**PAO DATA REQUEST**

**Question 1**

On p. 2 line 10 of [SDG&Es Chapter 3 rebuttal testimony](https://sempra.sharepoint.com/:b:/r/teams/ct-sdge/Programs/PYD%202.0/Application%20and%20Direct%20Testimony/Rebuttal%20Testimony/SDG%26E%20Final%20Versions/A19-10-012%20-%20Ch%203%20-%20Rebuttal%20Testimony%20of%20John%20Black.pdf?csf=1&web=1&e=d5DvKt), you provide a cost comparison

between SDG&E’s Power Your Drive (“PYD”) Pilot, and SDG&E’s PYD 2 costs on an

“adjusted cost per port” basis.

* 1. Please provide all workpapers used to develop SDG&E’s $43,210,321 cost estimate

for PYD 2. If the $43,210,321 value was calculated in previously provided workpapers, please indicate the workpaper lines where the value is calculated.

* 1. Does SDG&E agree that the PYD Pilot incurred costs for utility ownership of workplace EV Supply Equipment (EVSEs), whereas PYD 2 will replace utility ownership of workplace EVSE costs with workplace rebate costs? Explain why or why not.
  2. Based on SDG&E’s response to part b. above, do you agree that there are cost components in the SDG&E’s PYD Pilot adjusted cost per port value that are not present for the respective value for SDG&E’s PYD 2? Explain why or why not.

**SDG&E Response**

1. The $43,210,321 can be found in SDG&E’s PYD Extension’s “Chapter 3 Workpapers” on the Summary Table tab, cell Q38.[[1]](#footnote-2)
2. Yes, this is correct. In PYD Pilot the workplace EVSEs costs were incurred as capital costs to the program because the utility owns the EVSEs. In PYD Extension, SDG&E is proposing in its Application that workplace EVSE costs will be replaced by an O&M rebate since the site hosts will own and install the EVSEs.
3. The cost of the EVSEs are included in PYD Pilot’s adjusted cost table referenced above. In addition, the estimated EVSE rebates at workplace sites and estimated costs of the utility owned EVSEs at MUD sites are both included in the adjusted cost table for PYD 2. In other words, all EVSE costs in PYD Pilot are accounted for and included in the PYD 2 estimates as well as the adjusted cost per port table included in the prepared rebuttal testimony.

**Question 2**

On p. 2 lines 6-10 of [SDG&E’s Chapter 4 rebuttal testimony](https://sempra.sharepoint.com/:b:/r/teams/ct-sdge/Programs/PYD%202.0/Application%20and%20Direct%20Testimony/Rebuttal%20Testimony/SDG%26E%20Final%20Versions/A19-10-012%20-%20Ch%204%20-%20Rebuttal%20Testimony%20of%20Jennifer%20Montanez.pdf?csf=1&web=1&e=2h4gam), SDG&E states that PYD 2

costs should be recovered through distribution rates because the PYD 2 program is an

infrastructure program that is part of distribution infrastructure.

1. Does SDG&E agree that its ownership of non-transportation electrification (TE) distribution infrastructure usually ends at the point of the utility meter? Explain why or why not.
2. Does SDG&E agree that PYD 2 would cause SDG&E to own infrastructure on the customer side of the utility meter (“make-ready infrastructure”, as well as EVSEs at multi-unit dwellings)? Explain why or why not.
3. Does SDG&E agree that outside of the potential for vehicle-grid integration (VGI) of EV load, EV make-ready infrastructure does not provide distribution grid benefits (i.e. provide grid distribution capacity) to SDG&E customers besides to the customer on site? Explain why or why not.
4. Based on the answers to parts a. to c. above, does SDG&E agree that distribution infrastructure installed in PYD 2 has different characteristics (i.e. includes a greater proportion of infrastructure on the customer side of the utility meter) than most of the distribution infrastructure SDG&E installs outside of TE programs? Explain why or why not.
5. Based on SDG&E’s answers to parts a. to c. above, does SDG&E agree that distribution infrastructure installed in PYD 2 has different distribution grid benefits than most of the distribution infrastructure SDG&E installs outside of TE programs? Explain why or why not.
6. Based on SDG&E’s answers to parts a. to e. above, does SDG&E maintain that the PYD 2 program is an infrastructure program that is part of distribution infrastructure, and therefore must be recovered through distribution rates with a distribution allocator? Explain why or why not.

**SDG&E Response**

a. SDG&E agrees that its ownership of non-transportation electrification distribution infrastructure generally ends at the point of the utility meter.

b. Yes, SDG&E agrees that the PYD Extension Program, if approved as proposed, would allow SDG&E to own infrastructure on the customer side of the meter (“make-ready infrastructure”, as well as EVSE at MUD sites. This is illustrated in Figures 2-1 and 2-2 on page RS-13 in Randy Schimka’s direct testimony.

c. SDG&E disagrees with the premise in the question (…EV make-ready infrastructure does not provide grid benefits (i.e. provide grid distribution capacity). One of the main benefits TE projects bring to utility ratepayers, besides GHG reductions, is to provide EV owners / customers with charging stations and rate options that help to incentivize charging during grid-friendly times and defer or prevent the associated infrastructure upgrades that would be required to serve that additional EV charging load on-peak. This benefits all customers.

d. SDG&E agrees that the distribution infrastructure proposed for the PYD Extension Program for EV charging stations is different than most distribution infrastructure SDG&E installs. However, that fact isn’t relevant with respect to the PYD Extension Program. There are specific State goals for EVSE and ZEVs that need to be met, and the PYD Extension Program is SDG&E’s response to move towards those goals. Without utility ownership of infrastructure and MUD EVSE, fewer customers would participate in the program.

e. Please see answer to 2d.

f. SDG&E believes that the PYD Extension Program costs are distribution costs that should be recovered through distribution rates based on the CPUC approved distribution revenue allocation factors.

**Question 3**

On pp. 4-5 lines 17-6 of [SDG&E’s Chapter 2 rebuttal testimony](https://sempra.sharepoint.com/:b:/r/teams/ct-sdge/Programs/PYD%202.0/Application%20and%20Direct%20Testimony/Rebuttal%20Testimony/SDG%26E%20Final%20Versions/A19-10-012%20-%20Ch2%20-%20Rebuttal%20Testimony%20of%20Randy%20Schimka.pdf?csf=1&web=1&e=B5ta3B), SDG&E states that no

MUD site hosts have been interested in owning their own EVSE because they are interested

in the turn-key SDG&E provided in the PYD Pilot.

1. Did SDG&E present MUD site hosts with options other than SDG&E ownership when the MUD site host expressed that they were not interested in owning EVSE?
   * 1. If so, what were the options presented to the MUD site hosts?
2. If SDG&E did not present the MUD site hosts with other ownership options, is SDG&E aware whether MUD site hosts knew there were other ownership options than SDG&E ownership?
3. Provide any survey of MUD site hosts that SDG&E has performed to gauge MUD site hosts’ interest in owning EVSE.
   * 1. Provide any aggregated results of this survey

**SDG&E Response**

a. The quoted statement in SDG&E’s rebuttal testimony is anecdotal - referring to conversations that have taken place between potential site hosts and SDG&E’s Clean Transportation team at various times over the life of the PYD Pilot and at Marketing, Education, and Outreach events. The reference is not to a specific discussion of ownership options, but rather, to a series of conversations with various site hosts over time where they remarked that they like the idea of a turn-key solution provided by SDG&E in the PYD Pilot, and lack the funds necessary to take on a project like this themselves.

b. MUD sites weren’t presented with ownership options during the PYD Pilot because there were no other ownership options available to offer or discuss in the Pilot.

c. To refresh the conversations cited above regarding reactions from site hosts during the PYD Pilot, SDG&E is currently surveying all the customers that are on the PYD interest list (both workplace and MUD). Those results will be available in the near future and served on the service list.

**Question 4**

On p. 16 lines 9-10 of [SDG&E’s Chapter 2 rebuttal testimony](https://sempra.sharepoint.com/:b:/r/teams/ct-sdge/Programs/PYD%202.0/Application%20and%20Direct%20Testimony/Rebuttal%20Testimony/SDG%26E%20Final%20Versions/A19-10-012%20-%20Ch2%20-%20Rebuttal%20Testimony%20of%20Randy%20Schimka.pdf?csf=1&web=1&e=B5ta3B), SDG&E states that site hosts

purchasing their own EVSE may pay a higher price compared to the prices SDG&E has

negotiated.

1. What prices did SDG&E pay for the EVSE in SDG&E’s PYD Pilot?
   * 1. Provide the average price and the range of prices paid by SDG&E for its PYD Pilot EVSE.
2. What are the qualifications that SDG&E proposes for an EVSP to qualify its EVSE for installation in MUDs?
3. What are the qualifications that SDG&E proposes for an EVSP to qualify its EVSE for installation in workplaces?

**SDG&E Response**

a. SDG&E paid Average: $REDACTED, Min: $REDACTED, Max $REDACTED for Networked Level 2 EVSE under PYD Pilot Program; value includes Equipment, Shipping, (1) Year Network Fees, One Time Commissioning Fee.

b. There are 48 Requirements listed in the SDG&E RFQ, classified as Basic, Preferred, and Utility Grade. Customer Owned Equipment must meet the Basic level requirements; Utility Owned Equipment must meet both Basic and Utility Grade Requirements; Preferred level requirements include recently adopted CARB, CCR, and DMS regulations, equipment already conforming to these regulations are considered Preferred, these Preferred Level Requirements will be reclassified as Basic Level Requirements after the conformance deadline established by the regulation. Requirements for MUD and Workplace are the same, the differentiator is the Ownership Option selected by the Customer.

c. See 4.b. The Requirements Checklist from the EVSE RFQ is embedded below:



**END OF RESPONSES**

1. <https://www.sdge.com/rates-and-regulations/proceedings/extend-modify-pyd-pilot> [↑](#footnote-ref-2)