**DATA REQUEST**

**TOPIC: SALES FORECAST UPDATE DUE TO EFFECTS OF COVID-19**

1. What impact, if any, to customer class sale from the outbreak of COVID-19 were included or reflected in the updated customer class sales forecast used in SDG&E’s second revised testimony submitted on January 15, 2020?

**SDG&E Response:**

SDG&E’s Second Revised direct testimonies submitted on January 15, 2020 did not include any updates to the sales forecast beyond what was filed in the Direct testimony of Kenneth Schiermeyer filed on March 4, 2019.

2. Please provide a forecast by customer class for the years 2020-2022 incorporating the customer class sales impacts of the COVID-19 pandemic and current economic recession.

**SDG&E Response:**

SDG&E objects to this request to the extent that it seeks analysis that has not been performed and/or information that would be unduly burdensome to produce. SDG&E further objects to this request on grounds that it calls for speculation. Subject to and without waiving foregoing objections, SDG&E responds as follows:

It is uncertain at this time whether SDG&E will need to adjust its current sales forecast to account for the effects of COVID-19 on sales. Given continued uncertainty regarding the impacts of COVID at this time, SDG&E recommends that further consideration of the impacts of COVID to the sales forecast occur in a filing to update its sales forecast in 2021, for year 2022, consistent with SDG&E’s proposal for an annual update beginning 2021 presented in the Supplemental Testimony of Kenneth Schiermeyer filed July 2, 2019.

a. Provide the new class average rates based on the above-mentioned updated sales.

**SDG&E Response:** See the response to question 2.

b. Provide the updated workpapers based on the above-mentioned updated sales.

**SDG&E Response:** See the response to question 2.

3. How long does SDG&E expect any disruptions to its customer class sales due to COVID-19 to continue before sales return to “normal” levels, if ever? By normal, this question refers to customer class sales trajectories pre-COVID-19.

**SDG&E Response:**

SDG&E objects to this request to the extent that it seeks analysis that has not been performed and/or information that would be unduly burdensome to produce. SDG&E further objects to this request on grounds that it calls for speculation. Subject to and without waiving foregoing objections, SDG&E responds as follows:

Due to continued high degree of uncertainty associated with the impacts of COVID and number of unknowns, SDG&E does not have a response at this time.

4. Has SDG&E already observed changes in its customer class sales and demand due to the outbreak of COVID-19? If so, please describe the magnitude and direction of changes that SDG&E has seen for all customer classes. i.e. provide the prior/post COVID-19 load profiles (weather normalized) by customer class.

**SDG&E Response:**

SDG&E objects to this request to the extent that it seeks analysis that has not been performed and/or information that would be unduly burdensome to produce. SDG&E further objects to this request on grounds that it calls for speculation. Subject to and without waiving foregoing objections, SDG&E responds as follows:

While it is difficult to definitively isolate and/or attribute any changes in sales and demand due to the outbreak of COVID-19, the table below provides year-to-date (YTD), which reflects January through June, sales data comparing the 2020 Forecast from the Direct Testimony of Kenneth Schiermeyer YTD with YTD actuals and weather normalized YTD actuals. Table 2 compares 2020 actuals and weather normalized 2020 actuals to the 2020 forecast based on average variances during 2020 pre-COVID months (January – February), post-COVID months (April – June), and YTD (January – June).

Table 1: Comparison of 2020 Year-To-Date (January - June) Sales by Customer Class



Table 2: Comparison of 2020 Pre-COVID (January – February) and Post- COVID (April – June) Sales to Forecast by Customer Class



Generally, system sales are below forecasted, largely driven by non-residential sales being lower than forecasted partially offset by increases in residential sales.

This has resulted in slight change in the composition of 2020 sales by customer class. Table 3 presents the composition by customer class of the forecast 2020 sales as presented in Table KS-1 of the Direct Testimony of Kenneth Schiermeyer. Table 4 below presents the composition by customer class of YTD sales. Based on YTD sales, which only capture half of the year, sales from the residential class are approximately 3% higher than forecasted while sales from the M/L C&I class are approximately 3% lower than forecast.

Table 3: Composition by Customer Class of 2020 Proposed Sales Forecast



Table 4: Composition by Customer Class of YTD Sales

