

ENERGY DIVISION DATA REQUEST
ED-SDG&E-DR-01
APPLICATION FOR APPROVAL OF ELECTRIC VEHICLE HIGH POWER CHARGING
RATE (A.19-07-006)
SDG&E RESPONSE
DATE RECEIVED: MARCH 13, 2020
DATE RESPONDED: MARCH 25, 2020

Question 1

What use cases did SDG&E assume in developing its rebuttal testimony calculations?

- a. How do they differ from the use cases included in the initial A.19-07-006 testimony?
- b. Please explain why any use cases and assumptions are differing in a table that compare the use cases assumed in the rebuttal testimony and those provided in the opening testimony. Please provide the following details for each use case, at a minimum:
 - i. Demand Charge/Subscription charge (\$/kW)
 - ii. Subscription block size (kW)
 - iii. Volumetric TOU rates (\$/kWh by hour)
 - iv. Any seasonal rate differences or weekend/weekday variances that apply
 - v. CPP or other grid-related adder(s) (\$/kWh)
 - vi. CPP Capacity Reservation Charge (\$/kW)
 - vii. Non-By-passable charges, by line item, per month or annual

SDG&E Response

- a. SDG&E did not conduct or apply new or additional use cases in developing the revised rate levels presented in the rebuttal testimony of William G. Saxe.

SDG&E will update the use cases provided in the prepared testimony of Praem Kodiath with the revised EV-HP rate levels by April 3rd.

- b. See answer to Question 1.a.

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Question 2

Please provide, in line item format in an Excel spreadsheet, SDG&E's new cost workpapers for the new subscription charges and rates described in the rebuttal testimony. Please break down any capital and expense charges and include separate line items for each customer charge included in the proposed rate.

SDG&E Response

The attached workpaper ("WS Rebuttal Testimony Workpapers") is the workpaper used to develop the subscription charge and the other proposed EV-HP rates presented in Attachment A of Rebuttal Testimony of SDG&E witness William G. Saxe. The "WS – RT Attachment A (Page 1)" tab of this workpaper presents the illustrative proposed EV-HP rates based on SDG&E's February 1, 2020 electric rates, including the subscription charge (Line Numbers 2-12), customer charge called the "Basic Service Fee" (Line Numbers 14-21), and energy charges (Line Numbers 23-50). The "WS – RT Attachment A (Page 2)" tab of this workpaper also presents the development of the 10-year phase-in of the illustrative proposed subscription charge.

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Question 3

Within the cost workpapers or separately, please explain and provide an Excel spreadsheet that illustrates how SDG&E's marginal costs were developed for the rates proposed in rebuttal testimony.

SDG&E Response

The marginal non-coincident demand costs used to develop the proposed subscription charge, as presented in "EV-HP Rate Design Modifications" tab of the "WS Rebuttal Testimony Workpapers" file provided in response to Question 2, reflect the proposed marginal distribution demand costs in the Rebuttal Testimony of William G. Saxe in SDG&E's 2016 GRC Phase 2 proceeding (A.15-04-012). These marginal distribution demand costs, adjusted for the 39% non-coincident demand/61% on-peak demand split the Commission adopted in D.17-08-030¹ to allocate distribution demand costs between non-coincident demand and on-peak demand charges, are the basis for SDG&E's current demand charges for Schedule AL-TOU, which is the basis for the development of the proposed EV-HP rates.

¹ Conclusion of Law 15 and Ordering Paragraph 15 of D.17-08-030 adopted in SDG&E's 2016 GRC Phase 2 proceeding (A.15-04-012).

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Question 4

Please describe how SDG&E calculated the differentials between its TOU period rates and explain in more detail why the differentials in the rebuttal testimony differ from SDG&E's initial proposal. Provide the TOU differential calculations in Excel spreadsheet format either as part of the answer to Question (2) above or separately.

SDG&E Response

The TOU differentials in the proposed EV-HP energy charges differ in SDG&E's direct testimony versus rebuttal testimony due to changes in the Schedule AL-TOU rates used as the basis for the proposed EV-HP rates. The proposed EV-HP rates in SDG&E's direct testimony were based on its June 1, 2019 rates, the current rates at the time the direct testimony was filed. The proposed EV-HP rates in SDG&E's rebuttal testimony, by contrast, are based on SDG&E's current February 1, 2020 electric rates. The TOU differentials between SDG&E's direct and rebuttal testimony also reflect SDG&E's proposal to reduce the super off-peak commodity energy charges of EV-HP customers by \$0.03/kWh. This results in increases to EV-HP customers' on-peak commodity energy charges of around \$0.04/kWh, as described on pages WS-5 and WS-6 of the Direct Testimony of William G. Saxe and on page WS-4 of the Rebuttal Testimony of William G. Saxe.

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Question 5

How were non-by-passable charges (NBC) included in the rate proposed in the rebuttal testimony?

- a. How do the NBC in the rebuttal testimony proposal differ from SDG&E's initial cost workpapers? Please provide workpapers that demonstrate how the NBC are calculated for the different kW subscription rates.
- b. Do the NBC vary based on subscription increment? Please explain why or why not.

SDG&E Response

- a. The workpaper file provided in response to Question 2 ("WS Rebuttal Testimony Workpapers") presents the EV-HP non-bypassable charges in the "WS – RT Attachment A (Page 1)" tab of this workpaper. Non-bypassable charges are collected through energy (\$/kWh) rates. As explained in response to Question 4, the changes in the non-bypassable charges presented in SDG&E direct testimony compared to those charges rebuttal testimony is because the rates non-bypassable charges are based on change. The EV-HP rates proposed in SDG&E's direct testimony were based on SDG&E's June 1, 2019 rates per Advice Letter 3377-E approved by Energy Division letter on June 21, 2019. The EV-HP rates proposed in SDG&E's rebuttal testimony were based on SDG&E's February 1, 2020 rates per Advice Letter 3500-E approved by Energy Division letter on March 6, 2020.
- b. Because the NBCs are included in the EV-HP energy charges and not the subscription charge, the NBCs do not vary based on the subscription charge increment.

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Question 6

SDG&E's initial proposal suggested costs/revenues would be tracked through a memorandum account, and any costs recovered through its Public Purpose Charge. How does SDG&E propose to track and recover any costs or revenues associated with the EV-HP rates proposed in its rebuttal testimony?

SDG&E Response

In its revised rebuttal testimony proposal, SDG&E is no longer proposing to track and recover any costs or revenues associated with the EV-HP rates.

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Question 7

Is SDG&E requesting any separate budget for marketing, education, and outreach (ME&O) about its proposed EV-HP rate? If not, how would it finance any informational/outreach materials it would need to educate and encourage customers to enroll in the proposed rate? Please provide a proposed estimated budget for ME&O for the EV-HP rate in Excel format and suggest potential financing options for creating new EV-HP ME&O materials.

SDG&E Response

SDG&E is not requesting a separate budget for ME&O for the EV-HP rate.

SDG&E plans to educate existing and potential MD/HD EV operators about the EV-HP rate both through ME&O activities associated with the SDG&E MD/HD EV Infrastructure Program and through customers' SDG&E Account Executives, who are available to help customers in-person, and through phone and email. The planned ME&O budget for the MD/HD Program is shown in the attached workpaper ("SDGE MDHD MEO Preliminary Budget"). While not all of these ME&O activities will directly market the EV-HP rate, describing the advantages of the rate is expected to be an integral part of attracting customers to the Program.

SDG&E also plans to educate DCFC operators through these customers' existing Account Executives. Education for other non-residential charging site operators will be conducted through SDG&E's existing EV ME&O activities multilingual staff experts, dedicated call center staff, and potentially through future EV infrastructure program ME&O.

END OF RESPONSES