

SDAP DATA REQUEST

SDAP-DR 04

Application for Approval of Electric Vehicle High Power Charging Rate (A.19-07-006)

SDG&E RESPONSE

DATE RECEIVED: December 23, 2019

DATE RESPONDED: January 9, 2019

Instructions: These questions pertain to SDGE territory. Any time there is work to show, please provide it in the work paper format and a live excel document.

1. Please confirm that customers who are eligible for and elect EV-HP will have the option to remain on EV-HP but opt out of CPP commodity rates.

SDG&E Response: Yes, bundled SDG&E customers who opt into the EV-HP rate will have the option to take commodity service on Schedule EECC, which does not include Critical Peak Pricing but does include an on-peak demand charge for Medium/Large Commercial & Industrial customers.

2. On p.WS-5 of SDG&E's July 3, 2019, Mr. Saxe's testimony states:

“SDG&E proposes that the Schedule EECC-CPP-D super off-peak commodity energy charges for summer and winter periods be reduced by \$0.03/kWh to provide an additional incentive for EV-HP customers to charge during the super off-peak period. Under SDG&E's proposal, the revenues not designed to be collected from these customers due to the reduction in their super off-peak commodity energy charges will instead be collected in their on-peak commodity energy charges.”

Will similar adjustments apply to Schedule EECC, or whatever commodity rate schedule is available to EV-HP customers who wish to opt out of CPP?

SDG&E Response: As stated in response to Question 1 above, EV-HP customers are eligible to opt out of Schedule EECC-CPP-D and take service on the Schedule EECC non-CPP rates that the customer is eligible to take commodity service on. The \$0.03/kWh reduction in the super off-peak commodity rates and approximate \$0.04/kWh increase in the on-peak commodity rates proposed for EV-HP customers, as presented in Table WS-4 of William G. Saxe's Prepared Direct Testimony (page WGS-6), would also apply if the customer took commodity service on Schedule EECC. The file attached below (“SDAP DR-04, Q3”) in response to Question 3 provides the requested comparable June 1, 2019 Schedule EECC rates with the proposed \$0.03/kWh adjustment applied.

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3. Please provide a version of Table WS-4 on p. WS-6 that shows the commodity rates that would be paid by EV-HP customers wishing to opt out of CPP.

SDG&E Response: The attached file (“SDAP DR-04, Q3”) provides the requested comparable June 1, 2019 Schedule EECC rates with the proposed \$0.03/kWh EV-HP super-off peak adjustment applied.

4. This is a follow-up to an earlier SDAP data request: In a response dated December 12, 2019 to SDAP data request SDAP-01, SDG&E sent the following information:

Schedule AL-TOU CTM Revenues		
	<u>Secondary Service</u>	<u>Primary Service</u>
Total AL-TOU Revenues	\$1,356,009,946	\$171,899,839
Distribution Revenues	\$458,113,521	\$60,874,909
Commodity Revenues	<u>\$525,661,945</u>	<u>\$57,130,820</u>
Non-Distribution and Non-Commodity Revenues	\$372,234,480	\$53,894,110
Marginal Distribution Cost Revenues	\$195,492,984	\$22,369,877
Marginal Commodity Cost Revenues	<u>\$309,795,721</u>	<u>\$33,531,882</u>
Total Marginal Cost Revenues	\$505,288,705	\$55,901,759
CTM Related Revenues	\$877,523,185	\$109,795,869
Sources:		
(1) Schedule AL-TOU Revenues are based on the rates effective June 1, 2019, per Advice Letter 3377-E.		
(2) Schedule AL-TOU marginal cost revenues are based on SDG&E's marginal cost rates from its 2016 GRC Phase 2 proceeding multiplied by the 2019 determines used to develop the June 1, 2019, electric rates.		

From the above table, total AL-TOU commodity revenues (primary + secondary) are \$582,792,765. (continued)

From SDG&E’s Chapter 2 workpapers in A.19-07-006, AL-TOU Commodity Energy Charges total \$520,986,648.

Does the difference between total AL-TOU commodity revenues and AL-TOU Commodity Energy Charges, i.e. \$61,806,117, represent revenues from the AL-TOU CPP adder, or CPP revenues from commodity schedule EECC-CPP-D customers paying

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AL-TOU UDC rates ? If not, please explain.

SDG&E Response: The difference in AL-TOU commodity revenues is due to fact that the commodity revenues in the table shown above (table provided in response to SDAP DR-01, Question 6) reflect AL-TOU total commodity revenues based on Schedule EECC rates, including revenues from the summer on-peak demand charge, whereas the AL-TOU commodity revenues used to develop the proposed EV-HP commodity energy rates presented in Table WS-4 of the Chapter 2 EV-HP testimony of William G. Saxe (page WGS-6) reflect only commodity energy revenues based on Schedule EECC-CPP-D rates without including revenues from the CPP Event Day Adder or Capacity Reservation Charge. The revenues from the CPP Event Day Adder and the Capacity Reservation Charge reflect revenues that would be collected under the summer on-peak demand charge under Schedule EECC rates. For comparison purposes, the commodity energy charge revenues for secondary and primary service levels under Schedule EECC for AL-TOU is \$521,998,780, which is higher than the commodity energy revenues under Schedule EECC-CPP-D due to the slight differences in the adopted energy rates.

5. Please provide the CPP adder revenues from schedule EECC-CPP-D customers paying AL-TOU UDC rates, if it is not already correctly stated above in Q. 4.

SDG&E Response: Assuming 100% of AL-TOU customers took service on Schedule EECC-CPP-D, the annual revenues designed to be collected under the CPP Event Day Adder for secondary and primary service levels based on June 1, 2019 rates is approximately \$62 million.

6. Please provide the revenues from the AL-TOU Monthly Service Fees consistent with the “Schedule AL-TOU CTM Revenues” shown above (as provided by SDG&E in response to a previous SDAP data request).

SDG&E Response: Based on June 1, 2019 rates, the AL-TOU Monthly Service Fees (also called “Basic Service Fees”) for Secondary and Primary Service are designed to collect \$42,964,150 in annual revenues (\$42,866,357 for secondary service and \$97,793 for primary service).

7. Use Case Impact: For each use case, show how the interim TOU M Rate would affect the cost comparison with the applicable fossil fuel.

This question was previously asked in SDAP-DR-01.

- a. Show AL-TOU.

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SDG&E Response: See response to Question 7.

- b. Show undiscounted EVHP Rate and 50% Discounted EVHP Rate.

SDG&E Response: See response to Question 7.

- c. Show this information in each use case and work paper format.

SDG&E Response: See response to Question 7.

- d. Charging behavior for each use case is the following:

- i. Scenario 2: 26% peak, 31% off peak and 43% Super off peak.

SDG&E Response: SDG&E has shared the EV-HP prepared testimony Chapter 3 workbooks per a previous data request. This model can be adjusted to estimate different illustrative charging scenarios by altering its inputs and calculation fields.

- ii. Scenario 3: 19% peak, 23% off peak and 58% Super off peak.

SDG&E Response: See response to question 7.d.ii.

- 8. In your use case scenarios did you consider consumed kWh by the vehicle verses what is required by the Grid.

SDG&E Response: The illustrative scenarios presented in the EV-HP Chapter 3 workpapers do not account for line losses between the utility meter and the EV.

- a. Do you agree that you must purchase more kWh from grid than you consume or use in the vehicle?

SDG&E Response: Yes, similar to all electric customers some line losses are expected to occur between the utility meter and the end use.

- i. If not, why not?

SDG&E Response: See response to Question 8.a.

- 9. The new 2016 TOU hours change (implemented 12-2017) increased the % Peak and Off-peak use and decreased Super off peak. If a customer's average energy use case is the

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following. This includes use 7 days per week in a M&L large commercial rate. 19% peak, 23% off peak and 58% Super off peak.

- a. What would be there new percentages of energy use in each TOU period.

SDG&E Response: The table below provides the TOU period hours for 2019 (as previously provided in response to SDAP DR-03, Question 28) based on SDG&E's previous standard TOU periods (prior to 12/1/17) compared to SDG&E's current TOU periods (implemented on 12/1/17). As explained in response to SDAP DR-03, Question 28, the change in SDG&E's TOU periods on 12/1/17 also changed the TOU period naming so that the TOU period that used to be called "Off-Peak" is now called "Super Off-Peak" and the TOU period that use to be called "Semi-Peak" is now called "Off-Peak." In addition, weekends and holidays used to reflect only "Off-Peak" hours whereas under SDG&E's current TOU periods weekends and holidays now also reflect "On-Peak" and "Super Off-Peak" hours. For this reason, it is not possible to identify the change in the energy usage in each TOU period as requested.

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	SDG&E's Current TOU Periods (Implemented on 12/1/17)	SDG&E's Previous TOU Periods (Prior to 12/1/17)
Summer		
<u>Weekdays</u>		
On-Peak	535	903
Off-Peak	1,391	1,032
Semi-Peak	NA	1,161
Super Off-Peak	642	NA
<u>Weekends & Holidays</u>		
On-Peak	230	NA
Off-Peak	230	1,320
Super Off-Peak	644	NA
Winter		
<u>Weekdays</u>		
On-Peak	730	372
Off-Peak	1,726	992
Semi-Peak	NA	1,612
Super Off-Peak	1,048	NA
<u>Weekends & Holidays</u>		
On-Peak	330	NA
Off-Peak	330	1,368
Super Off-Peak	924	NA
Total		
On-Peak	1,825	1,275
Off-Peak	3,677	4,712
Super Off-Peak	3,258	NA
Semi-Peak	NA	2,773
Total	8,760	8,760

Please note that the TOU percentages identified above in the question include a percentage for “Super Off-Peak,” a period first introduced in SDG&E’s standard TOU period on 12/1/17. For this reason, SDG&E assumes that the questions below are referring to the customer having energy usage of 19% “On-Peak,” 23% “Off-Peak,” and 58% “Super Off-Peak” under SDG&E’s current TOU periods implemented on 12/1/17.

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- b. Would the number of hours increase in Peak?

SDG&E Response: It depends on how much of the customer's "On-Peak" energy usage occurs on weekends and holidays since the "On-Peak" period did not occur on weekends and holidays under SDG&E's previous TOU periods but does under SDG&E's current TOU periods implemented on 12/1/17.

- c. Would the number of hours increase in Off Peak?

SDG&E Response: As explained above in response to Question 9, the change in SDG&E's TOU periods on 12/1/17 also changed the TOU period naming so that the TOU period that used to be called "Off-Peak" is now called "Super Off-Peak" and the TOU period that use to be called "Semi-Peak" is now called "Off-Peak." As shown in the table above in response to Question 9, the annual hours previously labeled "Semi-Peak" that are now labeled "Off-Peak" increased approximately 33%. However, the number of annual hours labeled "Off-Peak" in the current TOU periods versus the old TOU periods have decreased approximately 22%.

- d. Would the number of hours decrease in Super Off Peak?

SDG&E Response: As discussed above in response to Question 9c, the TOU period labeling changed introducing a new TOU period name for SDG&E standard TOU periods called "Super Off-Peak." SDG&E's previous TOU periods did not have a "Super Off-Peak" period. The period called "Super Off-Peak" used to be called "Off-Peak." As shown in the table above in response to Question 9, the annual hours previously labeled "Off-Peak" that are now labeled "Super Off-Peak" decreased by approximately 31%.

- e. Would Weekends alone create more cost to the customer in this scenario due to this change? If not, why not.

SDG&E Response: It depends on the customer's usage behavior during weekends since SDG&E's new TOU periods (implemented on 12/1/17) have higher "On-Peak" rates and lower "Super Off-Peak" rates than comparable "Off-Peak" rates whereas SDG&E's old TOU periods billed only "Off-Peak" rates on weekends.

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- f. Please explain how customers are impacted by the change of hours alone.

SDG&E Response: The customer impact from the change in what TOU period the hour falls under SDG&E's current TOU period (implemented on 12/1/17) depends on the customer's individual usage pattern and pricing for the TOU periods.

10. Due this TOU hour change how much does a customer increase the % in each TOU period if the customers behavior was the exact same as before the TOU Change.

SDG&E Response: The answers provided above in response to Question 9 are based on the customer's TOU period behavior not changing under the old TOU period compared to the new TOU period (implemented on 12/1/17). If the customer's behavior changed due to the TOU period changes then this would result in additional TOU related changes to the customer's bill.

- a. Please explain this impact.

SDG&E Response: The customer impact is not known without knowing the change in the customer's behavior due to the TOU period change.

- b. What is the average impact?

SDG&E Response: The customer impact is not known without knowing the change in the customer's behavior due the TOU period change.