

SDCP DATA REQUEST – SDG&E RESPONSE
Data Request #01
SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001
DATE RECEIVED: October 18, 2021
DATE RESPONDED: November 1, 2021

**RESPONSE CONTAINS CONFIDENTIAL PROTECTED MATERIALS SUBJECT TO
NONDISCLOSURE AGREEMENT**

General Objections:

SDG&E objects to the definitions and instructions included in this data request on the grounds that they are overbroad, unduly burdensome, and seek information that is irrelevant to the subject matter involved in the pending proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence, and therefore, beyond the requirements of CPUC Rule of Practice and Procedure 10.1. SDG&E also notes that special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

1. Please provide all workpapers supporting the initial application and all witness testimony, including all workpapers associated with the derivation of illustrative rates and illustrative bill impacts in the testimony and attachment of witness Hannah Campi.

SDG&E Response:

Subject to and without waiving the foregoing general objections, SDG&E responds as follows:

Please see the attached documents titled “Updated_CONFIDENTIAL - Illustrative Rate Design_A2109001.xlsx” and “TOU-ELEC Bill Model_A2109001.xlsx”.

“Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx” contains nonpublic “protected materials” subject to nondisclosure agreement (i.e., trade secret, market sensitive, or other confidential and/or proprietary information) as determined by SDG&E in accordance with the provisions of Decision 06-06-066 and subsequent decisions. The Protected Materials have been highlighted in yellow. The confidentiality declaration of Hannah Campi is also provided.

2. Please provide the responses to all other intervenor data requests on an ongoing basis.

SDG&E Response:

OBJECTION: SDG&E objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SDG&E will provide all responsive documents in existence at the time of its response. Should SDCP seek to update its request, SDG&E will respond to such a request as a new data request in the future. Subject to and without waiving the foregoing objections, SDG&E provides existing responsive documents as attachments below.

All public data request responses that SDG&E has provided to parties to date can be found at the web address below. Confidential responses will be sent in a separate email to any/all representatives who

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have signed the NDA Certificate, once the completed NDA has been received.

<https://www.sdge.com/rates-and-regulations/proceedings/Application-for-a-Residential-Untiered-Time-of-Use-Rate-with-a-Fixed-Charge>

3. Please provide a sample tariff for the TOU-ELEC rate if available.

SDG&E Response:

OBJECTION: SDG&E objects to the request on the grounds that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

Subject to and without waiving the foregoing objection, SDG&E responds as follows:
SDG&E has not developed a sample tariff for TOU-ELEC at the time of this response.

4. Referring to the Application at page 3 please respond to the following:
 - a. How does SDG&E define “energy storage device”?
 - b. Please explain whether SDG&E’s definition of an energy storage device includes restrictions such as materials of construction, manufacturer, age, capacity or efficiency of the device?

SDG&E Response:

As stated in the direct testimony of SDG&E witness Morien on GM-12, SDG&E will require customers taking service on TOU-ELEC through “energy storage device eligibility” to interconnect those energy storage devices through Electric Rule 21. The requirements of Rule 21 can be found in the Rule 21 Tariff: https://tariff.sdge.com/tm2/pdf/ELEC_ELEC-RULES_ERULE21.pdf

SDG&E has not proposed additional restrictions for energy storage devices beyond the requirements of Electric Rule 21.

5. Referring to Witness Morien’s direct testimony at GM-10, lines 20-21, please explain how SDG&E decided to use the average of a customer’s *three* daily non-coincident peaks to determine a customer’s fixed charge. Did SDG&E investigate using a different number of daily non-coincident peaks? Please explain.

SDG&E Response:

SDG&E proposed to use the top three daily non-coincident peak demands to determine a customer’s fixed charge to provide customers with more flexibility and encourage them to consistently reduce their demand. Customers who may fall into a higher fixed charge tier due to a high anomalous non-coincident demand on a single day will still be able to offset that higher demand with their typical lower demand, and likely remain in the lower fixed charge tier.

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This design also ensures that the price signal for non-coincident demand is not significantly diluted, and customers pay their cost of service. SDG&E believes this is preferable to using a single data point, i.e., the customer's single annual non-coincident demand.

6. Referring to Witness Campi's direct testimony at HC-5, lines 19-21 please respond to the following:
 - a. Please provide example talking points that will educate, assist, or improve the understanding of customers in calculating their three non-coincident peaks.
 - b. Does SDG&E plan to assist customers so that customers may identify both the timing and magnitude of their three non-coincident peak demands? Please explain.

SDG&E Response:

OBJECTION: SDG&E objects to the request on the grounds that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist. SDG&E further objects to this request on the grounds that it calls for speculation. SDG&E has not speculated on talking points associated with this proposed rate design as it has not been approved by the Commission.

Subject to and without waiving the foregoing objection, SDG&E responds as follows: SDG&E anticipates communicating these hours to customers, however, the method in which they will be communicated is dependent on the final adopted rate design and therefore SDG&E does not have detailed implementation information or talking points developed at this time.

7. Referring to Witness Campi's direct testimony at HC-5, lines 21-23 please respond to the following:
 - a. Please provide workpapers, in native format with working formulae, quantifying 20% of commodity capacity costs and demonstrating the move from summer to winter on-peak periods in the proposed rates.
 - b. Please explain and provide supporting workpapers to show how capacity costs are recovered in SDG&E's current residential rate TOU-DR1 on a seasonal basis (e.g., are all summer capacity costs recovered in the summer season on this rate).

SDG&E Response:

- a. See response to question 1.
- b. SDG&E objects to the request to the extent that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

Subject to and without waiving the foregoing objection, SDG&E responds as follows: SDG&E's residential rate TOU-DR1 commodity rates reflect cost-basis; all generation capacity costs are designed to be recovered in either the summer on-peak or summer off-peak periods.

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8. Referring to Witness Morien’s direct testimony at GM-12, lines 20-21. Please respond to the following:
- a. How will SDG&E determine when customers no longer qualify for the rate?
 - b. In the event that SDG&E relies on self-reporting of customers to determine disqualification, what is SDG&E’s estimate as to percentage of non-qualified customers to self-report disqualification?

SDG&E Response:

OBJECTION: SDG&E objects to this request on the grounds that it calls for speculation. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

SDG&E does not currently plan to require customers to verify they qualify for TOU-ELEC on an annual basis. When electing the rate, SDG&E will require customers to self-certify that they meet the eligibility requirements for the rate in the event the customer qualifies for the tariff through an EV or heat pump. SDG&E will be able to verify that customers taking service on this rate through “energy storage device eligibility” are interconnected through Electric Rule 21.

SDG&E has not estimated a percentage of non-qualified customers to self-report disqualification. TOU-ELEC is an opt-in rate, and SDG&E does not expect this number to be significant.

9. Referring to Witness Campi’s direct testimony at HC-9, lines 3-10, please provide a representative sample (400 customers) of customer-specific interval load data for customers currently taking service on either EV-TOU-5 or EV-TOU-2. Please ensure the data is provided in electronic form and includes at a minimum a customer identifier (i.e., some means of differentiating between customers), the date/time stamp of the interval, and the interval read.

SDG&E Response:

OBJECTION: SDG&E objects to this request on the grounds that it seeks production of individual customer usage data and under Public Utilities Code Section 8380, SDG&E is strictly prohibited from sharing, disclosing, or otherwise providing access to any third party.

10. Referring to Witness Campi’s direct testimony at Attachment A, please provide the interval load data for each customer profile relied on to develop the monthly kWh and Annual NCD (kW) for each scenario.

SDG&E Response:

OBJECTION: SDG&E objects to this request on the grounds that it seeks production of individual customer usage data and under Public Utilities Code Section 8380, SDG&E is strictly prohibited from sharing, disclosing, or otherwise providing access to any third party.

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11. Referring to Witness Campi’s direct testimony at Table HC-2, please explain the source of total commodity revenue requirement and bundled customer billing determinants used to develop the illustrative proposed base commodity rate under TOU-ELEC. Provide all workpapers that demonstrate such revenue requirement and billing determinants.

SDG&E Response:

See “Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx” , “Commodity Rate Design” Tab

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12. Referring to Witness Campi’s direct testimony at Table HC-2, does SDG&E agree that bundled customers’ commodity rates include recovery of their share of SDG&E’s power charge indifference adjustment (PCIA). If no, please explain.

SDG&E Response:

To the extent that PCIA rates are not capped pursuant to D.18-10-019, SDG&E agrees that bundled customers’ commodity rates include recovery of their share of the PCIA. SDG&E has several vintages of PCIA rates that are currently capped through the end of 2021, and therefore, bundled customers currently pay for this departing load cost responsibility in addition to their own cost responsibility.

13. Referring to Witness Campi’s direct testimony at Table HC-2, please explain whether SDG&E considered bundled customers’ PCIA cost responsibility (i.e. bundled customers’ equivalent PCIA rate) when developing the proposed TOU-ELEC commodity rates. If no, please explain why not.

SDG&E Response:

SDG&E does not separate above-market costs when designing bundled commodity rates. Bundled commodity rates are designed using the total bundled commodity revenue requirement, which includes above-market costs.

14. Referring to Witness Campi’s direct testimony at Table HC-2, please respond to the following:

- a. Please confirm that D.20-03-019 required SDG&E to propose a method to show the power charge indifference adjustment (PCIA) as a line item on all customer bills, including bills to bundled customers. If not confirmed, please explain.
- b. Please explain whether SDG&E filed the required Tier 3 Advice Letter on or before August 31, 2020, and provide a current status of that Advice Letter.

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- c. Does SDG&E anticipate changing bundled customers' bills to include the PCIA as a separate line item by the end of 2021? If no, please explain why not.
- d. Please explain the impact on SDG&E's proposed illustrative TOU-ELEC commodity rates if the PCIA is included as a separate line item on bundled customers' bills.

SDG&E Response:

- a. **OBJECTION:** SDG&E objects to this request to the extent it requires SDG&E to provide information of public record in CPUC proceedings equally available to SDCP. SDG&E will not produce matters of public record in CPUC regulatory proceedings.
- b. **OBJECTION:** SDG&E objects to this request to the extent it requires SDG&E to provide information of public record in CPUC proceedings equally available to SDCP. SDG&E will not produce matters of public record in CPUC regulatory proceedings.
- c. SDG&E filed AL 3855-E on September 30, 2021, which is effective November 1, 2021. The AL states that SDG&E will implement this change on the corresponding bill cycle, beginning November 1, 2021.
- d. There will be no impact to SDG&E's proposed illustrative TOU-ELEC commodity rates when the PCIA is included as a separate line item on the bundled customer's bill.