

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

Application of San Diego Gas & Electric Company
(U-902-E) Providing Information as Directed by
Resolution E-4906, Ordering Paragraph 37.

Application No. A.18-10-_____
(Filed October 19, 2018)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
PROVIDING INFORMATION AS DIRECTED BY RESOLUTION E-4906,
ORDERING PARAGRAPH 37**

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October 19, 2018

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VERIFICATION

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Pursuant to Article 2 of the Commission’s Rules of Practice and Procedure (Rules), and Commission Resolution E-4906, Ordering Paragraph (OP) 37 at 100-102, San Diego Gas & Electric Company (SDG&E) submits this application.

I. INTRODUCTION

A. The basis for this application

Resolution E-4906, OP 37, directs the Utilities¹ “to file separate Applications with the Commission to allow appropriate consideration and allow for evidence development on the issue of loggers and meters.” OP 37 requests information on SDG&E’s Demand Response (DR) programs and how to monitor third-party-aggregated customers’ use of Backup Generators (BUGs), the technology available, and the associated costs. SDG&E provides the information requested by OP 37 in testimony served with this application, and asks that the Commission accept the testimony as compliant with OP 37.

B. Supporting testimony

SDG&E is serving, contemporaneously with this application, supporting prepared direct testimony by Jerry Stewart, SDG&E’s Smart Meter Operations Manager. Mr. Stewart’s

¹ Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and SDG&E are the “Utilities.”

testimony provides responses to the questions propounded by OP 37. The testimony is based on SDG&E's experience performing measurement and verification of distributed generation (DG) within SDG&E's service territory, as well as input from SDG&E's metering vendor, Itron, Inc. SDG&E's entire advanced metering infrastructure (AMI) system is provided by Itron, which consists of approximately 1.3 million electric smart meters and approximately 900,000 smart gas modules. In addition, Itron has extensive experience performing measurement and verification of DG and DR programs throughout the country. Because of our long-standing relationship with Itron and its measurement devices, SDG&E consulted with Itron to answer the OP 37 questions. Also, in preparing this testimony, Mr. Stewart necessarily consulted with other SDG&E subject matter experts for customer data and incentive levels.

II. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 – relief sought by this application

SDG&E requests that the Commission find that the prepared testimony served in support of this application complies with OP 37, and that the Commission provide guidance on how to proceed with monitoring DR customer usage of BUGs.

B. Rule 2.1(a) – (c)

In accordance with Rule 2.1(a) – (c) of the Commission's Rules and Practice and Procedure, SDG&E provides the following information:

1. Rule 2.1(a) – Legal Name

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. The exact legal name of the Applicant is San Diego Gas & Electric Company. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E's attorney in this matter is E. Gregory Barnes.

2. Rule 2.1(b) – Correspondence

Correspondence or communications regarding this application should be addressed to:

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3. Rule 2.1(c) – Category, issues and schedule

a. Proposed Category of Proceeding

In accordance with Rule 7.1(a), SDG&E requests that this application be categorized as a quasi-legislative proceeding because it aims to set rules of general applicability and it does not propose to increase or to change rates.

b. Need for Hearings

SDG&E submits that the Commission can address this matter based on comments and possibly workshops, without evidentiary hearings.

c. Issues to be Considered

The issues to be considered are described in this application and the supporting testimony and exhibits served concurrently herewith.

d. Proposed Schedule

SDG&E proposes the following schedule:

ACTION

Application filed
End of Response Period (including Applicant Reply)
Prehearing Conference (if desired)
Scoping Memo

DATE

October 19, 2018
+30 days from Daily Calendar +/-15 days
December 12, 2018
January 11, 2019

Remaining dates to be set in Scoping Memo.

C. Rule 2.2 – Articles of Incorporation

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014 in connection with SDG&E Application No. 14-09-008, and is incorporated herein by reference.

D. Compliance with other Commission Rules

This application does *not* request authority to construct a project, to increase rates, to issue stock, to acquire, encumber or transfer utility property, or an exemption from undergrounding rules.

III. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this application, testimony and related exhibits on parties to the service list for the *Order Instituting Rulemaking to Enhance the Role of Demand Response in Meeting the State’s Resource Planning Needs and Operational Requirements* (Rulemaking 13-09-011), and *Application of Pacific Gas and Electric Company for Approval of Demand Response Programs, Pilots and Budgets for Program Years 2018-2022* (A.17-01-012 *et al.*). Hard copies will be sent via FedEx to Chief Administrative Law Judge Kelly A. Hymes.

IV. CONCLUSION

SDG&E hereby requests the Commission provide guidance on how to proceed with monitoring DR customer usage of BUGs.

Respectfully submitted,

/s/ E. Gregory Barnes

E. Gregory Barnes

Attorney for

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October 19, 2018

OFFICER VERIFICATION

Scott B. Crider declares the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U-902-E) PROVIDING INFORMATION AS DIRECTED BY RESOLUTION E-4906, ORDERING PARAGRAPH 37** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of October, 2018, at San Diego, California.

/s/ SCOTT B. CRIDER _____

Scott B. Crider
Vice President, Customer Services
San Diego Gas & Electric Company