

**PUBLIC ADVOCATES OFFICE (PAO) DATA REQUEST  
CAL ADVOCATES-PYD2-SDGE-02  
SDG&E POWER YOUR DRIVE 2.0 (A.19-10-012)  
SDG&E RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2020  
DATE RESPONDED: FEBRUARY 18, 2020**

**PAO DATA REQUEST**

**Question 1**

In San Diego Gas & Electric Company’s (SDG&E’s) A.19-10-012 Chapter 3 workpapers, SDG&E has a “Cost Estimate by Month” tab that breaks down costs into different line items.

- a. Please provide a list of all “Cost Estimate by Month” line items that are part of the \$23,740,000 construction site direct costs that SDG&E states in Table 3-2 of testimony. The same \$23,740,000 value is also listed in the tab “Const. Site Cost Summary” in the workpaper.
- b. If any of “Cost Estimate by Month” line items are partially but not fully incorporated into the \$23,740,000 construction direct site cost value, please provide the dollar value these line items are incorporated into the \$23,740,000 site construction site cost value. That is, the Public Advocates Office expects that the line items that SDG&E indicates in part a. of this question should add up to \$23,740,000. If that is not the case, SDG&E should explicitly indicate and provide the value of each source of discrepancy.
- c. Please provide the same information as for parts a. and b. of this question, but rather than identifying which line items comprise SDG&E’s “construction site direct costs”, provide which line items represent the incremental direct costs of SDG&E’s proposed utility ownership of multi-unit dwelling (MUD) Electric Vehicle Supply Equipment (EVSEs).

**SDG&E Response**

- a. The table below shows the rows and values from the “Cost Estimate by Month” line items that are part of the \$23,740,000 construction site direct costs value.

Excel Row	Description (Column C)	Capital EAC (Column D)
16	6220006 - SRV-CONSTRUCTION SERVICES DEPT ONLY	804,003.31
18	6221000 - SRV-CONSTRUCTION-ELECTRIC	19,494,989.36
24	6215070 - MATL ISSUANCES-KEARNY WAREHOUSE	1,005,001.29
25	6213090 - MATL-FREIGHT	102,001.36
27	6213225 - MATL-ELECTRICAL EQUIPMENT	1,530,001.36
28	6213385 - MATL-ELEC MATERIAL MISCELLANEOUS	1,004,003.31
		<b>23,940,000.00</b>

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- b. Row 28, 6213385 - MATL-ELEC MATERIAL MISCELLANEOUS, also consists of an estimate of \$200,000 for spares not included in the construction site direct costs table. The table below shows the reconciliation.

Total value - response a. table	23,940,000.00
Less: spares included in 6213385 - MATL-ELEC MATERIAL MISC.	<u>(200,000.00)</u>
Weighted Construction Site Direct Cost Estimates Total	23,740,000.00

- c. The multi-unit dwelling (MUD) EVSE costs for the program are captured on Excel row 25, 6213225 - MATL-ELECTRICAL EQUIPMENT for \$1.53M (\$3,000 \* 510 nozzles) for MUD sites and one testing and training site and are shown as capital costs.

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**Question 2**

In SDG&E's response to Public Advocates Office's A.19-10-012 DR-01 Q02b, SDG&E provided a spreadsheet with data on SDG&E's Power Your Drive (PYD) Pilot program.

- a. Please re-provide the spreadsheet with the following additional data: a column showing only construction site direct costs, as opposed to the already provided column showing total costs for each site. "Construction site direct costs" is defined here as used by SDG&E in Table 3-2 of SDG&E's Opening Testimony.
- b. The spreadsheet appears to show that SDG&E averages over 17 ports per structure site. Please explain why SDG&E's A.19-10-012 Chapter 3 workpapers budgets based on the assumptions that structure sites will only have 10 ports per site.

**SDG&E Response**

- a. The attached Excel file (CalPA DR-02 Q2) includes the additional requested column for construction site direct costs for the PYD Pilot Program. PYD Pilot costs are based on the costs shown in SDG&E's September 20, 2019 PYD Report.
- b. SDG&E's illustrative site types for the PYD Extension budget estimate is based on the median port count goal of approximately 10 ports across all PYD Pilot sites.

SDG&E added the necessary formulas to the CalPA DR-02 Q2 spreadsheet to calculate the total number of sites and ports that were installed, and then calculated the average for the PYD Pilot Program to be approximately 12 ports per site (not 17).

If approved, the actual PYD Extension Program site composition and final port counts for different site types will be influenced by many factors including the composition of the final interest list, a site's location, a site's current and future EV charging needs, and the feasibility of construction at each of the sites. Because of these reasons, the final constructed port count may vary from the goal of 10 ports per site.

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**Question 3**

In Chapter 2 of SDG&E’s Opening Testimony, SDG&E states that it cannot bill individuals on a “Rate-to-Driver” if the EVSE is not owned by SDG&E.

- a. Please elaborate on what challenges specifically prevent SDG&E from billing customers on this model (“Rate to Driver”, with the EVSE not owned by SDG&E). For example, other utilities, such as Pacific Gas & Electric Company (PG&E) in its EV Charge Network (EVCN) program has offered both “Rate-to-Host” and “Rate- to-Driver” options with no ownership restrictions,<sup>1</sup> despite EVCN mainly disallowing utility ownership of the EVSE.<sup>2</sup>
- b. If SDG&E cannot bill customers on the aforementioned model because of SDG&E’s VGI rate, please indicate whether or not SDG&E could bill customers on the aforementioned model if the customer subscribes to a TOU rate.

**SDG&E Response**

- a. Despite the identical name, SDG&E understands that PG&E’s “Rate-to-Driver” offering is structured differently from SDG&E’s “Rate to Driver”. In PG&E’s program, the program participant, or site host, is the customer of record for the “Rate to Driver” option. The program participant then passes the TOU rate directly to drivers, but drivers are not the utility customer of record. The details of this arrangement are to be negotiated between the vendor and the program participant.<sup>3</sup>

In SDG&E’s program the “rate to driver” option allows individual drivers to be the customer of record and be served under SDG&E tariffs and billed directly by SDG&E. The architecture SDG&E is proposing for workplace sites in this program is described in Chapter 2 of SDG&E’s Opening Testimony on page RS-3. In the workplace scenario, SDG&E will sell energy consumed at each charging site to the customer of record (the site host or EVSP), based on the utility smart meter at each site. That is the extent of SDG&E’s billing involvement at the workplace sites. SDG&E will not have access to the charging station internal meters, won’t be able to verify the accuracy of the billing data from the charging station meters, and can’t effectively respond to customer inquiries about issues with billing at these sites since SDG&E won’t own and isn’t responsible for the charging equipment, the accuracy of the internal meters, and testing / repairing /

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<sup>1</sup> D.16-12-065, OP 14.

<sup>2</sup> D.16-12-065, OP 1.

<sup>3</sup> [https://www.pge.com/en\\_US/large-business/solar-and-vehicles/clean-vehicles/ev-charge-network/program-participants/rates-and-billing.page](https://www.pge.com/en_US/large-business/solar-and-vehicles/clean-vehicles/ev-charge-network/program-participants/rates-and-billing.page)

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replacing them (as required by Electric Rule 18 for utility-owned meters).<sup>4</sup>

At workplace sites, SDG&E expects that any issues with the charging data or metering internal to the charging stations will be taken care of by the owner of the equipment (EVSP or the site host). Therefore, SDG&E is not proposing to bill drivers directly at workplace charging sites in the PYD Extension Program.

- b. Due to the reasons explained above in part a. of this question, SDG&E will not be collecting individual charging session data at workplace sites and thus, will not be able to bill drivers directly (The “Rate-to-Driver” model) on the VGI rate or any other available rate. Billing drivers at these workplace PYD Extension Program sites would be the responsibility of the site host in conjunction with the EVSP., including TOU rates. Instead, the site host will be the customer of record (the “Rate-to-Host” model in SDG&E’s terminology). These workplace sites can take service on the VGI rate under the Rate-to-Host model, or any other applicable Commercial & Industrial (C&I) TOU rate.

**END OF RESPONSES**

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<sup>4</sup> SDG&E Rule 18 document, see [https://www.sdge.com/sites/default/files/elec\\_elec-rules\\_erule18.pdf](https://www.sdge.com/sites/default/files/elec_elec-rules_erule18.pdf)