H.     OP 37(h) Provide the approximate percentage of demand response**  
21           **participants whose usage pattern or resource type may require multiple**  
22           **installations of a measuring device, whether meters or loggers**

23          SDG&E has only one DR customer that could require multiple installations of a metering  
24          device, which represents 0.0004% of total DR customers, 0.51% of affected DR customers (*i.e.*,  
25          BIP and CBP customers), and 14.29% of DR customers with prohibited resources.

1 **III. CONCLUSION**

2 In conclusion, the final objectives of this initiative will drive the selection of either a  
3 revenue or non-revenue grade metering solution. While SDG&E is more familiar with managing  
4 revenue grade metering solutions, individual field or site-specific scenarios may warrant a  
5 variety of solutions. In addition, labor and hardware cost estimates provided in our responses,  
6 typically do not account for data collection, storage, and presentment costs. These costs will be  
7 determined once the overall objectives and meter vendors are selected.

8 This concludes my prepared direct testimony.

1 **IV. STATEMENT OF QUALIFICATIONS**

2 My name is Jerry Stewart. I am employed by SDG&E as its Smart Meter Operations  
3 Manager. My business address is 4949 Greencraig Lane, San Diego, California, 92123. My  
4 current responsibilities include overseeing SDG&E’s Smart Meter applications, Smart Meter  
5 Daily Operations Team, Electric Meter Engineering Team, and the Network Operations and  
6 Engineering Team. I assumed my current position in 2011. I have been employed by SDG&E  
7 since 2003 and have held positions of increasing responsibility in Project Management, Electric  
8 Metering Operations, and Smart Meter Operations. I received a Bachelor of Science degree in  
9 Business Management, and a Master of Business Administration with an emphasis in Energy  
10 Management from the University of Phoenix. I have testified previously before the California  
11 Public Utilities Commission.



**ATTACHMENT A**

**CUSTOMER INCENTIVES AND LOAD PROFILES FOR THE BASE  
INTERRUPTIBLE PROGRAM**

## ATTACHMENT A

### CUSTOMER INCENTIVES AND LOAD PROFILES FOR THE BASE INTERRUPTIBLE PROGRAM (BIP)

Below are SDG&E's responses to the information requested in Resolution E-4906 OP 37(d) and OP 37(e).

	100 kW < x ≤ 500 kW	500 kW < x ≤ 1 MW	1 MW < x ≤ 2 MW
Incentive Range <sup>1</sup>	\$1.80 - \$10.80/kW	\$1.80 - \$10.80/kW	\$1.80 - \$10.80/kW
Incentive Mean <sup>2</sup>	N/A; see footnote 2, below	N/A; see footnote 2, below	N/A; see footnote 2, below
Incentive Median <sup>3</sup>	N/A; see footnote 3, below	N/A; see footnote 3, below	N/A; see footnote 3, below
% of Customers Providing Reduction	20%	20%	60%
Range of Non-Revenue Grade and Settlement Quality Meter Cost <sup>4</sup> (per Resource Unit)	Elite XC Data Logger: \$1,500 Veris Industries X51C3: \$2,100	Elite XC Data Logger: \$1,500 Veris Industries X51C3: \$2,100	Elite XC Data Logger: \$1,500 Veris Industries X51C3: \$2,100
Range of Non-Revenue Grade and Settlement Quality Meter Installation Cost <sup>5</sup> (per Resource Unit)	\$1,200	\$1,200	\$1,200
Range of Revenue-Grade and Settlement-Quality Meter Cost <sup>6</sup> (per Resource Unit)	Itron Sentinel Meter: \$1,500 Maxsys Elite: \$3500	Itron Sentinel Meter: \$1,500 Maxsys Elite: \$3500	Itron Sentinel Meter: \$1,500 Maxsys Elite: \$3500

<sup>1</sup> The incentive range is a capacity payment that remains the same regardless of the customer load reduction. The capacity incentive is based on the committed load available by a customer. The range is \$1.80 during November thru April and \$10.80 during May thru October. (committed load = peak demand minus firm service level).

<sup>2</sup> The incentive mean is not meaningful because SDG&E's committed load is different at different times of year.

<sup>3</sup> The incentive median is not meaningful because SDG&E's committed load is different at different times of year.

<sup>4</sup> Meter cost is only good for one unit and does not include costs of external cellular modem, computer, and other external device necessary to communicate remotely as described on the testimony.

<sup>5</sup> Installation cost is only good for simple meter installation. Difficult installations can take much longer and can be costly depending on situation as described on the testimony.

<sup>6</sup> Meter cost is only good for one unit and does not include costs of external cellular modem, computer, and other external device necessary to communicate remotely as described on the testimony.

Range of Revenue-Grade and Settlement-Quality Meter Installation Cost <sup>7</sup> (per Resource Unit)	\$1,300	\$1,300	\$1,300
Range of Logger Cost <sup>6</sup> (per Resource Unit)	Continental Control System WattNode Pulse: \$1700 Campbell Scientific CR310: \$300	Continental Control System WattNode Pulse: \$1700 Campbell Scientific CR310: \$300	Continental Control System WattNode Pulse: \$1700 Campbell Scientific CR310: \$300
Range of Logger Installation Cost <sup>7</sup> (per Resource Unit)	\$1200	\$1200	\$1200

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<sup>7</sup> Installation cost is only good for simple meter installation. Difficult installations can take much longer and can be costly depending on situation as described on the testimony.

**ATTACHMENT B**

**CUSTOMER INCENTIVES AND LOAD PROFILES FOR THE CAPACITY  
BIDDING PROGRAM**

## ATTACHMENT B

### CUSTOMER INCENTIVES AND LOAD PROFILES FOR THE CAPACITY BIDDING PROGRAM (CBP)

Below are SDG&E’s responses to the information requested in Resolution E-4906 OP 37(d) and OP 37(e). In Table 1, SDG&E provides what data it is able to in accordance with the given format in E-4906 OP 37. However, SDG&E is not able to break out some of the data in this manner; therefore, Tables 2 and 3 provide what data SDG&E does have available in regards to CBP.

**Table 1: Response to OP 37 (d) and OP 37 (e)**

	$x \leq 100$ kW	$100 \text{ kW} < x \leq 1 \text{ MW}$	$1 \text{ MW} < x \leq 2 \text{ MW}$
Incentive Range <sup>1</sup>	\$2.86 - \$27.63 per kW per month (May-October)	\$2.86 - \$27.63 per kW per month (May-October)	\$2.86 - \$27.63 per kW per month (May-October)
Incentive Mean <sup>2</sup>	N/A; see footnote 2, below	N/A; see footnote 2, below	N/A; see footnote 2, below
Incentive Median <sup>3</sup>	N/A; see footnote 3, below	N/A; see footnote 3, below	N/A; see footnote 3, below
% of Customers Providing Reduction <sup>4</sup>	N/A; see footnote 4, below	N/A; see footnote 4, below	N/A; see footnote 4, below
Range of Non-Revenue Grade and Settlement Quality Meter Cost <sup>5</sup> (per Resource Unit)	Elite XC Data Logger: \$1,500  Veris Industries X51C3: \$2100	Elite XC Data Logger: \$1,500  Veris Industries X51C3: \$2100	Elite XC Data Logger: \$1,500  Veris Industries X51C3: \$2100
Range of Non-Revenue Grade and Settlement Quality Meter Installation Cost <sup>6</sup> (per Resource Unit)	\$1,200	\$1,200	\$1,200

<sup>1</sup> The incentive range is a capacity payment that remains the same regardless of the customer load reduction. The capacity incentive is based on the committed load available by a customer.

<sup>2</sup> The incentive mean is not meaningful because SDG&E nominates different customers at different times of year.

<sup>3</sup> The incentive median is not meaningful because SDG&E nominates different customers at different times of year.

<sup>4</sup> SDG&E does not have load analysis by percentage of customers providing reduction by these categories. Reference Table 1 and Table 2, below, for Ex-Post Load Impacts and the nominated accounts.

<sup>5</sup> Meter cost is only good for one unit and does not include costs of external cellular modem, computer, and other external device necessary to communicate remotely as described on the testimony.

<sup>6</sup> Installation cost is only good for simple meter installation. Difficult installations can take much longer and can be costly depending on situation as described on the testimony.

Range of Revenue-Grade and Settlement-Quality Meter Cost <sup>7</sup> (per Resource Unit)	Itron Sentinel Meter: \$1,500 Maxsys Elite: \$3,500	Itron Sentinel Meter: \$1,500 Maxsys Elite: \$3,500	Itron Sentinel Meter: \$1,500 Maxsys Elite: \$3,500
Range of Revenue-Grade and Settlement-Quality Meter Installation Cost <sup>8</sup> (per Resource Unit)	\$1,300	\$1,300	\$1,300
Range of Logger Cost <sup>7</sup> (per Resource Unit)	Continental Control System WattNode Pulse: \$1,700  Campbell Scientific CR310: \$300	Continental Control System WattNode Pulse: \$1,700  Campbell Scientific CR310: \$300	Continental Control System WattNode Pulse: \$1,700  Campbell Scientific CR310: \$300
Range of Logger Installation Cost <sup>8</sup> (per Resource Unit)	\$1,200	\$1,200	\$1,200

As stated in footnote 4, San Diego Gas & Electric (SDG&E) does not have some of the data broken out as requested. As such, we present the data that we do have on CBP, which comes from a report that SDG&E filed for its Demand Response (DR) activities for program year (PY) 2017 in accordance with (D.) 08-04-050. This report documents ex-post and ex-ante load impact evaluations of non-residential customers.

Table 2 below, presents the PY2017 ex-post load impact estimates filed in April 2018 with the following columns:

- Average of typical event date (MW): Represents average load impact at the aggregate level across all SDG&E events for CBP. SDG&E called 9 events for the Capacity Bidding Program (CBP Day Of (DO) and 19 events for CBP Day Ahead (DA)).

<sup>7</sup> Meter cost is only good for one unit and does not include costs of external cellular modem, computer, and other external device necessary to communicate remotely as described on the testimony.

<sup>8</sup> Installation cost is only good for simple meter installation. Difficult installations can take much longer and can be costly depending on situation as described on the testimony.

- Peak event date (MW): Represents the average load impact at the aggregate level across all SDG&E events for CBP on SDG&E's Peak Day (September 1<sup>st</sup>, 2017).
- Average per premise on the typical event date (kW): Represents the average per premise load impact across all SDG&E events for CBP.

Total accounts: The last 2 columns show the number of accounts on the typical event date (on average across all event dates) and on the SDG&E Peak Date.

Table 3, below, shows the current number of customers as of September 2018 for CBP.

**Table 2: PY17 DR Ex-post LI estimates**

Program	Average of typical event date (MW)	Peak event date (MW) - Sep 1st 2017	Average per premise on the typical event date (kW)	Total nominated accounts on the typical event date	Total enrolled accounts on the peak date
CBP-DA All	0.7	1.1	9.9	68	69
CBP-DO All	3.2	3.0	18.4	174	178
CBP_DO4	3.1	3.0	18.5	170	174
CBP_DO6	0.1	0.1	13.4	4	4

**Table 3: Total nominated accounts**

Program	Total nominated accounts as Sep 2018
CBP DA 11-7 Hour	2
CBP DA 1-9 Hour	1
CBP DO 11-7 Hour	96
CBP DO 1-9 Hour	97