1) This question refers to the street light rate model (excel file Ch\_7\_WP#1\_Lighting

Model\_Revised), tab DEMAND&CUSTOMER MC.

a. The total marginal customer cost per kW per year is calculated assuming 5,384

street light customers. How was the count of street light customers determined?

b. The footnote referencing the number of customers states it is “the number of

lighting customers forecasted for 2016”. Is this correct or is the forecast for 2020?

c. The 2016 street light rate model forecast 5,790 street light customers for 2016.

Has the number of street light customers decreased over the past four years?

**SDG&E Response:**

1. The number of street lighting customers being served was pulled from SDG&E’s billing records as of September 2018.
2. Line 41 footnote should state that actual 2018 street light customers are used in the calculations.
3. Yes, compared to the billing data pulled for SDG&E’s 2016 GRC Phase 2 proceeding (A.15‑04-012) the number of street lighting customers that SDG&E serves has declined.

2) The Second Revised Prepared Direct Testimony of William G. Saxe (Chapter 7)

references an updated cost study for street lighting used to develop street lighting

distribution rates. Please provide any documents and workpapers substantiating the street

lighting cost study.

**SDG&E Response:**

The excel file “Ch\_7\_WP#1\_Lighting Model\_Revised” reflects the 2019 GRC Phase 2 workpaper that presents the updated lighting cost study.

3) The Second Revised Prepared Direct Testimony of William G. Saxe (Chapter 7), page

WGS-9 beginning line 23 states “The resulting total school lighting rates are slighting

(sic) higher than the total non-school lighting rates by approximately 1-2%. For this

reason, for simplicity purposes SDG&E does not propose to adopt separate lighting rates

for schools in this proceeding but instead proposes that the lighting rates developed for

non-school accounts also be applied for school accounts.” If all lighting customers (street

light and school customers) are proposed to be charged the non-school rates, how does

SDG&E intend to recover the 1-2% cost difference attributable to school lighting

customers?

**SDG&E Response:**

The proposed street lighting rates are designed to recover the Commission authorized lighting revenue requirement. For this reason, any cost difference that is not specifically collected in the school lighting rates will be collected in the rates of all lighting customers, including school lighting customers.

4) This question refers to tariff LS-DS:

a. In this proceeding, does SDG&E propose any changes to LS-DS?

b. How many customers are currently taking service on LS-DS?

c. How many street lights are currently enrolled on LS-DS?

d. Are there any customers that have submitted an application and are pending

enrollment in LS-DS?

**SDG&E Response:**

1. SDG&E is not proposing any changes to the Schedule LS-DS rate design, including the rates specifically adopted for LS-DS in D.17-08-030 such as the $8,000 upfront participation fee and the implementation cost distribution rates and O&M distribution rates that vary by watts/lamp size. However, the base distribution rates and other energy charges in the LS-DS tariff are being proposed to change just like any other lighting rates to reflect the updated lighting cost study and recovery of the Commission authorized lighting revenue requirement.
2. No customers are currently taking service on LS-DS.
3. No customers are currently enrolled on LS-DS.
4. No customers have submitted applications that are still pending to take service on LS-DS.

5) This question refers to tariff LS-AD:

a. In this proceeding, does SDG&E propose any changes to LS-AD?

b. How many customers are currently taking service on LS-AD?

c. How many devices are currently enrolled on LS-AD?

d. Are there any customers that have submitted an application and are pending

enrollment in LS-AD?

**SDG&E Response:**

1. SDG&E is not proposing any changes to the Schedule LS-AD rate design, including the $3.73 per month Monthly Service Fee adopted for LS-AD in D.17-08-030. However, the energy charges in the LS-AD tariff are being proposed to change just like any other lighting rates to reflect the updated lighting cost study and recovery of the Commission authorized lighting revenue requirement.
2. No customers are currently taking service on LS-AD.
3. No customers are currently enrolled on LS-AD.
4. No customers have submitted applications that are still pending to take service on LS-AD.

6) What is the status of software development to support automated billing for LS-DS and

LS-AD? Has SDG&E established a memorandum account to record costs? What costs

have been recorded in the account to date?

**SDG&E Response:**

The software development to support automated billing for LS-DS and LS-AD has been completed. On March 2, 2018, pursuant to D.17-08-030 and per SDG&E Advice Letter 3194-E, SDG&E established the Adaptive Streetlight Implementation Memorandum Account (ASLIMA) and Adaptive Streetlight Maintenance Memorandum Account (ASLMMA). The ASLIMA will record the implementation costs and revenues collected from the $8,000/customer upfront participation payment and monthly implementation fees for both rate options. The ASLMMA will record the ongoing maintenance costs and revenues collected from the ongoing maintenance fees for both rate options. Please see the embedded Excel file.



7) The UDC rates for LS-1, LED, Rate A, Energy, 1-Lamps are proposed to have increases

ranging from 0.4% to 2.4% depending on wattage. In contrast, the UDC rates for LS-2 LED, Rate A, Energy, 1-Lamps are proposed to have increases ranging from 28.6% to

23.8% depending on wattage. Why are the UDC proposed increases such much higher for

LS-2 lamps compared to LS-1 lamps?

**SDG&E Response:**

The difference in UDC rate changes for LS-1 versus LS-2 is mainly due to the change in distribution rates. The distribution rates for LS-1 lamps include lighting facilities costs, costs that are going down since the 2016 GRC Phase 2. Conversely, the LS-2 lamps do not have facility costs and thus, changes in other distribution costs like marginal customer and demand costs, that are increasing significantly, are driving the larger change in LS-2 UDC distribution rates.

8) Are updated bill impact analyses available reflecting the second revised testimony filed

on January 15, 2020?

**SDG&E Response:** Yes, public bill impacts are available at the link below and confidential versions were provided on February 25, 2020 to those parties able to receive them.

<https://www.sdge.com/rates-and-regulations/proceedings/2019-grc-phase2>