

Company: San Diego Gas & Electric Company (U 902 M)
Proceeding: 2024 General Rate Case
Application: A.22-05-016
Exhibit: SDG&E-51-S

**SUPPLEMENTAL TESTIMONY OF
IFTEKHARUL (SHARIM) B CHAUDHURY
(AFFORDABILITY METRICS)**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



November 2022

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1 SUPPLEMENTAL TESTIMONY OF SHARIM B. CHAUDHURY
2 (AFFORDABILITY METRICS)

3 I. OVERVIEW

4 Pursuant to the Assigned Commissioner’s Scoping Memo and Ruling (Scoping Memo),
5 issued October 3, 2022, and consistent with the requirements of Decision (D.) 22-08-023, San
6 Diego Gas & Electric Company (SDG&E) is submitting this supplemental Affordability Metrics
7 testimony. Going forward and pursuant to D.22-08-023, SDG&E is required to submit
8 Affordability Metrics in any initial filing in a proceeding with a revenue increase estimated to
9 exceed one percent of currently authorized revenues systemwide for a single fuel.¹ However,
10 this requirement was not applicable to SDG&E’s Test Year (TY) 2024 General Rate Case (GRC)
11 Application because D.22-08-023 was issued months after the May 16, 2022 initial filing of
12 SDG&E’s TY 2024 GRC. Nonetheless, SDG&E agreed to, and was subsequently ordered to,
13 submit the Affordability Metrics pursuant to the requirements of D.22-08-023.² Accordingly,
14 associated with the current revenues in effect at the time of this filing and with the 2024 GRC
15 proposed revenues, this testimony provides:

- 16 a) Essential usage bills;³
- 17 b) Average usage bills;
- 18 c) Affordability Ratio 50 (AR50);
- 19 d) Affordability Ratio 20 (AR20);
- 20 e) Hours required to work at minimum wage to pay monthly gas bill; and
- 21 f) For Areas of Affordability Concern (AAC) as defined in the most recent annual
22 Affordability Report,⁴ AR20 subdivided by Public Use Microdata Area (PUMA).

23 This testimony also presents additional analyses of (1) including the California Alternate
24 Rates for Energy (CARE) discounts for low-income households; and (2) energy burden to isolate
25 the impact of the gas revenue requirements being requested. SDG&E argued for the inclusion of

¹ D.22-08-023, Ordering Paragraphs 5 and 6 at 84-85.

² See Scoping Memo at 14-15.

³ Unlike the SDG&E’s electric service, on the gas side, SDG&E has a single climate zone.

⁴ CPUC 2020 Annual Affordability Report (October 2022) (2020 Annual Affordability Report) at 19,
available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/affordability-proceeding/2020/2020-annual-affordability-report.pdf>.

1 these metrics in the Affordability Order Instituting Rulemaking (OIR) (R.18-07-006) and
2 although the Commission declined to adopt them as official affordability metrics, D.22-08-023
3 permits stakeholders to provide alternatives to the adopted metrics.⁵ SDG&E still believes these
4 are important supplemental metrics that complement the affordability metrics required by D.22-
5 08-023 and provide a rounded view of potential impacts to its customers.

6 **A. Organization of Testimony**

7 My testimony is organized as follows:

- 8 • Section I – Overview
- 9 • Section II – Essential and Average Bills
- 10 • Section III – Affordability Metrics
- 11 • Section IV – Areas of Affordability Concern
- 12 • Section V – Supplemental CARE Analysis
- 13 • Section VI – Supplemental Energy Burden Analysis
- 14 • Section VII – Conclusion

15
16 **II. ESSENTIAL AND AVERAGE BILLS**

17 Essential usage bills represent the average monthly bill a customer would pay for their
18 essential energy, water, or telecommunications usage. For gas, essential usage has been defined
19 as the baseline allocation of gas.⁶ To calculate the essential usage bills, SDG&E multiplied (1)
20 the baseline allowance for individually metered gas residential customers by (2) the residential
21 baseline rate.⁷ Essential usage bills are used as the numerator to calculate the Affordability Ratio
22 (AR) and Hours worked at Minimum Wage (HM) metrics.

23 As proposed, SDG&E’s TY 2024 GRC Phase 1 would result in an increase to total gas
24 bundled revenues of \$199.6 million,⁸ or 22.5%, in 2024 compared to current⁹ and incremental

⁵ D.22-08-023, Findings of Fact (FOF) 17 at 77.

⁶ Baseline quantities vary by season (summer vs winter).

⁷ SDG&E Tariff Schedule GR, Residential Natural Gas Service, available at https://tariff.sdge.com/tm2/ssi/tariffs/inc_gas_rates_core.html.

⁸ Amount includes franchise fees & uncollectibles (FF&U).

⁹ Revenue requirements effective January 1, 2022 per advice letter (AL) 3046-G.

1 post-test year increases of \$60.0 million (5.5%) in 2025, \$96.5 million (8.4%) in 2026 and \$64.9
 2 million (5.2%) in 2027.

3 To understand the impact that SDG&E’s GRC gas revenue requirement request has on
 4 the affordability metrics, SDG&E has calculated the gas essential usage bills using (i) rates
 5 effective November 1, 2022,¹⁰ and (ii) rates based on the proposed gas revenue requirement for
 6 each of the years in the GRC cycle (2024-2027). The resulting gas essential usage bills are
 7 summarized in Table 1.¹¹

8 **TABLE 1**
 9 **MONTHLY GAS ESSENTIAL USAGE BILLS (NON-CARE)**
 10

	Current 2022	2024			2025			2026			2027			Total Change Over Current	
Climate Zone	Bill (\$)	Bill (\$)	Δ (\$)	Δ (%)	Bill (\$)	Δ (\$)	Δ (%)	Bill (\$)	Δ (\$)	Δ (%)	Bill (\$)	Δ (\$)	Δ (%)	Δ (\$)	Δ (%)
SDG&E	\$39.97	\$50.09	\$10.12	25.3%	\$53.19	\$3.10	6.2%	\$58.19	\$5.00	9.4%	\$61.52	\$3.33	5.7%	\$21.55	53.9%

11
 12
 13 The gas average use bills are summarized in Table 2.¹² While essential usage is based on
 14 the allotted baseline quantity, average usage is based on the average of the most recent five
 15 calendar years’ recorded gas usage.

16 **TABLE 2**
 17 **MONTHLY GAS AVERAGE USAGE BILLS (NON-CARE)**
 18
 19

	Current 2022	2024			2025			2026			2027			Total Change Over Current	
Climate Zone	Bill (\$)	Bill (\$)	Δ (\$)	Δ (%)	Bill (\$)	Δ (\$)	Δ (%)	Bill (\$)	Δ (\$)	Δ (%)	Bill (\$)	Δ (\$)	Δ (%)	Δ (\$)	Δ (%)
SDG&E	\$49.05	\$61.48	\$12.43	25.3%	\$65.29	\$3.82	6.2%	\$71.44	\$6.14	9.4%	\$75.53	\$4.10	5.7%	\$26.48	54.0%

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 21
 22
¹⁰ Current rates effective November 1, 2022 per advice letter (AL) 3127-G.

¹¹ The calculation of the essential usage bills does not incorporate the annual gas residential California Climate Credits (CCC).

¹² The calculation of the average usage bills does not incorporate the annual gas residential CCC.

1 **III. AFFORDABILITY METRICS**

2 **A. Hours at Minimum Wage**

3 The Hours at Minimum Wage (HM) metric represents the number of hours a household
4 that earns the minimum wage would need to work per month to pay their monthly essential usage
5 bill.¹³ It is calculated by dividing the essential usage bill by the hourly minimum wage.¹⁴ The
6 HM formula for gas utilities is shown below:

7
8 **HM = essential gas usage bill / hourly minimum wage**

9 SDG&E is presenting two sets of HM metrics—City of San Diego and Non-City of San
10 Diego because the minimum wage for the City of San Diego and Non-City of San Diego will
11 diverge starting in 2023. For 2022, the current minimum wage for all SDG&E’s territory (City
12 of San Diego and Non-City of San Diego) is \$15/hour, consistent with the California statewide
13 minimum wage.¹⁵ Going forward from 2022, the minimum wage for the City of San Diego,
14 which makes up approximately 40% of SDG&E’s households, will increase annually based on
15 the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W), U.S. city
16 average,¹⁶ which was recently announced to increase to \$16.30 for 2023. The California
17 statewide minimum wage increases annually by the lesser of 3.5 percent or the 12-month period
18 from July to June percentage change in the CPI-W.¹⁷ Beginning January 1, 2023, the California
19 statewide minimum wage will increase by 3.5 percent to \$15.50 per hour for all employers.
20 SDG&E used the 2023 California statewide minimum wage as a proxy for its non-City of San
21 Diego service area. For purposes of forecasting HM minimum wage for 2024-2027, SDG&E
22 uses the five-year average increase in CPI-W.

23 The resulting HM metrics are presented in Tables 3 and 4.

¹³ D.20-07-032 at 11.

¹⁴ D.20-07-032 at 47.

¹⁵ D.20-07-032 at 48, states that by 2023, the California statewide minimum wage standard for both employers with 25 employees or less and employers with 26 employees or more will be \$15 per hour.

¹⁶ San Diego Municipal Code (SDMC) Chapter 3, Article 9, Division 1, Section 39.0107.

¹⁷ California Labor Code section 1182.12.

TABLE 3
HM METRIC FOR GAS CUSTOMERS – CITY OF SAN DIEGO (NON-CARE)

	Current 2022	2024			2025			2026			2027			Total Change Over Current	
Climate Zone	Hours	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Δ (hrs)	Δ (%)
SDG&E	2.66	2.95	0.29	10.8%	3.01	0.06	2.0%	3.17	0.15	5.1%	3.22	0.05	1.6%	0.55	20.8%

TABLE 4
HM METRIC FOR GAS CUSTOMERS – NON-CITY OF SAN DIEGO (NON-CARE)

	Current 2022	2024			2025			2026			2027			Total Change Over Current	
Climate Zone	Hours	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Δ (hrs)	Δ (%)
SDG&E	2.66	3.13	0.47	17.5%	3.22	0.09	2.9%	3.42	0.19	6.0%	3.50	0.08	2.5%	0.83	31.3%

B. Affordability Ratio

The Affordability Ratio (AR) seeks to quantify the percentage of a representative household’s income required to pay for an essential utility service after non-discretionary costs, such as housing and other essential utility services, are removed from the household income.¹⁸ It is calculated by dividing the essential usage bill by the discretionary income for a given geography.¹⁹ The Energy Division developed a tool (AR Calculator), and updates it annually, to calculate the AR that considers the essential usage bills for each service (electric, gas, water and telecommunications).²⁰

SDG&E utilized the AR Calculator by inputting the gas average monthly essential usage bills (shown in Table 1 above) and the electric average monthly essential usage bills (discussed in the supplemental testimony of Rachelle Baez, Exhibit SDG&E-50-S), and ran the macro to calculate and populate the results by year at the 50th and 20th percentiles of income distribution in SDG&E’s territory. The AR Calculator calculates individual AR values for each service, using only the essential usage bill for the given service in the numerator with the denominator equal to

¹⁸ D.20-07-032 at 51.

¹⁹ D.20-07-032 at 51.

²⁰ The current AR Calculator used for all calculations in this testimony is the 2020 Affordability Ratio Calculator released July 8, 2022, available at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/affordability>.

1 household income minus housing costs and the remaining essential usage service bills in the
2 denominator. The AR formula for gas utilities is shown below:

$$\text{Individual Gas AR} = \frac{\text{Gas Essential Bill}}{(\text{Income} - \text{Housing} - \text{Other Essential Bills} \\ \text{[electric, water, telecomm.]})}$$

7 The individual AR values are calculated at a more granular geographic level broken
8 down into PUMA geographical areas as designated by the United States Census Bureau.²¹ In
9 addition to the underlying assumptions within the AR Calculator, the following assumptions and
10 definitions apply:

- 11 1) Gas essential bills are based on the essential usage for non-CARE residential
12 customers. Gas essential bills do not include the annual California Climate Credit
13 (CCC).
- 14 2) Electric bills are based on the essential usage for non-CARE residential
15 customers. Electric bills do not include the biannual electric CCC.
- 16 3) Other commodity bills (telecommunications and water) pre-populated by the AR
17 Calculator.
- 18 4) Current metrics are based upon current gas rates effective November 1, 2022 and
19 current electric rates effective June 1, 2022.
- 20 5) Proposed metrics are based on SDG&E's proposed TY 2024 GRC Phase 1
21 electric and gas revenue requirements for each year of the GRC cycle (2024-
22 2027).
- 23 6) The Gas AR50 and AR20 metrics meant to represent the percentage of income
24 after housing and all other essential commodity (electric, water and
25 telecommunications) expenses that essential gas bills represent for households at
26 the 50th lowest and 20th income percentile, respectively.

²¹ PUMAs are “non-overlapping, statistical geographic areas that partition each state or equivalent entity into geographic areas containing no fewer than 100,000 people each.” (August 22, 2022) available at <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/pumas.html>.

The resulting individual gas AR50 and AR20 metrics are presented in Tables 5 and 6, respectively.

**TABLE 5
AR50 METRIC FOR GAS CUSTOMERS (NON-CARE)**

	Current 2022	2024		2025		2026		2027		Total Change Over Current
Climate Zone	AR50	AR50	Δ (%)	AR50	Δ (%)	AR50	Δ (%)	AR50	Δ (%)	Δ (%)
SDG&E	0.69%	0.84%	20.6%	0.87%	3.8%	0.92%	6.1%	0.95%	2.5%	36.2%

**TABLE 6
AR20 METRIC FOR GAS CUSTOMERS (NON-CARE)**

	Current 2022	2024		2025		2026		2027		Total Change Over Current
Climate Zone	AR20	AR20	Δ (%)	AR20	Δ (%)	AR20	Δ (%)	AR20	Δ (%)	Δ (%)
SDG&E	3.09%	3.90%	26.2%	4.14%	6.3%	4.43%	7.0%	4.59%	3.5%	48.6%

IV. AREAS OF AFFORDABILITY CONCERN (AAC)

Areas of affordability concern (AAC) are pockets within the state where lower-income Californians spend, on a percentage basis, more of their available budget on essential utility service than the majority of Californians. Based on the most recent 2020 Annual Affordability Report, for gas service, an AAC is designated by areas where the AR20 is in excess of 10%.²² Table 7 presents the PUMA’s where the Gas AR20 is greater than 10% for either the current year or any projected year in the 2024-2027 GRC cycle, making them areas of affordability concern.

²² 2020 Annual Affordability Report at 19.

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TABLE 7
AAC – PUMA’S WITH GAS AR20 >10% (NON-CARE)

PUMA #	County/City	Climate Zone	# of Housing Units	Current 2022	2024	2025	2026	2027	Total Impact (2027 – Current)
07306	San Diego County (Northwest)-- Escondido City (East) PUMA	SDG&E INLAND	44980	7.94%	10.62%	11.65%	12.61%	13.21%	5.27%
07306	San Diego County (Northwest)-- Escondido City (East) PUMA	SDG&E MOUNTAIN	477	7.39%	9.88%	10.84%	11.74%	12.29%	4.90%
07313	San Diego County (Central)--El Cajon & Santee Cities PUMA	SDG&E INLAND	70527	8.13%	10.78%	11.77%	12.72%	13.30%	5.17%

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V. SUPPLEMENTAL CARE ANALYSIS

The affordability metrics presented above utilize non-CARE rates to calculate the HM and AR metrics. However, the CARE program, which offers a 35% effective discount on electricity bills and 20% discount on gas bills, should be taken into consideration in determining a low-income customer’s cost of essential utility service.²³ Excluding the CARE discount inflates the true cost of essential utility charges and provides an inaccurate representation of affordability. Additionally, the 2020 Annual Affordability Report acknowledges that when low-income discounts are considered for purposes of assessing affordability, there is a “sizable

²³ See Public Utilities Codes §739.1; D.01-06-010, Ordering Paragraph 2. Further, as of September 2022, SDG&E has achieved a 122% CARE penetration rate and thus it is reasonable to assume that most SDG&E low-income customers in the 20% income percentile are enrolled in the CARE program discount. See Monthly Report of SDG&E on Low Income Assistance Programs For September 2022 (October 21, 2022) at CARE Table 2; available at <https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2022/11/SDGE-SEPTEMBER2022-Low-Income-Monthly-Report.pdf?emrc=17bab7>.

1 improvement in utility affordability for customers who are enrolled in the programs in the most
 2 vulnerable areas.”²⁴

3 Accordingly, because CARE discounts are relevant to the issue of affordability, SDG&E
 4 provides supplemental HM and AR20 metrics including the CARE discount in both gas and
 5 electric bills in Tables 8, 9 and 10, respectively.

6 **TABLE 8**
 7 **HM METRIC FOR GAS CUSTOMERS – CITY OF SAN DIEGO (CARE)**
 8

	Current 2022	2024			2025			2026			2027			Total Change Over Current	
Climate Zone	Hours	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Δ (hrs)	Δ (%)
SDG&E	2.09	2.32	0.24	11.3%	2.37	0.05	2.1%	2.50	0.12	5.3%	2.54	0.04	1.7%	0.45	21.8%

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 10
 11 **TABLE 9**
 12 **HM METRIC FOR GAS CUSTOMERS – NON-CITY OF SAN DIEGO (CARE)**
 13

	Current 2022	2024			2025			2026			2027			Total Change Over Current	
Climate Zone	Hours	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Hours	Δ (hrs)	Δ (%)	Δ (hrs)	Δ (%)
SDG&E	2.09	2.46	0.38	18.0%	2.54	0.07	3.0%	2.69	0.16	6.2%	2.76	0.07	2.5%	0.67	32.4%

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 15
 16 **TABLE 10**
 17 **AR20 METRIC FOR GAS CUSTOMERS (CARE)**
 18

	Current 2022	2024		2025		2026		2027		Total Change Over Current
Climate Zone	AR20	AR20	Δ (%)	AR20	Δ (%)	AR20	Δ (%)	AR20	Δ (%)	Δ (%)
SDG&E	2.32%	2.93%	26.1%	3.10%	6.1%	3.32%	7.1%	3.44%	3.4%	48.1%

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 21 **VI. SUPPLEMENTAL ENERGY BURDEN (EB) ANALYSIS**

22 The Energy Burden metric is the percentage of total income spent on an energy bill or
 23 bills. Although the Commission declined to adopt this metric in the Affordability OIR, the
 24 Commission specifically found that the Decision Implementing the Affordability Metrics (D.22-
 25 08-023) “does not preclude stakeholders from generating variations on or alternatives to the

²⁴ 2020 Annual Affordability Report at 52.

1 adopted metrics ... in Commission proceedings.”²⁵ The energy burden metric is an additional,
2 complementary metric that should be considered in conjunction with the required affordability
3 metrics addressed above. The energy burden metric is a simple, easily understood calculation
4 that isolates the impact of SDG&E’s GRC request and excludes the uncertainty posed by non-
5 discretionary expenses outside the Commission’s control (e.g., housing costs). In addition, it
6 allows for greater ease of comparison across utility services. The gas energy burden formula is
7 shown below:

8
9 **Gas EB = Gas Essential Bill / Income**

10
11 The AR metrics discussed above remove housing and essential utility/service bills from
12 total income. The EB metric does not remove any bills or expenses from total income. By not
13 removing non-discretionary expenses from total income, the EB metric is able to better isolate
14 the impact of any utility bill—here the gas bill—and create a metric that is comparable across
15 utility services. The EB metric further eliminates the impact of housing costs, which can vary
16 across SDG&E’s service territory and between income levels. While SDG&E recognizes that
17 housing costs may be non-discretionary, neither SDG&E nor the Commission influence or
18 determine housing affordability. Additionally, because the denominator for the AR metric
19 changes based on what utility service is being analyzed, the various AR metrics cannot be
20 compared or added together. For example, the Electric AR value cannot be added to the Gas AR
21 value for a total SDG&E AR value. Because the denominator for the EB metric is total income it
22 is a more flexible metric that allows for comparison and combination across utility services.

23 Further, although the EB metric has been previously used in the Affordability OIR to
24 represent median-income households and average usage, SDG&E uses the same income
25 assumptions and essential usage bills as the AR metric to make an apples-to-apples comparison
26 to the AR metric. Thus, for purposes of the gas EB metric, SDG&E used the AR calculator and
27 cleared the electric, water, and telecommunication bill inputs as well as the housing and propane
28 cost embedded assumptions to calculate the gas EB for a median income household (EB50) and
29 a low-income household (EB20).

²⁵ D.22-08-023, FOF 17 at 77.

The resulting gas EB50 and EB20 (both Non-CARE and CARE) metrics are presented in Tables 11, 12 and 13, respectively.

**TABLE 11
EB50 METRIC FOR GAS CUSTOMERS (NON-CARE)**

	Current 2022	2024		2025		2026		2027		Total Change Over Current
Climate Zone	EB50	EB50	Δ (%)	EB50	Δ (%)	EB50	Δ (%)	EB50	Δ (%)	Δ (%)
SDG&E	0.50%	0.60%	19.3%	0.62%	3.3%	0.66%	5.9%	0.67%	2.3%	33.4%

**TABLE 12
EB20 METRIC FOR GAS CUSTOMERS (NON-CARE)**

	Current 2022	2024		2025		2026		2027		Total Change Over Current
Climate Zone	EB20	EB20	Δ (%)	EB20	Δ (%)	EB20	Δ (%)	EB20	Δ (%)	Δ (%)
SDG&E	1.21%	1.44%	19.3%	1.49%	3.3%	1.58%	5.9%	1.62%	2.3%	33.5%

**TABLE 13
EB20 METRIC FOR GAS CUSTOMERS (CARE)**

	Current 2022	2024		2025		2026		2027		Total Change Over Current
Climate Zone	EB20	EB20	Δ (%)	EB20	Δ (%)	EB20	Δ (%)	EB20	Δ (%)	Δ (%)
SDG&E	0.95%	1.13%	19.9%	1.17%	3.4%	1.24%	6.0%	1.27%	2.4%	34.6%

VII. CONCLUSION

This supplemental Gas Affordability Metrics testimony provides the requisite information set forth in the Scoping Memo and D.22-08-023. SDG&E also provides additional

1 analysis to include CARE discounts for low-income households as well as isolate the impact of
2 the electric revenue requirements being requested in this proceeding.

3 This concludes my prepared supplemental direct testimony.

APPENDIX A

GLOSSARY OF TERMS

Acronyms	Definition
ACC	Areas of Affordability Concern
AR	Affordability Ratio
AR20	Affordability Ratio 20
AR50	Affordability Ratio 50
CARE	California Alternate Rates for Energy
CCC	California Climate Credit
CPI-W	Consumer Price Index for Urban Wage Earners and Clerical Workers
D.	Decision
EB	Energy Burden
EB20	Energy Burden 20
EB50	Energy Burden 50
FF&U	Franchise Fees & Uncollectibles
GRC	General Rate Case
HM	Hours at Minimum Wage
OIR	Order Instituting Rulemaking
PUMA	Public Use Microdata Area
SDG&E	San Diego Gas & Electric